

**LOCAL DEVELOPMENT FRAMEWORK (LDF) – CORE STRATEGY – ISSUES AND
OPTIONS DOCUMENT - RESPONSES TO CONSULTATION**

Agenda Item ..

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Background Papers: Issues and Options Document – April 2007
Financial Implications: Costs of ldf preparation are being met from base budget and from planning delivery grant
Equalities Implications: Addressed as part of ldf preparation
Legal Implications: None
Options:
1. To take the responses received to the consultation on the Issues and Options Document into account in the preparation of the Preferred Options Document

Risks: If the Council does not carry out consultation in accordance with the Statement and Community Involvement and demonstrate how the consultation has been taken into account in the preparation of the Core Strategy there is a risk that the plan will be judged to be unsound.

EXECUTIVE SUMMARY

This report summarises the responses received to the consultation on the Issues and Options Document.

DECISION

1. That the responses received to the consultation on the Issues and Options Document be noted and taken into account in the preparation of the Preferred Options Document

LOCAL DEVELOPMENT FRAMEWORK (LDF) – CORE STRATEGY – ISSUES AND OPTIONS DOCUMENT – RESPONSE TO PUBLIC CONSULTATION

Background

1. The Issues and Options Document was published for consultation on April 2007 for six-weeks, with the consultation period closing on 31st May 2007. Some 1174 representations were received, with 59.4% of responses being made electronically. A summary of the responses is attached at Appendix 1 to this report. The responses can be viewed in full on the Council's website via the following link:

<http://consultation.limehouse.co.uk/braintree/drafts/5/index.html>

2. The main points emerging from the consultation are as follows:

Overall vision for the District – most support for “Where ideas take shape” mixed with “a focus on leisure, heritage and nature”. Support for retaining elements of the current vision and for incorporating sustainable development, climate change, social, community and environmental issues

Settlement Strategy – Most support for options 1 and 2 (existing commitments and urban concentration, also support for development in the larger villages, some suggestions for development sites in smaller villages, mostly opposition to a new settlement although two major new settlement proposals suggested (to west of District on border with Uttlesford and to east of District on border with Colchester). Generally a lack of support for new development to be located to assist with the provision of new infrastructure (e.g. Halstead By Pass). For Braintree some support for development to the south-west and west of the town, in general a lack of support for development to the north-east of the town. For Halstead the majority of responses in favour of development within the existing built-up area with two responses suggesting urban extensions. For Witham the views are evenly balanced on the different directions of growth for the town.

Affordable Housing – a mixed response with some representations seeking stronger policies to ensure that affordable housing is maximised with others commenting that changes to policy such as lowering the site size threshold may not be realistic or viable. Policies need to be based on an up to date strategic housing market assessment. Also a need to take account of individual circumstances of each site. Although there was a majority of responses in favour of not increasing the percentage requirement above 30% the East of England Plan has an aspiration to achieve 35%. Some support for

a different threshold in rural areas. Also some support for commuted payments for affordable housing in certain circumstances. Also support for retaining the current rural exceptions policy and for allocating specific sites for affordable housing. Mainly opposition to allocating greenfield sites in urban areas with a much higher percentage of affordable housing.

Gypsies and Travellers – Core Strategy should set out transitional/interim measures to make provision for immediate and urgent needs. It should set out the criteria for the location of sites to guide the allocation of sites. There should be consultation with the gypsy and traveller community. Criteria for sites should enable sites to be available, suitable and achievable.

Economic Development – Support for identification of a new strategic employment area or business park. Support both for retention of existing employment areas and for the use of existing used or vacant employment sites for other uses. The results of the employment land review should be used to assess the suitability of employment sites for other uses. Support for Option 62 to encourage the use of suitable unused and underused farm buildings for employment subject to the capacity of local infrastructure. Also support for the allocation of additional land in rural areas for employment.

Transport - The Core Strategy, Development Control and other DPD policies are important in promoting public transport, cycling and walking. Developers should promote sustainable transport through contributions and design. Road improvements to the A12, A120, Galleys Corner and the construction of the Halstead by pass are considered as a priority in the District. The bus and rail services from Braintree to surrounding rural areas and to places outside the District should be improved. Support for Option 66 as there is a need for additional car parking in town centres and railway stations at Witham, Kelvedon and Hatfield Peverel. The District should take measures to support inter-urban and rural bus services to Stansted Airport.

Town Centres and Retailing - Support for Option 68 to contain Braintree town centre within its existing boundaries to promote investment and to preserve the historic centre. An expansion of Braintree Freeport and Braintree Retail Park would need an assessment to determine the impact on the town centre vitality and viability. Support for Option 72 to contain Halstead town centre within its existing boundaries with a retail policy to protect existing floorspace and core shopping areas. Halstead has limited capacity for convenience and comparison goods floorspace, however it is argued that Land East of High Street should be promoted for comparison goods. Support for Option 76 to contain Witham town centre within its existing boundaries with the comprehensive redevelopment of Newland Precinct. The importance of villages and local centres should have been considered in the Issues and Options.

Carbon Emissions and Renewable Energy - Support for Option 79 to increase the proportion of buildings needs to be met by low carbon and renewable sources of energy to 15% as this would be consistent with Policy ENG1 of the Proposed Changes to the Draft East of England Regional Plan. However, the

practicalities of any renewable energy options and the financial / cost implications of increasing them should be considered. The 'Code for Sustainable Homes' and building regulations can assist in achieving Carbon Neutrality

Social, Health and Community Issues - Broad support was expressed for the continued provision of health care facilities within the District to reduce the need for people to travel. Policing was also raised as an issue with people wanting to see more police especially in rural areas to tackle anti-social behaviour. Also the provision of schooling, education and sports were highlighted as important

Implementation - There is general support for the phasing of housing development to enable infrastructure improvements to keep pace, but this could be an issue as housing targets are now minimum rather than maximum. Also there is support for standard charges to provide infrastructure as long as there is evidence of need. Any policy on charges should be separate from the Core Strategy

Other matters – Other issues and options suggested by respondents include development in rural areas to support service, the need for landscape protection, transport studies, environmental issues, the issue of development in neighbouring districts, protection of the historic environment and the need for an up to date housing needs survey.

Core Strategy

Issues and Options Document

Consultation Response Summary

Option 1 – The Vision Should be Reviewed and Updated

33 Respondents Agree

- Need to review as a result of changes around us, including sustainable development and climate change
- Need to review housing provision to be inclusive of vulnerable groups
- Need to improve public transport and reduce the use of the private car
- Core strategy should include an amplification of the spatial implications of the vision set out in the Community Strategy
- Need more proactive planning for sustainable development
- Should take into account the changing needs of the District
- Need to meet the housing demand in the District in a sustainable way
- Concentration of most new development within existing 3 main settlements is no longer tenable as continued peripheral expansion is less sustainable than creating a new settlement of sufficient size
- Urban capacity study reveals shortfall of urban development land, need to identify locations where better use can be made of previously developed land assets
- Need to secure continuing economic growth and improvements to the environment and quality of life for the local population
- Vision should explicitly protect and enhance the environment
- Plans must evolve to keep pace with the changing needs of the District
- Sites beyond the three main towns will be required to meet the needs of all homeseekers; Cressing is an example of where additional dwellings could be provided to contribute to the overall vision
- The resident population should have adequate sports facilities by maintaining and improving current facilities
- Should take account of new and emerging Government and regional advice and studies
- This is an area of water shortage and more needs to be done to address this issue
- There is a need for a clear prioritising of the key issues that will lead to a more sustainable pattern of growth and more sustainable lifestyles
- The three scenarios are not particularly helpful or relevant in that elements of all three futures need to be embraced
- Need to include reference to the protection and improvement of the environment and natural heritage of the District
- Needs to be made more specific and distinctive to Braintree District

Option 2 – The Current Vision for the District Should Remain

2 Respondents Agree

No specific comments made

Option 3 – A District in which everyone is able to access high quality services and means of transport

28 respondents agree that this element of the current vision should remain

- Need to be vibrant and inclusive
- Need to keep up to date with transport issues
- Need to aspire to high quality services to ensure that the District retains its vitality and remains a vibrant and prosperous place to live
- People living in all parts of the District should be able to reap the benefits of innovation related not only to economic activity but also the delivery of services which should assist in breathing new life into rural communities as well as securing the future and quality of life in the larger towns
- An important factor is locating new development close to existing, improved or new services, this should include an assessment of underused sites accessible to such facilities
- Out-commuting is an issue of concern, ideally need more local employment with next best solution of promoting public transport between homes and workplaces
- Need a community hospital in Witham as there are far too many journeys to and from Chelmsford for minor hospital visits
- Need to add “sustainable” before “means of transport”
- Need to locate new development in existing or new settlements that have a sufficient critical mass to ensure viability
- Improvements to the Braintree branch line would encourage commuters who use cars for part of their journey to make the whole journey by train
- This should also relate to sports facilities
- Need to make the vision more specific and targeted
- Needs to be retained to set a baseline for the Core Strategy
- These are high minded objectives which it would be churlish to oppose
- The vision should be locally distinctive rather than being applicable to any District across the country
- All elements of the current vision should probably feature in some form in the updated version but they are not sufficient in themselves
- It is crucial for sustainable development that new housing is located in close proximity or highly accessible to existing services and facilities, including access to public transport
- This is fundamental to ensuring the creation of sustainable communities

Option 4 – A District in which everyone takes responsibility for making the District a safer, cleaner and healthier place to live

23 respondents agree that this element of the current vision should remain

- It is very important to be responsible and set an example for future generations
- There are many issues that need to be addressed on road usage by heavy transport vehicles, which is a major reason for unrest in the community
- It is the Council's responsibility to try and aspire to high quality services to ensure that the District retains its viability and remains a vibrant and prosperous place to live
- These elements are still relevant and important to the District
- People living in all parts of the District should be able to reap the benefits of innovation related not only to economic activity but also the delivery of services which should assist in breathing new life into rural communities as well as securing the future and quality of life in the larger towns
- The need to maintain/develop a District which promotes healthy living and a sense of community is viewed as an essential element of emerging policies and objectives; Rivenhall Country Park will help to cater for the emotional and physical well-being of the community
- This is supported in so far as it may bring about improved sporting facilities
- The vision should be more specific and targeted
- There is an age imbalance with the young far outnumbering the rest of the population. This overburdens schools and other facilities for young people to the detriment of others. Many facilities are created that may not be required in future.
- These are high minded objectives which it would be churlish to oppose
- The vision should be locally distinctive rather than being applicable to any District across the country
- All elements of the current vision should probably feature in some form in the updated version but they are not sufficient in themselves

Option 5 – A prosperous and vibrant District in which everyone is welcome and lives, works and plays together harmoniously

21 respondents agree that this element of the current vision should be retained

- Good inclusion brings harmony and pride in the District
- We need to set an example and to lead the way to a peaceful co-existence with people from all walks of life
- It is the Council's responsibility to try and aspire to high quality services to ensure that the District retains its viability and remains a vibrant and prosperous place to live
- It is considered that all the aims and objectives of the current vision are retained and built upon as these elements are still relevant and important to the District
- People living in all parts of the District should be able to reap the benefits of innovation related not only to economic activity but also the delivery of services which should assist in breathing new life into rural communities as well as securing the future and quality of life in the larger towns
- Policy must facilitate the needs of existing and future residents in terms of new employment and housing, including affordable housing
- This is supported insofar as it may bring about improved sporting facilities

- The need for reviewing and updating relates to the potential to make the vision more specific and therefore targeted
- In the past expansion has been created with large new housing developments causing a large number of incomers and a moving community with no heart. A different approach to a prosperous and vibrant District should be considered
- These are high minded objectives which it would be churlish to oppose
- The vision should be locally distinctive rather than being applicable to any District across the country
- All elements of the current vision should probably feature in some form in the updated version but they are not sufficient in themselves

Option 6 – A District in which everyone has an opportunity to meet their full potential and participate fully in decisions which affect their communities

21 respondents agree that this element of the current vision should be retained

- There are many who through no fault of their own who have given up and need to be encouraged to find out their roles and potential in life
- It is the Council's responsibility to try and aspire to high quality services to ensure that the District retains its viability and remains a vibrant and prosperous place to live
- It is considered that all the aims and objectives of the current vision are retained and built upon as these elements are still relevant and important to the District
- People living in all parts of the District should be able to reap the benefits of innovation related not only to economic activity but also the delivery of services which should assist in breathing new life into rural communities as well as securing the future and quality of life in the larger towns
- Landowners should not be unduly constrained by blanket policies where a development of the full potential of their asset could bring about community and environmental benefits. The current blanket imposition of a 20% site coverage limit at the Galleys Corner special policy area is no longer tenable
- This is supported insofar as it may bring about improved sporting facilities
- The need for reviewing and updating relates to the potential to make the vision more specific and therefore targeted
- These are high minded objectives which it would be churlish to oppose
- The vision should be locally distinctive rather than being applicable to any District across the country
- All elements of the current vision should probably feature in some form in the updated version but they are not sufficient in themselves

Option 7 – Business as Usual

15 respondents commented on this Option with 7 specifically disagreeing with it

- Should be an amalgam of all three options
- Issues have moved on and planning policy must be reviewed to facilitate an appropriate level and improved quality of development to meet identified needs in a sustainable way
- The plan must evolve to meet current and future needs of the District

- The challenges are too great to consider this a viable option
- This is not an option. It would place too much of a burden on other Districts to provide jobs, such as St. Edmundsbury and the transport infrastructure for journeys to work
- This scenario is not suitable for Braintree District
- This scenario suggests that the District will not respond positively to the challenges presented by future opportunities for growth, the sustainability agenda to meet objective for the local economy, managing and enhancing the environment and improving quality of life
- We strongly disagree with this option especially regarding the likely role of Halstead in terms of the intended low level of development growth implied in the corresponding development options

None of these scenarios are considered to be very helpful. They are very theoretical and generalised whilst there are elements of each scenario which could be supported or opposed. We do not see the benefit of pursuing these scenarios in order to formulate a Core Strategy

Option 8 – Providing a focus on leisure, heritage and nature

15 respondents commented on this option

- The heritage of the built environment does not receive sufficient emphasis in the overall vision and should be championed with rigour. Historic buildings and conservation areas need to be included in any future development plans for the District
- Should be an amalgam of all three options
- Whilst all three options are considered important, providing a focus for the review of objectives and policies is considered to be favourable. It may however be beneficial to widen the focus to embrace a raft of environmental and social issues. Rivenhall Country Park would be a large provider of sport and leisure as well as a conservation/interpretation centre for nature and heritage
- This should be combined with Option 9
- There is one serious omission: our heritage of historic buildings, conservation areas and landscapes of special scientific interest. These need to be included in any future development plans for the District.
- The option of focusing on leisure, heritage and nature does not appear to recognise the pressure for economic growth in this part of the region, particularly given the proximity of Stansted Airport
- This scenario is not suitable for Braintree District
- This is supported but it should be acknowledged that partnership working is critical to achieve the objectives identified
- A combination of Options 8 and 9 are considered to be suitable in the context of the future planning and development of the District and its urban areas. Development growth should be concentrated at the three main market towns which will help to increase accessibility, reverse out commuting and increase self sufficiency as well as providing for additional homes and jobs and the promotion of the locations as key attractors for the development of tourism
- None of these scenarios are considered to be very helpful. They are very theoretical and generalised whilst there are elements of each scenario which

should be supported or opposed. We do not see the benefit of pursuing these scenarios in order to formulate a Core Strategy

- Need more detail in order to assess which scenario is most compatible with Natural England's objectives

Option 9 – Where ideas take shape

32 respondents commented on this option with 30 supporting

- An excellent view of the future provided it supports the weakest members of the community
- Supports a more dynamic Braintree District
- Supports more ideas but needs to incorporate heritage and leisure
- Important to promote living and working in the same place and to improve employment prospects in the District. Needs to include environmental issues and protection of the countryside
- By focussing economic development across the District including the larger villages this will help to encourage both inward investment and the growth in businesses more locally
- People living in all parts of the District should be able to reap the benefits of innovation, related not only to economic activity but also to the delivery of services which should assist in breathing new life into rural communities as well as securing the future and quality of life in the larger towns
- This needs to be supported by the provision of an appropriate level of housing to support the increase in inward investment to the area.
- New responses and ideas are needed including a review of village envelopes to provide additional land to serve the current and future needs of the community
- The reduction in out commuting is considered a key objective of sustainable development. Important that housing and employment achieves a balance and that development is located in sustainable locations
- Should include the provision of high quality housing with innovative solutions to changing patterns of working and delivering sustainable developments
- Development to the south west of Braintree presents a unique opportunity to provide a development which will fulfil this vision through its ability to provide a new strategic employment site
- A central component of the new vision should be a strong knowledge driven economy with high quality jobs
- An emphasis on improving the economic base should include a commitment to the provision of a commensurate level of new housing
- Focus should also be given in the vision to sub-regional connections for employment particularly with the Haven Gateway area
- None of these scenarios are considered to be very helpful as they are theoretical and generalised
- It is crucial that Braintree reduces its dependence for employment on surrounding settlements such as Chelmsford and Stansted Airport
- No view at this stage as to which of Options 8 or 9 are most compatible with Natural England's objectives

Issue 4 – Are different approaches appropriate in different parts of the District

Option 10 – Different Approaches are Appropriate in Different Parts of the District

23 respondents supported this option

- Should consider larger villages for development as well as the continued development of previously developed land in the main centres
- Only Braintree, Witham and Halstead appear to have the critical mass to achieve sustainable development. Other settlements are inherently unsustainable and should not be encouraged to grow
- A different policy approach can be applied to Braintree than to the more rural parts of the District
- Different approaches are appropriate where it is clear that a part of the District has a particularly significant spatial relationship with an area or place outside of the District boundary
- We advocate a District-wide approach to securing sustainable development and not blind acceptance that maximising growth in urban centres is the most sustainable option
- A different approach is appropriate in different parts of the District as Braintree's environmental assets are not evenly distributed

Option 11 – Different approaches are not appropriate in different parts of the District

7 respondents commented on this option

- The “Where ideas take shape scenario” is attractive for the District as a whole
- We do not believe that fundamentally different approaches are required in different parts of the District

Issue 5 – Should the vision for the District incorporate sustainable development and a response to climate change?

Option 12 – Include sustainable development

33 respondents supported this option

- It is important that a new vision for the District is created which reflects external factors such as climate change
- Sustainability issues should underlie the settlement strategy and therefore it is essential that this is included in the vision
- A wider view of sustainability is required. It may be less sustainable to expand the 3 main existing settlements further than to create a single new settlement of sufficient size
- It should encourage the promotion of travel behavioural change to encourage more sustainable patterns of local travel

- The Core Strategy should seek the highest possible standards of sustainable construction and design
- Water efficiency measures should be encouraged in all new development
- The document should set realistic objectives for sustainable development in maximising energy efficiency
- The allocation of appropriate sites in close proximity to existing built-up areas and services will help to achieve this vision
- The use of renewable and sustainable sources of energy, building materials and construction methods can all assist in meeting this vision
- Sustainable development by definition will help to reduce the impact on climate change and there is therefore no need for a specific reference to climate change in the vision

Option 13 – Include Climate Change

24 respondents supported this option

- It may be necessary to respond to even greater climate change than now forecast
- It is important that a new vision for the District is created which reflects external factors such as climate change
- New development locations should minimise the impact on existing sewers through direct connections to existing wastewater treatment works wherever possible
- The current vision needs to be reviewed in the light of recent developments on the subject

Issue 6 – Should the vision be developed to incorporate social, community and environmental issues?

Option 14 – Yes, the vision be developed to incorporate social, community and environmental issues

33 respondents supported this option

- Projects should be considered to encourage older and younger generations to appreciate where they live
- To be successful sustainable development must deliver social, environmental and economic benefits simultaneously
- A serious omission of heritage. We would suggest “A District in which the heritage of the built and natural environment is sustained and preserved for the future generations of the District residents, workforce and visitors”
- The natural environment is inextricably linked to furthering both economic and social goals and should be given fair weighting in the process. We would promote the provision of a comprehensive green grid as an objective of the Core Strategy
- The vision should be supported by policies which make it deliverable
- If integrated healthy communities are to be achieved then social, community and environmental infrastructure should be fully integrated into the ldf process
- There is a minor role for promoting non-sustainable development where social, community and environmental reasons are held to be overriding

- Consulting on scenarios that only reflect economic issues is likely to produce a response which fails to address the range of matters that should influence the vision. Environmental issues, including the historic environment should be a key strand.
- Protecting, enhancing and providing improved access to semi-natural green space can provide benefits in terms of both nature conservation and human health and well-being, as well as helping to create a sense of place and links to the past

Option 15 – No, the vision should not be developed to incorporate social, community and environmental issues

No comments made for this option

Settlement Strategy

Issue 7 – What is the most appropriate settlement strategy for the future development of the District to 2021 and beyond?

Option 16 – Settlement Strategy Option 1 – Strategy based on existing commitments and sites within existing built-up areas

17 respondents commented on this option

- The spatial strategy for the East of England Plan concentrates development within urban areas with priority given to the use of previously developed land. The development strategy needs to be consistent with the Regional Plan. This option would not be consistent with the Regional Plan if the supply of housing sites is insufficient to meet the minimum dwelling provision identified for Braintree District in Policy H1 of the Regional Plan
- It is unlikely that existing commitments and sites within existing built-up areas will meet the future dwelling provision target for Braintree District
- Existing sites will not satisfy the requirement and this option should be considered in conjunction with a sustainable new settlement
- There is no reason why all built communities cannot sustain at least a small amount of housing development on brownfield sites
- We must maintain a choice of housing and not be tempted to change low density with high density just to meet targets
- We would urge the Council to locate development to areas well served by public transport, walking and cycling thereby reducing the need to travel, particularly by car
- This option does not provide flexibility in the light of flood risk and ecological constraints. Sites should be the subject of flood risk assessments, contamination studies and ecological assessment
- This option may not meet the housing requirements using the new PPS3 criteria and it would be premature to base the settlement strategy on this option alone
- This will not offer sufficient capacity for the quantity and range of dwelling types and sizes which would be required in all cases

Option 17 – Settlement Strategy Option 2 – Urban Concentration – New development to be located at Braintree, Halstead and Witham

20 respondents commented on this option

- New development should be focused on Braintree and Witham to protect the character of Halstead as a country market town and to limit the need for new infrastructure there
- There are concerns regarding the ability of the current infrastructure to be able to cope with additional development
- Braintree has the widest range of services and facilities and development should be concentrated at or adjacent to Braintree
- This would exacerbate unsustainable travel patterns due to the difficulty of introducing new cycle and pedestrian paths in town centres, would potentially increase congestion problems and would increase the population without providing new employment opportunities. These problems would be alleviated by combining this option with another, namely a new settlement on land east of Stebbing.
- Development should be focussed on the three main towns. Development of a more limited scale could be provided at villages with services
- Any areas of flood zone should be avoided
- This option represents the most appropriate way forward. Much of the new development should be concentrated at Braintree. The Core Strategy would be enhanced if it acknowledged that other factors impinging upon the settlement hierarchy include the expansion of Stansted Airport and the broader policy framework of the emerging Regional Plan
- The scale of growth should reflect the existing settlement size proportional to the amount of development to be accommodated
- This option would lead to a high level of urban infilling, resulting in the potential loss of urban green spaces. High densities would be required in many cases. Further development in Braintree would give rise to concerns about local service provision, Halstead is inappropriate for development due to landscape constraints and the need to maintain its market town identity, and Witham lacks elements to build further sustainable communities.
- This option should not be to the exclusion of reasonable levels of growth in secondary or tertiary centres
- To comply with PPS3 there is a need to demonstrate that sites with planning permission are deliverable. There will be a need to identify additional housing land. Development should be concentrated at Braintree and the direction of growth should be to the north-east of the town
- This option should provide scope to reduce reliance on private vehicles and increase the efficiency with which utilities and services can be provided. Some brownfield land is of nature conservation value. Decisions on the location and form of development should be taken in the light of landscape character and ecological assessments
- There is unconstrained land on the periphery of Witham. This option has the least impact in accommodating greenfield growth compared to other options canvassed within the report.

- In order for Halstead to fulfil its role as a Primary Town Centre it is necessary to ensure that development in the town is encouraged

Option 18 – Settlement Strategy 2A – New development to be concentrated at Braintree

18 respondents commented on this option

- This raises concerns about the ability of current infrastructure to be able to cope with additional development
- This is the most sustainable settlement strategy option
- Braintree is the largest and most sustainable location within Braintree District and possesses the main ingredients of further sustainable development
- Flood risk should be taken into consideration. Braintree has areas of flood some located to the north-east and the south-west of the town
- The exclusion of Halstead fails to recognise the contribution that existing sites and previously developed land within the existing urban area of Halstead can make to meeting the town and District’s development needs
- Land at “Great Notley Campus” is situated within close proximity to the town centre and adjacent to the existing built-up area of Great Notley. It is therefore able to take advantage of existing facilities as well as to maximise use of existing public transport, cycling and pedestrian networks that are already in place
- Braintree has the potential to accommodate a significant proportion of the new housing and employment development in the period to 2025 and beyond. In conjunction with appropriate planned urban extensions the opportunity can be taken to achieve improvements to the Braintree branch line
- This could exacerbate out commuting to destinations outside the District. Much will depend on the ability to provide local jobs in conjunction with housing growth
- To comply with PPS3 there is a need to demonstrate that sites with planning permission are deliverable. There will be a need to identify additional housing land. Development should be concentrated at Braintree and the direction of growth should be to the north-east of the town
- This option provides opportunity to provide more sustainable choices of transport. Dispersed growth options are objected to due to the fewer range of benefits delivered

Option 19 – Settlement Strategy Option 2B – New development to be concentrated at Witham

12 respondents commented on this option

- This raises concerns about the ability of current infrastructure to be able to cope with additional development
- Shopping, health and community facilities are limited in Witham and the town’s internal road network suffers from congestion at peak periods. Locating housing here may increase the need to travel to places with better facilities.

- Flood risk needs to be taken into account. Witham has a flood zone that runs north-west to south-east through the town and the town is adjacent to an expansive area of flood zone along the eastern boundary of the settlement
- Witham needs better shops and facilities, not more houses
- This could exacerbate out commuting to destinations outside the District. Much will depend on the ability to provide local jobs in conjunction with housing growth
- This option is supported. There needs to be a balance between urban sites and accessible greenfield options rather than exhausting the first before considering the second

Issues and Options Representations

Option 20 Settlement Strategy Option 2C

New Development to be concentrated at Braintree and Witham

Yes 8 No 2

Key Points Made

In Favour

- The largest settlements are most suitable for new development, maximising accessibility to facilities, services and employment and reducing need to travel. Dispersal would lead to disproportionate need to travel with increase in carbon emissions.
- Urban concentration is supported by national policy (PPS) and regional policy (East of England Plan.)
- Concentration allows services to be accessed via non-car modes of transport.
- Most sustainable option, as some level of self- containment possible in Braintree and Witham. ie each settlement has sufficient population to sustain shops and services and a level of employment loosely commensurate with the local population. (Halstead relies on Braintree and Witham for some of its essential services.)
- Braintree is well connected via the road network and has rail access.
- Braintree is well served by most types of shops, services and facilities and is a sustainable location. It does not need more development to become sustainable. Witham has opportunities for development, which will allow it to become more sustainable.
- The Council should examine all possible options in relation to strategic growth at Braintree not focus on 3 directions, in order for LDF to be sound.
- Development potential at Halstead limited by surrounding landscape. Potential at Braintree and Witham is less constrained in landscape and environmental terms.

- Halstead and many villages of historic interest, with sensitive landscape settings. Further development would threaten their character and distinctiveness.

Against

- Development should be concentrated at Braintree. (To the north-east of the town and north-west of Broad Road.) Housing site of 2.0 hectares proposed with 0.6 public open space.
- Exclusion of Halstead fails to recognise the contribution that existing sites and previously developed land can make in meeting the District's development needs and need for affordable housing in Halstead.
- Recognise case for focusing higher levels of growth in 2 largest towns, but have reservations, if this growth is at expense of reasonable levels of growth in secondary and tertiary centres.
- This raises concerns about the ability of current infrastructure to be able to cope with additional development
- Splitting development between two towns is less sustainable than locating most or all development in one. This would avoid the need of duplicating the cost of services and facilities between two settlements. Braintree is the best location for this concentration of development

Other Points

- Refers to paragraph 58 of PPS3-planning authorities in looking at how much land supply is required, should not include sites for which they have granted planning permission unless sites are deliverable.
- Therefore completions of 290 dwellings per year is not likely to be met in full and additional housing should be identified above 2,420 to ensure numbers can be delivered.

Option 21

Settlement Strategy Option 2D

New development to be concentrated at Braintree, Witham and Halstead

Yes 8 No 4

Key Points Made

In Favour

- Regional Spatial Strategy concentrates development within urban areas, with priority to use of previously developed land.

- Development concentrated on urban areas with more limited scale provided at villages with services.
- Although Halstead growth is constrained there are opportunities on existing sites and brownfield land in existing urban area, particularly affordable housing.
- Encourage development in Halstead, to ensure it continues to fulfill its role as a Primary Town Centre, to maintain its attraction to local residents.
- There will be infrastructure to cope with new demands on utilities and traffic.

Against

- Splitting development between three settlements would be less sustainable than focussing it into one. It would increase inter-settlement travel as facilities, jobs and services are spread across the three.
- Concentrate growth on Braintree.
- An increase in Halstead's residents would lead to an increased need for travel to the larger settlements. Halstead has no rail service.
- Unable to support if this growth prejudices enhanced role for secondary and tertiary centres.
- Promoting development in a number of centres, rather than just larger centres, allows for a more even distribution of town centre uses and ensures community's needs are met at local level in accordance with PPS6.

Other Points

- Halstead has an area of high flood risk zone through the centre of the town.

Option 22

Settlement Strategy Option 3

Dispersal- New settlement spread more widely across the District including development in selected larger villages as well as the three main towns.

Yes 28 No 3

Key Points Made

In Favour

- PPS3 implies that adequate provision should be made in smaller settlements to address local need and affordability.
- Paragraph 38 of PPS3 states 'Local Development Documents should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development. Local Planning Authorities should, working with stakeholders, set out the criteria to be used for identifying broad locations and specific sites taking into account... the need to provide housing

in rural areas, not only in market towns and local service centres, but also in villages in order to enhance or maintain their sustainability.’

- PPS3 requires District Council’s to consider importance of including ‘villages’ in their assessment and the Issues and Options includes 4 options that fail to do so and only one that to a degree complies with this.
- Limited development at villages with services would be consistent with strategy set out in Government’s proposed changes to the Regional Spatial Strategy.
- Sites should be allocated in smaller settlements for affordable (rented) accommodation, to keep these as vibrant communities. Commuters are populating villages near railway stations and outpricing locals and first time buyers.
- Spreading development across District would help to mitigate against road congestion and overcrowding on public transport within the three main towns.
- List of settlements which could accommodate development should be reviewed to take account of environmental constraints and availability of land which could meet site selection criteria. A detailed review of village envelopes should be undertaken as part of this process.
- If rural settlements are overlooked, this may be to detriment of rural economy, which has already suffered in recent times. This strategy will help to maintain existing services and facilities within smaller settlements.
- Smaller rural settlements are facing stagnation in the face of the current moratorium on housing in these smaller settlements.
- Almost half the District’s population live in rural areas. Core Strategy should make this population more sustainable. If reasonable levels of growth are resisted in non-urban settlements, opportunities to maintain and improve existing services and public transport will be limited and the almost certain effect will be an even less sustainable non- urban population.
- Identify key rural centres where new housing, jobs and community facilities can be focused and allow limited growth in smaller settlements where compatible with social and environmental objectives. Accessibility to employment a pressing issue.
- Braintree District has an age imbalance, spread expansion around the District, so incomers move into established communities with existing facilities.
- This strategy should be considered if existing commitments and sites within built-up areas are insufficient.
- Avoid over-concentration in main urban areas.

- Sustainable settlement pattern:
 - 3 primary urban centres
 - Secondary rural centres Coggeshall, Earls Colne, Hatfield Peverel, Kelvedon/Feering and Sible Hedingham (these are also close to urban areas) with high level of existing services reducing need to travel to towns. Opportunity to balance growth between the 3 primary and 5 secondary centres.
 - Plus some growth in tertiary centres, (all other settlements) which can contribute to retention of or improve community facilities, public transport, affordable housing or vibrancy of rural life.
 - Suggested growth split- 70% new housing in primary, 20% in secondary and 10% in tertiary centres.
 - Catalyst for growth should be generation of employment in primary and secondary centres.
- Eco-friendly dwellings with low carbon footprints, which are part of large-scale urban extensions, will always attract the highest sustainability scores. However, this does nothing to improve sustainability of existing properties. An appraisal system that judged the benefit of new housing to the existing settlement would enable village schemes to provide part of the housing allocation.
- A moratorium on house-building in rural communities, because they are not sustainable, has led to increased house prices, exclusion of long term community residents, a mature affluent population, decline of schools, family facilities and rural transport; which is generally used by young and old. Provision of a few affordable houses does not provide an integrated and cohesive community, although it can form a useful part of the remedy. Report by the Affordable Rural Housing Commission recognises the failure of the 'rural exceptions policy' in delivering rural affordable housing. The Commission outlines 3 possible sources of funding including allowing some growth in private development to generate further cross- subsidy.
- Supports expansion to west of Rayne, to focus new development close to existing population and with good transport links and where demand is highest. This avoids environmentally sensitive areas in north of District.
- Proposes development at Silver End, in south of District, well served by public transport and facilities. (Government target of 60% on brownfield sites means a further 40% needs to be accommodated on greenfield sites- this greenfield site should be included.)
- Larger villages such as Earls Colne should not be starved of future development, which could damage their prosperity and viability. Mixed development at Earls Colne could allow an increase in local employment opportunities reducing need to travel and encouraging non-car transport.
- Supports development of land within Coggeshall bypass. Coggeshall benefits from facilities, A120 and access to Earls Colne Business Park and Marks Hall Estate. Cycle routes would allow improved access to these.

- Proposed development of land off Tey Road, Coggeshall.
- This will enable recycling of surplus brownfield land at Premdor site, Sible Hedingham.
- Hunnable site at Great Yeldham could be part of Option 22.
- The following settlements provide an opportunity for small scale development:-
- Ashen, Coggeshall, Great Bardfield, Pebmarsh, Earls Colne, White Colne, Hatfield Peverel, Helions Bumpstead, Kelvedon, Feering, Shalford, Sible Hedingham, Wethersfield, Colne Engaine, Great Saling, Great Maplestead, Rayne and Gosfield.
- No more room to build in Black Notley or SW Braintree. The area needs time to settle.

Against

- Less sustainable than focusing development into one settlement. Result in pressure on greenfield sites, or impact on local landscapes, countryside or historic setting of villages.
- Rural areas are generally poorly served by public transport, apart from villages with railway stations. This option would therefore increase traffic generation.
- Problems of service and infrastructure provision. Limited capacity in village centres for new shops. Infrastructure investment difficult to achieve.
- Affordable housing difficult to achieve.
- Shortfall in capacity in schools, sewage system.
- Proximity to Braintree could make village shops less viable.
- Consider previously developed land close to larger settlements for housing, with an element of employment use eg vacant Tanner Food Plant at Sible Hedingham.
- A new settlement east of Stebbing would not present problems outlined in arguments against this Option.
- Plan for a new sustainable town at Marks Tey in longer term.

Other Points

- Environment Agency states that flood risk should be fully considered.

- Respondent critical of word ‘dispersal’ which implies pepper-potting development around District, which is not a true reflection of a strategy which could focus perhaps 90% of growth in primary and secondary centres.

Option 23

Settlement Strategy Option 4

New Settlement-New development to be located in a new settlement

Yes 3 No 10

Key Points Made

In Favour

- Proposed new sustainable settlement east of Stebbing to meet housing targets in plan period and beyond. This would avoid urban and village extensions and avoid impacting upon areas of landscape sensitivity. It would be consistent with the Government’s identification of the London-Stansted-Cambridge-Peterborough corridor as a growth area. It should be assessed in conjunction with Uttlesford’s housing needs.
- Marks Tey has potential for new settlement of 6,000-10,000 dwellings, which would have sufficient population to deliver schools, social and transport infrastructure. Potential to bring forward upgrade to A120. Close to road and rail connections. Most of Marks Tey site is within Colchester Borough and would contribute to Colchester’s housing requirements. This new settlement would avoid new development around highly regarded rural settlements to the north of Braintree and prevents coalescence of settlements with Braintree. Marks Tey settlement has potential to give Braintree a stronger identity in terms of future growth, strengthening relationship with Haven Gateway. Also potential for balanced development, within which housing can be phased to come forward with significant employment growth. Regional housing targets are only base lines not maximum ceilings.
- A new settlement avoids pooling of development contributions from numerous smaller developments, which are often complex to bring together to deliver infrastructure.
- Sufficient lead in time for a new settlement to phase housing delivery beyond 2017.
- New settlement could meet needs in second half of plan period, not short term delivery of growth.
- A new settlement would avoid the over intensification of existing urban areas and the resultant loss of character that is often a concern of established communities.
- Continuing the existing settlement pattern makes insufficient provision for the delivery of the full housing requirement. Growing existing settlements outwards is the wrong approach.

Against

- One of the least sustainable options and would require substantial investment in new infrastructure and services. The Report of the Panel on the Examination of the East of England Plan stated ‘We were also not convinced that small new settlements of this general size (around 5,000 dwellings) would rank sufficiently high up the scale of sustainability to merit including them as a significant component of the spatial strategy.’
- The East of England Panel Report considered that the potential contribution of a new settlement of a least 10,000 dwellings is the size required for a sustainable community. Braintree only require sites for 2,320 homes.
- Buchanan Study on urbanisation implications from growth of Stansted considered thresholds of new settlements:-
 - 10,000 dws- degree of self- containment and attract employment
 - 5,000 dws maximum developers are often willing to consider for financial reasons, range of facilities eg secondary school, some employment and function fairly effectively as a community.
 - 1,500 dws or less not large enough to attract facilities or employment, risk being a dormitory.Study concluded 5,000 dws minimum for a new settlement.
Therefore a new settlement cannot be justified.
- Dwelling requirement is far too small to create a new settlement of a size necessary to provide the full range of facilities, to be a self- contained and sustainable community.
- No clear sustainability advantages for a new settlement.
- A new settlement would not be in accordance with the emerging Regional Plan.

Other Points

- Any option that focused all development into a new settlement would need to demonstrate that this was preferable in sustainability terms to the growth of the existing settlements. In particular it would need to show how local needs in rural communities were being addressed.
- The Council should not include all outstanding planning permissions within their housing trajectory, or windfalls.

Option 24

Strategy Settlement Option 5

Infrastructure Provision-New development to be located to assist with the provision of new infrastructure.

Yes 1 No 5

In Favour

- May be acceptable. Subject to requirements in Circular 05/05 on Planning Obligations-ie provision for infrastructure is fairly and reasonably related in scale and kind to proposed development.

Against

- The approach that new infrastructure is required and new development will pay for it is too narrow and flawed. It would be necessary to examine a Strategic Environmental assessment /Sustainability Appraisal to see if this is appropriate for this location.
- No clear sustainability advantages.
- Unsustainable. Most infrastructure requirements relate to provision of new roads.
- This would lead to disjointed and piecemeal development.

Other Points

- This is not a geographical option but an objective that will be influential in determining the future pattern of growth, wherever it is directed.

Option 25

Settlement Strategy Option 5A

Further development at Halstead to assist with the provision of a Halstead Bypass.

Yes 1 No 11

In Favour

- Strongly agree with this option. Halstead should be developed further, not just to help justify a bypass but to allow the town to grow in a sustainable way, without being constrained by a previously imposed landscape designation.

Against

- Halstead is the least sustainable of the 3 main settlements. The provision of a bypass would not make it a more sustainable location.
- There are no clear sustainability advantages of providing for development to be located to assist the provision of infrastructure.
- Questions if this accords with Government sustainable development objectives that seek to encourage development at sustainable locations, supported by sustainable transport, thereby reducing travel by car.
- Halstead By-pass is not included within the Essex Local Transport Plan funding. A significant public funding commitment would need to be set aside

to achieve the bypass, not clear that this is forthcoming. Reliance on developer contributions would be unreasonable.

- The Council's strategy for Halstead provides only for use of existing sites and previously developed land. Setting aside funding for the bypass by developer contribution would be unrealistic, contrary to Circular 05/05 and unlikely to be meaningful within the Plan period. Would need the release of significantly more land for development to fund the bypass. However the Council considers major growth at Halstead unacceptable for landscape and environmental reasons.
- New development can be located to assist with provision of infrastructure. However, this does not mean further growth should be focused upon towns that do not provide the opportunity to secure sustainable development in line with objectives of East of England Plan.
- Castle Hedingham Parish Council objects to development of a Halstead Bypass, as those not wishing to use the bypass are likely to travel through Castle Hedingham instead.
- Notwithstanding the serious impact of through traffic on the town, a bypass would have serious and adverse consequences for the environs of the town.

Option 26

Settlement Strategy Option 5B

Development to the north of Witham to assist with the provision of a link road between the B1018 and the A12.

Yes 3 No 6

In Favour

- Although traffic survey showed a high percentage of vehicles on B1018 had a destination of Witham, many of these were HGV's and other commercial and private vehicles heading for industrial areas to north-east of the town. A northern bypass would relieve the town centre of this traffic and traffic for A12 and also reduce traffic levels passing by a school. Further more detailed traffic study is required of B1018 to determine need for northern bypass. If need is established, no development until bypass is constructed.
- Development to north-east of Witham could be used to secure contributions towards sustainable transport projects, including a possible link between the B1018 and the A12.
- This link road will achieve sustainable aims of improving accessibility, reducing journey lengths and easing traffic congestion within the town centre, achieved in part by developer funding..

Against

- No clear sustainability advantages in providing development to be located to assist the provision of infrastructure.

- The approach that new infrastructure is required and new development will pay for it is too narrow and therefore flawed.
- Traffic survey showed that 80% of traffic approaching Witham from the north via the B1018 has a destination of Witham, therefore bypass unnecessary and will not relieve this traffic.
- Highways Agency has concern about new or improved access to the A12 at Witham and there is a presumption in favour of using existing accesses and junctions.
- Sustainable location for new development is Braintree, as the largest settlement with best facilities and services.

Other

- It would be necessary to examine a Strategic Environmental Assessment/Sustainability Appraisal to see whether this approach is appropriate for this location, or whether an alternative approach would be more sustainable.

Option 27

Settlement Strategy Option 5C

Development at Hatfield Peverel to assist with the provision of a link road between the B1019 and the A12.

Yes1 No4

In Favour

- Support for modest expansion at Hatfield Peverel because of A12 corridor, railway network, existing infrastructure in south of District and landscape quality of the north.

Against

- Priority to use of previously developed land.
- Hatfield Peverel is not a sustainable location for new development.
- No clear sustainability advantages in providing development to assist the provision of infrastructure.
- Highways Agency has concerns about new or improved accesses at Hatfield Peverel.

Option 28

Settlement Strategy Option 5D

Development at Tye Green, Cressing to assist with the provision of a passing loop on the Braintree branch line.

Yes 4 No 6

In Favour

- This development should be explored further, having regard to A120 east of Braintree, as well as improvements to the Braintree branch line.
- Whilst majority of new growth should go to urban areas, where improvements to local infrastructure are required, justification can be made for additional growth to support the delivery of this infrastructure. Only a small proportion of finance required is currently secured through the Local Transport Plan. Doubling the frequency of trains on this line will encourage modal shift. Housing stock in Tye Green has a lack of range of properties and there is an ageing population, which will have implications for service provision. Proposals would include enhancements to footpath that links village to Cressing station. Development would reduce the need to travel by private car. Main employment, retail and leisure centres in the District are on south side of Braintree, close to Tye Green. Although not within an urban area, location benefits from access to services and employment. Development would not compromise countryside gap between Tye Green and Galleys Corner. (Proposes 150 to 200 dwellings at Tye Green.)

Against

- Tye Green Cressing is not a sustainable location for new development.
- The root problem of rail transport via Witham is the congestion on the main line between Shenfield and Colchester. Provision of a passing loop will not solve the problem of additional slots for additional trains to gain access to the main line to Liverpool Street.
- If there is a need for a passing loop on the Braintree branch line, this requirement does not dictate that development should be provided at Tye Green, Cressing. This would be a significant extension of a rural settlement, contrary to the development strategy of the East of England Plan. If the branch line is necessary to support the further growth of Braintree, financial contributions could be sought from planned urban extensions of Braintree.
- No clear sustainability advantages of providing for development to be located to assist the provision of infrastructure.

Question 1

Are there any other options?

- Settlement strategy should be a fusion of Options 1, (existing commitments and sites within existing built-up areas) 2 (urban concentration) and 3 (dispersal across District including larger villages as well as the 3 main towns). –Majority of development in 3 main urban areas, with modest infill in smaller villages to cater for local housing needs, to maintain village services and create ‘equal opportunity for all.’

- Reassess potential to use existing developed sites more efficiently- eg underused Galleys Corner Special Policy Area, which has arbitrary use and site coverage restrictions.
- Pursue firstly most efficient use of urban land, secondly infill and minor rounding in villages and thirdly a new settlement sequentially.
- Steady and controlled release of properties in the countryside.
- Plan should cover period to 2026- 15 years from adoption of allocations document. (5,800 dwellings). Some sites identified in 5 year housing land supply are inappropriate.
- Combination of Option 16 (existing commitments and sites within existing built-up areas) and Option 18 (concentrate new development at Braintree) and then cascade to other settlements in order of sustainability. (Rejects new settlement.)
- Urban capacity in rural settlements is less sustainable than urban extensions, particularly Braintree.
- The 5 options are not comprehensive and are not mutually exclusive.eg Option to provide new infrastructure could be a key determinant in all other 4 options, option for new development in 3 main towns could be considered together with option for a new settlement.
- Consider corridor growth along A12, A120 B1018 opportunities to improve inter-urban public transport and attract new employment (first and last are also rail corridors). A120 Marks Tey new settlement and growth at Coggeshall.
- A12 Kelvedon/Feering , Witham and Hatfield Peverel. B1018- Tye Green growth.
- Widen scope of settlement policy so as not to preclude housing in smaller rural settlements eg Wethersfield.
- Extend envelope at -Belchamp Otten.
-Shalford.
- all villages where land is available for development.
- Greenfield site at Silver End.
- Regional Spatial Strategy requirements, of 2420 dwellings, should be treated as a minimum.
- Set a lower threshold for affordable housing in rural areas.
- Disagrees with housing provision calculation by BDC- suggests require 385 dws per annum to 2026. ie 5880 dws 2006-2025. Replace residual figure of 2,420 with 2,790 dws.

- Plan more sound if use 2004 based household projections.

Option 29

Braintree Settlement Strategy Option B1

Development to the south-west of the town.

Yes 5 No 4

In Favour

- This would take advantage of facilities and services at Great Notley and improved road network. Within walking and cycling distance of employment, town centre and railway station. Good bus service along London Road.
- Opportunity to provide additional employment, community and leisure facilities.
- 'Great Notley Campus' site can deliver growth to complement facilities already present at Great Notley. Suitable for Braintree College.
- Proposes urban extension on land between London Road and Baker's Lane for housing and employment.
- Proposes Row Green/Black Notley adjacent to London Road.
- The area to the south of Braintree has limited environmental value, when compared with other more sensitive landscape areas within the A120 corridor.
- Strong transport corridor along A120. Could improve Express bus link between Braintree and Stansted.
- Prominent ridgeline above the Brain Valley to the east of Black Notley. Country Park and recreational area west of Great Notley. Special landscape areas-generally around river valleys: These all contain and dictate further development in and around Braintree.
- Degraded landscape in this area associated with urban fringe-power lines, masts, A120, horses.
- Unlikely to lead to perception of coalescence as inter-visibility between Great Notley, Black Notley and Braintree is poor.

Against

- SW of Springwood Industrial Estate is fragmented from other residential development and the town centre. Further SW is floodplain.
- .Development in SW raises problem of coalescence with Black Notley.

- Already been disproportionate development of Black Notley/Great Notley area. Black Notley has doubled in size with no increase in infrastructure. Both need time for consolidation without further development.
- Would encourage more commuters, overburdening the new roads.
- NW development would be better.

Other Points

- A matter for local determination subject to consistency with spatial strategy.
- Further development of Braintree should not lead to coalescence with surrounding villages.

Option 30

Braintree Settlement Strategy Option B2 Development to the west of Braintree

Yes 5 No 1

In Favour

Majority of District's population live in the southern part of the District. Locating new development at Rayne is close to existing population and where demand is highest. Good transport connections: Close to junction of A131 and A120, near to Braintree station and on hourly bus route to Stansted.

Not within northern part of District which is of a higher environmental quality.

Rayne is a sustainable location with good facilities and is close to other facilities in Braintree.

Development on western side of Rayne would maintain physical separation of Braintree and Rayne and character of Conservation Area and Special Landscape Area.

Development north west of Braintree will be sustainable close to existing infrastructure, jobs and services. Key advantage close to Springwood.

Location advocated between Great Dunmow and Braintree with access to A120.

Preserves character of Braintree and avoids coalescence.

Against

Not well related to Braintree station. Location south-west of Braintree would be better for non- car travel .

Other Points

Environment Agency not opposed to this, as not in high risk flood zone.

Option 31

Braintree Settlement Strategy Option B3 Development to the north-east of Braintree

Yes 2 No 4

In Favour

Sustainable location, which could encourage walking, cycling and public transport.

Highfield Stile Farm a suitable location.

Blanket designation as special landscape area unjustified- affected by sewage works, concrete block making plant and bypass.

Do not need to await completion of A120 Braintree to Marks Tey to develop this area.

Concentrate growth at Braintree, which has good access to employment, facilities and services.

Against

Impinge on special landscape area.

Not well related to Braintree railway station. Less non car travel opportunities than land south-west of Braintree.

Result in development within high risk flood zone.

Only route to Straits Mill is down Broad Road and up Convent Lane. Development access would cause unacceptable disruption to residents. Would need new access to new dualled A120 between Braintree and Marks Tey.

Other Points

Resite Straits Mill industrial area.

Option 32 Halstead Settlement Strategy Option H1 Use of sites within the existing built up area

9 Reps

Agree 6 Disagree 3

Key Points Made

Agree

- Development should be on existing built up areas, especially for retail.
- Central Park site, Colchester Road, Halstead suggested for redevelopment as a mixed-use site.
- Core Strategy should encourage the delivery of a range of retail, community and other facilities.

Disagree

- Does not allow for flexibility. Could result in failure to bring forward needed development.

- This option represents a ‘do nothing’ option which is not sustainable for the future development of the town. The northwest and western fringes should be considered as an urban extension to the town.

Other Points

- Area of high risk flood zone runs through the centre of the town.
- LA must apply Sequential Test & where appropriate Exception Test to any new developments.
- Development should be in scale and character with surroundings. Concern expressed about application of Urban Place Supplement to small market towns.
- Previously developed land is not always the most sustainable option – for example, in areas of high hazard as identified by the SFRA. Sequential approach should be applied within high risk flood zone as well as between each flood zone.
- Core Strategy ought not to preclude development on the edge of the built up area of the town, if it can be delivered in such a way that respects and does not have an unacceptable impact on the surrounding landscape character.
- Should be consistent with Regional Spatial Strategy.

Option 33 Witham Settlement Strategy Option W1

Potential direction for growth to the west of the town north of the railway line.

5 Reps

Agree 4 Disagree 1

Key Points Made

Agree

- This is the best option in terms of preserving the settlement character and avoiding coalescence.

Disagree

Other Points

- Flood zone runs north-west to south-east through the town. Town also adjacent an expansive area of flood zone along eastern boundary of the settlement.

Option 34 Witham Settlement Strategy Option W2
Potential direction for growth to the west south of the railway line

5 Reps

Agree 4 Disagree 1

Key Points Made

Agree

- There is land suitable for mixed-use development to the west of the town south of the railway line at Lodge Farm.
- Core Strategy's approach towards future housing should embrace the need for an increased and flexible housing land supply.
- This is the best option in terms of preserving the settlement character and avoiding coalescence.

Disagree

Other Points

- Flood zone runs north-west to south-east through the town. Town also adjacent an expansive area of flood zone along eastern boundary of the settlement.

Option 35 Witham Settlement Strategy Option W3
Potential direction for growth to the north-east of the town

5 Reps

Agree 4 Disagree 1

Key Points Made

Agree

- This land has few environmental and landscape constraints.
- Area is largely contained by a golf course which would be retained and would prevent coalescence with other settlements. It is accessible and can be integrated with the existing town centre and other facilities.

Disagree

Other Points

- Flood zone runs north-west to south-east through the town. Town also adjacent an expansive area of flood zone along eastern boundary of the settlement.

Question 2

Are there any other options?

13 Reqs

- Land shown as 'white land' on the Local Plan Review Proposals Map to the north of Springwood Industrial Estate and west of Panfield Lane should be identified for future housing growth.
- Work with Uttlesford District Council to allocate land for a new settlement between Great Dunmow and Braintree to serve the needs of both Districts.
- Village envelopes should be reviewed to facilitate logical rounding-off, infilling and minor extensions eg. In the vicinity of Ashes Garage, Cressing. This is well located for a small development of affordable housing that would be facilitated by inclusion within the village envelope.
- Location of new development needs to consider the provision of new service infrastructure. Especially the distance between the new development and the location of existing wastewater treatment works - excessive distance may lead to excessive pumping of sewage, and the sustainability of solutions needs to be considered. It is recommended that a water cycle study is undertaken, which will provide a strategy for water provision and wastewater disposal.
- A variation of Option B1 is most appropriate & should be incorporated within the Preferred Options. Land adjoining the southern boundary of Braintree but immediately north of the A120 is the most sustainable Greenfield location. Could deliver new housing and associated uses, community/leisure uses accessible by a range of sustainable modes of transport.
- Need to prevent the coalescence of Braintree town with surrounding villages eg Bocking Church Street, Cressing (Tye Green), Black Notley, Rayne and Panfield.
- As Halstead is one of the key urban centres within the District, a suitable level of housing and employment development growth should be allocated to this area, on appropriate suitable sites within and adjacent to the urban area. The document does not identify a suitable development option capable of allowing the town to grow and improve its transportation links, including the provision of an optimum level of additional new development and a by-pass. This represents a "do nothing" strategy for Halstead, which does not represent a sustainable future for the Town or District. The Local Development Framework should allow for other development options including small urban extensions at this location to be considered.
- A growth corridor along the A12 (new settlement at Marks Tey, potential growth at Kelvedon/Feering, Hatfield Peverel, Witham) and A120 (further opportunities for growth at Coggeshall) or B1018 between Braintree and

Witham(Tye Green, Cressing). Corridor Growth should be an independent option.

- Issues and Options identifies three options for Braintree but does not look at all available options for strategic growth. North of Braintree, land between Broad Road and Church Lane, known as Dorewards Hall should be considered. Site has defensible boundary, pedestrian access to town centre and services, amenity area with landscape and biodiversity value. Could deliver affordable housing.
- New development should be concentrated in and around the town centre as it is a sustainable location. Priority should be redevelopment of brownfield sites particularly under-used, vacant and derelict land and buildings.
- The Core Strategy should encourage a range of retail, community and other facilities to be delivered in Halstead. It may not be possible to accommodate these on sites in the existing built up area. Development on the edge of the built up area should be considered.

AFFORDABLE HOUSING

Question 3

How can more affordable housing in the District be secured?

4 Reqs

- Have an open approach to housing development and the market delivery of housing. From the experience of operating existing policies it has been found that larger sites have the potential to yield additional affordable units.
- The options presented should reflect the most recent guidance in PPS 3 and offer flexibility for determining planning applications against a set of policy options, dependant on the overall need for affordable housing. Economic viability of any pre-determined thresholds should be taken account of and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities are of primary importance.
- The Council should adopt an appropriate target for affordable housing, as set out in H3 of the proposed changes (East of England Plan) to ensure adequate supply to meet local needs. This should be informed by the forthcoming Housing Needs Survey. This section needs to be reconsidered to ensure that the levels of affordable housing are maximised.
- Suitable sites adjacent to village envelopes should be identified. Eg Ashes Garage in Cressing.
- Widen the number of allocated sites particularly at the three existing towns.

- The Council must ensure that a proper Strategic Housing Market Assessment is undertaken with the full involvement of the property industry in order to help to more fully underpin the evidence base for any policies and requirements, and to accord with PPS3.
- Proposed changes may not be realistic or viable. There is no account taken of the availability (or not) of grant funding (as referred to in PPS3). Nor is there any regard given to other planning gain requirements that will be sought, the Council refers elsewhere to significant infrastructure requirements.
- A lower site size threshold (below 15 dwellings), and the introduction of commuted sum payments in respect of individual dwellings, could be a significant deterrent to landowners to bring forward land for housing development.

Option 36 (Affordable Housing)

Yes, the percentage of housing that is required should be increased.

7 Reps

Agree 4 Disagree 3

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Vital that young people and those less well off should be given the opportunity to rent housing.
- Affordable housing should be achieved via a percentage requirement of approximately 35% unless there are site viability issues which indicate there should be more or less housing.

Disagree

- To set affordable housing thresholds below the national indicative minimum of 15 units and higher percentages of affordable housing than that proposed in PPS 3 (30%) would potentially stymie development in the District in relation to surrounding council areas especially where the Braintree could be found to be proposing / operating a more robustly stringent policy in comparison to neighbouring councils. The percentage of affordable housing units on sites over 15 units should not exceed the PPS 3 requirement.
- Increasing the percentage could have a detrimental effect on the viability of development and may prohibit, if applied inflexibly without having the regard to the merits of each case, housing development in the area.
- Each case should be treated on its merits.

- Provision of affordable housing should be based on an up-to-date Strategic Housing Market Assessment.

Other Points

- The need for affordable dwellings in particular locations should be assessed as this may justify a higher or lower percentage of affordable housing.
- Consideration in the policy to the need to have regard to the specific circumstances of each site including economic viability, when negotiating the provision and type of affordable housing.

Option 37 (Affordable Housing)

No, the percentage should not be increased

9 Reps

Agree 7 Disagree 2

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- 30% is widely recognised as an appropriate proportion and helps create balanced communities.

Disagree

Other Points

- Affordable housing policies should be based on sound & up to date survey information & are in accordance with Central Government policies.
- Percentage should be justified through a robust Housing Needs Assessment.
- The Council should consider a policy which requires that they negotiate with developers to secure affordable housing taking into account (i) site size, suitability and economics of provision, (ii) the need to have a successful housing development, (iii) the size, tenure and type of dwellings needed in accordance with a strategic housing market assessment.

Option 38 (Affordable Housing)

Yes, the site threshold should be lowered

5 Reps

Agree 2 Disagree 3

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Affordable housing should be part of every new development for targets to be reached.

Disagree

- Consideration should be given to the need to have regard to the specific circumstances of each site, including economic viability, when negotiating the type and provision of affordable housing.

Other Points

- Any changes to current policy would have to be justified using the approach set out in paras 29 to 30 of PPS3.

Option 39 (Affordable Housing)

No, the site threshold should not be lowered

4 Reps

Agree 4 Disagree 0

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Provision should be met by all relevant developers. The threshold should reflect existing and emerging Government guidance, in particular paragraphs 29 and 30 of PPS3. Any lower threshold would need to be fully justified by local circumstances.

(Relates to Options 36-53 inclusive).

Disagree

Other Points

Option 40 (Affordable Housing)

Yes, the site threshold should be deleted

4 Reps

Agree 1 Disagree 3

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

(All points made have already been made in preceding options)

Option 41 (Affordable Housing)

No, the site threshold should not be lowered

2 Reps

Agree 1 Disagree 1

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Option 42

Yes, the site threshold should be deleted in parishes under 3,000 population

6 Reps

Agree 4 Disagree 2

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- There should be a pro-active approach to designating sites in smaller rural areas.

Option 43

No, the site threshold should not be deleted in parishes under 3,000 population

3 Reps

Agree 2 Disagree 1

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Need to consider what the new developments are doing to rural locations.
- Important that the District's affordable housing policies are based on sound and up to date survey information and are in accordance with Central Government planning policies.

Option 44

Yes, a different threshold should be applied to sites in rural areas

5 Reps

Agree 4 Disagree 1

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Need to retain local people in their communities. This will require greater provision of low cost market or other affordable housing.
- Would be appropriate to reduce threshold and increase the percentage of provision (separate rates for larger town & rural communities).

Disagree

Other Points

- It is important that low cost market housing be included in the 'affordable' category to retain the option of home ownership for those starting on the property ladder.

Option 45

No, a different threshold should not be applied to sites in rural areas

0 Reps

Agree 0 Disagree 0

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Option 46

Yes, there should be a commuted payment for affordable housing to be paid per dwelling for sites below the threshold?

5 Reps

Agree 3 Disagree 2

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Need to consider requirements in PPS3, the Strategic Housing Market Assessment and the likely economic viability relating to land for housing within the area, taking account the risks to delivery by drawing on informed assessment of likely levels of finance available for affordable housing, policy subsidy & the level of developer contribution that can be secured.

Disagree

- Commuted sum payments would affect viability. Would also be difficult to ensure that that sums raised in one locality would contribute to affordable housing in the same locality.
- A proportionate and stepped approach to contributions may be a way to extend a basic policy. Affordable housing contributions below the 15 unit threshold can be scaled to the size of the development. This way all developments share responsibility for delivering affordable housing. (Except for developments at or below 5 units – will affect the viability).
- Could have a detrimental effect on viability of a development & may prohibit housing development.
- Para 29 of PPS3 states in lieu of on-site affordable housing provision may only be accepted if it can be robustly justified.
- Need to have regard to the specific circumstances of each site including economic viability.

Other Points

- On smaller sites contributions should be in the form of ring fenced commuted sums, not land or bricks and mortar.

Option 47

No, there should not be a commuted payment for affordable housing to be paid per dwelling for sites below the threshold

5 Reps

Agree 4 Disagree 1

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

- All key points already made against preceding options.

Option 48

Yes, the existing rural exception policy should be retained

8 Reps

Agree 7 Disagree 1

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Facilitates provision of affordable housing that would not otherwise come forward.

Disagree

- The current rural exception policy leads to uncertainty. Should either be replaced by a policy with includes unambiguous criteria for site selection or allocations for affordable housing.

Option 49

No, the existing rural exception policy should not be retained

5 Reps

Agree 3 Disagree 2

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

- All key points already made against preceding options.

Option 50

Yes, specific rural exception sites should be allocated

9 Reps

Agree 7 Disagree 2

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Greater encouragement should be given by identifying appropriate sites.
- There must be prior discussion with the local community & Parish Council.
- Allocations should be on land adjacent to existing settlement boundaries.
- Needed in the villages as there is often a demand for people to remain in the village.
- Where urban sites within village envelopes are not available to deliver such affordable housing, exceptions could be made on Greenland outside the envelope.
- The current rural exception policy leads to uncertainty. Should either be replaced by a policy with includes unambiguous criteria for site selection or allocations for affordable housing.
- Will provide for balanced growth. Will meet the needs of residents and provide a choice of housing and will assist the rural economy, increasing the viability of village services including public transport.
- This would encourage landowners to release land for affordable housing.
- Sites should be in a reasonably sustainable location, adjacent a village envelope and where a strong local need has been identified.

Option 51

No, specific rural exception sites should not be allocated

3 Reps

Agree 2 Disagree 1

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

No points made

Option 52

Yes, urban Greenfield sites with a much higher percentage of affordable housing specifically to meet the need for affordable housing should be allocated to be brought forward on a phased basis

7 Reps

Agree 3 Disagree 5

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- Suggest 50:50 ratio
- It will help meet local needs and district targets.
- Development costs generally lower on Greenfield sites compared with brownfield ones.

Disagree

- Provision of affordable housing should not be a reason for going against existing countryside policies.

Other Points

- PPS3 states that the Council is required to make an assessment of the likely economic viability of land for housing within the area, taking into account any risks of delivery when assessing the overall target for the amount of affordable housing to be provided. The economic viability of setting thresholds also needs to be considered as well as the impact on housing delivery and the need to create sustainable communities. Economic viability will influence the amount of affordable units provided.

Option 53

No, urban Greenfield sites with a much higher percentage of affordable housing specifically to meet the need for affordable housing should not be allocated to be brought forward on a phased basis.

4 Reps

Agree 4 Disagree 0

****Reps from Edward Gittens on behalf of Mr & Mrs Fancy, Messrs Hosford & Raymond Banning have not been included as they contradicted each other and it was unclear which option they supported.**

Key Points Made

Agree

- This would not achieve a sustainable, mixed community. It should be mixed with market housing.

GYPSIES AND TRAVELLERS

Question 4

How can the requirement to provide sites to meet the needs of gypsies and travellers in the District best be met?

4 Reps

Key Points Made

- Need to take into account the recently published research report 'Preparing Regional Spatial Strategy reviews on Gypsies and Travellers'. Report suggests 15 additional permanent pitches within the Braintree District up to 2011. These should be provided.
- Before Allocations document is adopted (2010) the Core Strategy should set out transitional/interim measures to make provision for immediate and urgent needs and unexpected demand. These needs comprise caravans currently without authorisation, needs to cater for family formation, overcrowding.
- Core Strategy should set out criteria for the location of Gypsy and Traveller sites to guide the allocation of sites in the Allocations document. Criteria should be fair, reasonable, realistic and effective in delivering sites.
- Current criteria are unacceptable and contravene guidance in Circular 1/2006.
(1) First criterion is capable of being interpreted as a blanket ban on site development in locally designated areas. The Circular states that local designations should not be used in themselves to refuse planning permission.
(2) Limitation to families with local connections & limited consents are unacceptable. (3) The size limitation is arbitrary.
- The Circular sets out a series of transitional measures on page 11 which includes the separate DPD in advance of or in parallel with the development of the Core Strategy. It is suggested that Braintree takes this approach to ensure timely site provision. In any event the Core Strategy should set out how timely provision will be made so that Government target of substantial provision of sites with planning permission in a 3-5 year period is met.
- Consultation with Gypsies and Travellers asking them how they can be accepted into community and what they require from us to accept them for their chosen lifestyle.
- Need to address the issue of those cramped in unauthorised manner on land not owned by Gypsies and Travellers, i.e. transit provision.
- Essex wide study has been superseded by work aimed at reconciling GTAAs (Preparing Regional Spatial Strategy review on Gypsies and Travellers, DCLG March 2007) which states 15 pitches are needed for the District. The minimum stated should be reviewed in light of this work and the revision of the Regional Spatial Strategy.

Question 5

What criteria are the most important to guide the location of sites?

7 Reps

Key Points Made

- As regards to criteria to guide the location of sites – should refer to Circular 1/2006 and PPS3.
- Criteria should enable sites at a point of adoption to be available, suitable and achievable.
- The most important criteria are (1) not in a special landscape area etc, (2) convenient and safe access, (3) satisfactory access to local services.
- Sites must not be located in flood risk areas. PPS25 classifies these sites as ‘Highly Vulnerable’ and they are not appropriate in Flood Zone 3. They are only appropriate in Flood Zone 2 (medium risk zone) where the Sequential and Exception Tests are passed. Ecological considerations must also be taken into account.
- Ensure gypsies and travellers are aware of their next generations being included in medical centre registration, schooling and further education.
- Not to cause blight on landowners who pay Council Tax.
- Add the following to first criterion: “sites will not be permitted in a special landscape area, conservation area or other areas of historic interest, nature reserve, Local Wildlife Site, Regionally Important Geological Site or within or adjacent to a Site of Special Scientific Interest”. Local Wildlife Sites hold a very important component of the District’s total biodiversity and geodiversity asset.

ECONOMIC DEVELOPMENT

Option 54

Yes, existing employment areas should be protected from development of other uses

15 Repts

Agree 11 Disagree 4

Key Points Made

Agree

- This would be consistent with policy E2 of the Proposed Changes to the East of England Plan.
- This policy should be upheld to protect such sites from speculative development.
- Given the conclusions of the Mid Essex Economic Future's Study and the recommendations of the East of England Plan it is likely that Braintree District is going to find more employment land across the district.
- The opportunity to create further jobs should not be underestimated.
- It is appropriate and sustainable to maintain existing employment areas.
- Existing employment land should be protected as at present there is an imbalance between the number of jobs and the number of houses.
- Employment growth due to the effects of expansion at Stansted reinforces the fact that existing employment areas should be protected from other uses.
- Concern that Broomhills Industrial Estate may be used for housing. Would like it to be protected for employment land. Approx. 200 people are employed. Most of the businesses are small local firms.

Disagree

- It is important for the future growth of Haverhill that planning policies for the Haverhill Business Park are consistent with those in the St Edmundsbury Replacement Local Plan where it is identified as a general employment area.
- Some existing employment sites are not suitably located to meet modern employment needs.

- Braintree's future employment land needs have not been studied in detail & it is not clear whether currently committed land may, in the right circumstances, be released for other forms of development.
- To ensure previously developed land is developed in line with trajectories it should be considered whether sites for industrial or commercial use could be reallocated for housing.
- Allocations need to be appropriate to the needs of modern industry, especially B1.
- Existing allocations need to be assessed and alternative locations be identified or more flexibility given to permitting alternative or mixed uses.
- Sites should be reviewed and assessed on their merits relative to the commercial market demand, appeal, take-up and alternative use potential.
- There is a major shift from manufacturing to service industries so there would be no point in hanging on to manufacturing type sites which are no longer required.
- An employment land study would provide a detailed assessment of the market potential of existing employment areas, and could consider proposals for selective de-allocation of employment land to meet the wider objectives of the strategy.
- It is inappropriate to apply a blanket restriction on the use of employment land and policy should allow for account to be taken of individual site constraints & opportunities.
- There should be a shift towards mixed use. This would make the most efficient use of land.
- Option is contrary to guidance in PPS3 regarding setting out a strategy for the planned location of new housing. PPS3 states options may include re-use of vacant and derelict sites or industrial and commercial sites for housing or mixed-use areas.

Other Points

- Would support the provision of new employment areas as part of mixed-use schemes not only in the major towns but also within the larger villages where appropriate.
- New employment land should be provided across the district in a joint strategy with the dispersal of the future housing growth.
- Must have regard to flood risk. Local authority must apply the sequential test and, where appropriate the Exception Test to new developments.

- The balance between employment land and housing must be maintained and therefore this issue will be dependent on the evidence base.
- It is important that a homes-jobs balance is achieved. An overall alignment needs to be an objective of the Core Strategy.
- A review of existing employment commitments should be carried out with a view to accommodating alternative forms of development such as residential.
- Should new housing come forward, there should be employment opportunities in close proximity in order to reduce potential car commuting.
- A review of employment land should be undertaken as set out in 'Employment Land Review: Guidance Note' (ODPM 2004) to assess future demand, supply, suitability of sites, identify sites no longer suitable for employment uses.
- Need to try and reduce out-commuting. Could be assisted by improving existing employment areas and by creating new ones that the market can support.
- Proximity to Stansted and ports in the Haven Gateway means Braintree could attract UK headquarters of European firms.

Option 55

No, existing employment areas should not be protected from development for other uses

12 Reps

Agree 11 Disagree 1

Key Points Made

Agree

- Industrial area at Straits Mill, Convent Lane should be reallocated, as it is a constant irritant. It would result in an environmental improvement for the local population.
- Should be support for employment use of sites and premises in smaller communities. This would include promoting the re-use of farm buildings for employment use, though this should not be applied in a way that precludes other forms of development.
- Should be a more flexible approach attitude towards concentration of economic development on existing sites.
- Circumstances may change in respect of any given existing employment site. Redundancy and waste of land may be avoided by allowing alternative uses and development.

- Developed and under-used sites should be reassessed as they could be used more effectively for alternative and more appropriate/beneficial uses.
- Galleys Corner Special Policy Area could be better used, more intensively for a greater range of uses, including residential.
- Area needs to evolve.
- Where employment sites become underused or are no longer required for an employment use, policy should support an alternative use.
- Existing businesses/occupiers may require the release of capital from inefficient or poorly located site in order to facilitate a move/development of an alternative & more appropriate site.
- Independent review should be carried out to examine whether allocations can be justified.
- Other forms of development can be accommodated on existing allocated employment areas without having any impact on the provision of jobs or on the overall supply of employment land in terms of quantity, types, sizes and locations of sites.
- Retail can provide as many jobs as traditional employment uses. Policy needs to be flexible to facilitate this form of development.
- Under-used, vacant or derelict employment land should be redeveloped to provide more appropriate uses in relation to locational characteristics, market demand & economic growth in order to achieve sustainable growth.
- PPS 3 states strategies should consider whether sites that are currently allocated for industrial or commercial uses could be more appropriately allocated for housing.
- Redevelopment should be determined on a site-by-site basis.

Option 56

Yes, existing employment areas should be extended

9 Reps

Agree 9

Disagree 0

Key Points Made

Agree

- Policy E2 of the draft East of England Plan requires Local Development Documents to ensure that employment land is allocated to meet the job targets

in Policy E1 and the needs of the local economy as revealed by an up-to-date employment land review.

- Rapid housing growth in the District has not been matched by employment growth and resulted in out-commuting. PPS1 states that Development Plans should reduce the need to travel & bring forward sufficient land in appropriate locations to meet the expected needs for industrial, retail and commercial development.
- Extending employment areas would create more jobs, ensure that the economy of the area continues to grow, achieve a homes-jobs balance, reduce out-commuting, reduce carbon emissions, improve internal sustainability and increase community cohesion.
- An extension to the north-east of Springwood Industrial Estate would be an optimum location for employment land expansion.
- Opportunity to extend Bluebridge Industrial Estate in Halstead to the east to provide additional jobs in line with housing growth.
- Present employment areas should be retained and if possible extended to secure sustainable patterns of development as they are often well related to the public transport network.
- The District may face difficulty in meeting its likely employment needs to 2026. There may be insufficient urban and brownfield sites to cater for future demand. Land at North East Witham would be a sustainable location to accommodate employment growth and would have the least impact in accommodating Greenfield growth.

Option 57

No, existing employment areas should not be extended

4 Reps

Agree 2

Disagree 2

Key Points Made

Agree

- Consideration should only be given to areas which have easy access to major roads so that service lorries and traffic are kept out of the town.
- Eastways along A12 towards Kelvedon – no further than Burghey Brook Poultry Farm.

Disagree

- The extension of existing, successful employment areas in sustainable locations should be promoted.

- Not extending existing employment areas would restrict the potential for growth in the local economy. This would create a job deficit in the District and encourage out-commuting. It would also add to carbon emissions and reduce community cohesion.

ISSUE 19

OPTION 58 – Yes, one or more locations should be identified for a new strategic employment area or business park of 10 hectares.

11 Representations

1 – Disagree

10 – Agree

KEY POINTS

- Rapid housing growth in the District in the last ten to fifteen years has not been matched by employment growth.
- The job density is lower in Braintree District than the regional or UK average.
- There has been an increase in out commuting the majority of which is by car. More jobs in Braintree will reduce out commuting.
- The conclusions of the Economic Study indicate that there is sufficient demand to extend existing employment areas.
- Reducing out commuting will reduce carbon emissions and ease congestion on A120 and A12.
- A new strategic employment area would provide sufficient employment land to reduce the shortfall in jobs in the District.
- The land northeast of Springwood Industrial Estate would be appropriate for a strategic employment area.
- PPS 1 states that Development Plans should reduce the need to travel and bring forward sufficient land in appropriate sustainable locations to meet the expected needs for industrial, retail and commercial development.
- New strategic employment provision must include the needs of Stansted Airport.
- A strategic employment area should be located within a new settlement between Great Dunmow and Braintree.
- St Edmundsbury Borough Council and Braintree District Council should work together to identify a further strategic employment site in Haverhill.

- Capacity exists at Witham for a new strategic employment site.
- The Great Notley Campus has the ability to meet Braintree's employment growth targets.
- The Skyline 120 Business Park is likely to be fully developed in the next 3 to 4 years, emphasising the importance of identifying a new strategic employment site.
- It is important to maintain a balance between jobs and housing.
- New employment areas can be provided as part of mixed use planned urban extensions at Braintree to the south/south west and a urban extension to the west of Witham.
- Locate a new strategic employment area or business park in a mixed-use development as part of a new settlement at Marks Tey.

OPTION 59 – No, one or more locations should not be identified for a new strategic employment area or business park of 10 hectares

5 Representations

2 – Disagree

3 - Agree

KEY POINTS

- Seek to protect suitable existing employment sites and identify new opportunities for employment development.
- The proximity of Stansted Airport and its planned expansion and the improvements to the A120 will have a beneficial effect on economic development in Braintree town.
- There is a need for the delivery of employment sites that are less than 10 hectares in area.

QUESTION 6 – How can the number of jobs in the District be increased to secure a better balance between houses and jobs?

9 Representations

3 – Agree

6 – No Opinion

KEY POINTS

- Opportunities should be made for high quality employment space to attract new and expanding businesses.
- Provide sufficient employment space to attract new businesses to Braintree i.e. identify a new strategic employment area.
- The expansion of Stansted Airport will enhance the economic attractiveness of the general A120 sub region.
- Sustainability objectives should be implemented district wide not just urban areas.
- Unless priority is given to job creation then levels of out commuting will rise with the large number of new housing units that the District is required to absorb.
- To generate the maximum number of new jobs in the District in locations which will counteract the need to commute outside the District.
- To maximise the number of new jobs in conjunction with the provision of new housing in order to offer local work opportunities as an alternative to commuting.
- Need to address the accessibility to employment, over concentration of growth in urban centres is not necessarily the most sustainable strategy.

ISSUE 20

OPTION 60 – Yes, currently used or vacant employment sites can be allocated or redeveloped for other uses

14 Representations

3 – Disagree

11 – Agree

- Release of redundant employment land to other uses should only be considered where the District Council has ensured that there is sufficient

employment land this could be demonstrated as part of Employment Land Review.

- Employment land should be retained for similar uses before it is released for housing.
- Opportunities for economic development should be supported across the district, including support for employment use of sites and premises in the smaller communities.
- Galleys Corner Special Policy Area has potential for uses other than those currently permitted by policy RLP58, and/or greater site coverage than is currently limited to 20%.
- Consideration should be given to flood risk. PPS25 advocates a risk based approach and requires the Local Authority to apply the Sequential Test, and where appropriate the Exception Test, to any new developments.
- Contamination will be an environmental consideration where the redevelopment of brownfield sites is proposed. As a minimum a desktop study should be completed and submitted to the Local Planning Authority in accordance with PPS23.
- Some brownfield sites may provide valuable habitat for nationally/locally rare invertebrate species. An ecological assessment of the District would assist in identifying these areas.
- Potentially new companies need to be made aware of vacant locations and offered an incentive to utilise with a view to permanent use.
- Some existing and/or allocated employment sites may not be suitably located to meet modern employment needs, therefore redevelopment for alternative uses might be appropriate.
- Employment sites are often well related to the public transport network, as part of the endeavour to secure sustainable patterns of development, such employment areas should be protected from development or other uses.
- The ex-government building site along Panfield Lane in Braintree is an opportunity to redevelop a vacant employment site for residential uses. The site comprises of outdated office premises that are surrounded by low sale employment uses, housing and open space.

OPTION 61 – No, currently used or vacant employment sites cannot be allocated or redeveloped for other uses

5 Representations

1 – Disagree

4 – Agree

- Paragraph 38 of PPS3 recognises that Local Development Documents should set out a strategy for the planned location of new housing, which contributes to the achievement of sustainable development. Re use of vacant and derelict sites or industrial and commercial sites to provide housing as part of mixed use town centre development should be considered as an option.

QUESTION 7 – How can the use of vacant or underused factories at Silver End and Gt. Yeldham be promoted?

1 Representation

1 – Agree

- Rents should be reasonable to encourage companies to locate here. More than one company should occupy the factory to avoid detrimental effect on the local population if a company closes down.

ISSUE 21

OPTION 62 – Yes, the use of unused and underused farm buildings for employment should be encouraged

9 Representations

7 – Agree

1 – Disagree

1 – No Opinion

- The results of the Strategic Environmental Assessment / Sustainability Appraisal should be considered.
- The capacity of local infrastructure to support employment use should be considered.
- Opportunities for economic development should be supported across the district including support in the smaller communities. This would include promoting the reuse of farm buildings for employment use however this should not be applied in a way that precludes other forms of development.
- The suitability of farm buildings for conversion to employment use should be considered.
- Conversion of underused farm buildings to employment use may lead to additional out commuting from towns into the countryside, this may not be a

sustainable solution. However, the conversion of such buildings may promote local job opportunities.

- Ecological surveys should be carried out on any proposals to develop unused or underused farm buildings.

OPTION 63 – No, the use of unused and underused farm buildings for employment should not be encouraged

1 Representation

1 – Disagree

ISSUE 22

OPTION 64 – Yes, additional land should be allocated for employment in rural areas

15 Representations

3 – No opinion

1 – Disagree

11 – Agree

- New employment land should be situated adjacent to existing rural settlements such as Earl Colne, which would be well related to the existing built form of the settlement.
- Employment land in rural areas would provide employment opportunities for local residents.
- The proposed development at Boxted Wood, East of Stebbing would include the provision of employment land.
- Employment development areas should be well served by public transport, walking and cycling, thereby reducing the need to travel by car.
- The 5 secondary centres should be the focus for possible increased allocations for employment.
- Small-scale allocations for employment land can enhance the local economy.
- An urban extension at Coggeshall near Tey Road would represent a sustainable approach for an allocation of employment land.

- The function of settlements in rural areas and what their needs are should be considered to determine what benefits development can bring.
- There is a concern in the role of such development in enhancing the landscape through the high quality of its design and setting and improving access to the countryside.

OPTION 65 – No, additional land should not be allocated for employment in rural areas

6 Representations

4 – Disagree

2 – Agree

- Significant employment growth should occur within and adjacent to the three existing market towns within the District.

TRANSPORT

QUESTION 8 – What measures are required to promote public transport, cycling and walking and to discourage the use of motor vehicles?

12 Representations

3 – Agree

1 – Disagree

9 – No Opinion

- Core Strategy, Development Control and other DPD policies should seek to protect and enhance the network of footpaths, bridleways and cycleways. These should be protected from obstructive development and non-compatible neighbouring uses.
- Developer contributions can promote alternative modes of transport through minimising car parking provision and providing cycle facilities.
- DPDs should recognise links to other key documents such as local transport plans.
- Policies should identify potential for new and multi access recreational routes in the countryside.
- Urban thoroughfares should be made safer for cyclists and pedestrians.
- The existing cycle network in the district should be improved to promote cycling.

- Rural public transport and slow modes should be improved to improve accessibility of rural communities to employment and services and highway safety in rural communities.
- The proposed sustainable development at Boxted Wood, East of Stebbing would allow footpaths and cycleways to lead the transport hierarchy within the settlement.
- For new development proposals it is essential that measures to encourage the use of more sustainable modes of transport be in place prior to occupation.
- The availability of car parking and parking pricing structure; travel plans; car-sharing initiatives can influence car use.
- Bus services from Witham to Stansted should be improved.
- The evidence base does not contain any transport based or related studies. Without supporting evidence it is difficult to evaluate or support emerging options to achieve this priority.
- The spatial implications of improvements at adjoining district transport facilities i.e. a new railway station and additional park and ride sites in Chelmsford should be considered and reflected in the evidence base.
- The A120 – A12 link east of Braintree should be given a high priority to create an effective Braintree-Colchester axis. It must be promoted as a public transport corridor to achieve modal shift to buses and trains.
- Public transport is better in the larger towns of Witham and Braintree, therefore new development should be concentrated here. This would be in accordance with PPS 3 and PPG 13.

QUESTION 9 – What should the priority be for road improvements in the District?

8 Representations

2 – Agree

1 – Disagree

5 – No Opinion

- The provision of a dual carriageway from A120 (Braintree) to (Marks Tey) A12.
- The A12 and A120 are considered as of primarily regional importance.
- The A12 widening between Chelmsford and Colchester.

- In December 2006 the Government's Proposed Changes to the Draft RSS was published. Policy T15 Transport Investment Priorities of the proposed changes included a list identifying areas likely to come under increasing transport pressure as a result of underlying traffic growth. The London to Ipswich Corridor including Chelmsford and Colchester urban areas was identified.
- Documents should have a clear policies setting out the purpose and the need of the improvements. Consideration should also be given to the wider network and the implications for the district.
- Ensuring that junctions are kept clear of parked vehicles with use of yellow lines where required.
- The A1017 should be included in the main road network, in recognition of its wider strategic and economic importance. An examination of improvements that are required along this route to relieve settlements of through traffic should be carried out.
- The congestion at Galleys Corner Roundabout should be addressed.
- The Halstead by pass should be constructed to relieve congestion and to improve air quality within the built up area and to strengthen the economic potential of the town.

QUESTION 10 – What improvements are required to bus and rail services in the District?

11 Representations

6 – Agree

5 – Disagree

- There should be a plan to create an integral interchange for bus and train in Braintree.
- The bus park in Braintree is underused and too far from the rail station.
- Improvements to the bus service from Braintree to Stansted.
- A proposed rail link from Braintree – Stansted – Cambridge. This would ease through traffic congestion, particularly haulage.
- Bus links to rural areas should be improved.
- Improved rail service from Braintree.
- Public transport needs to be cheaper and more reliable.

- Improvements to bus service connections and parking provision at key train stations would be a catalyst for transport modal shift.
- A new settlement at Marks Tey would provide a significant focus for transport interchange on a sub regional basis, with benefits to Braintree, Colchester and the Haven Ports to the east.

ISSUE 23

OPTION 66 – Yes, there is a need for additional car parking in town centres and at the main railway stations

10 Representations

10 – Agree

- Consideration must be given to reducing traffic congestion in the respective station environments when the siting of new parking is decided.
- There is a need for additional car parking in town centres at Witham, Kelvedon and Hatfield Peverel railway stations.
- New additional car parking should be accessible without a need to travel through the town and village centres.
- A comprehensive review should be undertaken of car parking facilities and all major transport interchanges such as railway stations/bus station etc.
- A car parking strategy should be developed for the larger towns. This is necessary to ensure that the retail offer, vitality and viability of the town centres can be maintained and enhanced.
- The capacity of the Cut Throat Lane car park, Witham should be increased with access via Morrison's Supermarket.
- Free of charge short stay spaces should be provided for stays up to ½ hour.

OPTION 67 – No, there is not a need for additional car parking in town centres and at the main railway stations

2 Representations

1 – Agree

1 – Disagree

QUESTION 11 – What improvements are required to public transport between the District and Stansted Airport?

4 Representations

1 – Agree

1 – Disagree

2 – No Opinion

- Policy T5 of the Proposed Changes identifies Stansted Airport as Regional Transport Node. This policy refers to a number of potential measures in these areas including facilities to support high quality interurban bus/coach bus services.
- A rail link between Braintree and Airport.
- Improve links between villages such as Maldon through Witham through Braintree and onto Stansted with communication links between buses.

QUESTION 12 – What innovative ideas are there for improving public transport in rural areas?

4 Representations

3 – Agree

1 – No Opinion

- Policy T6 of the Proposed Changes supports the provision of public transport, where viable to improve accessibility to services. It also makes reference to innovative approaches to local transport provision including community based transport initiatives.
- Community buses to and from stations should be actively promoted such as the service from Coggeshall to Kelvedon.
- Communication links between buses to ensure that there is a regular service

TOWN CENTRES AND RETAILING

ISSUE 24

OPTION 68 – To contain Braintree town centre within its existing boundaries

5 Representations

5 – Agree

- Policy SS6 of the Proposed Changes requires Local Development Documents to define the role of town centres and to allocate land to meet the full range of identified needs for town centres. Additional land allocated for retail development within town centres should be consistent with this policy.
- Braintree town centre should remain within its existing boundaries to ensure the redevelopment of existing sites to increase intensification and compaction of this area to ensure an effective and efficient use of land.
- The key recommendations of GVA Grimley Study for Braintree town centre are supported.
- The promotion of better linkages from High Street through to George Yard shopping centre should be taken forward to improve the viability of the shopping area for the benefit of the town.
- Out of town provision threatens to undermine the role of the historic centre.
- An investment in the town centre environment is welcomed.

OPTION 69 – To identify a site adjacent to Braintree town centre for additional retail floor space, particularly for comparison shopping

4 Representations

2 – Agree

2 – Disagree

- A study should be undertaken of sites that maybe suitable for the expansion of comparison shopping within the existing town centre.
- Expansion of out of town developments would exacerbate car dependency in and around the town.
- Additional retail floor space should not be of a regional or sub regional scale for consistency with policy E6 of the Proposed Changes.

- The proposal of a specific site is contrary to the approach set out in PPS12. The Core Strategy should confirm its adherence to national guidelines concerning retail sites as set out in PPS6.
- The location of a new site to accommodate additional floor space may be difficult with environmental planning, infrastructure and landownership constraints.
- Any new proposal for additional floor space would need to ensure that there are appropriate linkages to existing shopping areas and George Yard.

OPTION 70 – To identify Braintree Freeport and Braintree Retail Park for further expansion

4 Representations

2 – Agree

2 – Disagree

- Additional retail floor space should not be of a regional or sub regional scale for consistency with policy E6 of the Proposed Changes.
- Any proposed expansion to Freeport and Braintree Retail Park would need a through assessment to determine whether there would be impact on the town centre vitality and viability.

OPTION 71 – To identify other out of centre sites around Braintree for additional comparison goods floorspace

6 Representations

3 – Agree

3 – Disagree

- A district shopping centre could be incorporated in a new settlement between Great Dunmow and Braintree.
- The Core Strategy should confirm its adherence to national guidelines concerning retail sites as set out in PPS6.
- Out of town shopping centres would be contrary to the recommendations contained in the GVA Grimley Study.

ISSUE 25

OPTION 72 – To contain Halstead town centre within its existing boundaries

5 Representations

4 – Agree

1 – No Opinion

- All possible developments should be made on existing built up areas, especially for retail before approval is given for use of green fields e.g. Tesco proposal.
- Retail policy should seek to protect the existing floorspace and core shopping areas and allow for some growth of new retail especially for small unit shops and to allow for the development of a speciality-shopping sector.

OPTION 73 – To identify land to the east of Halstead High Street for additional convenience shopping

5 Representations

3 – Agree

2 – Disagree

- The Coop Food Store, Weavers Court is vulnerable to new food store development. The Coop Food store should be supported to improve performance and to enhance its role in the viability and vitality of the town centre.
- Land to the East of High Street should be promoted primarily for comparison goods floorspace to improve the towns' role and profile for specialist shopping in Halstead town centre.
- It is inappropriate for the Core Strategy to direct development to specific locations within the District's town centres. This approach does not accord with PPS 12.

OPTION 74 – To identify another site adjacent to Halstead town centre for additional convenience shopping

5 Representations

3 – Agree

2 – Disagree

- Halstead town centre has very limited capacity for convenience and comparison goods floorspace and promotion of additional convenience shopping in the form of a new food store would effect the vitality and viability of the existing convenience offered in Halstead.
- The provision of a further food store at the northern or southern end of the town will not provide any additional vitality to the town centre. These areas are mainly occupied by non-retail uses and sites for a food store in either location will not provide any additional vitality to the town centre.
- The GVA Grimley Study confirms that there is insufficient convenience shopping capacity to support additional provision of a large supermarket.

OPTION 75 – To identify an out of centre site around Halstead for additional convenience shopping

4 Representations

2 – Agree

2 – Disagree

- Out of town shopping centre would be suitable for additional convenience shopping.
- The provision of a further food store beyond the town centre will not provide any additional vitality to the town centre and would be contrary to regional planning policy and government advice and sustainability principles.

ISSUE 26

OPTION 76 – To contain Witham town centre within its existing boundaries

7 Representations

6 – Agree

1 - Disagree

- Witham needs to retain its competitiveness with other centres and therefore, the town centre should be actively supported.
- Measures to include accessibility and environmental enhancements.
- The ability of Witham to retain and improve its retail offer would be significantly enhanced by the allocation of additional strategic scale housing and employment development.

OPTION 77 – To identify the Newland Precinct for comprehensive redevelopment

7 Representations

1 – Disagree

6 - Agree

- Policy SS6 of the Proposed Changes of the Draft East of England Regional Plan requires Local Development Documents to define the role of town centres and to allocate land to meet the full range of identified needs for town centres. Additional land allocated for retail development should be consistent with this policy.
- Newland Precinct is overdue for redevelopment. A scheme to incorporate the adjacent Newlands car park (as a low rise multi storey car park) and a cinema would be favoured.
- The proposal of a specific site is contrary to the approach set out in PPS12. Individual sites should be considered at a more appropriate stage in the LDF process.
- Proposals for comprehensive redevelopment should ensure there are excellent linkages to Newland Street to ensure its function as a prime shopping area can be enhanced.

OPTION 78 – To identify a site adjacent to Witham town centre for additional convenience shopping

6 Representations

3 – Agree

3 – Disagree

- Policy SS6 of the Proposed Changes requires Local Development Documents to define the role of town centres and to allocate land to meet the full range of identified needs for town centres. Additional land allocated for retail development within town centres should be consistent with this policy.
- Out of town stores should be resisted.
- Land currently unused immediately behind Newland Street (south side) would be suitable land for development as small retail outlets and would be within the present town centre-shopping environment.
- The proposal of a specific site is contrary to the approach set out in PPS12. Individual sites should be considered at a more appropriate stage in the LDF process.

- GVA Grimley Study recommendations indicate there would need to be caution on such a proposal and that impact and trade draw would need to be considered carefully.

QUESTION 13 – Are there any other options?

6 Representations

4 – No Opinion

1 – Disagree

1 - Agree

- It is disappointing that the Issues and Options Document does not highlight the importance of shops in villages and local centres to local communities. The core strategy should set out support for the retention of such facilities and their improvement and enhancement.
- There is a recognised absence of a specialist discount supermarket in Braintree, surprising for a town of this size and scale. People are forced to travel longer distances than necessary to obtain discount groceries.
- Policy should recognise that an out of centre location might be appropriate as an assessment of potential retail sites on the edge of Braintree Town Centre demonstrates that there are none viable or suitable for this form of development.
- The Ernest Doe and Sons Ltd site at Rayne Road in Braintree is an appropriate site where the identified need for convenience goods floorspace can be met. This is a sustainable location for a discount supermarket.
- We consider that the Core Strategy should contain realistic assessment of need for retail development taking account of both quantitative and qualitative considerations, which should be informed by an up to date Retail Study. The existing Retail Study does not identify capacity for Witham.
- The Core Strategy for Braintree should reflect the approach set out in PPS6 that a sequential test should be applied in the allocation of sites for retail uses.
- Morrisons supermarket should be identified and allocated as an existing retail designation.
- Policy E5 focuses major new retail development in the Regional Centres and Major Town Centres as set out in the policy. There is a need for clarification of the term ‘major town centre’ as described in the study as opposed to the retail hierarchy set out in policy E5.

- A policy that allows retail comparison warehouse development and convenience shopping to be accommodated within Maltings Lane should be implemented.

CARBON EMISSIONS AND RENEWABLE ENERGY

OPTION 79 – Yes, the council should increase the proportion of a building’s needs to be met by low carbon and renewable sources of energy to 15%

12 Representations

3 – Disagree

9 - Agree

- Policy ENG1 of the Proposed Changes document requires Local Planning Authorities to identify ambitious but viable proportions of energy from substantial development in their development plan documents from on site renewables and decentralised low carbon energy sources. Increasing to 15% would be consistent with these proposed changes.
- The proposed target of 15% should be investigated to see how this could be achieved through the Core Strategy.
- An approach in line with central Government objectives as set out in ‘Building a Greener Future: Towards Zero Carbon Development’ would be more appropriate as it is unreasonable to expect all developments to be carbon neutral.
- The use of a ‘blanket policy’ to provide renewable technology should not stifle regeneration and development. Such rigid requirements may make some schemes unviable and as a consequence important housing sites may not come forward to be developed.
- The Merton Rule is probably the most well known example of a policy within an UDP which states; The council will encourage the energy efficient design of buildings and their layout and orientation on site. All new non-residential development above a threshold of 1,000 sqm will be expected to incorporate renewable energy production equipment to produce at least 10% of predicted energy requirements.
- Merton proposes a revised policy wording in the draft LDF: The council will require all development, either new build or conversions, with a floorspace of 500m² or one or more residential units, to incorporate onsite renewable energy equipment to reduce predicted CO₂ emissions by at least 10%.

OPTION 80 – No, the council should not increase the proportion of a building’s needs to be met by low carbon and renewable sources of energy to 15%

8 Representations

1 – Disagree

7 – Agree

- The draft supplement of PPS1 ‘Planning and Climate Change’ states that local planning authorities require that a standard of 10% of buildings needs to be met by the low carbon and renewable sources of energy. This document is in draft therefore it would be premature at this stage to identify any increase in this figure.
- Setting standards for every element of the development, including the use of sustainable materials, may ultimately prove too restrictive to developers and designers.
- There are occasions when new technologies may result in environmental issues, such as visual impact in sensitive areas. There should be restrictions for properties in conservation areas and listed buildings rather than a ‘blanket ban’.
- The Local Planning Authority must understand the practicalities of any renewable energy options and the financial and cost implications of increasing them.
- An increase of 5% may have an adverse effect on the development industry in terms of being able to deliver the target and may therefore discourage inward investment within the Borough.
- The relationship between the Code for Sustainable Homes and planning policies are being interpreted in an inconsistent way throughout England. The Home Builders Federation have signed to a deal with the Government to achieve Carbon Neutrality within the next 10 years. Local planning authorities should sign this to achieve consistency and certainty with regard to long term investment in new technologies and skills essential to deliver Carbon Neutrality in the 10-year time span envisaged.
- Carbon Neutrality is best achieved through Building Regulations not via unsubstantial planning polices. Planning policy should be concerned with innovations such as wind turbines and other energy generation development and should not seek to control the power within dwellings or the fabric of the buildings.

ISSUE 28

OPTION 81 – Yes planning permission for extensions should require the energy efficiency of the building to be extended to be improved

5 Representations

5 - Agree

Only where practical.

OPTION 82 – No, planning permissions for extensions should not require the energy efficiency of the building to be extended to be improved

8 Representations

1 Disagree

7 Agree

This is not a local issue and therefore such matters should be decided at Government level.

The Home Information Packs (HiP) due to have come into force on 1st June 2007 but have now been delayed until August 2007 require homeowners when selling their properties to provide Energy Performance Certificates which provide key information about the energy efficiency/carbon performance of the home. All developments subject to Building Regulation approval will be required to meet energy efficiency standards.

Issues and options representations

Issue 29 – The government is working towards a target that all new homes should be zero carbon producing by 2016. Should the Council seek such developments ahead of this date?

Option 83 – Yes 10

Option 84 – No 9

Key Points Made

In favour

- The majority of supporting comments have reservations on this option. Prescriptive standards for everything would be too restrictive. Building regulations should be the primary source of delivering the 2016 target. Restrictions on certain types of energy generation on LB's and conservation areas would be supported. The council should take a proactive approach in

identifying appropriate areas for energy generation to reduce uncertainty and speed up the planning process.

- The core strategy should include policies on energy and water efficiency, waste minimisation and surface water management. The use of grey water systems should also be encouraged.
- Any targets should reflect government objectives.

Key Points Made

Against

- The Council should not proceed in advance of government plans to have zero carbon new homes by 2016. By doing so you do not allow technological advances to be come cost effective which could impact the housing market and stifle development in general. Also by providing a blanket policy you would make certain sites un developable especially were contamination and affordable housing are also an issue.
- The issue should not be addressed at the local level but by government so a consistent approach is taken in all Districts. Multiple different targets could undermine the governments overall objective and hinder sustainable development.
- Carbon neutrality is best achieved through building regulations rather than unsubstantiated planning policy. Also policy should be prescriptive and favour one technology over another. Planning policy should be solely concerned with removing barriers to energy generation policies rather than the use of energy or the materials used in the home.
- Planning Policy should not duplicate national policy.
- It needs to be recognised that if carbon emissions are to be tackled then emissions from the existing housing stock need to be addressed.

Other points made

- That the proposed sustainable new community at Boxted Wood East of Stebbing would provide potential for carbon neutral development.

Issue 30 – For certain sites it may be difficult to develop zero carbon homes, due to geographical factors or environment sensitivities, should the Council be identifying sites for localised renewable energy and combined heat and power communal systems so as to reduce reliance on the national grid?

Option 85 – Yes 9

Option 86 – No 3

Key Points Made

In Favour

- It is important for new development to reduce its carbon footprint.

Key Points Made

Against

- Standards for every aspect of a development could ultimately be too restrictive for designers and developers. Building regulations should be used to comply with best practice and standards.
- It may not always be advisable or practical to make alterations to existing homes and businesses and may also not be possible to do so in new developments.

Other Points Made

- Alternative energy supplies are included in the Rivenhall Country Park proposals (as well as education/interpretation for visitors on the subject).

Questions 14 – What else could the Council do as local planning authority to reduce carbon emissions and increase renewable energy generation?

- New technologies should be embraced, demonstrative project could be provided at Riven hall County Park, a positive approach to the reduction of car travel and travel behaviour initiatives, a policy against light blight and subsidies for solar and wind power. Any policies must be based on evidence. Also the commentary is too technical and needs specific measures to reduce carbon emissions, also consider working with neighbouring authorities.

Issue 31 – Do you think that solar panels and other renewable technologies should be allowed on listed buildings and in conservation areas (Subject to structural capabilities)?

Option 87 - Yes

Option 88 – No

Key Points Made

In favour

- Only if not visible to passers by and subject to being able to complement the character of the building without spoiling the appearance or historic fabric of the building. A sensitive approach should be used.

Key Points Made

Against

- Solar panels and renewable technologies such as wind turbines on buildings provide minimal energy gain. In conservation areas or on listed buildings their use would be unacceptable.
- This matter is being addressed by government and should not be dealt with locally through the core strategy.

Other Points Made

None

Issue 32 – Should the Council identify potential sites for the development of large scale wind turbines in the form of an opportunities map for the District, based on planning and technical suitability?

Option 89 – Yes (10)

Option 90 – No (5)

Key Points Made

In favour

- In general terms there is support for renewable energy but are concerned about setting standards where standards already exist (i.e. Building regs) and any potential impact on the environment whether natural or built and any cross boarder impacts as well. It was also suggested that waiting for guidance or recommendations from central or regional government would be a better approach. It was also mention that this approach could be a step in the right direction.

Key Points Made

Against

- Not unless required to do so by national policy.

Other Points Made

None

Issue 33 – Should the Council set sustainable materials standards for new development?

Option 91 – Yes (11)

Option 92 – No (5)

Key Points Made

In favour

- In general terms there is support for renewable energy but are concerned about setting standards where standards already exist (i.e. Building regs) and any potential impact on the environment whether natural or built.
- A policy requiring all new developments to meet the standards set out under the code for sustainable homes and for non residential developments to meet “very good” under BREEAM.
- In general the majority of comments are in favour of having standards but suggest using other standards rather generating our own.

Key Points Made

Against

- It is not appropriate for the Council to set its own standards as they are already set out elsewhere.

Other Points Made

None

Issue 34 – Should the development plan include other measures for climate change mitigation and adaptation and if so what should they be?

Option 93 – Yes (9)

Option 94 – No (4)

Key Points Made

In favour

- Climate change needs to be made more explicit and reference made to various standards which should be adhered to such as BREEAM, SUDS and the code for sustainable homes. Local Development Documents should minimise or avoid climate change and reduce the carbon footprint and should also include SUDS. Water efficiency should be maximised through the Core Strategy and the use of appropriately worded policy should set clear targets based on national targets on water efficiency.
- Policies should discourage development in flood risk areas, encourage greater water efficiency, reduce water pollution. Buildings should be assessed before demolition to see if they can be re-used.

Key Points Made

Against

- This is not a local issue and should be decided at a national level. In general terms there is support for renewable energy but are concerned about setting standards where standards already exist (i.e. Building regs) and any potential impact on the environment whether natural or built and any cross boarder impacts as well.

Other Points Made

- A proposed new sustainable settlement at Boxted Wood would allow for maximum use of bio-mass technologies to power the settlement. Such innovative, sustainable and renewable energy measures, as these should be encouraged.

Issue 35 – Is there a need to provide more outpatient services and other higher-level health services locally and if so how should this be done?

Option 95 – Yes (12)

Option 96 – No (0)

Key Points Made

In favour

- Braintree's increasing population requires a general hospital as the one in Chelmsford is too far away especially for the elderly. Access to services is essential in rural areas. Services should be provided in towns such as Witham due to its size and to reduce the need to travel. Existing services such as those

in Halsted should be retained and the use of local services should be encouraged.

- Clarification page 7 paragraph 2.7 requested.

Key Points Made

Against

None

Other Points Made

- The proposed sustainable new community at Boxted Wood, East of Stebbing proposed by Galliard Homes would allow purpose built health and recreation facilities to serve the new community close to residential development.

Question 15 – What further measures can be carried out to improve community safety?

- Higher visibility policing and more police in the evenings as well as enforcement of speed restrictions. Re-development of vacant/derelict or underused sites in prime locations along key routes to more appropriate uses where safety can be improved through design and crime hotspots eliminated.

Question 16 – What measures can be taken to improve education and skills training in the District.

- Suggestions include public, private and voluntary sectors to support training in the areas and use of the community college and private sector to provide training to enhance opportunities and facilities to local people. Also better advertising of available courses. Other points made include the potential opportunities of a community at Boxted Wood and a 1Rivenhall Country Park.

Question 17 – What are the priorities for improving sports and leisure facilities in the District?

- The undeveloped site at Straits Mill Convent Lane could be redeveloped for further recreational uses by relocated the industrial area and other local improvements.
- Recreation and leisure facilities should be provided within urban areas for sustainability reasons.
- Sites should be identified across the district and existing facilities expanded in line with housing growth.
- An up to date assessment of open space, sport and recreation (PPG17) to inform priorities and to support core strategy policies, use of regional and county strategies as part of the evidence base to inform the preparation of the LDF.

- Need to bring forward additional inland water for recreational purposes to relieve pressure from coastal areas (With reference to a Rivenhall County Park).
- Clubs should be allowed to release development potential of land to allow for expansion and investment in facilities to ensure future survival/improvements and modernisation.
- Youngsters should be encouraged into sport not crime.
- The issues associated with Brampton Sports Centre in Witham and the need to update it should be included.
- There should be no erosion of current open space/Playing fields (With reference to Castle Hedingham).
- Improvements are important to support and encourage the promotion of health and well being in the District for residents and visitors (with reference to a Rivenhall County Park).
- Halstead Town Football Club – Support needed for improvements, which the LDF should encourage to enable the club to continue to fulfil its role within the local community and improve facilities so more people and age groups can be catered for. This should be a priority.
- Design should be a priority for recreation and semi natural areas so as to protect wildlife potential.

Issue 36 – Phasing of Development – Should the development of housing be phased to enable a continuous supply through out the plan period and to ensure that the provision of employment, services, facilities and infrastructure keeps pace with housing growth?

Option 97 – Yes

Option 98 – No

Key Points made

In Favour

- There is a general consensus in favour of phasing housing development as development could outstrip infrastructure capacity. Provided there is flexibility when housing is not being delivered at the required rate and that the phasing is linked to infrastructure delivery. Phasing should not effect previously unidentified housing sites from coming forward and smaller schemes in rural villages should not be effected. Also a water cycle study should be conducted to determine necessary water infrastructure improvements.

Key Points Made

Against

- Housing targets are now minimum, phasing of development should only take place where it is necessary for infrastructure delivery and could be linked through s106 agreements anyway. The main focus should be housing delivery.

Other Points Made

None.

Issue 37 – Planning Obligations and Standard Charges – Should the Core Strategy include a policy requiring the payment of a standard charge toward the provision of community services and infrastructure required by the development and identified as part of the policy?

Option 99 (9)

Option 100 (6)

Key Points Made

In Favour

- Principle agreed but should be covered in a Development Plan Document.
- No objection to the principle of requiring payment of a standard charge towards the provision of community services and infrastructure as the principle is well established.
- A robust study of existing provision is required to justify a standard charge. Further guidance on this is available on the Sport England website.
- Phasing of development can not be justified unless it is related to infrastructure provision in which s106 agreements can be used. It would be useful if the Core Strategy could set out these requirements.
- Continued joint working between St Edmondsbury Borough Council and Braintree District Council with regard to provision of infrastructure at Haverhill is required.
- Standard charges can facilitate the provision of community services that can otherwise be difficult to fund such as publicly accessible green space and Cycleways.

Key Points Made

Against

- The core strategy is not the place to set out requirements of a standard charge toward the provision of community services and infrastructure. The s106 process currently works in its existing format and ensuring that one is in place within 8/13 week deadline line would be sufficient.

- Such a provision falls beyond the remit of the Core Strategy and should be included in a DPD. It is inappropriate and premature for such an approach in the core strategy pending government advice.
- It is inappropriate to set out standard charges in a SPD documents as it should be included in a DPD that can be given an appropriate level of public scrutiny. The HBF would not support a standard charge for community service and infrastructure unless it was related to scale and nature of development and accords with circular 5/05 and should also take into account site viability.
- It is too early to identify a policy within the Core Strategy on standard payments given the current government consultation.

Other Points Made

None

Question 18 – Do you wish to draw the Council’s attention to any other issues or options that you think are relevant to the Core Strategy?

- Land to the west of Panfield land should not include parts of the areas designated as SSSI.
- Development potential for Earls Colne should be considered to help maintain service centres for rural areas.
- The landscape character assessment should be a basic part of the strategy and there should be a core strategy commitment to improving the countryside.
- Villages should not be overlooked when allocating housing sites as this could be detrimental to the rural economy and development would help support local services.
- The review of Braintree Local Wildlife Sites should be listed as part of the evidence base. The core strategy should include a commitment to protecting and improving the integrity of the countryside and natural environment within the general built environment.
- There is a need for a transport study as part of the evidence base otherwise it could be considered unsound if perceived traffic problems are referred to without evidence.
- There is no mention of contaminated land, ecology or flood risk and overarching policies on all three issues will be needed. Also it does not appear to be the case that the Core Strategy has been informed by the draft sustainability appraisal.
- The Core Strategy should make it clear when the next review will be carried out.

- Coordination of development is required alongside infrastructure improvements. Close working between the LPA and Anglia Water is needed to ensure timely delivery of improvements and to maintain environmental and water standards. Overdevelopment could impact on existing infrastructure and the development plan needs to consider noise and odour issues and we would seek appropriate policies to ensure full consultation and presumption against inappropriate development and sufficient lead time is allowed for infrastructure to be provided. There is also support for undertaking a water cycle study to provide a strategy for water and infrastructure provision. Anglia fully support the principles of sustainable drainage systems and will consider ownership of such schemes in appropriate circumstances, such schemes should be in the control of a public body.
- A new settlement at Andrewsfield should be considered and fully explored as an option.
- There is a water shortage already where will the additional water required come from?
- Regard should be taken for proposals in adjacent local authorities and how they could impact on proposals within the district. Also further details on how this document links in with hierarchy of other plans at the national regional and local level. The document does not say how the policies in the East of England Plan will be delivered.
- Also there are too many issues and options and this may alienate the public. The sustainability appraisals should be made available.
- There should be more emphasis on provision of affordable housing and service industry.
- The Council must consider the extent to which the objectives and content of the draft document are consistent with government and policy guidance and provide realistic trajectories for housing that provides suitable types of house based on strong evidence base such as a strategic housing land availability assessment. Sites identified for housing should be available and provide for a range of housing types, also planning gain should relate to site viability and affordable housing targets should not effect housing delivery. The allocations should include numbers of houses units to be provided by the site.
- The document should be in compliance with national and regional policy but not replicate it.
- It is likely that the overall housing requirement figure to be found will no doubt be higher than that specified by the Council.
- Consider the creation of a country park within the valley of the River Black water for the benefit of the local community.

- There is need to include an evidence base for the historic environment such as the Historic Town Survey. Design guides should be used in appropriate locations and no one size fits all approach should be used in the historic environment.
- Core strategy policies should include sustainable development, balanced decisions, net environmental benefits, climate change, high design standards, general criteria that development will be judged against, and approach that does not harm the environment, provide and protect green infrastructure, sustainable construction, discourage unnecessary demolition and encourage energy efficient design and location for development. Also promote renewable energy, protect natural sites, protect locally designated sites, natural resources coastal zones, pdl where there is value, landscape character. That new development builds in biodiversity, address the problems of the urban fringe, protect and enhance SSSI's and ANOBs, a policy commitment to deliver biodiversity action plans, to protect irreplaceable semi natural habitats, create strategic links to national and local biodiversity action plans, protect and manage locally distinctive sites, promote community forests, encourage good town design and village design statements, promote public rights of way, produce a SPD on the countryside, s106 agreements for countryside improvements, management of features in the countryside of major importance, re-use of rural buildings, promote informal recreation in the countryside, protecting national trails and related footpaths, accommodate noisy sport in the countryside in appropriate ways and inland waterway protection.
- When developing preferred options discuss with Essex County Council the draft sustainability appraisal also consider joint working with Local Authorities and the content of other Local Authorities documents. Reference should be made to natural England's preliminary list of policy topics and suggested additional documents such as supplementary file 14 checklists for LDF's.
- According to the housing needs survey there is a deficiency in provision for housing for the elderly. The Local Development Framework should provide a policy basis for allocations to meet this need.
- In taking forward the preparation of this document there is a need to make reference to the need to protect and enhance the environment both natural and historic and to the provision of open space.