



(SCG/003)

Publication Draft Braintree, Colchester and Tendring Local Plans: Section One Shared Strategic Plan

Statement of Common Ground with Environment Agency

DECEMBER 2017

Braintree District Council, Colchester Borough Council and Tendring District Council Section 1 Shared Strategic Plan

Statement of Common Ground

between

Environment Agency and Braintree District Council, Colchester Borough Council and Tendring District Council

1. This Statement of Common Ground has been prepared to identify the areas of agreement between the Environment Agency (EA) and Braintree District Council, Colchester Borough Council and Tendring District Council as the Local Planning Authorities (LPAs) on matters relating to the LPAs Section 1 Shared Strategic Plan and the representations submitted by Environment Agency concerning that document.

This Statement includes a table, which sets out the LPAs agreed response with the Environment Agency to the Section 1 Shared Strategic Plan representations and lists the areas of the Shared Strategic Plan that the Environment Agency supports. This Statement addresses all of the issues raised by Natural England in the representations listed in the table. There are no unresolved issues.

This Statement addresses all of the issues raised by THE Environment Agency in the representations listed in the table. There are no unresolved issues.

General Matters

2. The LPAs have worked with the Environment Agency on the development of the Local Plan and the Sustainability Appraisal (SA), from the outset. The EA also provided advice during the preparation of the Strategic Flood Risk Assessment (SFRA), on the Flood Risk Sequential Test methodology and contributed to the Langham Position Statement along with the Council and

Anglian Water. The LPAs will continue to work with the Environment Agency to further develop the Integrated Water Management Strategy (IWMS) for the 3 Garden Communities.

3. In accordance with the Town and Country Planning (Local Development) (England) Regulation the Environment Agency has been formally consulted at every stage of consultation. The Environment Agency submitted representations to both Section 1 and Section 2 of the Local Plan during the Publication Draft Local Plan consultation period (letter dated 11 August 2017).

4. The Environment Agency support the Section 1 Shared Strategic Plan in the following areas:
 - (a) The EA is supportive of the thrust of the Vision (S1 375/ LPPD19). We are encouraged by the Vision advocating that green and blue infrastructure, among other things, will be planned and provided along with other facilities to support the development of substantial new growth. We are supportive of the thrust of Policy SP1 (BDC 243, TDC LPPD20).
 - (b) The EA is supportive of the thrust of policy SP2 (S1198/ 244 & S1 375/ LPPD21) and that the three Garden Communities will be planned and developed drawing on Garden City principles.

**BRAINTREE DISTRICT COUNCIL, COLCHESTER BOROUGH COUNCIL AND TENDRING DISTRICT COUNCIL
/ENVIRONMENT AGENCY AGREED AMENDMENTS TO LOCAL PLAN SECTION ONE**

BDC Rep number	TDC Rep number	Local Plan Section or Policy	Summary of Environment Agency Representation	LPAs agreed response with Environment Agency
	S1 375/ LPPD19	Introduction & Vision	Vision for North Essex We are supportive of the thrust of the Vision for North Essex. We are happy with the inclusion, in Objective 4, of references to ensuring that flood defence infrastructure and foul sewage infrastructure	The Environment Agency’s support for the Vision for North Essex in the Section 1 Strategic Plan is noted. The comments re Objective 4 and Objective 9 relate to Section 2 of Tendring’s Local Plan and will need to be

			are considered by developers of future developments. The words in Objective 9 are good, but we currently have a problem with the Strategic Flood Risk Assessments' methodology for assessing the zonal extents of flood risk areas as a consequence of climate change as a means to support this objective.	addressed by Tendring District Council as part of the Section 2 examination.
S1198/244	S1 375/LPPD21	SP2	Vision for North Essex We are supportive of the thrust of the Vision. We are encouraged by the Vision advocating that Green and blue infrastructure, among other things, will be planned and provided along with other facilities to support the development of substantial new growth. Policy SP 2 Spatial Strategy for North Essex We are supportive of the thrust of this policy and that the three Garden Communities will be planned and developed drawing on Garden City principles, with necessary infrastructure and facilities provided and a high quality of place-making and urban design. There may be merit in reinforcing the desire to follow Garden City principles by making reference to the principles reflecting the Garden City principles espoused by the Town and Country Planning Association. See for instance The Art of Building a Garden city: Designing New Communities for the 21st Century.	Support from the Environment Agency is welcomed. It is agreed that the garden communities should follow the Town and Country Planning Association (TCPA) Garden City Principles. Reference to these principles is made in paragraph 8.10, which precedes policy SP7 (Development and Delivery of New Garden Communities in North Essex).

	S1 375/ LPPD22	SP5	<p>There is no similar overarching policy that addresses other ‘environmental’ infrastructure such as further waste water or flood risk infrastructure to help accommodate the proposed growth. This is particularly important given that the sustainability, in particular, of low lying coastal communities, will be ever more dependent on replacement and/or enlarged flood defence infrastructure to address sea level rises as a consequence of climate change over a development’s lifetime. Tendring District Council or developers will need to help with Partnership funding to secure new flood defence infrastructure.</p>	<p>Policy SP5 includes the strategic priorities for infrastructure that are identified to serve the needs arising from development. The need for improvements to the waste water infrastructure is recognised in policies SP8, SP9 and SP10. To address the point raised by the EA the following addition is recommended to the end of policy SP5:</p> <p>“Water & Waste water</p> <p>Provision of improvements to water infrastructure and waste water treatment and off-site drainage improvements.”</p> <p>An Integrated Water Management Strategy (IWMS) is being prepared to identify sustainable solutions for water supply, waste water treatments and flood risk management within the proposed Garden Communities in North Essex. The IWMS will be prepared in partnership with the 3 North Essex Authorities, Environment Agency, Anglian Water Services and Affinity Water will be key stakeholders in the preparation of this strategy.</p> <p>Whilst Tendring District Council will need to help with Partnership funding to secure new flood defence infrastructure this is not a direct requirement of the garden communities, which are not located within coastal or high</p>
--	-------------------	-----	--	--

				flood risk areas, and will not be funded as part of the delivery of the garden communities.
S1198/245	S1 375/LPPD23	SP6	<p>We are supportive of the thrust of this policy, in particular we are pleased to see that all new development should reflect place shaping principles that will, among other things:</p> <p>Provide an integrated network of multi-functional public open space and green and blue infrastructure that connects with existing green infrastructure where possible.</p> <p>Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate wastewater and flood mitigation measures.</p> <p>There is no reference to the benefits of open space for sustainable drainage although the policy makes reference to "multifunctional" open space and identifies the provision of flood mitigation and wastewater measures as a principle requirement in place shaping.</p>	<p>It is recommend that the tenth bullet point is amended as follows to include reference to the promotion of sustainable drainage systems:</p> <p>“Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate wastewater and flood mitigation measures, including the use of open space to provide sustainable drainage solutions and.”</p>
S1198/249	S1 375/LPPD27	SP10	Support reference to provision of improvements to waste water treatments however it requires amendment to clearly signpost the IDP. We have been working with	It is agreed that the IWMS is an important part of the evidence base. Development Plan Documents (DPDs) are being prepared for the garden communities, with publication of

		<p>AECOM and Anglian Water on the preparation of an Integrated Water Management Strategy (IWMS) for the Garden Communities. A draft IWMS stage 2 report is expected to be made available to us and AW August 2017. Stage 1 IWMS highlighted that the scale and location of development across the Garden Communities poses significant challenges around provision of water supply, wastewater services and management of flood risk and that the final garden communities does not have identified solutions. IWMS Stage 2 will develop a range of delivery option strategies based on a series of potential measures. IWMS Stage 2, and where considered necessary, an IWMS Stage 3 should provide the necessary evidence to support the development of the respective garden communities without impacting on the environment.</p> <p>Item 17 should be re-worded along the following lines: Provision of improvements, ahead of development, to waste water treatment including an upgrade to the Colchester Waste Water Treatment Plan in accordance with the programme set out in the Braintree Infrastructure Delivery Plan and off-site drainage improvements. The purpose here is to set out a clear signposting of</p>	<p>Issues and Options consultation documents for each garden community on 13 November 2017. The IWMS will form part of the evidence base for these DPDs and their accompanying Sustainability Appraisals, helping to ensure that the garden communities will not adversely impact on the environment. Stage 1 of the IWMS (EB/015) demonstrated that there are options for discussion for strategic level solutions to the water supply and sewerage undertakers for water supply and wastewater treatment that could be delivered to serve the proposed growth without impacting on environmental legislation. These options will be further examined by the IWMS stage 2.</p> <p>The IWMS Stage 2 will include a more detailed analysis of the options identified at stage 1 for all of the Garden Communities, including the West of Braintree Garden Community. This will ensure that there are sustainable and innovative water supply and management, waste water treatment and flood risk solutions in place to serve the new Garden Communities.</p>
--	--	--	--

		<p>infrastructure delivery requirements as evaluated under the BIDP. It should be noted that the priority for this infrastructure type is described as critical under Table 13.1, which is presumably a reflection of its importance. We understand the Braintree Infrastructure Delivery Plan has already been published and whilst it does show a programme for water infrastructure, this appears to have been based on the water cycle studies carried out at the individual local planning authority level. Given this, it might be preferable for a standalone detailed IWMS delivery plan for the preferred strategy for the Garden Communities to be provided for evidence purposes in support of the water infrastructure requirements for Section 1 of the Local Plan.</p>	<p>The stage 1 IWMS identified 2 waste water treatment solutions to serve the West of Braintree Garden Community, neither of, which is the Colchester Water Recycling Centre. This garden community is likely to require its own solution. The LPAs will continue to work with the Environment Agency, the water companies and Essex County Council in their capacity as Lead Local Flood Authority to further develop the IWMS.</p>
--	--	--	--

Agreed by:

Colchester Borough Council	Braintree District Council	Tendring District Council	Environment Agency
Karen Syrett Place Strategy Manger	Emma Goodings Head of Economic Development and Planning Policy	Cath Bicknell Head of Planning	Barbara Moss Taylor

04 December 2017