



Homes  
England

Date: 19 May 2023

Our Ref: RFI4264

Tel: 0300 1234 500

Email: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

The Housing and Regeneration Agency

██████████  
By Email Only

Information Governance Team  
Homes England  
Windsor House – 6<sup>th</sup> Floor  
50 Victoria Street  
London  
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██████████

**RE: Request for Information – RFI4264**

Thank you for your request for information which was processed in accordance with the Environmental Information Regulations 2004 (EIR).

Please accept our sincere apologies for the time it has taken to process your request. We recognise that the handling of your request has fallen below expectations and the time for compliance set out in the legislation.

You requested the following information:

Please can you provide me with a copy of the **MDPGA Wethersfield Stage 1 Report commissioned by Homes England dated July 2018 carried out by Tibbalds CampbellReith.**

**Response**

We can confirm that we do hold the information that you have requested.

Please find enclosed with this response Annex A, the MDPGA Wethersfield Stage 1 Report.

Some information contained with Annex A has been redacted under the following exceptions:

**Regulation 12(5)(e) – Confidentiality of commercial or industrial information**

Under regulation 12(5)(e) of the EIR, Homes England may refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.

Four elements are required for Regulation 12(5)(e) to be engaged:

- 1) The information is commercial or industrial in nature.

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The withheld information relates to Homes England's approach to negotiations when proposing residential development to third parties. The withheld information also relates to the future disposal of land including appraisals and development potential. Therefore, it is commercial in nature as it relates to commercial activity.

2) Confidentiality is provided by law.

The withheld information is subject to confidentiality provided by law under a common law duty of confidence. The information is subject to a common law duty of confidence because it is not trivial and not in the public domain. There is no need for the public authority to have obtained the information from another or a third party for this duty to apply. The information was created in circumstances creating an obligation of confidence; it has been created internally to assist an internal decision making/approval process. Homes England therefore recognises that this information was intended to be held in confidence within the organisation.

3) The confidentiality is protecting a legitimate economic interest.

If the confidentiality of this information was breached it would harm the ability of Homes England and third parties to develop on or dispose of land and secure works for market value. There is a legitimate economic interest in protecting the ability of Homes England and third parties to negotiate in current and future commercial agreements.

4) The confidentiality would be adversely affected by disclosure.

Disclosure would result in third parties gaining access to commercially valuable information. Disclosure of the confidential information would harm the ability of Homes England to achieve good value for public money.

Public Interest Test

Regulation 12(5)(e) is subject to the public interest test. Once the exception has been engaged it is then necessary to consider the balance of the public interest in maintaining the exception or disclosing the information.

Under regulation 12(2) the public authority must apply a presumption in favour of disclosure, in both engaging the exception and carrying out the public interest test. In relation to engaging the exception, this means that there must be clear evidence that disclosure would have the adverse effect listed in 12(5).

Factors in favour of disclosure

- Homes England acknowledges that there is a presumption in disclosure regarding environmental information as well as a public interest in promoting transparency in how we undertake our work and allocate public money; and



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- Homes England acknowledges that there is a public interest in our work with third parties and how we work to progress the delivery of Homes England's programmes, given it involves the spending of public money and the development of services that will affect the public.

#### Factors in favour of withholding

- Disclosure would adversely affect the relationship between Homes England and current and potential partners. There would be significant reputational, commercial and financial loss to Homes England and our partners as third parties could use the information to distort the market for their own gain;
- Releasing the information would be likely to negatively impact future processes and proposals for our intervention/involvement as potential partners may be deterred from collaborating with Homes England if they felt information relating to their commercial and ongoing commitments would then be released to the public domain. This would be likely to result in a substantial impact on potential financial outcomes and delivery of Homes England's programmes. Furthermore, this would impact the ability of Government officials to make effective, informed decisions regarding allocation of public funds. This would not be in the public interest as public funds could be allocated in a way that would distort regional need for development;
- The withheld environmental information relates to the value, condition and development potential of the land. Disclosure of this information would negatively impact a third party's commercial interest relating to the future disposal of this land. This would likely result in significant commercial and financial loss as the release of this information could allow third parties to unduly influence the disposal or development process; and
- Homes England has been unable to identify a wider public interest in disclosing the information requested.

Having considered the arguments for and against disclosure of the information, we have concluded that at this time, the balance of the public interest favours non-disclosure.

The full text of Regulation 12(5)(e) in the legislation can be found via the following link:

<https://www.legislation.gov.uk/ukSI/2004/3391/regulation/12>

#### **Regulation 12(5)(a) – International relations, defence, national security or public safety**

Under regulation 12(5)(a) of the EIR, Homes England may refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety.

Homes England considers that the disclosure of the withheld information would have an adverse effect on defence and public safety. This is because the withheld information relates to the condition of the land and services that affect that land. The land is owned by the Ministry of Defence and therefore any environmental information about the land also relates to the defence of the United Kingdom. Homes



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England considers that disclosure of this environmental information would harm the capability, effectiveness and security of armed forces. The land which is the subject of the information requested is a former military airfield. Disclosing information about the infrastructure that supplies the site and resources that may be held on site could encourage interested parties to seek access to the land, which would put those individuals at direct risk of physical harm. Additionally, disclosing this information may provide intelligence to those who wish to harm the defence of the United Kingdom.

#### Public Interest Test

Regulation 12(5)(a) is subject to the public interest test. Once the exception has been engaged it is then necessary to consider the balance of the public interest in maintaining the exception or disclosing the information.

Under regulation 12(2) the public authority must apply a presumption in favour of disclosure, in both engaging the exception and carrying out the public interest test. In relation to engaging the exception, this means that there must be clear evidence that disclosure would have the adverse effect listed in 12(5).

#### Factors in favour of disclosure

- Homes England acknowledges that there is a presumption in disclosure regarding environmental information as well as a public interest in promoting transparency in how we undertake our work and allocate public money.

#### Factors in favour of withholding

- Disclosure would adversely affect the capability of the armed forces. If the information were to be disclosed, there would be a significant risk of harm to the services and infrastructure that affects the land. This would harm the capability and effectiveness of the armed forces which in turn will also adversely affect the UK's defence.
- Disclosure of the withheld environmental information would adversely affect public safety. Homes England considers that the release of the information would result in harm to the physical health of the public as it would allow individuals or groups who wish to harm the defence of the United Kingdom to gain intelligence on Armed Forces' capabilities.

Having considered the arguments for and against disclosure of the information, and that the Information Commissioner considers there is an "obvious and weighty" public interest in safeguarding national security, we have concluded that at this time, the balance of the public interest favours non-disclosure.

The full text of Regulation 12(5)(a) in the legislation can be found via the following link:

<https://www.legislation.gov.uk/ukxi/2004/3391/regulation/12>



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### **Regulation 13 – Personal Data**

We have redacted/withheld information on the grounds that it constitutes third party personal data and therefore engages Regulation 13 of the EIR.

To disclose personal data, such as names, contact details, addresses, email addresses and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Regulation 13 is an absolute exception which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exception is engaged.

The full text in the legislation can be found on the following link;

<http://www.legislation.gov.uk/uksi/2004/3391/regulation/13/made>

### **Right to make Representations**

If you are not happy with the information that has been provided or the way in which your request has been handled, you may request a reconsideration of our response (Internal Review). You can make this representation by writing to Homes England via the details below, quoting the reference number at the top of this letter.

Email: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

The Information Governance Team  
Homes England  
6<sup>th</sup> Floor  
Windsor House  
42-50 Victoria Street  
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Your request for reconsideration must be made in writing, explain why you wish to appeal, and be received within 40 working days of the date of this response (Reg 11(2)). Failure to meet this criteria may lead to your request being refused.

Upon receipt, your request for reconsideration will be passed to an independent party not involved in your original request. We aim to issue a response within 20 working days.

You may also complain to the Information Commissioner's Office (ICO) however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

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The Information Commissioner's details can be found via the following link <https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

**The Information Governance Team**  
For Homes England

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# MDPGA Wethersfield

## Stage 1 Report

July 2018

**Tibbalds** CampbellReith

Multidisciplinary Joint Venture





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## Executive Summary

### 1 Introduction

Tibbalds CampbellReith is leading a consultant study to explore options for the redevelopment of the former RAF Wethersfield site near Braintree, Essex. The study has been commissioned by Homes England, working in partnership with the current owners of the site, the Ministry of Defence (MOD). The site is surplus to requirements and the overall aim is to dispose of the site.

Stage 1 of the study involves a high level assessment of the development constraints and opportunities, as well as the preparation and appraisal of various potential land use strategies. This Stage 1 report summarises the findings of this work and provides recommendations for next steps to guide decision-making about the future of the site.

### 2 Project Objectives

At the outset of the study, Homes England, the MOD and consultant team distilled an overarching set of project objectives to inform the preparation and appraisal of the land use strategies. They are as follows:

- Establish the optimum land value prior to disposal.
- Achieve buy-in / planning certainty from Braintree District Council prior to disposal.
- Establish productive uses in the short-term (0-5 years).
- Ensure that short-term / temporary uses do not compromise long-term development potential.
- Ensure that short-term / temporary uses do not create ransom situations.
- Deliver maximum number of homes achievable.
- Achieve buy-in from Essex County Council for access and highways proposals.
- Ensure development can be successfully assimilated into the landscape.
- Retain Ancient Woodland and give consideration to finding sustainable uses for Woodland Trust planting.
- Retain and optimise use of existing utilities capacity.
- Ensure development respects areas of heritage within the site and surrounding areas.

### 3 Site Location and Description

The site is located to the north of the village of Wethersfield in Braintree District (see figure 1). It was originally developed as an airfield during WW2 and since 1993 has been used by the MOD Police and Guarding Agency for their training and headquarters, as well by a number of third party tenants including Essex Police and Fire Service.

The site comprises some 322ha of land in a relatively isolated rural location, surrounding by farmland and areas of woodland. It is generally flat and open, dominated by the wide expanse of the former airfield. A variety of buildings and structures occupy the fringes of the site, with a particular concentration in the south-west corner.

Access from the site to the local road network is limited, with narrow country roads connecting to the B1053. Only two access points are currently in use and these are controlled by MOD security. The nearest major settlement is the district centre of Braintree, 6 miles (approximately 20 minutes drive) to the south.

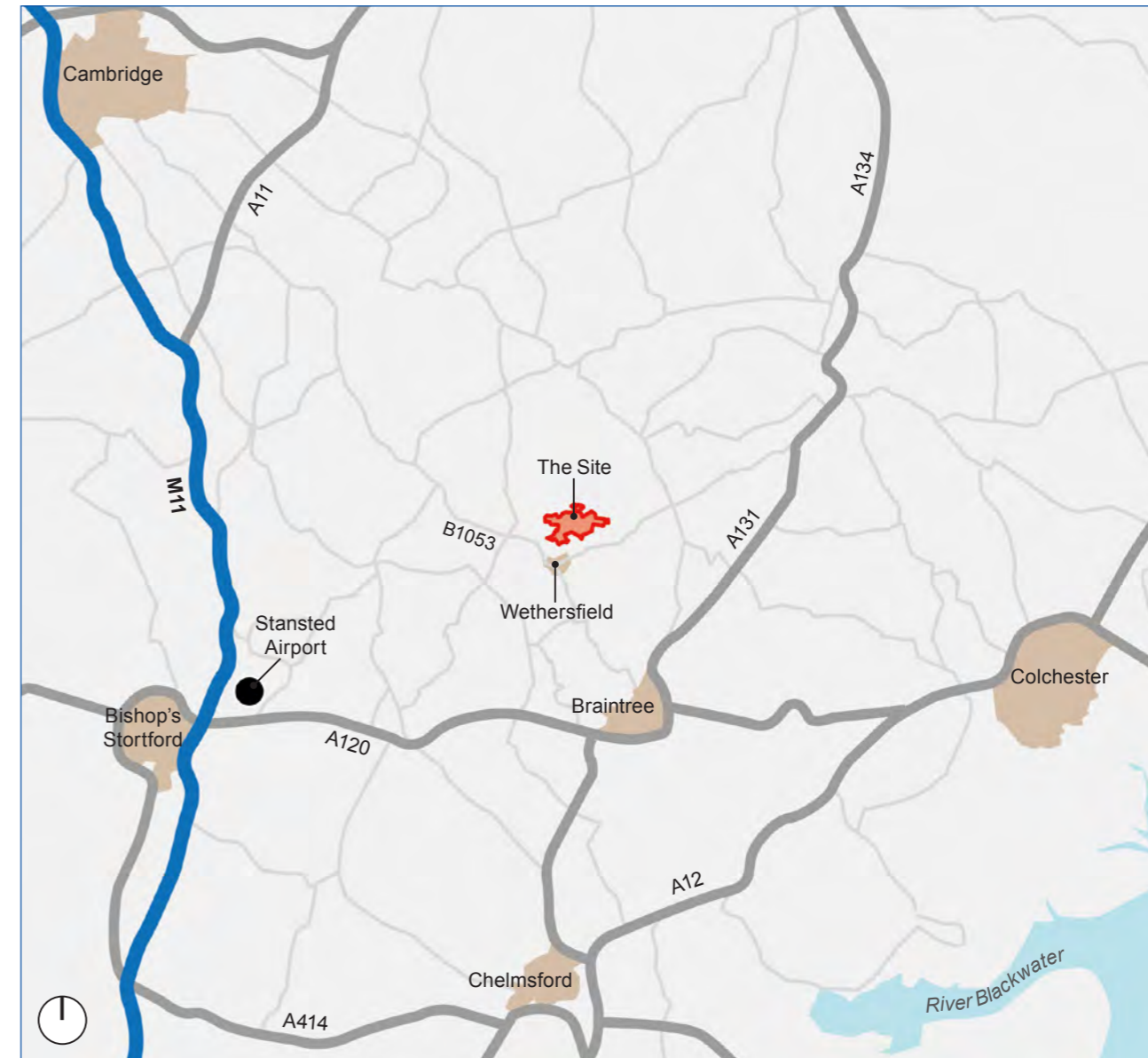


Figure 1: The site and its surrounding context

## 4 Site and Context Analysis

A baseline analysis of the site and its context has been undertaken through Stage 1 of the project. This considered a range of topics including: Highways and Transportation, Ground Conditions, Flooding and Drainage, Utilities and Infrastructure, Landscape and Views, Arboriculture, Ecology and Bio-diversity, Heritage and Archaeology. This analysis has informed a high-level constraints plan which broadly defines the areas of the site within which new development could be introduced (see figure 2).

## 5 Planning Policy Context

Braintree District Council (BDC) is currently in the process of updating its Local Plan to cover the period 2013 to 2033. The emerging local planning policy context as it relates to the potential future redevelopment of Wethersfield is briefly summarised below:

### Policy Context for Residential development

BDC, along with its partners Colchester Borough Council and Tendring District Council, have been working together to plan strategically for housing growth across the North Essex area. The growth strategy is focussed on a number of major urban extensions (including Braintree) and three new Garden Communities which are located along the A12 and A120 growth corridor.

Wethersfield is located within the rural area defined by the Draft Local Plan's spatial strategy and as such is not considered suitable for intensive redevelopment. The draft Local Plan does not allocate the site for redevelopment and its location outside the growth corridor and poor access to the strategic road network are significant obstacles to a future allocation for large scale residential-led development.

In June 2018 the Inspector carrying out the examination of the draft Local Plan identified several aspects of the draft Plan which require significant additional work. Of particular relevance to Wethersfield is the Inspector's conclusion that the Garden Community proposals are not adequately justified, have not been shown to have a reasonable prospect of being delivered, and are therefore unsound. BDC officers have indicated that they intend to undertake the additional work requested and present revised

proposals to the Inspector in early 2019 in order that the examination can be concluded and the Plan adopted by the end of that year. This timescale appears optimistic given the amount of additional work required by the Inspector, not all of which is within BDC's control.

The current five year housing land supply position in Braintree is complex and dependent on which methodologies are applied to the calculation of need and supply, which are awaiting a decision from the Local Plan Inspector. However, it is fair to say that prior to the adoption of the new Local Plan there is at least some doubt as to whether Braintree can demonstrate a robust five year housing land supply.

Prior to the Inspector's findings, discussions with BDC planning officers indicated that, if transport infrastructure can be improved, Wethersfield has the potential in the longer term to become a significant residential-led development and one that could be considered in future Local Plan reviews. The Inspector's letter creates a policy vacuum and presents an opportunity to promote Wethersfield as a major residential allocation earlier than expected. However, to be successful it will be necessary to demonstrate that Wethersfield is a viable, deliverable and sustainable option and that it compares favourably against both the Garden Villages and the other major sites being promoted within Braintree District.

reg. 12(5)(e)

Notwithstanding the Inspector's findings, achieving residential-led development at Wethersfield remains challenging due to the site's relatively remote location and poor transport accessibility. It is likely to take a considerable amount of time to achieve planning certainty. Given the lead-in time, alternative approaches need to be considered, including short-term, temporary uses that can bring in income but allow the ultimate development of a Garden Community; and permanent non-residential uses that can either sit alongside a smaller Garden Community or occupy the entire site, so delivering an alternative form of development.

reg. 12(5)(e)



## Policy Context for Non-residential development

### Employment

With respect to employment uses, the draft Local Plan focuses on the provision of high quality land and buildings in sustainable locations. Wethersfield does not currently constitute a sustainable location due to its poor accessibility and thus it will be necessary to consider specific types of employment uses which are not reliant on large numbers of vehicle trips, such as:

- employment with a low density of employees - for example, continuing some of the storage functions on site or high-tech uses such as a data centre; and/or
- employment where a comprehensive approach to travel planning (such as shuttle buses) can be implemented - this might typically be a single user in a large campus, such as a research and development facility that would benefit from a relatively isolated and secure site.

### Leisure and Tourism

The relevant policy states that leisure and tourism proposals should be connected to existing facilities or located at a site that relates well to defined settlements and is accessible by public transport, cycling and walking links. Without significant new transportation infrastructure, the approach to leisure and tourism uses at Wethersfield would need to involve uses that have low transport movements and/or where comprehensive travel planning can minimise the impact on the transport network.

### Renewable Energy

The emerging Local Plan states that proposals for renewable energy schemes will be encouraged, subject to avoiding serious harm to landscape character, nature conservation, good quality agricultural land, heritage assets, etc. As the site's ridge-line location makes it visually prominent, wind farm renewable energy has the potential to impact adversely on landscape character and the setting of listed buildings in the surrounding area. A solar farm is likely to be much more acceptable in planning terms. Informal discussions with planning officers have indicated that a solar farm is likely to be viewed positively,

## Educational / Training Campus

The site is not well connected to the surrounding area, and so it cannot currently provide educational facilities to support local communities. However, it may be able to provide educational / training facilities in a campus-style development that is self-contained and minimises the need for off-site travel. An educational / training use is likely to be acceptable in planning policy terms so long as there is a robust and credible travel plan / transport strategy to support it.

### Prison

There has been some interest from the Ministry of Justice in locating one or more prisons on the site. There is an absence of specific planning policy for a prison, however such a use is likely to be acceptable in planning terms, as the remoteness of the site would mean negligible impact on neighbouring uses. However, a credible transport strategy would be required for staff and servicing (deliveries), as well as for those visiting inmates. The scale and design of a prison and its secure enclosure will need to be carefully considered in order to minimise visual impact and to blend with the site's wider landscape setting.

## 6 Local Property Market

The local property market context for a range of potential uses at Wethersfield can be briefly summarised as follows:

### Commercial

Business activity in the Wethersfield area is limited, with farming driving commercial activity and high proportions of out commuting. The focus of the local market is generally small unit accommodation in the office, industrial and warehouse sectors providing for a limited number of local occupiers and SME's. Given the remoteness of the location and nature of the highway network there is little demand for commercial space and new space provision is unviable under current market conditions. Rentals for serviceable existing space are likely to range between **reg.** per sqft (assuming functional refurbishment) and yields to produce freehold capital values are estimated to be 10+%. Estimated rentals for production space within the existing Wethersfield complex are dependent on condition but would likely range between **reg.** per sq ft.

### Residential

The immediate settlement of Wethersfield is a relatively small village with limited transactions and a spectrum of different residential property types. Taking the view that new build development on the site could provide its own environment and be designed and accessed in such a way as to minimise impacts from adjacent commercial areas (and providing it was publicly accessible), normal benchmark planning and development assumptions show a hypothetical 1 acre residential site notionally to be worth between **reg. 12(5)(e)** per net developable acre based on current market conditions.

### Agriculture

Crop producing agricultural land values in Essex, it is estimated, range from between **reg. 12(5)(e)** per acre currently (excludes any 'hope' value). Where there is hard infrastructure and impediment to traditional crop farming, livestock grazing land may typically let for between **reg.** per year with capital values for this type of land being towards the lower end of the range above.

## Solar Farm

Rental values of between **reg. 12(5)** per acre per annum may be achievable. Capital Values for the consented land could be appraised at circa **reg.** per acre.

### Open and Covered Storage

Service yard accommodation may be a low cost alternative to development and the secure nature of the airfield may make this attractive for some prospective parties. Rental levels for open yard/storage space fluctuate in Essex dependant on location and use but vary between **reg.** per sqft. A limited premium may be available for covered storage. The rental for secure yard space on hardstanding at Wethersfield may be in the region of **reg.** per sqft.

### Prison

There is not an open market for prison land, and value is determined mainly through alternative use value, and urgency of the need. There are occasional transactions of secure institutions but these are very much driven by individual circumstances. Land for a prison at Wethersfield would be unlikely to transact at greater than estimated commercial land values.

## 7 Land Use Strategies

Based on the site analysis and planning and property market context, three possible land use strategies have been explored. These cover a spectrum ranging from short-term, minimal investment ('Do Minimum'), through a medium-term strategy ('Do More'), to a long-term strategy involving substantial infrastructure investment ('Do Maximum').

It is important to note that these strategies are not mutually exclusive and could be combined into a 'hybrid' of more than one strategy. For example, the 'Do Minimum' strategy could evolve into the 'Do Maximum' strategy over time. Equally, some discrete elements of the 'Do More' strategy (e.g. a data centre or prison) could be implemented without prejudicing the long-term objectives of the 'Do Maximum' strategy.

The three strategies are summarised, illustrated and appraised as follows:

### Strategy A: 'Do Minimum'

Strategy A is the common starting point for all three Strategies. It is essentially a 'holding strategy' for the next 1-5 years which aims to increase revenues to offset site maintenance and operating costs, limit investment in highways and other infrastructure, and retain maximum flexibility to ensure that the long-term development potential of the site is not compromised by any short-term moves. The key elements of the strategy are (see figure 3):

- Retain and expand the short-term tenant operations that currently exist on the site.
- Introduce new short-term uses within the developable areas of the site, such as a solar farm, open storage, grazing, and recreational uses associated with the airfield.
- Introduce a modest number of new homes (approx. 100) to complement the existing residential community on the site, accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche.

The 'Do Minimum' strategy could be accompanied by a marketing exercise which explores the opportunity to dispose of the site to one or more prospective purchasers (public, private or institutional).

### Strategy A: Summary Appraisal:

- Strategy A is low risk, but the rewards are also low.
- Strategy A performs very poorly in meeting the objective of maximising the amount of housing, as it delivers only around 100 new residential units.
- So long as Strategy A is seen as a 'holding' option leading to an alternative future, then it has merit in establishing short-term productive uses.

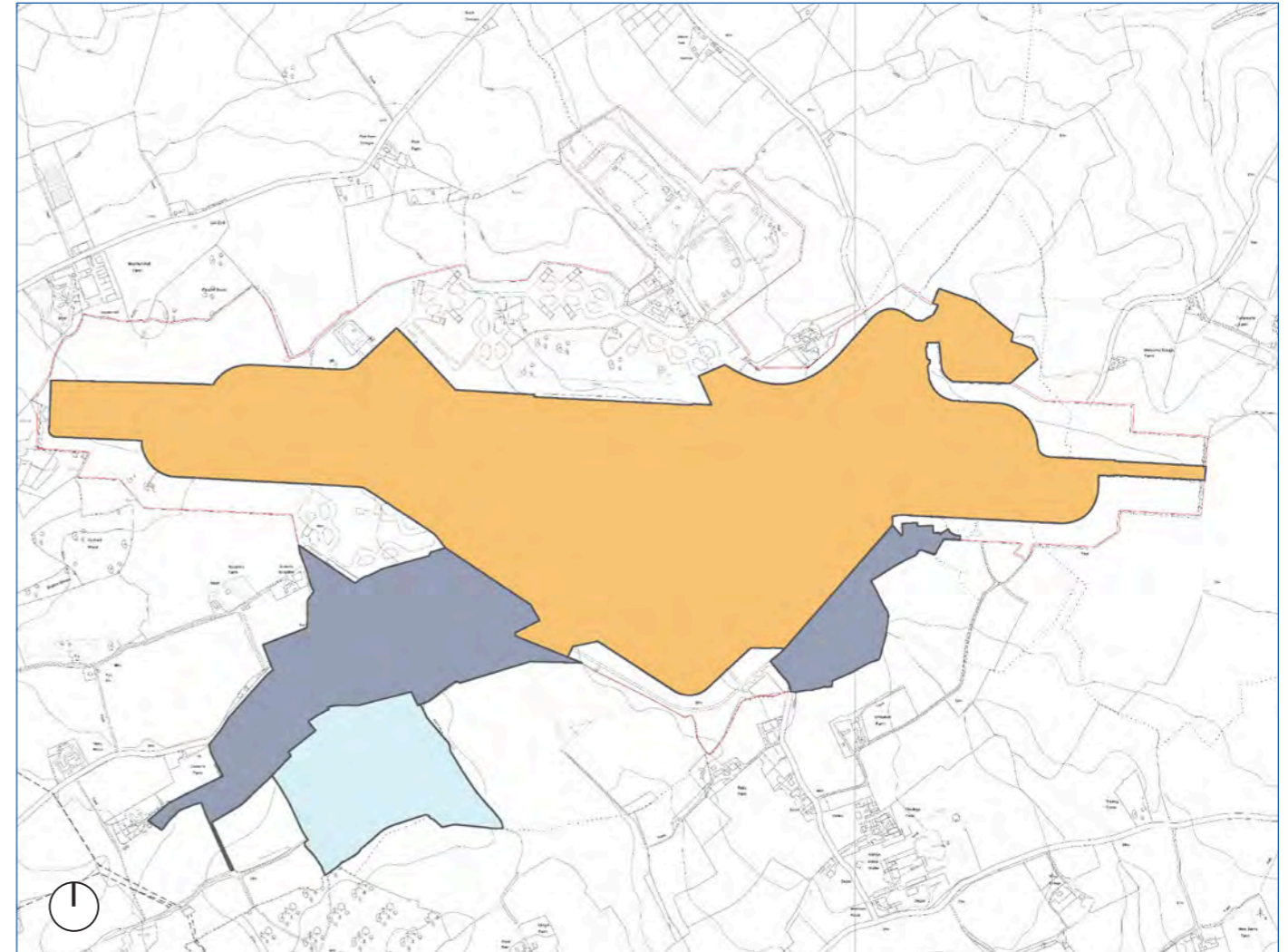


Figure 3: Strategy A: Do Minimum (not to scale)

- Site boundary
- 153.9 ha Developable area
- 41.7 ha Retained/expanded short-term tenancies
- 13.8 ha Existing residential including area for additional homes circa 100 (approx. 5 ha)

Options for additional temporary uses that do not require significant infrastructure upgrades	Indicative area (Ha)
Race track/drag racing	tbd
Airfield (private)	53
Solar farm	100
Open storage	tbd
Grazing land	153.9



**Strategy B: 'Do More'**

The 'Do More' strategy aims to bring the site into more productive use by gradually introducing permanent, primarily non-residential land uses over the medium term - approximately 5-15 years. The key elements of the strategy are (see figure 4):

- Retain and expand the existing tenant operations, converting them to permanent uses and upgrading the building stock when possible.
- Introduce a mix of new, primarily non-residential uses. Option 1 comprises uses with generally lower transport infrastructure requirements, including a prison, data centre, solar farm and airfield. Option 2 (see figure 5) comprises uses with generally higher transport infrastructure requirements, including a prison, open and covered storage and an R&D campus.
- Introduce a modest number of new homes (approx. 100) to complement the existing residential community on the site, accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche.

**Strategy B: Summary Appraisal:**

- Strategy B: Option 1 is likely to generate significantly lower land values than Option 2.
- Strategy B: Option 2 is highly speculative and dependent on finding a single user with an interest in a large part of the site. The values generated are unlikely to outweigh investment needed in transport infrastructure.
- Both Strategy B options perform very poorly in meeting the objective of maximising the amount of housing, as both deliver only around 100 new residential units.
- Strategy B: Option 1 is essentially a continuum of Strategy A, potentially leading towards Strategy C. It has merit in delivering productive land uses in the short to medium term.



Figure 4: Strategy B: Do More - Option 1 (not to scale)

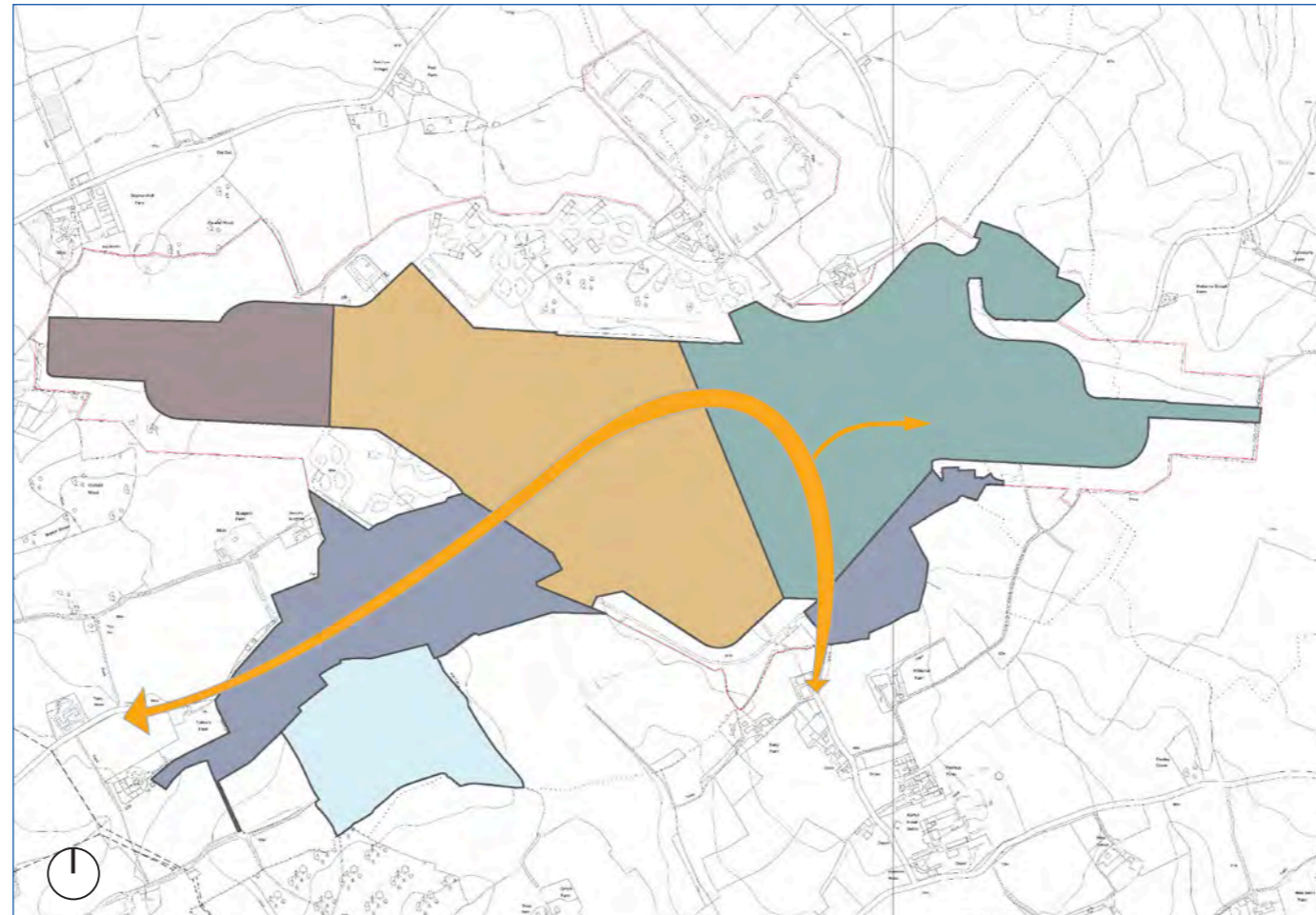


Figure 5: Strategy B: Do More Option 2 (not to scale)



### Strategy C: 'Do Maximum'

This is a long-term strategy to comprehensively redevelop the site to create a mixed use, self-contained and sustainable Garden Village. The plan illustrates (very conceptually) how a Garden Village might be configured on the site. The key elements of the strategy are (see figure 6):

- Approximately 2,400 - 3,600 new homes, a mixed use village centre comprising shops and community facilities, a substantial employment area, open space and green infrastructure.
- As with the other strategies, in the short-term there is also an opportunity to introduce a modest number of new homes (approx. 100) to complement the existing residential community on the site, accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche.

### Strategy C: Summary Appraisal:

- Strategy C delivers the highest land value. However, it also requires the most significant investment in transport infrastructure. It will not be viable without some form of public subsidy, and may also require land acquisition to provide a larger development area than the current site.
- It is the riskiest in terms of planning, and cannot be achieved in the short term. To achieve buy-in from the District and County Councils it will be necessary to demonstrate that Wethersfield is a more appropriate and viable option than other potential sites to meet future housing needs within the District/County.

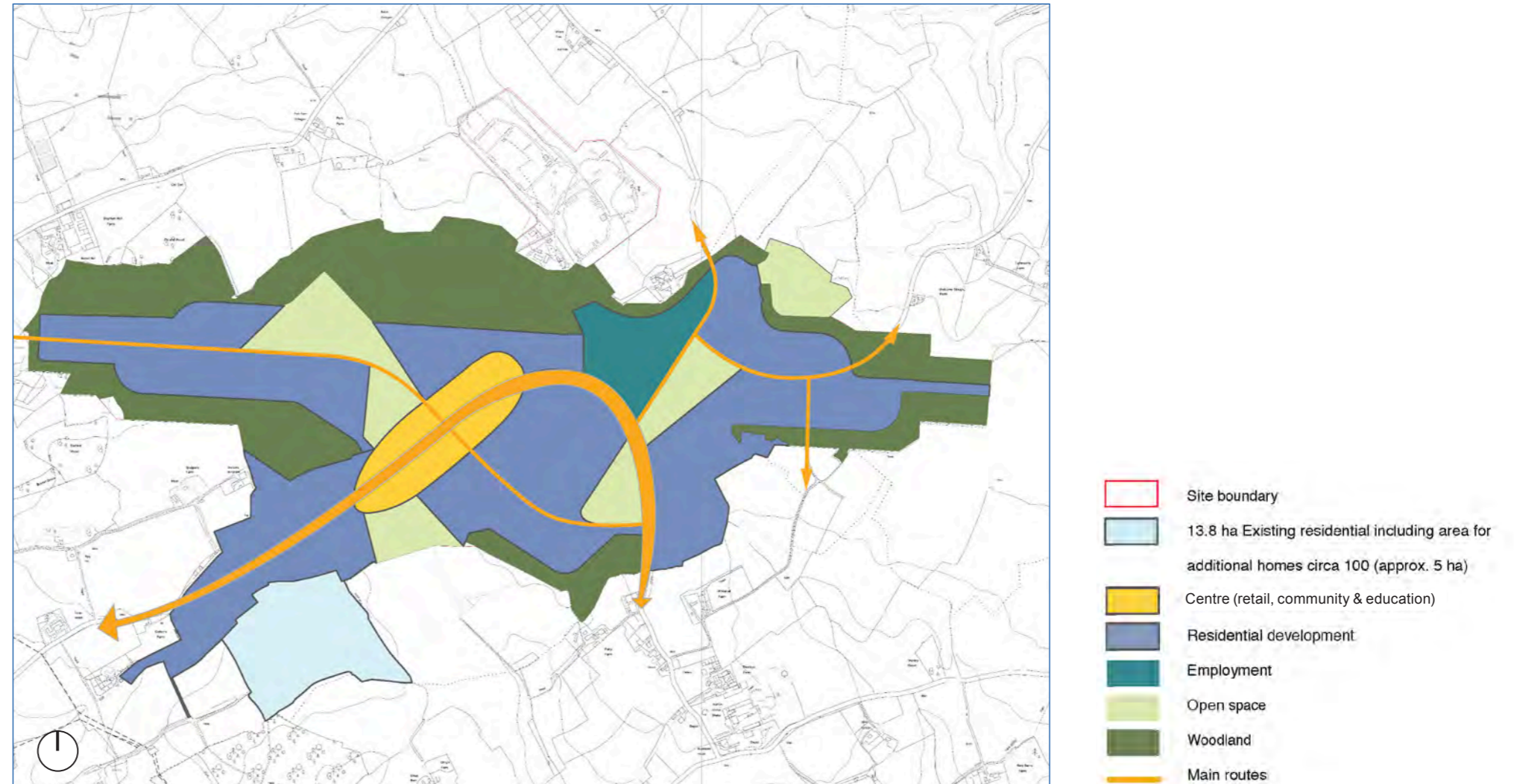


Figure 6: Strategy C: Do Maximum (not to scale)

## 8 Recommendations for Next Steps

The appraisal of the Strategies shows that they have very different strengths and weaknesses: Strategy A at one end of the spectrum is low risk, low investment but also very low return; whereas Strategy C is very high risk, very high investment but also high return. The Strategies are not 'either / or' options, but are instead a continuum of choices aimed at meeting Project Objectives by (i) securing some income from the land in the short to medium term; and (ii) keeping options open for future significant development.

There has been a significant shift in the timing of the adoption of the Local Plan since this project started, and the further work required of the Councils potentially gives opportunities for promoting Wethersfield for potential development. However, whilst the Inspector's letter was highly critical of the Local Plan process, it was generally supportive of the strategy of a series of Garden Communities. The failure of the Local Plan in its current form does not therefore suddenly transform Wethersfield into a site suitable for a Garden Village: it remains very poorly located, and making a case for development is highly challenging. Our view is that achieving the level of development proposed in Strategy C: Do Maximum is still a long-term option that will require at least another iteration of the Local Plan beyond the current version.

However, there will be a policy vacuum at Braintree for at least a year, and more likely a couple of years, whilst the Councils revisit their evidence base and re-start the Examination. reg. 12(5)(e)

There is therefore a window of opportunity of one to two years for bringing forward a 'Phase 1' of Strategy C through an application for residential development that balances numbers with relatively minimal transport and highway improvements.

reg. 12(5)(e)

In order to inform this decision, we recommend undertaking some transport-led feasibility testing / masterplanning of bringing forward up to around 500 homes at Wethersfield. This feasibility work could be completed by the end of 2018, enabling a decision to be made on the way forward at the end of 2018/beginning of 2019.

- Taking all of the above into account, our recommended approach can be briefly summarised as follows:
- test out a 'Phase 1' of Strategy C as a priority, making sure the feasibility work is structured to inform the other strategies should it fail;
  - if the Phase 1 approach is not feasible, 'twin track' Strategies A and B, to bring forward income-generating uses in the short to medium term;
  - undertake work to explore the feasibility of the full Strategy C in parallel with either (i) the development of the 'Phase 1' application or (ii) the twin-tracking of Strategies A and B; and
  - make a decision on whether to proceed with Strategy C once the studies have provided greater clarity on the issues, and so proceed to an end state of Strategy A, B or C.

The flow chart opposite (figure 7) sets out this recommended approach, identifying where key decisions to proceed are required.

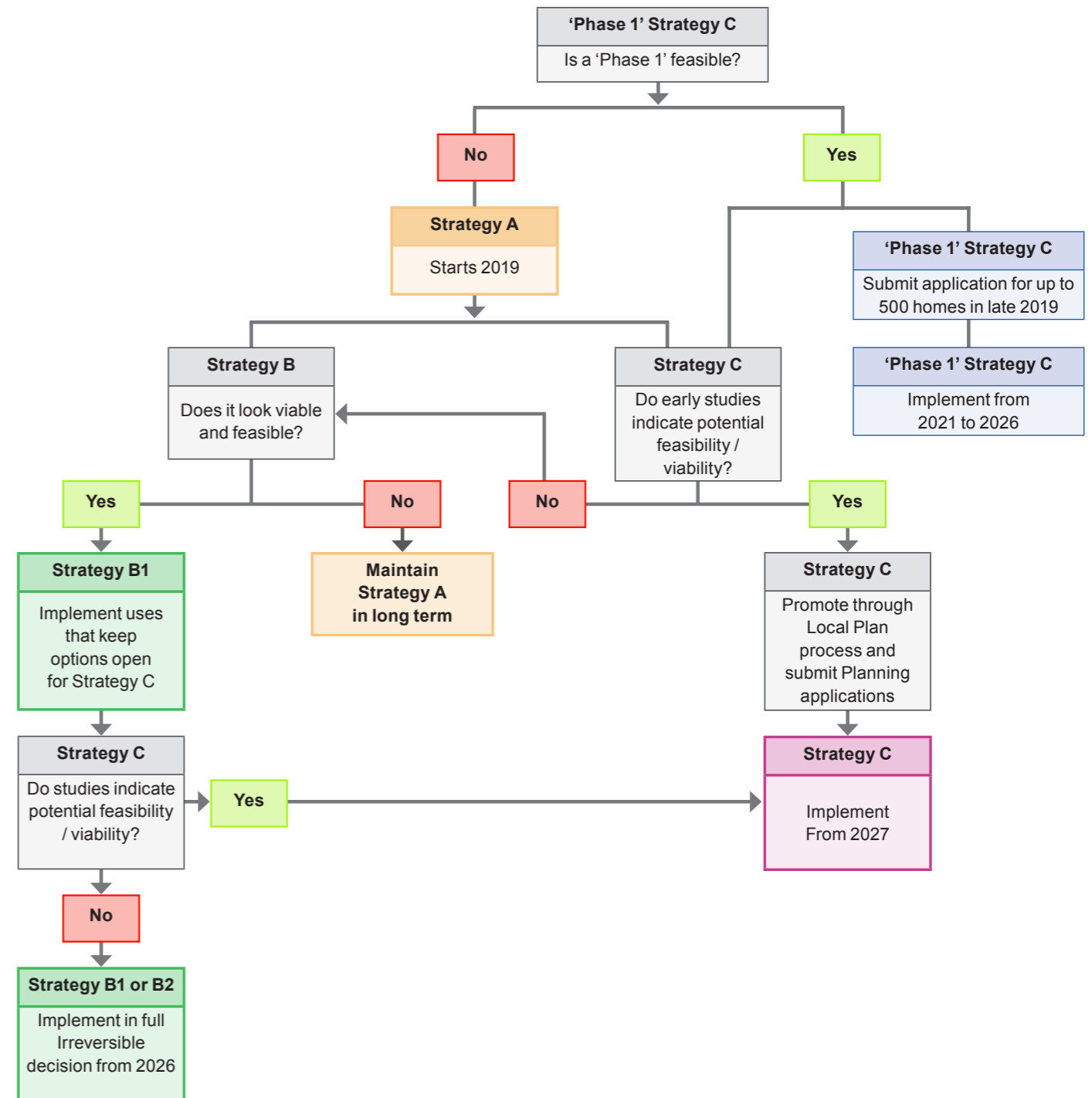


Figure 7: Flow chart

# 1 Introduction

## 1.1 Purpose and Content of Report

1.1.1 Tibbalds CampbellReith is leading a consultant study to explore options for the redevelopment of the former RAF Wethersfield site near Braintree, Essex. The study has been commissioned by Homes England, working in partnership with the current owners of the site, the Ministry of Defence (MOD). The site is surplus to requirements and the overall aim is to dispose of the site.

1.1.2 Stage 1 of the study involves a high level assessment of the development constraints and opportunities, as well as the preparation and appraisal of various potential land use strategies. This Stage 1 report summarises the findings of this work and provides recommendations for next steps to guide decision-making about the future of the site. It includes:

- **Section 1:** A set of overarching project objectives and land use options.
- **Section 2:** A description of the site and its current uses.
- **Section 3:** Analysis of the site and its context including: highways and transportation, ground conditions, flooding and drainage, utilities and infrastructure, landscape and trees, ecology and biodiversity, heritage and archaeology. An overview of the local planning policy context and property market.
- **Section 4:** Illustration and appraisal of a series of land use strategies, covering a spectrum of approaches ranging from short-term, minimal investment ('Do Minimum') to a long-term strategy involving substantial infrastructure investment ('Do Maximum').
- **Section 5:** Summary and recommendations for next steps to take the project forward.

1.1.3 This Stage 1 Report has also been informed by a workshop with the client and consultant team at which project objectives were debated and defined, a wide range of alternative land uses were explored, and a series of potential development strategies identified. The objectives and land use options were refined through the process of exploring the strategies, and these are set out opposite.

## 1.2 Project Objectives

1.2.1 At the outset of the study, Homes England, the MOD and consultant team distilled an overarching set of project objectives to inform the preparation and appraisal of the land use strategies. They are as follows:

- Establish the optimum land value prior to disposal.
- Achieve buy-in / planning certainty from Braintree District Council prior to disposal.
- Establish productive uses in the short-term (0-5 years).
- Ensure that short-term / temporary uses do not compromise long-term development potential.
- Ensure that short-term / temporary uses do not create ransom situations.
- Deliver maximum number of homes achievable.
- Achieve buy-in from Essex County Council for access and highways proposals.
- Ensure development can be successfully assimilated into the landscape.
- Retain Ancient Woodland and give consideration to finding sustainable uses for Woodland Trust planting.
- Retain and optimise use of existing utilities capacity.
- Ensure development respects areas of heritage within the site and surrounding areas.

## 1.3 Land Use Options

1.3.1 A 'long list' of potential land uses that are conceivably suitable for the site was developed at the client and consultant team workshop, as follows:

<b>Residential</b>	Infill development around current housing
	Gypsy and Traveller provision
	Speciality housing eg. Older persons', health , related to aviation, sports facilities and woodland
	Small scale, unique villages including self-build and custom-build
	Garden Village (criteria is 1,500-10,000 homes)
<b>Institutional</b>	Prison
	Boarding school
	Training centre
<b>Leisure</b>	Zoo/nature park
	Theme park
	Golf course
	Show-ground/festivals
	Race track/drag racing (e.g. Dunsfold)
	Rowing lake/sports complex
<b>Industrial/commercial/agricultural</b>	Recreational airfield use
	Research and development facility
	Wind farm
	Solar P.V. farm
	Waste to energy
	Return to agricultural use
	Grazing land
	Covered storage
	Film and TV set/studio
	Open storage
	Data centre
	Conference facilities and hotel
Pilot training	
Storage/hangars for aeroplanes (Stansted)	
<b>Other</b>	Wildlife and conservation area , ecological mitigation site (newts, farmland birds, nightingales etc.)



## 2 The Site

### 2.1 Site Location and Description

2.1.1 The former RAF Wethersfield site is located to the north of the village of Wethersfield in Braintree District. The site was originally established as an airfield in 1941. The runway was upgraded to a hardstanding runway in 1943. During World War II the airfield was occupied by both the Royal Air Force and United States Army Air Force. It was closed in 1946 and then reopened in 1951 to be used during the Cold War as a United States Air Force fighter airfield.

2.1.2 Since 1993 the site has been under the control of the MOD Police and Guarding Agency (MDPGA) and is currently home to their headquarters and training facilities. The site is owned in its entirety by the MOD and subject to a number of short-term occupational leases to third parties.

2.1.3 The site comprises some 322ha of land in a relatively isolated rural location, surrounded by farmland and areas of woodland. It is generally flat and open, dominated by the wide expanse of the former airfield. A variety of buildings and structures occupy the fringes of the site, with a particular concentration in the south west corner.

2.1.4 Access from the site to the local road network is currently limited. The primary access is via Sculpins Lane, which links to the B1053. A secondary access point links the site to the village of Wethersfield and the B1053 via minor roads (Hedingham Road and Hudson's Hill). A third access point links to the north via an unnamed road near Gainsford End. Each of these access points is controlled by MOD security. There are a number of other potential access points around the site, although none are currently in use. The nearest major settlement is the district centre of Braintree, 6 miles (approximately 20 minutes drive) to the south on the B1053.

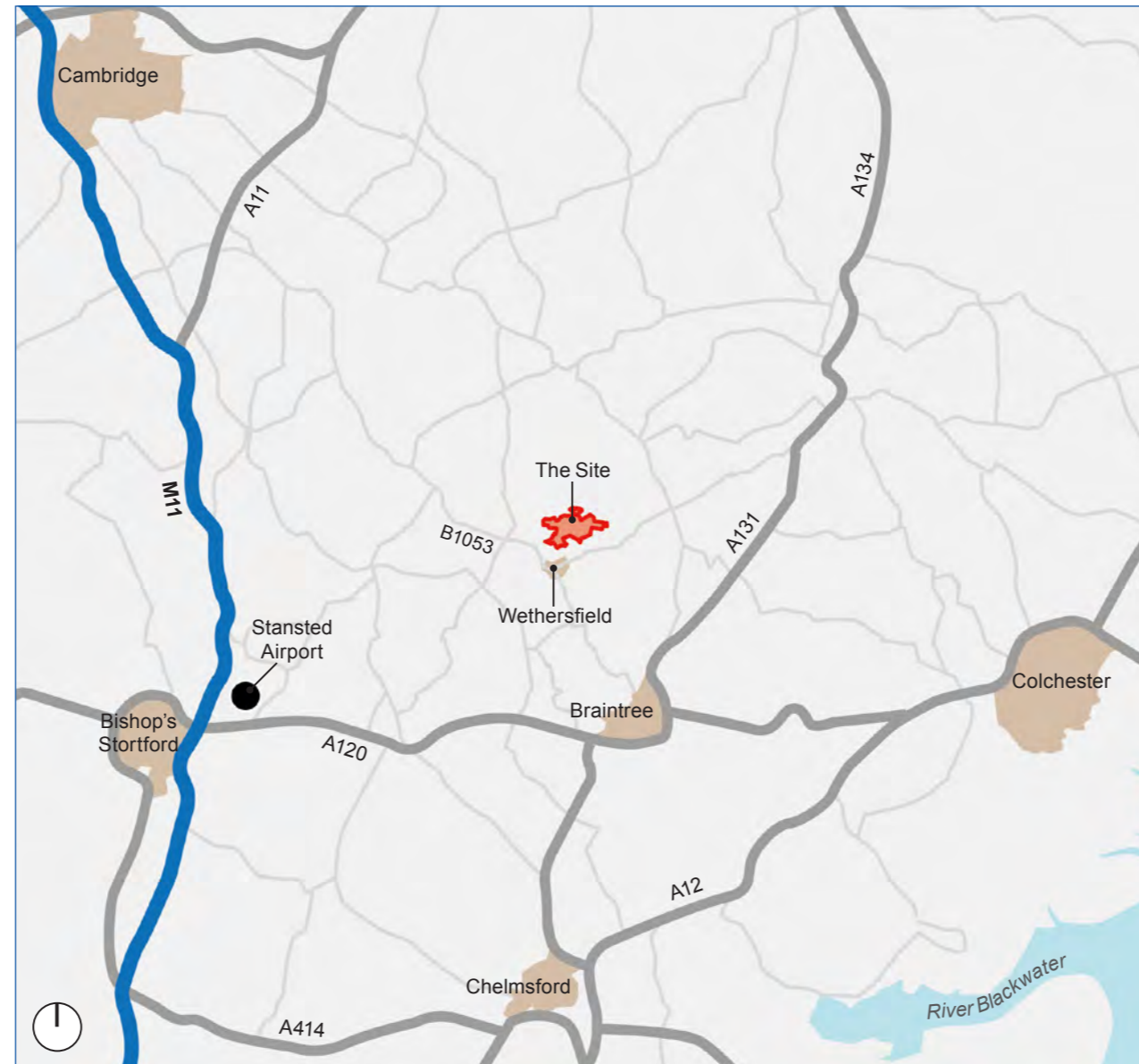


Figure 2.1.1: The site and its surrounding context



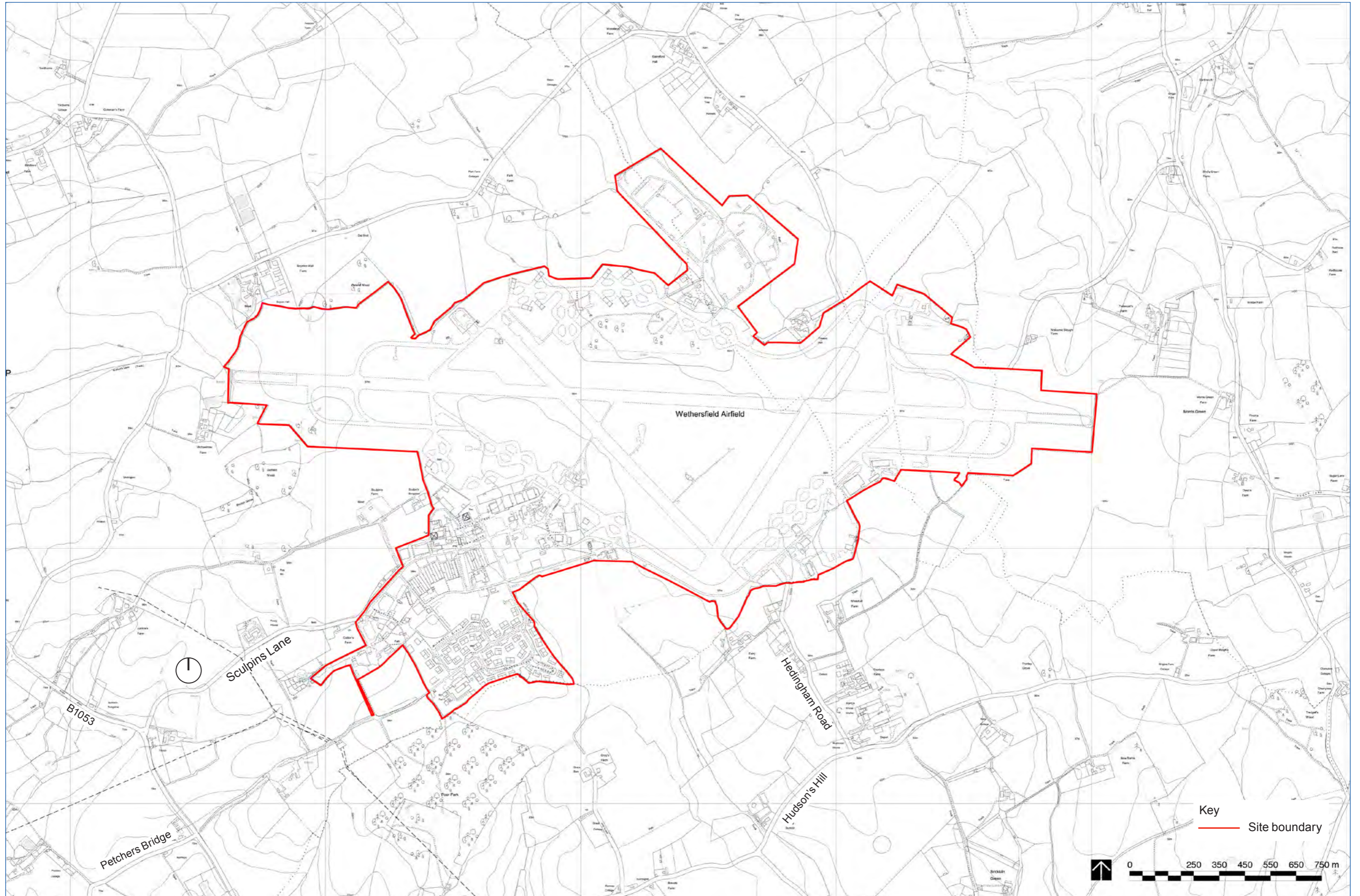


Figure 2.1.2: Site plan



## 2.2 Existing Uses and Planning Status

2.2.1 The existing uses of the site is as follows:

- A. Former airfield (runways, taxiways, hangars) open grassland and Woodland Trust (“Wethersfield Diamond Jubilee Wood”) planting.
- B. MODPGA offices, training facilities, catering, student accommodation, social club, chapel, museum. Third party leased storage and warehousing.
- C. 148 homes occupied by MODPGA families.

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G. Ancient woodland.

2.2.2 As noted above, the site is occupied by a broad range of uses including vacant land (former airfield), offices, storage, student accommodation, housing, training facilities, and ancillary facilities such as catering, a museum and social club. The variety of existing uses and lack of specific information available on individual buildings (due to MOD security) make it difficult to provide a detailed picture of the established uses of the site. However, based on analysis of the available information and a search of Braintree District Council’s planning application database it is considered that the established uses include: B1 (office), B8 (storage and distribution), C2 (residential institutions), C3 (dwelling houses), D1 (non-residential institutions) and Sui Generis.

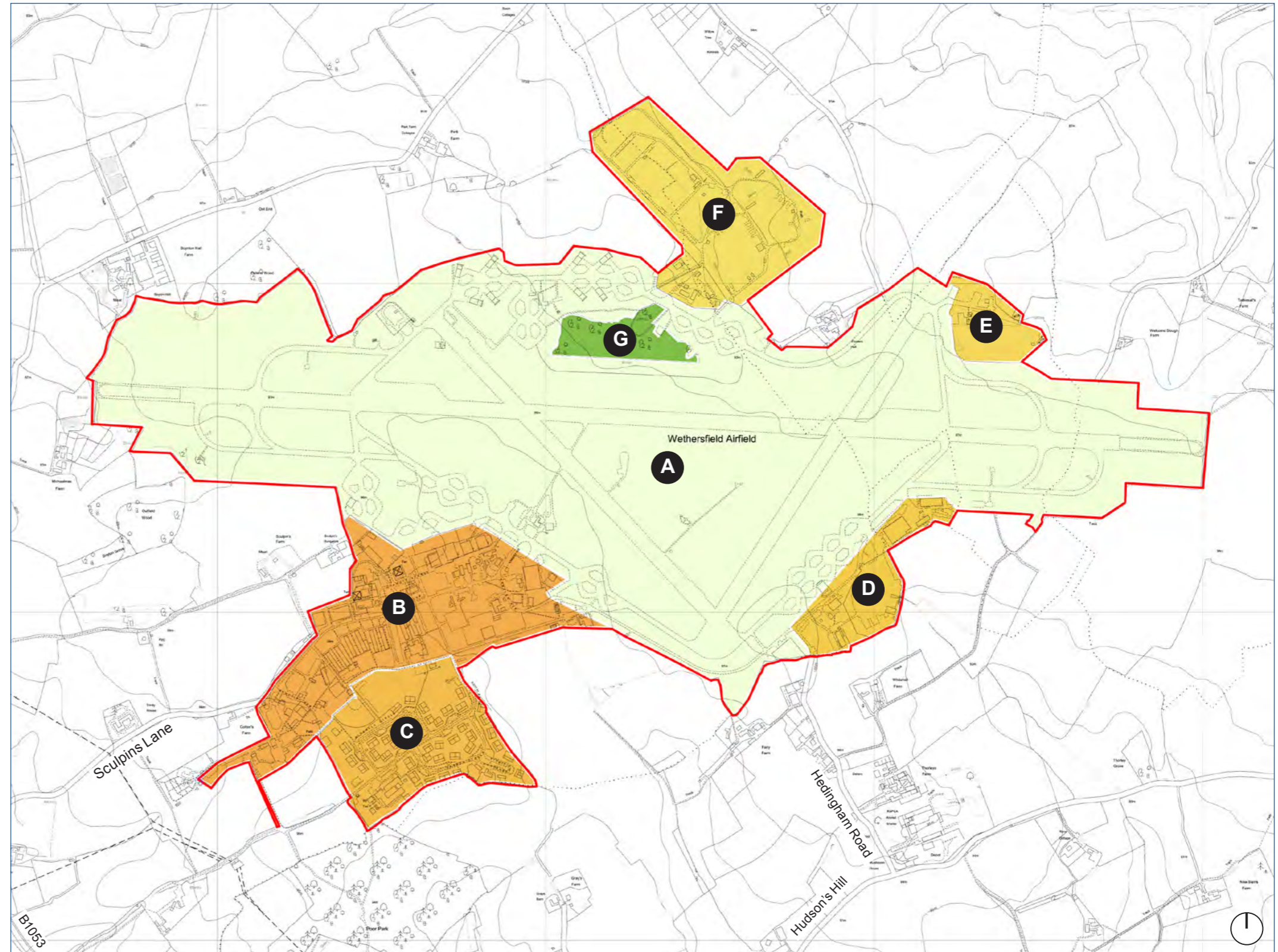


Figure 2.2.1: Existing Use of the site



## 3 Site and Context Analysis

### 3.1 Introduction

3.1.1 This section provides a summary of the baseline analysis of the site and its context undertaken in Stage 1 of the project to set the scene for the consideration of the land use strategies in Section 4 of the document. The following topics are covered:

- Highways and Transportation
- Ground Conditions
- Flooding and Drainage
- Utilities and Infrastructure
- Landscape and Views
- Arboriculture
- Ecology and Biodiversity
- Heritage and Archaeology
- Planning Policy Context
- Local Property Market

### 3.2 Highways and Transportation

#### Site Location and Accesses

3.2.1 Currently, pedestrian and vehicular access to the site is understood to be available at three points. The first (the existing main access point) is to the west of the site via Sculpins Lane, while two more access gates are located toward the south via Hedingham Road and to the north via an unnamed road near Gainsford End.

3.2.2 The existing highway network is very limited surrounding the site, with the immediate road links generally being single carriageway, often single-lane, roads. The B1053 runs to the west of the site and provides access to the village of Finchingfield and routes towards Cambridge. The nearest trunk road is the A12 near Colchester, approximately 37 km from the site (40 minutes' drive). The closest primary road is the A131 (maintained by ECC) at 19 km from the site (25 minutes' drive), and this leads from Braintree to Sudbury. The closest access to the strategic road network is at Junction 9 of the M11, approximately 30 km from the site (40 minutes' drive).

3.2.3 A map showing the site location in context can be seen in figure 3.2.1: Site location and key access points.

#### Existing Public Transport, Walking and Cycling Conditions

3.2.4 The nearest bus stops to the site are in the village of Wethersfield and along the B1053 to the south and west of the site respectively. The nearest bus stop, Justice's Farm, is approximately 2km from the site (a 23-minute walk). Bus services 9, 9A and 16 serve this bus stop and operate up to one service per hour to local areas throughout the week. Another service, 419, runs on school days only and provides one morning and one afternoon service through Shalford, Wethersfield, and Newport.

3.2.5 Braintree National Rail Station is located approximately 15km southeast of the site via the B1053 (a 23-minute drive). Braintree station is served by a branch off the Great Eastern Main Line at Witham, and has hourly services to London Liverpool Street, a journey of approximately 1 hour in duration.

3.2.6 There are very few pedestrian and cycle facilities in the area surrounding the site, with pedestrian movement being taken on or alongside the carriageway in approach of the site. There is however a Public Right of Way which connects the site with the B1053 to the west. The village of Wethersfield offers the nearest consistent formal pedestrian facilities, while Finchingfield has intermittent footways.

#### Census Data Analysis

3.2.7 The rural nature of the site's location is reflected in the travel habits of the existing daytime and night-time populations. Approximately 80% of residents in the areas surrounding the site travel to work by car, while for people who commute to the area from outside, the figure is 82%. 92% of households within the area in which the site falls have access to at least one vehicle, compared to 84% in Braintree and 82% in Essex as a whole.

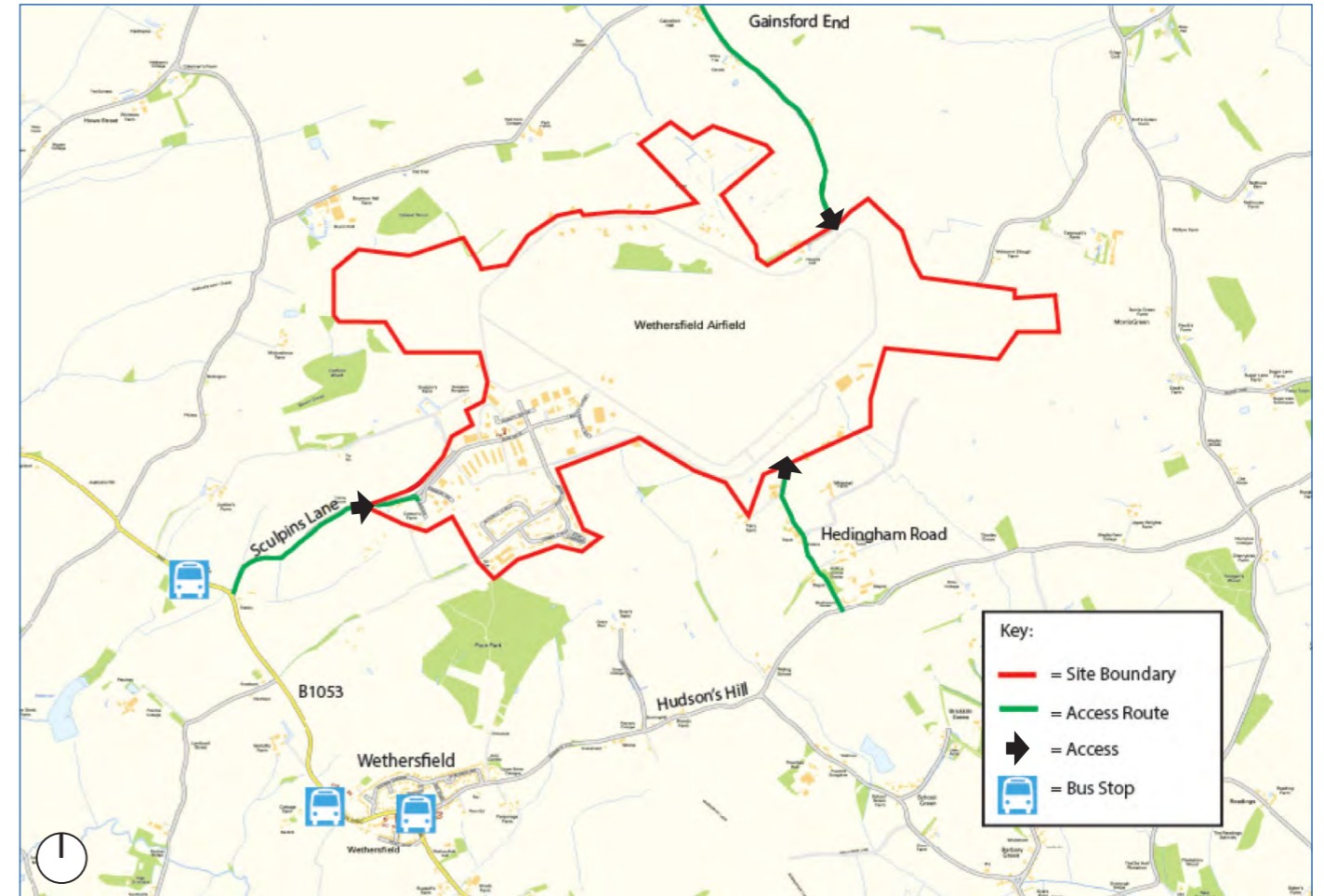


Figure 3.2.1: Site location and key access points

#### Existing Traffic Levels

3.2.8 Traffic surveys were undertaken to gather data on the existing movements within and surrounding the site, with Automatic Traffic Counter (ATC) strips being positioned at the two principal site accesses (Tinker Avenue and Toppesfield Lane), and on the B1053.

3.2.9 The site was found to produce an average of 679 arrivals and 727 departures on a typical weekday (1,406 two-way vehicle trips). It is assumed for the purposes of estimating future baseline traffic that each of the 148 existing dwellings generates 1 departure and 1 arrival per day, and that these trips will continue to be made for the foreseeable future. The 'baseline' number of vehicle trips on the network that would be removed if the site were to cease its current operations (excluding the housing areas) would therefore be 1,126 vehicle trips.

#### Key Points

- The surrounding highway network generally comprises low capacity roads, and the site has limited access to the strategic road network;
- The surrounding population has high levels of car ownership and commuting by car;
- The accessibility of the site by sustainable and active modes is low due to limited services and infrastructure; and
- The site was found to produce an average of 679 arrivals and 727 departures on a typical weekday (1,406 two-way vehicle trips).



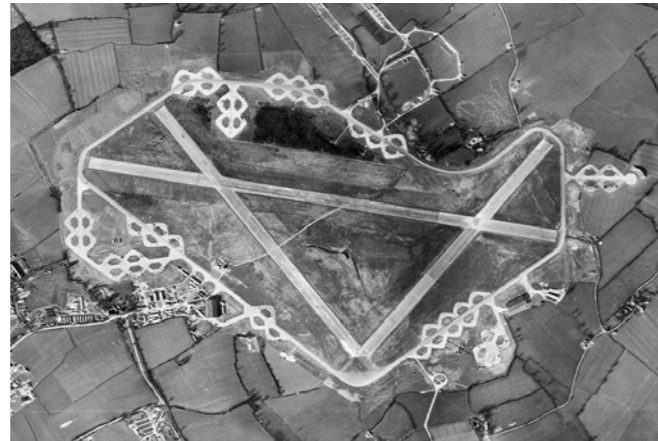
### 3.3 Ground Conditions

#### Past and current use of the site

3.3.1 The site originally comprised agricultural fields until the mid-1940's. Historical maps of the site dated 1881 to 1924 show a number of farms, associated buildings, ponds and hedgerows as illustrated below. The topography was largely flat and involved the destruction of both Broad Farm and Sculpins Farm. In 1942 the land was allocated by the RAF to the United States Army Air Force (USAAF) and by 1944 construction on site was complete as shown in the aerial photograph below. The highlighted area lies to the southwest of the current airfield and the wooded area was removed to build what is now the main east-west runway.



3.3.2 Initially the site was used by both the RAF and USAAF but post war the site was closed in 1946 and retained on a care and maintenance basis. As a result of the Cold War the base was reopened in 1951 as a USAAF fighter base until 1970 after which the site was again retained as a reserve base until 1993 when it became the headquarters and training base for the Ministry of Defence Police.



#### Geology and ground conditions

3.3.3 The geological map for the area (figure 3.3.1) shows that the site is underlain wholly by London Clay with little indication of other superficial soils and made ground. Underlying groundwater is unlikely to be at risk due to the London Clay. Little information has been obtained from the client although undoubtedly surveys and investigations would have been carried out on this site. Further joint efforts to obtain full disclosure of existing archives would be beneficial. A June 2012 land condition report that has been made available highlights concerns about potential contaminants as follows:

- Bulk fuel installations and former petrol filling station (all now disused)
- Active domestic fuel oil storage associated with the technical area and Married quarters area
- Previous areas of waste disposal and burning (not defined)
- Possible radioactive and asbestos containing materials
- Munitions
- Reported aircraft crash site in Park woods to the north of the runway
- Fire and Rescue training ground

3.3.4 The following gaps in information were identified in the report:

- Information about de-icing while airfield was in use for aviation
- Disposal of runway sweepings
- Possible disposal of aircraft and parts
- Nuclear weapon storage

#### Analysis

3.3.5 The Wethersfield site will undoubtedly contain residual contamination in various areas of the site as there are no signs of any significant demolition and remediation having been carried out. A comprehensive phased and targeted ground investigation will be required in due course as the project proceeds. The aim would be to highlight and identify risks particularly controlled waters risks that may impact on site value and liabilities. Figure 3.3.3: Initial Land Quality Risk Review and figure 3.3.4: Initial UXO / Demo Review summarise the potential risks for consideration in the next phase.

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Figure 3.3.1: Geological Map of the area

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## 3.4 Flooding and Drainage

3.4.1 MOD Wethersfield is relatively flat with datum levels of between 95-100m AOD across the wider site. Contours based on LiDAR data have been produced to help illustrate the existing topography, shown in figure 3.4.1: Topography Plan.

3.4.2 There is an existing separate Surface Water and Foul Sewer network which predominantly runs from north to south with various outfalls located along the site boundary (see figures 3.3.5: Existing Services Sewer Plan and 3.3.6: Existing Services Water Plan). The condition of the existing outfalls is currently unknown so a CCTV survey will be recommended.

3.4.3 The site is deemed to be classified as Flood Zone 1 based on the Environment Agency Flood Maps. If a site is classed within flood zone 1, this represents the site as being one of "Low Probability" and clearly states that all uses of land are appropriate in this zone.

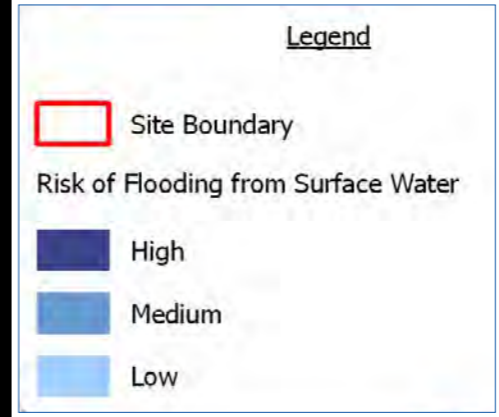
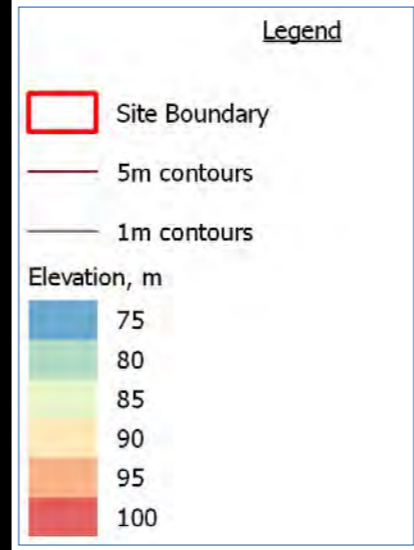
3.4.4 Land in this zone is assessed as having less than 1 in 1000 annual probability of river or sea flooding in any year.

3.4.5 The Surface Water Flood Risk Plan (figure 3.4.2: Surface Water Flood Risk Plan) indicated the perceived risk of surface water flooding across the site. The surface water run-off will need to be managed through the masterplanning process.

3.4.6 SUDS (Sustainable Urban Drainage Solutions) hierarchy is to be considered where possible and the surface water network will be designed such that it accommodates the 1:100 year storm events plus additional climate change.

3.4.7 Discharge from each new development area should be limited to Greenfield rates, at a minimum of around 5 L/S. It is intended to maintain the existing networks where possible, attenuation and flow control will be required to attenuate the proposed site.

3.4.8 Capacity checks for discharging the foul may be required if an increase of flow has occurred due to the new development.



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## 3.5 Utilities and Infrastructure

3.5.1 It is considered that utility capacity and identifying infrastructure upgrade requirements will play a key role in determining the next steps.

3.5.2 As with any former air base, understanding the existing utility network and obtaining the current utility provision will help inform and/or identify any significant delivery and cost risks associated with future land uses. The existing Utility Services Electricity and Telecoms plans and Extract from Existing Services Gas plan are shown in figure 3.5.1, figure 3.5.2 and figure 3.5.3.

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### Electrical Supply

3.5.3 reg. 12(5)(a)

built in 1982. The site seems to have a reasonable distribution of both HV and LV electrical services covering the perimeter. The majority of the electrical services are condensed within the 'Technical Area' of the site located to the southwest.

3.5.4 Consumption for the year between April 2015 and March 2016 totalled 3.79MKWh which equates to a daily average demand of 430kW.

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### LPG / Oil Supply:

3.5.5 The site relies on LPG as the main source of fuel with tanks located in strategic position across the airfield site. Consumption of LPG between April 2015 and March 2016 totalled 455,000 LPG/kWh.

3.5.6 In addition to the LPG usage the site also relies on Heating oil and used over 5.5 Million Litres (ML) in the year between April 2016 and March 2017.

3.5.7 There is a very limited gas supply, restricted to a few of the existing MOD residential settlement at the south of the site.

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### Foul Network:

3.5.8 There is an existing established Foul Sewer network across the airfield, largely consolidated at the south and south-western boundaries of the site. There appear to be a number of off-site connections but it is unclear as to what the current discharge rates are.



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**Surface Water Network:**

3.5.9 As with the Foul Sewer network, the surface water network is already established and covers the majority of the existing site. The outfalls and discharge rates would need careful consideration as part of any site intensification.

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**Water Supply:**

3.5.10 There appear to be a number of off-site potable water connections along the perimeter of the site with reasonable distribution apart from the north western corner. At this stage it is not clear as to what the availability of potable water is to the wider site.

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**Data and Communications:**

3.5.11 There is an existing network of data / telecoms cables along the southern boundary of the site, serving the need for the technical area. There are not any known data services in the northern, central or western portion of the airfield.

3.5.12 The existing strategic utility service corridors and associated easements will need to be carefully considered and respected.

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**Summary**

3.5.13 Wethersfield is extremely remote in nature and as such presents advantages and disadvantages in terms of future development opportunities.

3.5.14 It is understood that the statutory services infrastructure of limited capacity exists on the site which includes Gas, Water, Electricity and Data connections from adjacent off-site infrastructure.

3.5.15 Wethersfield offers a unique opportunity for sustainable development which could maximise the use of on-site renewable energy, however this will be require significant capital expenditure.

3.5.16 Any future land use strategy will have to carefully consider the mix of developments and how their individual utility requirements can be collectively provided.



### 3.6 Landscape and Views

3.6.1 This section of the report considers the existing site and its surroundings and describes the landscape character and condition. It further identifies sensitivities relating to the landscape and views. This appraisal has been informed by desk study and field survey undertaken by Chartered landscape architects during March 2018. A study area of 3km radius, centred on the site was identified, derived from local topography and landscape characteristics.

#### Landscape Designations

3.6.2 There are no national or local landscape designations within the study area. The Dedham Vale Area of Outstanding Natural Beauty (AONB) lies approximately 20km to the east and is centred on the lower Stour Valley. The closest Registered Park and Garden, is Spains Hall which lies 2.2km to the west, and is in private ownership. There are two conservation areas in the vicinity; Wethersfield approximately 900m to the south and Finchingfield 2km to the west.

3.6.3 The site in its present state has no influence on the setting of the AONB, Spains Hall Registered Park and Garden or the conservation areas, but this should be kept under review once preferred land use/s are identified.

3.6.4 There is one area of Ancient Woodland, Park Wood, within the site with three others adjacent to the site. These protected woodlands are considered in more detail in the arboriculture section of this report.

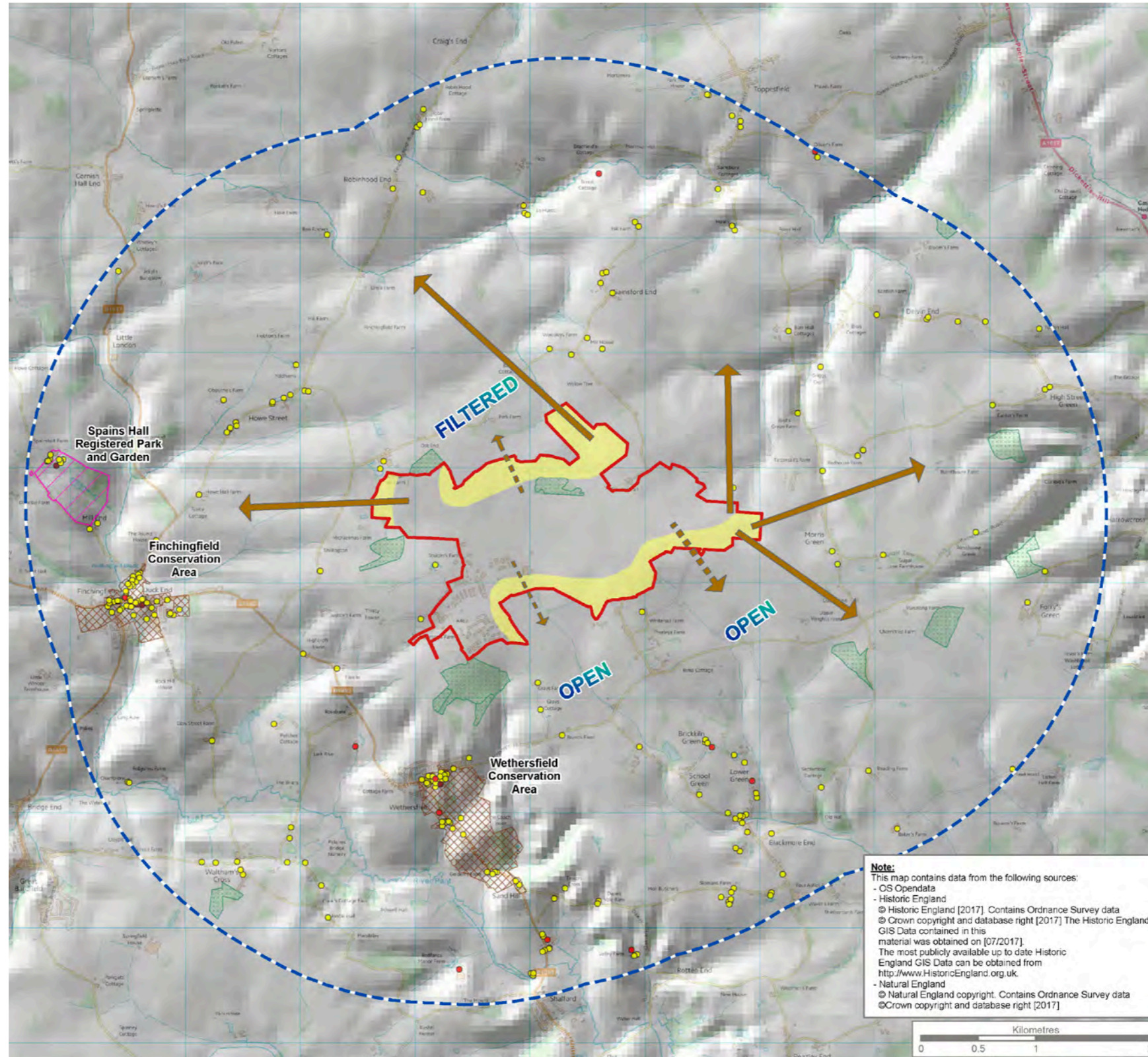


Figure 3.6.1: Landscape and visual appraisal plan of landscape features referred to in Landscape Designations



### On-Site Landscape Character

3.6.5 The landscape character of the site is dominated by the former airfield land uses; runway, other areas of hardstanding, aircraft hangars and bunkers, together with mature woodland blocks, areas of more recent woodland planting and vegetation along some boundaries. There are a number of specimen trees and areas of amenity grass used for recreation associated with the military accommodation and offices. Landscape features within the site are limited and with the exception of the Ancient Woodland, are of relatively low value.

### Surrounding Landscape Character

3.6.6 The Braintree District Landscape Character Assessment (LCA)<sup>1</sup> will need to be considered in any planning application as required by Local Plan Policy LPP 71 Landscape Character and Features<sup>2</sup>. The policy requires new development to be informed by, and sympathetic to local landscape character and development should not be detrimental to distinctive landscape features such as trees, hedges, woodlands, grasslands, ponds and rivers. The policy also states that development which would not be successfully integrated into the local landscape will not be permitted. The existing landscape character is therefore considered at this early stage of the project.

3.6.7 Within the LCA, the site is identified as being located within Landscape Character Area B9 Stambourne Farmland Plateau, between the Colne and Pant River Valleys. Key characteristics of this area are identified as:

- Relatively open gently undulating arable land;
- Predominantly agricultural land bounded by species rich hedgerows with trees and ditches;
- Narrow country lanes bounded by grass verges and ditches; and
- Lines of pylons dissect the open landscape.

3.6.8 Visual characteristics of the area are identified within the LCA as follows:

- The church towers of Stambourne, Toppesfield and Finchingfield are landmarks within the views towards the villages.

- Generally open views across the arable fields which are framed in places by small patches of woodland and hedgerows with trees.
- Wethersfield Airfield dominates the views in the south-eastern area.

3.6.9 The LCA identifies a number of sensitivities to change which are as follows:

- Several high areas of plateau have an open skyline, which is visually sensitive to new development, which may interrupt views across, to and from the plateau.
- The historic land and settlement pattern is sensitive to potential new large scale development.
- Important wildlife habitats which are sensitive to changes in land management.
- Overall the LCA has a moderate to high sensitivity to change.

3.6.10 The field survey undertaken for this Stage 1 report concurs with these findings. It will be important to locate large scale development or tall buildings sensitively to avoid adversely affecting views from sensitive locations such as the conservation areas.

3.6.11 The following landscape planning and land management guidelines for the LCA are identified and should be taken into consideration when considering future land use options on the site:

- Ensure that any new development is small-scale, responding to historic settlement pattern (dispersed historic settlement pattern with isolated farms, moated sites and small villages strung out along linear greens, and historic cores centred around churches), landscape setting and locally distinctive building styles.
- Conserve and enhance the existing field boundary pattern, and strengthen where necessary through planting native species appropriate to local landscape character.
- Conserve and manage areas of ancient and semi-natural woodland as important historical, landscape and nature conservation features.
- Conserve and manage the ecological structure of woodland, copses and hedges within the character area.
- Conserve and promote the use of building materials in keeping with local vernacular landscape character.

3.6.12 Given the size of the site, point i above would need to be achieved through careful site planning. It is recommended that any future Masterplan should be divided into distinct areas creating an appropriate settlement pattern with open spaces and green corridors delineating and structuring development. Locally distinctive features such as hedges with hedgerow trees, roadside verges and ditches, and small blocks of woodland should be incorporated into the proposed green infrastructure.

### Visual Appraisal

3.6.13 It is useful to note that there are a number of tall structures which create landmarks in the local landscape and which also aid orientation. These include church spires, water towers, communication masts and the Dutch barns.

### Views towards the site

3.6.14 The site occupies a flat plateau in an otherwise undulating landscape. Contrary to the statement within the Braintree District LCA which describes the Wethersfield Airfield as 'dominating views' our field survey did not find this to be the case, and with the exception of some of the larger buildings located towards the edges of the site, the site is not considered to be visually prominent in the local landscape. This is primarily due to the following factors which limit the site's visibility:

- Local topography is fairly complex; with river valleys and undulating fields. Land falls away from the site and views are often curtailed, narrow or intercepted by land-form, field boundary hedgerows and trees or blocks of woodland;
- The open plateau is occupied by the runway and associated hardstanding with few built structures;
- The site boundary is generally planted and this vegetation filters near views into and out of the site; and
- Existing adjacent woodland blocks screen local views into the site.

3.6.15 Despite the above, it is the case that some parts of the site are more visible than others. These are identified on the landscape and visual appraisal plan (figure 3.6.1) and are as follows:

- South eastern edge;
- Northern edge in the vicinity of the Dutch barns and the ammunitions storage area; and
- Western end of the runway.

### Views to and from the site

3.6.16 There are some long views from the site out towards distant hills. These are primarily from the north and eastern edges of the site and from the end of the runway, looking west. Photos which represent local views to and from the site are presented on figure 3.6.4.

3.6.17 Zone of Theoretical Visibility (ZTV) mapping has been prepared to identify land that, theoretically, is visually connected with the site. The Bare Earth ZTV is presented in figure 3.6.5 and this represents a worst case extent of the potential visibility of the site and does not convey the nature or magnitude of any potential visual impact. The Screened ZTV is presented in figure 3.6.6 and takes account of the screening effect of settlement and woodland blocks using a height of 8m for buildings and 10m for woodland based on OS Open Map Local data (Feb 2018). The ZTVs assume that the ammunition storage area will not be developed and that existing mature and recently planted woodland remain intact. ZTVs are a helpful tool when it comes to identifying potential visual receptors and when establishing a study area for detailed impact assessment. It is recommended that a full visual impact assessment be undertaken once the preferred land use options are decided and at that stage the ZTV can be refined to take account of the location and height of the proposed development, and the extent of visibility can be verified through further field survey.

<sup>1</sup> Landscape Character of Braintree District, 2006

<sup>2</sup> Braintree District Draft Local Plan June 2017



**Key Points**

- There are no national or local landscape designations within the study area.
- The site in its present state has no influence on the setting of the AONB, Spains Hall Registered Park and Garden or the conservation areas; this should be kept under review once preferred land use/s are identified.
- Landscape features on the site are limited, and with the exception of an area of Ancient Woodland, are of relatively low landscape value.
- The surrounding landscape is relatively open, undulating arable land, bounded by hedgerows with trees and ditches, and with narrow country lanes with grass verges and ditches. This is consistent with published local Landscape Character Assessments.
- The local historic land and settlement pattern is sensitive to potential new large scale development, therefore large scale development must be located to avoid adversely affecting landscape character.
- Visual characteristics of the surrounding landscape comprise open views across the arable fields which are framed in places by small patches of woodland, with church towers as landmarks.
- The site is relatively visually discrete, although being on a plateau it will be visually sensitive to new development. Some areas of the site are more visually prominent than others and taller buildings should be avoided in these locations to avoid adversely affecting views from sensitive locations such as the conservation areas.
- It is recommended that any proposed masterplan be sub-divided into distinct areas creating an appropriate settlement pattern with open spaces and green corridors delineating and structuring development. Locally distinctive features such as hedges with hedgerow trees, roadside verges and ditches, and small blocks of woodland should be incorporated into the proposed green infrastructure.



1. View west from the western end of the runway.



2. View to the north east across the runway looking towards the Dutch Barns and Park Wood.



3. View to the north west from the ammunition storage area.



4. Woodland edge, Park Wood.



5. View to the east from the eastern end of the runway.



6. View north east towards the Police dogs training area with Loves Wood (recent planting) on the right.



7. Family housing and amenity areas.

Figure 3.6.2: Photos of on-site landscape features





1. Arable fields adjoin the site with managed hedgerows and hedgerow trees.



2. View towards the site across open agricultural land with woodland blocks.



3. Rural lane with grass verges, ditch and embankment with field boundary trees.



4. Rural lane with grass verges, ditch and embankment with field boundary trees.



5. Undulating agricultural landscape with field hedgerows, farmsteads, overhead electricity and telegraph poles.



6. Mature trees along rural lane with open boundary to adjoining fields.



7. Local vernacular in Finchingfield.



8. Local vernacular in Finchingfield.

Figure 3.6.3: Photographs illustrating surrounding landscape character





1. View from local road near Gainsford End, looking south east towards the ammunition storage area.

2. View from local road looking east towards the site entrance with a water tower evident beyond intervening tree cover.

3. View from local road south towards the Dutch Barns.



4. View from the junction of Hudson's Hill and the road to Blackmore End with the water tower and communication masts evident.



5. View from Wethersfield Road (B1053) looking north towards Poor Park (woodland).

Figure 3.6.4: Photographs of views towards the site



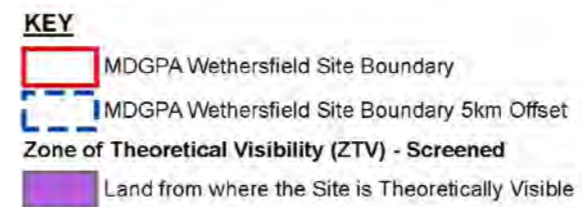
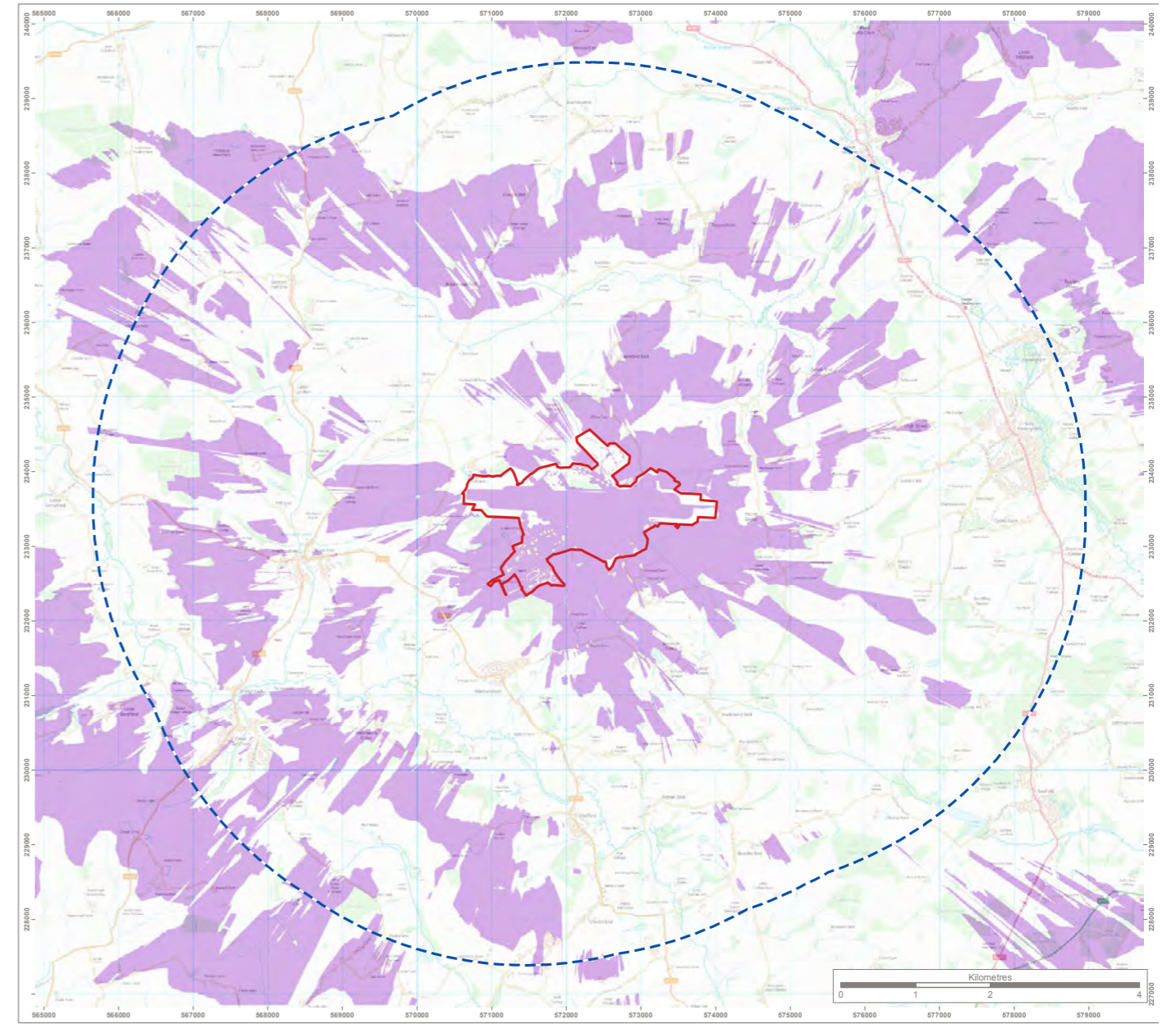
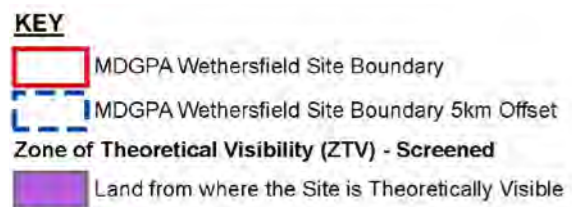
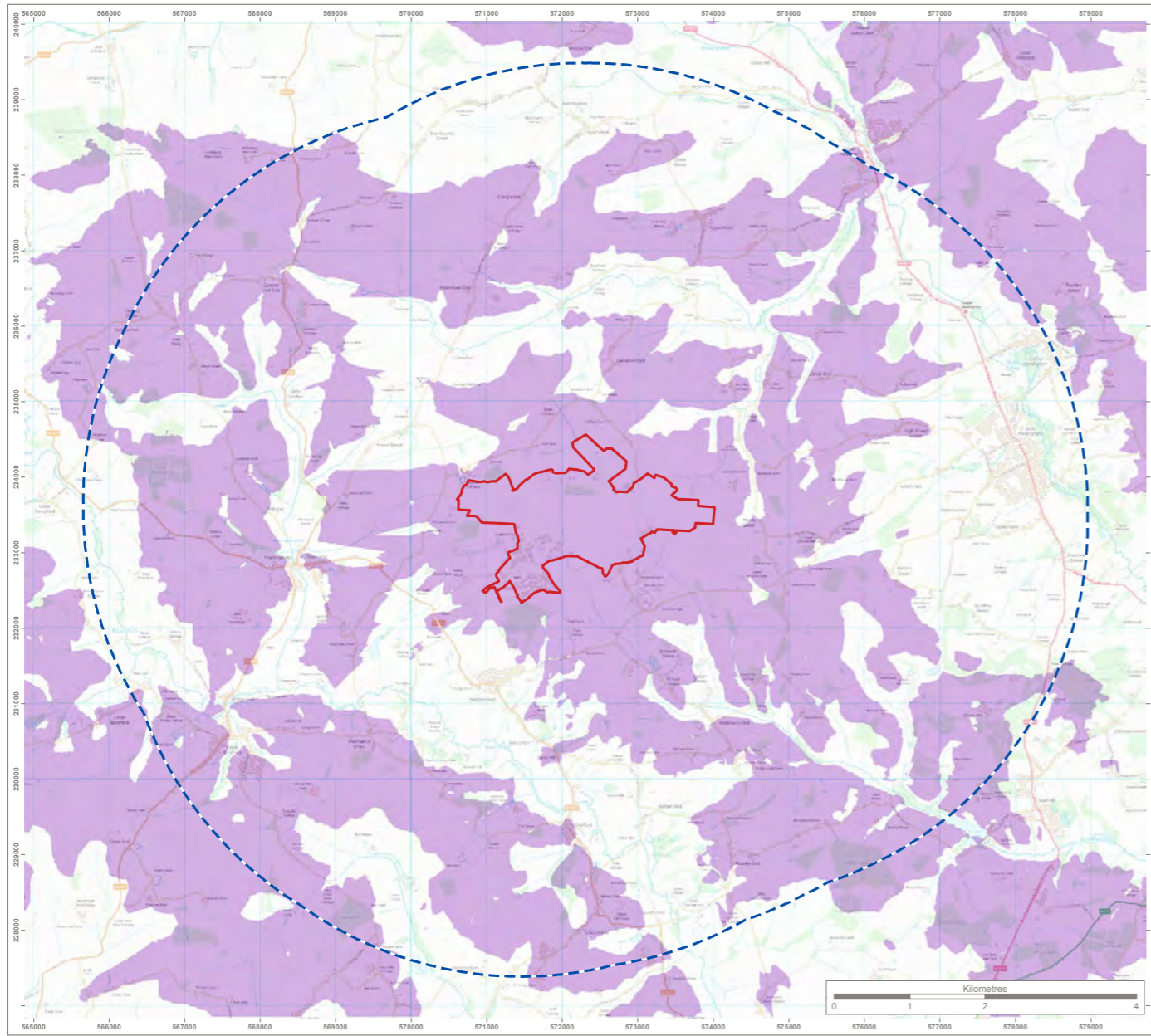


Figure 3.6.5: Zone of Theoretical Visibility (ZTV) **Bare Earth**

Figure 3.6.6: Zone of Theoretical Visibility (ZTV) **Screened**



## 3.7 Arboriculture

3.7.1 This section of the report considers the existing site and its immediate surroundings and describes the distribution, quality and significance of trees and woodland. This appraisal has been informed by desk study and field survey undertaken by a Chartered Arboriculturist during March 2018. The study area was the site itself with observations of adjacent land made from within the site.

### Desktop study

3.7.2 The site contains no Tree Preservation Orders and is not within a Conservation Area. There are three named ancient woodlands adjacent to the site and one within the site (Park Wood). All of the ancient woodlands are also designated as Local Wildlife Sites (previously 'County Wildlife Sites').

3.7.3 It was not possible to search for veteran trees (and none were noted during the survey). Occasional mature oaks and field boundaries pre-dating the airfield remain and should be surveyed to identify any veteran trees.

3.7.4 Park Wood is mapped as a Habitat of Principal Importance (Deciduous Woodland) as defined by the Natural Environment and Rural Communities Act 2014. A small area of scrub woodland adjacent to Outfield Wood may also meet the criteria although it is not mapped. Lapsed hedgerow where present along the perimeter boundary and very occasionally within the site is likely to also be a Habitat of Principal Importance (Hedgerow) but ornamental single species hedgerow is not.

3.7.5 A large part of the site outside of the main runway and hardstanding was planted with broadleaved trees with funding under the English Woodland Grant Scheme. This was done as part of a national project to plant 60 woodlands of at least 60 acres to mark the Diamond Jubilee of Her Majesty the Queen in 2012. The woodland (Wethersfield Diamond Jubilee Wood) is recorded in a document that was created as part of the project held by the British Library.

3.7.6 Braintree District Council has policies relating to the treatment of trees, woodland and hedgerow within developments. Policies RLP 80, RLP 81 and RLP 83 and explanatory text within the Core Strategy prioritise appropriate retention of trees and the provision of mitigation. They also underline the strong presumption against deterioration or loss of ancient woodland and make provision for enhancement, improvement and management plans for some habitats and for significant sites.

### Description of tree population

3.7.7 There are four distinct elements of the tree-landscape: Wethersfield Diamond Jubilee Wood; ancient woodland; remnant broadleaved hedgerow, scrub and mature trees; and landscaping associated with the built-up area in the south of the site.

3.7.8 Wethersfield Diamond Jubilee Wood comprises small trees that are established but growing slowly, possibly due to exposure. It includes a proportion of common ash, which is infected with Chalara ash dieback. It is likely that the woodland was planted with infected nursery stock imported from Europe. The approved planting design was not completed in some areas and additional planting was done in others, leading to an overall apparent shortfall of 5.46ha. At maturity, the woodland will be a significant arboreal resource. It will connect at least three currently fragmented ancient woodlands; screen the site on the northern, western and eastern sides; and the association with the royal family may be considered to have a particular cultural resonance in the context of a change of use from a military facility.

3.7.9 The ancient woodland is good quality mixed broadleaved semi-natural woodland or (in the case of Poor Park Wood) plantation woodland. There is some evidence of previous coppicing within some of the woodlands and they contain a good range of dead wood, ground flora, species and age structure. Park Wood within the site has some damage due to vehicle access and would benefit from some limited intervention to remove litter. Other woodlands overhang or come close to the boundary and could be influenced or affected by activity within the site.

3.7.10 Around the site boundary and occasionally within the site are scattered individual trees and lapsed hedgerow. These include trees that pre-date the current layout of the airfield, including mature oaks in the southern residential area and northern munitions store as well as a hedgerow along the northern edge of the residential area. Such trees are not numerous and many are actually immediately outside the perimeter fence. Management of trees within the site as an amenity resource is often in marked contrast to the surrounding agricultural landscape.

3.7.11 The buildings are mostly within the southern part of the site, which also contains most of the trees. These are principally amenity trees that have been planted to improve the aesthetics, shade, shelter and amenity of the occupied parts of the site. The planting comprises poplar, cypress, willow and flowering and fruiting trees as well as occasional oak, maple, birch and horse chestnut. Poplar are the largest trees and are widely planted in formal rows within verges. Leyland cypress and other evergreen species are planted for screening and shelter, and residential areas are planted with a range of smaller flowering and ornamental species including medlar, damson, apricot and cherry. The trees are generally in good condition and reasonably well-suited to the current context. However, they are very closely aligned to the layout and function of the site at present and may present a challenge to any more fundamental remodelling of this part of the site. Furthermore, many of the common species are approaching maturity and the lack of diversity in age means that tranches of the existing trees will reach the end of their safe useful life together, beginning within the next 20 years.



Figure 3.7.1: Occasional mature oak trees pre-date the airfield and need detailed surveying



### Recommendations

- A landscape buffer of 50m should be provided around all ancient woodlands. This should be measured from the canopy edge and it must be demonstrated that all activities within this area will not cause deterioration to the woodland but it may be possible to include low impact elements such as footpaths or low fences. A buffer of 15m should be provided within which there are no build structures whatsoever.
- It should be assumed that the Wethersfield Diamond Jubilee Wood should be retained and provision made for its management in the longer term. Where development priorities require it, removal of some areas would be acceptable provided that the overall area is not reduced. The liability for repayment of grant monies in the event of tree removal or failure should be confirmed.
- The parts of Wethersfield Diamond Jubilee Wood in the north-west and western part of the site will connect three ancient woodlands together. The retention, management and, where possible, augmentation of these parts should be prioritised.
- A strategy for the future character and 'tone' of the tree-scape in the southern part of the site should be developed. Piecemeal retention of trees as practicable within a redevelopment is likely to result in a directionless and uninspiring tree population with a legacy of imminent or future problems.
- The strategy for the southern part of the site should explore three broad options for the future and be strongly informed by the ultimate site use:
  - Retention of the existing character by phased replacement to improve age structure and resilience;
  - Retention of key features within a staged evolution of the tree population towards a clearly defined character;
  - Wholesale redesign of the built environment retaining only trees of particular quality and longevity within a high quality landscaping scheme.
- The perimeter fence should be removed or future planting and management changed to reduce the abruptness of the change in character and habitat at the boundary.
- A landscape and habitat management plan should be produced as part of any future planning application to detail how existing and proposed trees will be managed in the long-term. This should include Wethersfield Diamond Jubilee Wood.
- A detailed tree survey should be undertaken in support of any future planning application. This should pay particular regard for the safe useful life expectancy of poplar, cypress, willow and ornamental fruit trees in the south of the site.
- Any future application must be supported by an Arboricultural Impact Assessment. This should include details of the strategy of mitigation for any unavoidable tree loss. The management of Wethersfield Diamond Jubilee Wood and Park Wood provide suitable vehicles for the delivery of benefits in addition to new planting.
- New planting should not include ash trees because Chalara ash dieback is present on the site. Replacement of those lost to the disease with alternative species should be considered in any scheme of mitigation planting.
- Traditional Orchard creation is one objective of the Local Biodiversity Action Plan. This may be a useful mechanism for mitigation of tree loss within the current residential areas that would be viewed favourably by a range of stakeholders.



Ancient woodland overhangs site boundary and will require a landscape buffer



Ancient woodland adjacent to the site boundary



Ornamental cherry trees are short lived and many are already mature



Formal planting of poplar trees in wide verges delineate land use in the south of the site



Young tree planting as part of Wethersfield Diamond Jubilee Wood



Ancient Woodland within the site (Park Wood)

Figure 3.7.2: Photographs of woodland, trees and planting across the site



## 3.8 Ecology and Biodiversity

3.8.1 This section of the report provides an ecological assessment of the site and describes the habitats currently on-site and the potential for these to support protected species. This appraisal has been informed by a desk based assessment and field survey undertaken by TEP during April/May 2018.

### Desktop Study

#### Designated Sites

3.8.2 Review of the UK Government internet site MAGIC confirmed that the site does not benefit from any statutory nature conservation designation. However, there are three statutory nature conservation designations of national importance within 10km of the site boundary.

3.8.3 The site is located within the Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ) for Bovingdon Hall Woods SSSI. Categories that the site falls into are provided in figure 3.8.1.

3.8.4 Data received from Essex Wildlife Trust confirmed that a Local Wildlife Site (LoWS) is located within the site boundary. Park Wood, Wethersfield Aerodrome LoWS is located in the north of the site and is an ancient woodland. No further details of this site were provided.

3.8.5 Additionally, three LoWS are located adjacent to the site boundary and a further seven LoWS are located within 2km of the site boundary.

#### Protected and Notable Species

3.8.6 The desk based assessment identified multiple records of legally protected and notable species from within 2km of the site boundary. All data was provided by Essex Wildlife Trust.

3.8.7 Particular attention was paid to establishing whether any European Protected Species (EPS) were likely to be present within the site. The desk based data includes records of seven bat species, a single record for European otter and multiple records of white clawed freshwater crayfish within 2km of the site boundary.

3.8.8 In addition to the EPS listed above, records were provided for the UK protected Schedule 1<sup>1</sup> bird species fieldfare, kingfisher and red kite. Records of badger were also returned. Data also included records of five S41<sup>2</sup> bird species and two S41<sup>2</sup> butterfly species.

3.8.9 During the desk based assessment, a record of a European Protected Species Licence (EPSL) relating to great crested newt (GCN), granted in 2013, was identified originating within the site boundary.

### Extended Phase 1 Habitat Survey

#### Habitats

3.8.10 The site comprises three dominant habitat types, semi-improved neutral grassland, broadleaved plantation woodland and buildings and hardstanding. Combined, these habitats cover the largest area within the site boundary.

3.8.11 Other habitats of note are broadleaved semi-natural woodland, scattered broadleaved trees (particularly mature trees) and aquatic habitat such as waterbodies and ditches. Remaining habitats recorded on-site are amenity grassland, scrub, scattered coniferous trees and ephemeral/short perennial vegetation. However, these habitats cover a limited area and are of least ecological value.

3.8.12 A metal perimeter fence encompasses the entire site and adjacent habitats include arable fields, ancient woodland, hedgerows and improved grassland. In some locations dense scrub has encroached heavily through the perimeter fence.

#### Fauna

3.8.13 Evidence of the following species were observed during the Phase 1 Habitat survey:

- Birds - rook, blue tit, pheasant, partridge, sparrow, mallard, pigeon and magpie.
- Mammals - fallow deer, muntjac, badger and rabbit.
- Invertebrates - multiple species of butterfly.

3.8.14 The site has the potential to support the following protected and/or notable species:

- Badger
- Bats
- Dormouse
- Reptiles
- Great Crested Newt
- Nesting/Breeding Birds
- Invertebrates

3.8.15 Further targeted species surveys would be required to support any future planning application.

### Potential Constraints and Recommendations for Further Survey Work

#### Constraints

3.8.16 Potential ecological constraints to development of the site and recommendations for the likely further survey work that may be required are set out below.

#### Designated Sites

3.8.17 The desk study identified the presence of three SSSIs within the relevant search radius. The site does fall within the SSSI IRZ for one of these sites (Bovingdon Hall Woods). Consultation with Natural England would be required should any future planning application fall within the categories of Infrastructure or Air Pollution.

3.8.18 There is one LoWS and three LoWS located on-site and adjacent to the site boundary respectively. All LoWS are designated for the woodland habitat they contain. The presence of these designations may represent a significant constraint to the future development of the site. It is recommended that the LoWS located within the site be retained within any future scheme design. Depending on the scale and type of development proposed, early consultation with the Local Planning Authority (LPA) is recommended.

#### Habitats

3.8.19 The habitats of potential biodiversity value are discussed below:

#### *Semi-Improved Neutral Grassland*

3.8.20 A large proportion of the site comprises semi-improved neutral grassland. The long rank grass is cut annually for silage. During the summer months this habitat provides suitable habitat for a range of protected species. Wherever possible, areas of grassland should be retained within the scheme design. Any new areas of grassland created should be seeded with species suitable for site conditions.

#### *Broadleaved Plantation Woodland*

3.8.21 Although young, this habitat represents a significant area of the site. Once matured this habitat will form a canopy connection between three ancient woodlands (all LoWSs), which would be of significant benefit to woodland ecology. Wherever possible, areas of plantation woodland should be retained within the scheme design. Should the removal of any plantation be unavoidable, the extent of removal should be kept to a minimum and be compensated through additional allocation of woodland areas planted with native species of local origin that are suitable for site conditions.

#### *Broadleaved Semi-natural Woodland*

3.8.22 The block of woodland present on site is categorised as ancient woodland and comprises the Park Wood, Wethersfield Aerodrome LoWS. Although isolated this habitat represents the only mature woodland habitat on-site and therefore an important habitat for protected species. Any future scheme design should look at creating connectivity between this woodland and other off-site woodland habitats. Ancient woodlands receive protection in the National Planning Policy Framework (NPPF). A minimum buffer of 15m is recommended between any new development and ancient woodland. This buffer should be measured from the canopy edge.



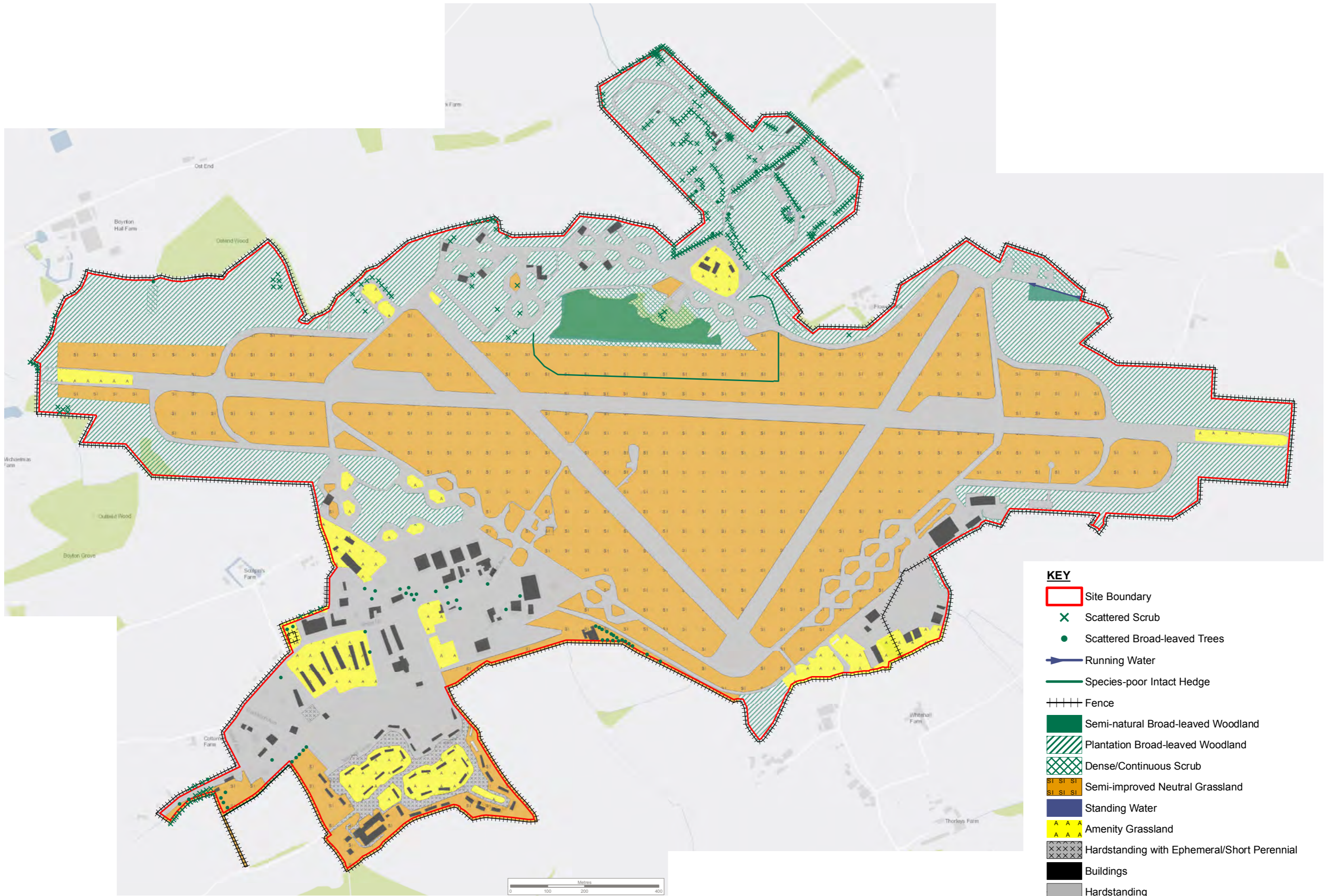


Figure 3.8.1: Phase 1 Habitat Survey.



### Scattered trees

3.8.23 The cumulative canopy cover of all scattered trees is likely to be of some biodiversity value. Where ever possible these trees should be retained within the future scheme design. Should the removal of any trees be unavoidable, the extent of removal should be kept to a minimum and be compensated through additional planting of native species of local origin that are suitable for the site conditions.

### Standing Water

3.8.24 There are a number of waterbodies on-site, the majority of which are man-made pits of poor quality for amphibians. However they provide the only aquatic habitat on-site. Wherever possible Sustainable Drainage Systems (SuDS) should be incorporated within the scheme design for the dual function of nature conservation and surface water drainage. These should be engineered to retain areas of standing water and planted with marginal plant species, appropriate to the ground conditions, with a view to increasing the botanical diversity of the site. This will provide aquatic habitat for species such as great crested newt and other amphibians.

### Recommendations

3.8.25 The following targeted protected species surveys are required to inform any future planning application.

#### Badger

3.8.26 Badger has been recorded within 2km of the site. Furthermore, the Phase 1 Habitat survey identified the presence of three badger setts, two of which were classified as active. Further monitoring and/or licensing work may be required to support a future planning application and a badger development licence.

#### Bats

3.8.27 The site contains buildings and trees which have potential to provide habitat for roosting bats. Furthermore, the site contains high suitability commuting and foraging habitat for bats and is well connected to the wider landscape via hedgerow and ditch networks. It is

recommended that activity transect and static monitoring surveys of the overall site are undertaken. Emergence and/or re-entry surveys of buildings and trees that support potential roosting features will be required to support a future planning application and if present (roosting), a subsequent European Protected Species Mitigation Licence (EPSML).

#### Dormouse

3.8.28 Although no historical records were returned, the site contains suitable habitat that has the potential to support dormice, a European Protected Species. The site is well connected through a network of hedgerows and adjacent blocks of woodland. It is recommended that dormouse surveys are undertaken to support any future planning application and if present, a subsequent EPSML.

#### Reptiles

3.8.29 The site contains suitable basking, foraging and hibernating habitat for common reptiles. It is recommended that a reptile survey, comprising seven survey visits be undertaken between the months of April and September to determine the presence or absence of reptiles on-site and inform any future mitigation measures and planning application.

#### Great crested newt

3.8.30 There are six waterbodies within the site and a further 26 within 500m of the site boundary. It is recommended that the off-site waterbodies are visited to assess their suitability to support breeding GCN, using the methodology set out in the Habitat Suitability Index (HSI) Guidelines. If the waterbodies provide suitable habitat for GCNs, and it is possible that GCN (if present) from these waterbodies could use terrestrial habitat that is located within the site, it is recommended that an Environmental DNA (eDNA) survey is undertaken to confirm the presence or absence of GCN in these waterbodies. All waterbodies within the site require an HSI survey and eDNA survey to determine the presence or absence of GCN. Should GCN be present, further population estimate surveys may be required to support a future planning application and subsequent EPSML.

### Nesting/Breeding Birds

3.8.31 In total, 42 protected/notable bird species have been recorded from within 2km of the site boundary. Furthermore, habitats within the site are likely to provide habitat for nesting birds, including ground nesting birds.

3.8.32 A number of bird species were observed during the Phase 1 survey. Due to the size of the site and the variety of habitats it supports, breeding bird and wintering bird surveys are recommended to support any future planning application.

3.8.33 To ensure compliance with the Wildlife and Countryside Act 1981 (as amended) in respect of nesting birds, any vegetation clearance (including arboricultural works to trees) or demolition/refurbishment of buildings must, wherever possible, be completed outside of the breeding bird season (which is generally considered to be March to August inclusive). Should any vegetation clearance or management, or works to buildings as above, be required during this period, a suitably qualified ecologist should survey the vegetation/buildings prior to the work commencing in order to check for the presence of any active nests. If an active nest is found, it would have to be left undisturbed until the young birds had fledged.

#### Invertebrates

3.8.34 The site supports a variety of suitable habitats for a range of invertebrate species. It is recommended that invertebrate surveys are undertaken throughout locations within the site boundary to establish the diversity of invertebrate species present on-site.



## 3.9 Heritage and Archaeology

### Historic Background

3.9.1 An airfield at Wethersfield was first established in December 1941, during the early stages of the Second World War. Initially it was little used, with only a grassed runway in use, but further to construction of a hardstanding runway in 1943, RAF Wethersfield was established under Bomber Command in January 1944. Various units took up short term residence over the course of the War. In July 1946 it was placed under care and maintenance and the airfield lay dormant with various short term occupants until the intensification of the Cold War in the early-1950s.

3.9.2 The 20th Fighter Bomber Group of the USAAF arrived at RAF Wethersfield in April 1952. The runway was lengthened and the airfield was generally upgraded, with new accommodation blocks, administration and social buildings, as well as the Chapel. The USAAF remained at RAF Wethersfield until July 1990, when it was handed back to the Royal Air Force. The base was once again placed under care and maintenance. From 1992 to the present the principal occupant has been the MOD Police Guarding Agency.

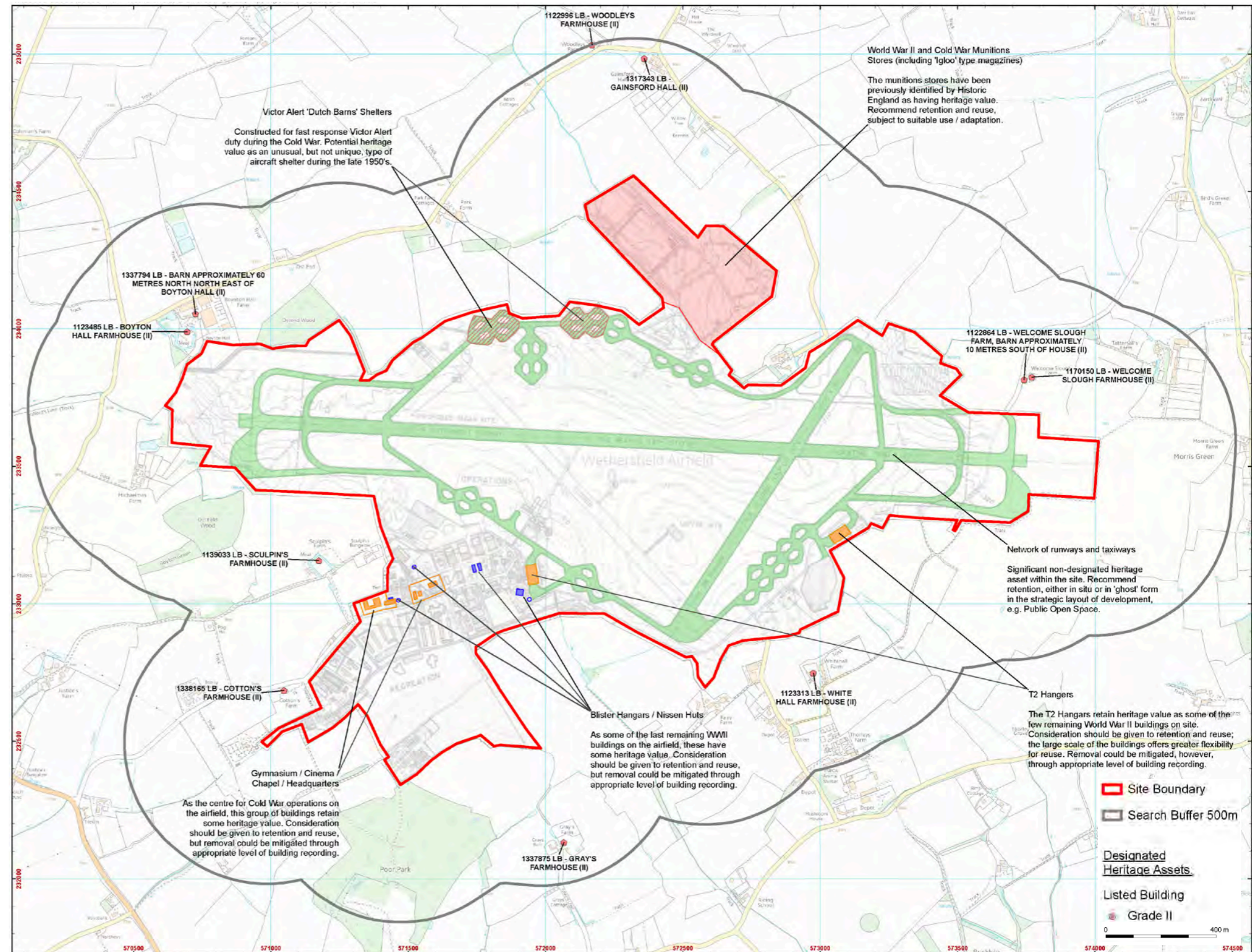


Figure 3.9.1: Built Heritage Development Considerations.



### Identification of Heritage Assets

3.9.3 There are no designated built heritage assets at RAF Wethersfield, nor does it lie within a conservation area. However, there are some structures that could be considered as non-designated heritage assets within the Site (figure 3.9.1). These include:

- WWII and Cold War Munitions Stores (including 'igloo' type magazines) in the north of the airfield, which potentially could be candidates for statutory designation;
- Network of runways and taxis;
- T2 hangers, the Blister Hangars and Nissen Huts, which are some of the last remaining WWII buildings on the airfield;
- Gymnasium, Cinema, Chapel and Headquarters, which formed the centre for the Cold War operations at the airfield; and
- The Victor Alert Shelters, which are associated with the nuclear deterrent operations during the Cold War.

3.9.4 In the surrounding area there are a number of listed buildings lying within 500m of the Site boundary (figure 3.9.1).

3.9.5 In addition, a review of the Essex Historic Environment Record identifies the potential for two below-ground archaeological non-designated heritage assets consisting of the possible alignment of a Roman Road crossing the site north-west to southeast, and the remains of a possible Medieval moated enclosure in the eastern part of the site (figure 3.9.2).

3.9.6 A wider review of data held on the Essex Historic Environment Record and other sources indicate that the site has a potential for further Roman activity in addition to that of the Roman road alignment; a potential for remains associated with several former Post-Medieval farmsteads; and a potential for now buried features associated with the Modern World War II and Cold War airfields. If such features are present, they could be considered to be of local (low) significance.

### Development Considerations

3.9.7 Any future redevelopment of RAF Wethersfield should aim to retain and reuse, subject to suitability, the WWII and Cold War Munitions Stores as an area of high significance. It is also recommended that the network of runways and taxis are either retained in-situ or in 'ghost' form in the strategic layout of the development. Consideration may also be given to the retention and reuse of some of the remaining WWII buildings and the key Cold War buildings, although their removal could be mitigated by an appropriate level of building recording.

3.9.8 Identified listed buildings lying outside the site would need to be proportionately considered as part of development proposals, with a view to enhancing or at least preserving their respective settings.

3.9.9 In regards to the possible archaeological remains associated with the recorded Roman road and Medieval moated enclosure, there is a likelihood that the Essex Archaeological Officer will recommend that a programme of pre-determination trial trenching be undertaken as part of any future planning application in order to determine the significance of any non-designated heritage assets present, as well as the anticipated impact to such remains development would cause.

3.9.10 There is a potential for other Roman, Post-Medieval and Modern below ground remains to be present within the site. Due to the likely limited significance of such remains, it is considered that any mitigation required could be feasible secured as a condition of planning consent.

### Key Points

- The site contains no designated heritage assets.
- This site contains a number of structures which could be considered as non-designated heritage assets:
  - The WWII and Cold War Munitions Stores (including 'igloo' type magazines) are considered to retain a high degree of significance, possibly meeting criteria for statutory designation (although there is no active process underway at present);
  - Network of runways and taxis;
  - T2 hangers, the Blister Hangars and Nissen Huts, which are some of the last remaining WWII building on the airfield;
  - Gymnasium, Cinema, Chapel and Headquarters, which formed the centre for the Cold War operations at the airfield; and
  - The Victor Alert Shelters, which are associated with the nuclear deterrent operations during the Cold War.
- This site contains a number of below-ground archaeological remains which could be considered as non-designated heritage assets:
  - A possible Roman road alignment; and
  - A possible Medieval moated enclosure.
- This site contains a further potential for unidentified archaeological remains associated with the Roman, Post-Medieval and Modern periods, of local (low) significance.
- There are a number of listed buildings lying within 500m of the site boundary. Development of the site has the potential to affect their respective settings. As such the design proposals should be developed with regard to these listed buildings, with a view to enhancing or at least preserving their respective settings.



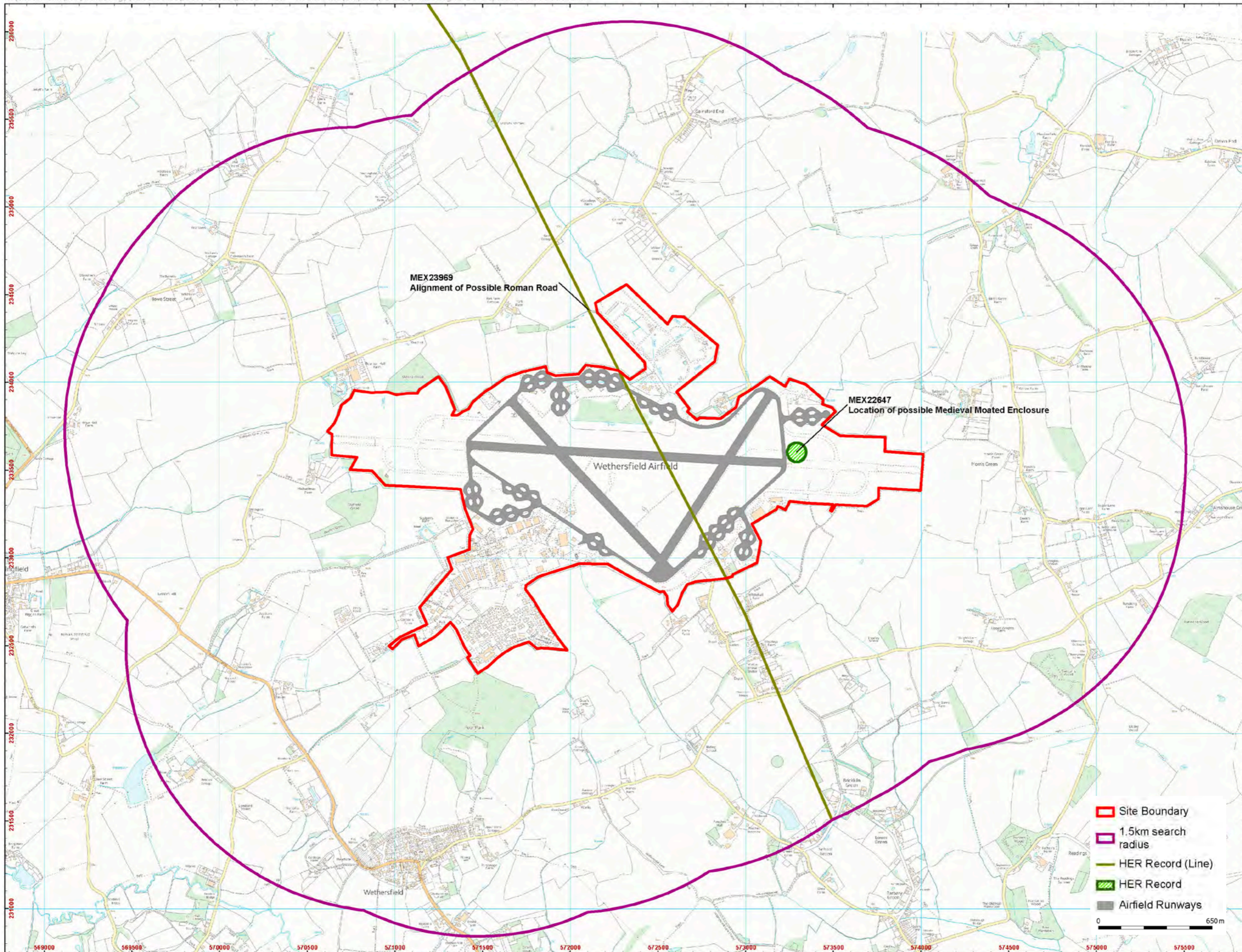


Figure 3.9.2: Archaeological Development Considerations.



## 3.10 Planning Policy Context

### Introduction

3.10.1 The site is located within the administrative area of Braintree District Council (BDC) and within the northern part of Essex County Council (ECC). The current policy context is set by:

- National Planning Policy Framework (NPPF) (2012)
- Braintree Core Strategy (2011)
- Essex Minerals Local Plan (2014)
- Essex Transport Strategy: Transport Plan for Essex (2011)

3.10.2 Other documents of relevance to the site include:

- Braintree Landscape Character Assessment (2006)
- South East LEP Strategic Economic Plan (2014)
- Braintree District Economic Development Prospectus 2013-2026

3.10.3 BDC is updating its Local Plan for the plan period 2013 - 2033, and this process is well underway. The emerging Local Plan comprises two separate documents: Section 1, which is at a more strategic regional level and Section 2 which relates to Braintree District only. Both documents together form the Braintree District Local Plan. Examination of Section 1 took place in the first part of 2018.

3.10.4 Policy is also changing at the national level, with the draft revised NPPF published in March 2018.

3.10.5 This section provides an overview of the planning policy context, firstly at the strategic level of the potential for a significant residential-led development at Wethersfield (i.e. a Garden Town) and then exploring the issues around a range of potential alternative land uses. Although not yet policy and subject to change, we have focused on the emerging Local as this sets the direction of travel for policy in the next five years or so.

## Strategic Residential Planning Context

### The Emerging Local Plan

3.10.6 The UK as a whole has a shortage of new homes, and this shortage is especially acute in south-east England. North Essex has experienced significant population, housing and employment growth in recent years and this is set to continue. The area's strong economic base, proximity to London, Cambridge and Stansted Airport, and attractive environment has driven this growth. Homes England's main purpose is to deliver new housing, and a site of the scale of Wethersfield has the potential to deliver significant numbers. The starting point for this planning policy context chapter is therefore to consider the potential for residential-led development.

3.10.7 Braintree District Council, along with its partners of Colchester Borough Council and Tendring District Council and with the support of Essex County Council, have been working together to plan strategically for growth across the North Essex area. This work has resulted in a shared Strategic Plan, which covers major sub-regional issues and provides a guiding framework in which local policies can then be formed. The Strategic Plan policies are set out in Section 1 of the draft Local Plan.

3.10.8 The three District and Borough Councils, together with Chelmsford City Council, form a single Housing Market Area (HMA) for planning purposes. This means that planning for future growth needs to be done across boundaries. This includes both the expansion of existing towns and villages as well as possible new communities.

3.10.9 The emerging Local Plan includes an overall vision for North Essex that includes the following:

*North Essex will be an area of significant growth over the period to 2033 and beyond, embracing positively the need to build well-designed new homes, create jobs and improve and develop infrastructure for the benefit of existing and new communities.*

*At the heart of our strategic vision for North Essex are new garden communities, the delivery of which is based on Garden City principles covered by policy SP7. The garden communities will attract residents and businesses who value innovation, community cohesion and a high quality environment.*

3.10.10 Whilst the detail of site allocations is addressed in Section 2 of the Plan for each district, Section 1 provides an overall spatial strategy. The key allocations are three new 'Garden Communities' located in an east-west corridor relating to existing major road infrastructure. Draft Policy SP7: Development & Delivery of New Garden Communities in North Essex sets out proposals as follows:

- Tendring/Colchester Borders: Delivering 2,500 homes during the Plan Period, as part of an overall total of 7,000 - 9,000 homes beyond 2033.
- Colchester/Braintree Borders: Delivering 2,500 homes during the Plan Period, as part of an overall total of 15,000 - 24,000 homes beyond 2033.
- West of Braintree: Delivering 2,500 homes during the Plan Period, as part of an overall total of 7,000 - 10,000 homes beyond 2033.

3.10.11 West of Braintree is closest to Wethersfield, being approximately 7.5 miles (12 km) from the site. Draft Policy SP7 sets out the principles for the design, development and phased delivery of the garden communities. It concludes with a statement that a Strategic Growth Development Plan Document (DPD) will be developed for each of the garden communities to set out the principles of their design, development and phasing.

3.10.12 Draft Policy SP10: West of Braintree Garden Community sets out the requirements for the DPD, noting that Braintree District Council may need to jointly prepare it with Uttlesford District Council if the garden community crosses the authorities' boundaries. The aim is to start housing development in 2023/24.

3.10.13 The east-west spatial strategy for the Garden Communities is partly shaped around maximising the use of public transport by providing new east-west rapid transport networks connecting to existing urban centres such as Colchester and Braintree, as well as improving the major roads: the A12 and the A120.

3.10.14 In relation to Braintree District, the spatial strategy is set out as follows:

*[G]rowth will be mainly addressed via a mixture of urban extensions and new communities. Braintree town, as the largest service centre in the District, will have a number of new urban extensions. Over 4,000 new homes will be allocated in this area. The other main focus for development will be the A12 corridor with the main town of Witham and service villages of Hatfield Peverel, Kelvedon and Feering with allocations of over 2,000 new homes. Other parts of the District, including the town of Halstead, will have smaller allocations to reflect a more local need and make the best use of brownfield sites, recognising that these areas are not as sustainable. A new strategic scale garden community will be located to the west of Braintree, on the boundary with Uttlesford DC and on the eastern boundary with Colchester BC.*

3.10.15 The vision for Braintree District set out in Section 2 of the draft plan includes the following:

*By 2033, the District will be the most successful in Essex. Jobs and businesses will have increased in both quantity and quality making the District a desirable place to live and work.*

*Housing growth has been achieved, with the expansion of the main town of Braintree providing sustainable, attractive new homes within a market town setting. Witham, Kelvedon and Feering have also continued to expand making the most of their excellent transport links to provide high-quality homes and new community facilities. Two new garden communities are being built within the District at West of Braintree and Colchester/Braintree borders providing new communities within a high quality environment. Smaller scale growth will continue in other areas of the District, including Halstead, meeting the local needs of smaller rural communities.*

*The strategic transport routes of the A120, A12 and rail routes from Braintree and Witham have been improved allowing fast and reliable connections to London, London Stansted Airport, the east coast ports and other key regional centres.*

3.10.16 BDC's spatial strategy sets out a settlement hierarchy that directs new development towards the most sustainable locations. Three considerations underpin the hierarchy:

- the availability of local employment;
- the availability of local sustainable transport links including education, small shops, pubs and eateries, community hall and open space and health care facilities; and
- natural, built and historic environment constraints.

3.10.17 The second bullet point does not make sense as written, but the intent is clear: development should be directed to locations that have transport links, along with the day-to-day facilities that are needed to support residents.

3.10.18 Taking into account the settlement hierarchy, the spatial strategy is defined as follows:

*...the broad spatial strategy for the Braintree District should concentrate development on the town of Braintree, planned new garden communities, Witham and the A12/ Great Eastern Mainline corridor and Halstead.*

3.10.19 Draft Policy SP3: Meeting Housing Needs states that each authority will maintain a sufficient supply of deliverable sites to provide for at least five years' worth of housing. The Objectively Assessed Need (OAN) for Braintree is 716 homes per annum, or a minimum of 14,320 over the plan period of 2013-2033 (see below for further discussion of this housing need figure). Draft Policy LPP 17: Housing Provision and Delivery of the draft Local Plan sets out that the Council will plan, monitor and facilitate the delivery of at least its minimum requirement in the following strategic growth locations:

Strategic Growth Locations	No. of homes (within the Plan period)
West of Braintree Garden Community	2,500
New Colchester Braintree Borders Garden Community	1,150
East of Great Notley	1,750
Land East of Broad Road, Braintree	1,000
Former Towerlands Park site, Braintree	600
Land at Feering	750
Wood End Farm, Witham	450
North West Braintree - Panfield Lane	600

3.10.20 Therefore 8,800 new homes out of the total minimum requirement of 14,320 are allocated on strategic sites. All sites suitable for delivering ten or more homes are allocated for development on the draft Proposals Map, and the housing trajectory shows a total forecast supply over the plan period (including the strategic sites) of 15,366 - exceeding the minimum requirement.

#### Inspector's Findings on the Draft Local Plan

3.10.21 On 8th June 2018 the Inspector carrying out the examination of Section 1 of the draft Local Plan wrote to each of the three North Essex Authorities to advise on the next steps that are required to make the plan sound and legally compliant. The letter identifies several aspects of the draft Plan which the Inspector considers to require significant additional work on the part of the Authorities.

3.10.22 Of particular relevance to Wethersfield are the Inspector's findings regarding the three proposed Garden Communities. The Inspector found the evidence provided to support the Garden Communities policies to be lacking in a number of respects. In summary, these include:

#### Transport Infrastructure

- Lack of certainty over the funding and alignment of two major trunk road schemes (the A12 Chelmsford to A120 widening scheme and the A120 Braintree to A12 dualling scheme) that are required to support the West of Braintree Garden Community and Colchester/ Braintree Borders Garden Community.
- Lack of certainty over the cost, funding and feasibility of the rapid transit system for North Essex which is integral to the sustainability of the Garden Communities.
- Lack of certainty over the relocation of Marks Tey railway station to the town centre of the Colchester/ Braintree Borders Garden Community.

#### Delivery of Market and Affordable Housing

- Concern that the annual housing delivery assumptions for the Garden Communities are unrealistically high.
- Concern over the deliverability of the 30% affordable housing target for the Garden Communities due to shortcomings in the viability assessment.

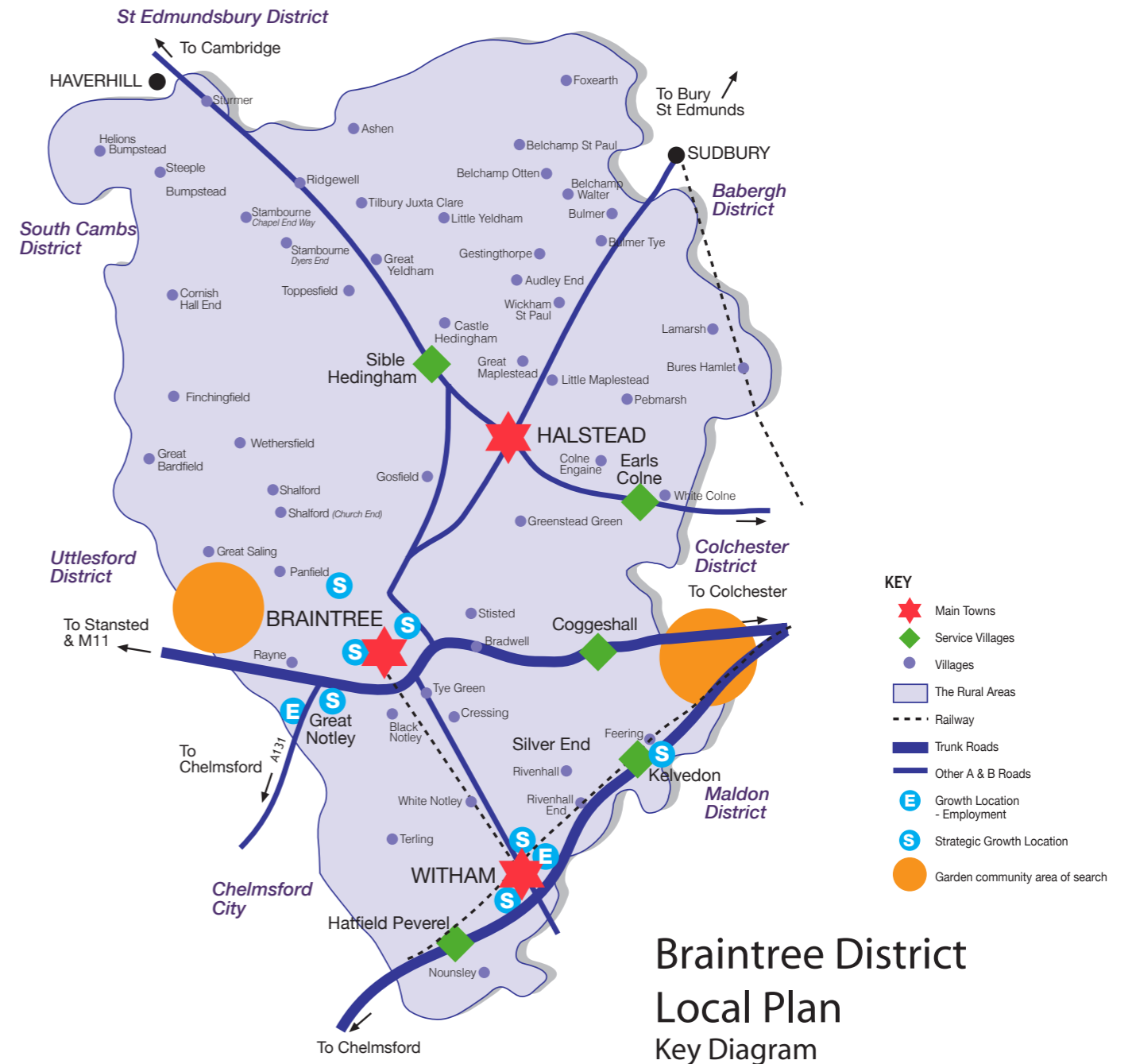


Figure 3.10.1: Key Diagram from Braintree District Council Local Plan June 2017, Publication Draft for Consultation



### Employment Provision

- Lack of specificity on the amount of employment land and floorspace to be provided at each of the Garden Communities.

### Viability

- Doubts over the financial viability of the Garden Communities due to concerns about the assumptions used in the viability assessment, in particular those relating to transport infrastructure costs, land acquisition and interest costs, and contingency allowances.

### Delivery Mechanisms

- Concern that one of the principles underpinning the proposed delivery mechanism (relating to risk and reward sharing between the public and private sectors) may be unlawful.

### Sustainability Appraisal

- Concerns over the objectivity of the appraisal of the preferred Spatial Strategy and the alternatives considered.
- Lack of clarity in describing alternative Spatial Strategies and the reasons for selecting them.
- Concerns over the selection of alternative Garden Communities for assessment.

3.10.23 The Inspector concluded that the Garden Community proposals contained within the draft Section 1 of the Local Plan are not adequately justified, have not been shown to have a reasonable prospect of being delivered, and are therefore unsound. The Inspector goes on to say that bringing forward three Garden Communities on the scale proposed is likely to be difficult to justify, mainly because of the difficulty of coordinating delivery of the necessary large-scale transport infrastructure.

3.10.24 In light of his findings, the Inspector identifies three options that the Authorities could explore to advance the Local Plan process. In summary these are:

#### Option 1:

- Remove the Garden Community proposals from Section 1 of the Plan and commit to submitting a partial revision of Section 1 within a defined time period e.g. two to three years. This would enable the examination of Section 2 of the Plan to proceed, although the Authorities would need to consider the implications of the removal of the Garden Community proposals for housing land supply in the years before the partial revision comes forward.

#### Option 2:

- Carry out the necessary further work on the evidence base and Sustainability Appraisal and bring forward revised proposals for Section 1 of the Plan prior to the commencement of the examination of Section 2.

#### Option 3:

- Withdraw Section 1 and Section 2 of the Plan from examination and resubmit them with any necessary revisions after carrying out the necessary further work on the evidence base and Sustainability Appraisal, and the relevant consultation and other procedures required by legislation.

3.10.25 An informal discussion with BDC planning officers indicates that the Council is leaning towards Option 2, which would involve pausing the examination of Section 1 of the Plan to allow time to carry out the necessary further work on the Garden Communities. Officers intend to recommend this approach to the Council's Local Plan Sub-Committee at their meeting in September. In the meantime they will begin to commission the additional studies required. Officers have identified a timescale of 6 months to complete the additional work and submit it to the Inspector. The examination would subsequently be re-opened and the Council hopes that Section 1 of the Plan could still be adopted by the end of 2019. This timescale appears optimistic given the amount of additional work required by the Inspector, not all of which is within BDC's control.

### Current 5-Year Housing Land Supply

3.10.26 In 2015 BDC, jointly with Chelmsford City Council, Colchester Borough Council and Tendring District Council, commissioned research from Peter Brett Associates to consider the emerging evidence for a joint Housing Market Area and advise on the scale of "objectively assessed housing need".

3.10.27 A first report on this work was published in 2015, and an update by Peter Brett Associates was published in 2016 to take into account new population, household and employment projections.

3.10.28 The 2016 Objectively Assessed Housing Need Study Update concluded that the objectively assessed need for Braintree District was an average of 716 new homes per annum from 2013 to 2037.

3.10.29 Whilst this annual average has been taken forward and underpins the draft Local Plan, in September 2017 the Department for Communities and Local Government published a consultation on a new methodology for producing Local Plan housing targets ("Planning for the Right Homes in the Right Places"). The consultation included a table of consultation draft housing targets for Local Planning Authorities for the period 2016-2026. The total for Braintree was 835 homes per annum, significantly higher than the OAN 2016 figure of 716 homes per annum from 2013 to 2037.

3.10.30 BDC's Annual Monitoring Report (2017) states that the Council had submitted their Local Plan by the qualifying date to be covered by transitional arrangements, meaning that housing need could be calculated using the 2016 OAN report, rather than on the basis of the higher draft figure. This could now be called into question given the delays to the Local Plan Examination resulting from the Inspector's recent findings.

3.10.31 The currently adopted development plan has a planned provision for the District from 2001-2026 of 9,625 new homes, which equates to an average of 385 homes per annum. It is acknowledged in the 2017 Monitoring Report that the new target of 716 homes per annum is a significant increase from this. The draft Local Plan also proposes to allocate sufficient sites to provide a 10% buffer above the target of 716 homes per annum, to provide greater certainty that the Local Plan target will be met.

3.10.32 In terms of historic delivery rates, the Monitoring Report notes that the annual average between 2001-2017 far exceeded the adopted plan target of 385 homes per annum, at an annual average of 552 homes. More recently between 2013-2017, this was an average of 351 homes per annum. The Monitoring Report acknowledges that the supply of new homes from 2013 has so far fallen short of the proposed annual average target of 716, resulting in a shortfall in supply from 2013 which must be made up in future years. As of December 2017, the identified shortfall from 2013 is 1,714 homes.

3.10.33 The Monitoring Report notes that there is no prescribed method of making up the accumulated shortfall in housing provision. Paragraph 35 of the Planning Practice Guidance states: *“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.”* There are however two recognised approaches to how this shortfall should be made up: the ‘Liverpool approach’ by which making up the shortfall is spread over the remainder of the Plan Period, and the ‘Sedgefield approach’ by which the shortfall is made up within the first 5 years. The Monitoring Report considers that the Liverpool approach is most appropriate for Braintree. The draft Local Plan has been prepared on this basis, which relies on significant housing being delivered later in the plan period from the Garden Communities. Braintree await a view from the Inspector on this assumption as part of the examination of the draft Local Plan, however this wasn’t included in the Inspector’s letter of 8th June 2018.

3.10.34 As set out in the Monitoring Report, Braintree have been making progress towards identifying a five year housing land supply. In March 2017 Braintree did not have a five year land supply, with 3.13 years under the Sedgefield approach and 3.91 years under the Liverpool approach. As of December 2017, the five year supply was 4.03 years under the Sedgefield approach and 5.15 years under the Liverpool approach. These calculations exclude allocations in the draft Local Plan.

3.10.35xWhilst the current Monitoring Report only covers the period up to March 2017, taking the figures as of December 2017 and applying the Sedgefield approach would mean that an annual average of 1,112 homes would need to be completed, including a 5% buffer in supply. Under the Liverpool approach an annual average of 870

homes per annum, including a 5% buffer. Such figures would seem to represent an unrealistic increase compared to past rates of completion, and rely on future allocations being adopted. With regards to emerging allocations in the Draft Local Plan, it is acknowledged in the Monitoring Report that significant improvements to infrastructure in the District and beyond are required to support the planned scale of growth. This assumption has recently been called into question by the Inspector’s findings on Section 1 of the Local Plan, as key decisions are outstanding on these upgrades.

3.10.36 In summary, the current five year housing land supply position in Braintree is complex and dependent on which methodologies are applied to the calculation of need and supply, which are awaiting a decision from the Local Plan Inspector. However, it is fair to say that prior to the adoption of the new Local Plan there is at least some doubt as to whether Braintree can demonstrate a robust five year housing land supply.

#### Summary and Conclusions

3.10.37 In summary, the current planning policy situation with respect to residential development is therefore:

- development of a Garden Town at Wethersfield is not supported by emerging planning policy, where the spatial strategy focuses on locating new development along the existing east-west road corridor formed by the A12 and A120;
- the lack of good transport connections is a significant obstacle to development - without major improvements, the site cannot be considered a sustainable location for development, and therefore fails to meet national and local planning requirements; and
- the Inspector has found Section 1 of the draft Local Plan to be unsound and has identified significant additional work that the Local Authorities will need to carry out to justify the spatial strategy and allocation of the three proposed Garden Villages. This will delay the adoption of the Local Plan by at least a year.

3.10.38 Prior to the Inspector’s findings, discussions with BDC planning officers indicated that, if transport infrastructure can be improved, Wethersfield has the potential in the longer term to become a significant residential-led development and one that could be considered in future Local Plan reviews. The Inspector’s letter creates a policy vacuum and presents an opportunity to promote Wethersfield as a major residential allocation earlier than expected. However, to be successful it will be necessary to demonstrate that Wethersfield is a viable, deliverable and sustainable option and that it compares favourably against both the Garden Villages and the other major sites being promoted within Braintree District.

3.10.39 reg. 12(5)(e)

3.10.40 Notwithstanding the Inspector’s findings, achieving residential-led development at Wethersfield remains challenging due to the site’s relatively remote location and poor transport accessibility. It is likely to take a considerable amount of time to achieve planning certainty. Given the lead-in time, two alternative approaches need to be considered from a planning policy perspective:

- short-term, temporary uses that can bring in income but allow the ultimate development of a Garden Community; and
- permanent uses as an alternative to residential, that can either sit alongside a smaller Garden Community or occupy the entire site, so delivering an alternative form of development.

3.10.41 The next section considers the planning policy issues for a range of potential temporary and permanent land uses.



**Planning Context for Non-Residential Uses**

3.10.42 This section explores that high-level planning policy context for a range of non-residential uses, including:

- employment;
- leisure / tourism;
- renewable energy generation;
- education / training campus; and
- a prison.

**Employment**

3.10.43 The main thrust of the emerging Local Plan is on the delivery of new housing, and the infrastructure required to support new residents. However, the need to create jobs is recognised in the overall vision for North Essex. Employment uses would be expected to form part of a Garden Town, but there may be potential for exploring an employment-led strategy for Wethersfield that can come forward in a shorter timescale than a large-scale residential-led Garden Town.

3.10.44 One of the key objectives in the Section 1 of the emerging Local Plan is fostering economic development, which states that the aim is:

*‘...to strengthen and diversify local economies to provide more jobs; and achieve a better balance between the location of jobs and housing, which will reduce the need to travel and promote sustainable growth.’*

3.10.45 Section 2 of the emerging Local Plan sets out the Braintree-specific objective of creating a successful economy as follows:

*‘To promote a local economy which supports the growth of existing businesses and encourages new entrepreneurial enterprises and employers to locate in the District, by providing high-quality land and buildings in sustainable locations, to meet the needs of businesses.’*

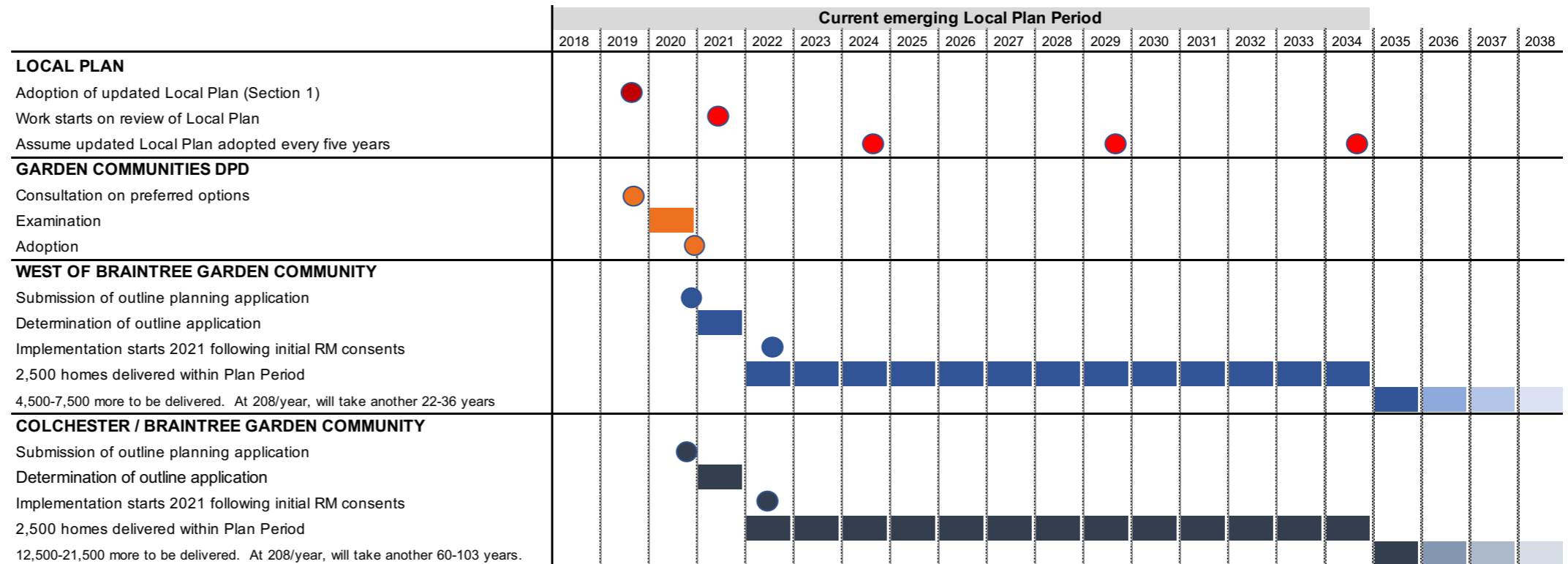


Figure 3.10.2: Planning Policy Programme

Note: The programme for adoption of Section 1 of the Local Plan is based on an initial discussion with BDC officers following receipt of the Inspector's letter. It is likely to be overly optimistic.

3.10.46 Wethersfield's location makes meeting these objectives difficult, as it cannot be easily reached by residents due to its poor transport links. It is therefore not currently in a sustainable location. Bringing forward employment therefore needs to consider specific types that are not reliant on many trips by private vehicle. Two types of employment may be possible:

- employment with a low density of employees – for example, continuing some of the storage functions on site or high-tech uses such as a data centre; and/or
- employment where a comprehensive approach to travel planning (such as shuttle buses) can be implemented – this might typically be a single user in a large campus, such as a research and development facility that would benefit from a relatively isolated and secure site.

3.10.47 The focus of the emerging Local Plan is on allocating sites for employment and protecting existing employment uses. There is no specific policy around the types of employment are identified above as potentially being suitable at Wethersfield. However, informal discussions with planning officers have indicated that appropriate employment uses would be supported, subject to them meeting policy requirements particularly in terms of transport and infrastructure.

3.10.48 There are, in principle, no planning obstacles to bringing forward employment at Wethersfield. It is wholly dependent on a sustainable transport solution which – aside from significant new infrastructure – could include low density employment uses and/or uses where sustainable travel planning can be readily managed over the long-term.

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#### Leisure and tourism uses

3.10.49 Both emerging and current planning policy place an emphasis on housing growth, along with employment and supporting community facilities. There is relatively little to guide the development of leisure and tourism uses. Policy LPP 9: Tourism Development within the Countryside sets out requirements for new tourist accommodation and facilities, but this is intended more for facilities that might relate to existing villages than a 'stand-alone' facility as could be proposed at Wethersfield and so is not particularly relevant. A key criterion of Policy LPP 9 makes delivery of leisure and tourism at Wethersfield very challenging:

*'Proposals [should be] connected to and associated with existing facilities or located at a site that relates well to defined settlements in the area and are accessible to adequate public transport, cycling and walking links.'*

3.10.50 As for other uses and given the above policy requirement, leisure and tourism proposals would need to address transport challenges. Without significant new infrastructure, the approach would need to be:

- uses that have low transport movements – for example, car racing training for individuals rather than car racing that attracts spectators; and/or
- uses where comprehensive travel planning (such as shuttle buses) can minimise the impact on the transport network.

3.10.51 There may be potential for recreational use of the airfield, so long as this is low-key and does not attract spectators. Informal discussions with BDC planning officers have indicated support for such a use.

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#### Renewable energy generation

3.10.52 The emerging Local Plan plans positively for renewable energy generation, stating that:

*The increase in sources of renewable energy in the District could contribute towards diversity and security of supply, reduce demand on the national power network, address fuel poverty, support the local economy and reduce harmful emissions to the environment.*

3.10.53 Policy LPP 76: Renewable Energy Schemes states that proposals for renewable energy schemes will be encouraged, subject to avoiding serious harm or loss of a range of assets, including:

- Natural landscape or other natural assets
- Landscape character
- Nature conservation
- Best and most versatile agricultural land
- Heritage assets, including the setting of heritage assets

3.10.54 As the site's ridge-line location makes it visually prominent, wind farm renewable energy has the potential to impact adversely on landscape character and the setting of listed buildings in the surrounding area. A solar farm is likely to be much more acceptable in planning terms. Informal discussions with planning officers have indicated that a solar farm is likely to be viewed positively,

3.10.55 A large-scale solar farm at Wethersfield is strongly supported by emerging policy, as it is making use of land which is of low quality, and BDC planning officers have informally indicated support. The success of such development is contingent on (i) ensuring that the development can connect into existing energy infrastructure; and/or (ii) the energy produced supports an on-site facility such as a data centre.

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#### Educational / Training Campus

3.10.56 The site is not well connected to the surrounding area, and so it cannot currently provide educational facilities to support local communities. However, it may be able to provide educational / training facilities in a campus-style development that is self-contained and minimises the need for off-site travel.

3.10.57 Emerging Local Plan policy is focused on protecting existing educational establishments (Policy LPP 64) and securing planning obligations from new development to support new or enhanced facilities. Given the unusual and specialist nature of a stand-alone campus-style educational facility, it is not surprising that policy does not specifically address this type of use.

3.10.58 Although there is an absence of specific planning policy, an educational / training use is likely to be acceptable in planning policy terms so long as there is a robust and credible travel plan / transport strategy to support it.

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#### Prison

3.10.59 There has been some interest from the Ministry of Justice in locating one or more prisons on the site. A prison falls under Planning Use Class C2A: Secure Residential Institution. As for educational and training campus use, there is an absence of specific planning policy for a prison - this is not surprising. Such a use is likely to be acceptable in planning terms, as the remoteness of the site would mean negligible impact on neighbouring uses. However, a credible transport strategy would be required for staff and servicing (deliveries), as well as for those visiting inmates. The latter may work well with sustainable solutions such as shuttle buses to Braintree Rail Station as visiting hours are normally fixed. The scale and design of a prison and its secure enclosure will need to be carefully considered in order to minimise visual impact and to blend with the site's wider landscape setting.



### 3.11 Local Property Market

#### Commercial

3.11.1 The Essex Commercial Property Market is underpinned by four main activity corridors around the primary arterial routes in the County. The A120 and M11 Corridors in the North of the County are those most closely related to Wethersfield. The towns along the A120 - Braintree, Dunmow, Stansted (on and off Airport) and Bishops Stortford are the focus for local commercial investment, and business activity. The western side of the Colchester area (Stanway) forms a node with the A120 and A12 intersection but the A120 corridor property market on this stretch (i.e. between Braintree and Colchester) is impacted from the bottlenecks east of Braintree where the A120 currently remains a single carriageway.

3.11.2 Generally speaking, Essex suffers from a shortage of well-located employment sites and there is perceived to be a latent demand for further allocations, however this commercial demand is almost solely focussed on the Key Centres in the County and at strategic locations on the Highway network.

Table 3.11.1: Commercial Rent Ranges (per Sq ft Net Lettable)

Town	B1 Office		B2/B8	
	Secondary	Prime	Secondary	Prime
Braintree	£8-£12	£17-£19*	£5.50-£7	£8-£9
Stansted	£15-£18	£20*	£8-£9	£9.50
Bishops Stortford	£14-£18	£21*	£7-£8.50	£9.50
Halstead	£6-£8	£12-14*	£3-5	£6*

\*Estimated – no comparable stock

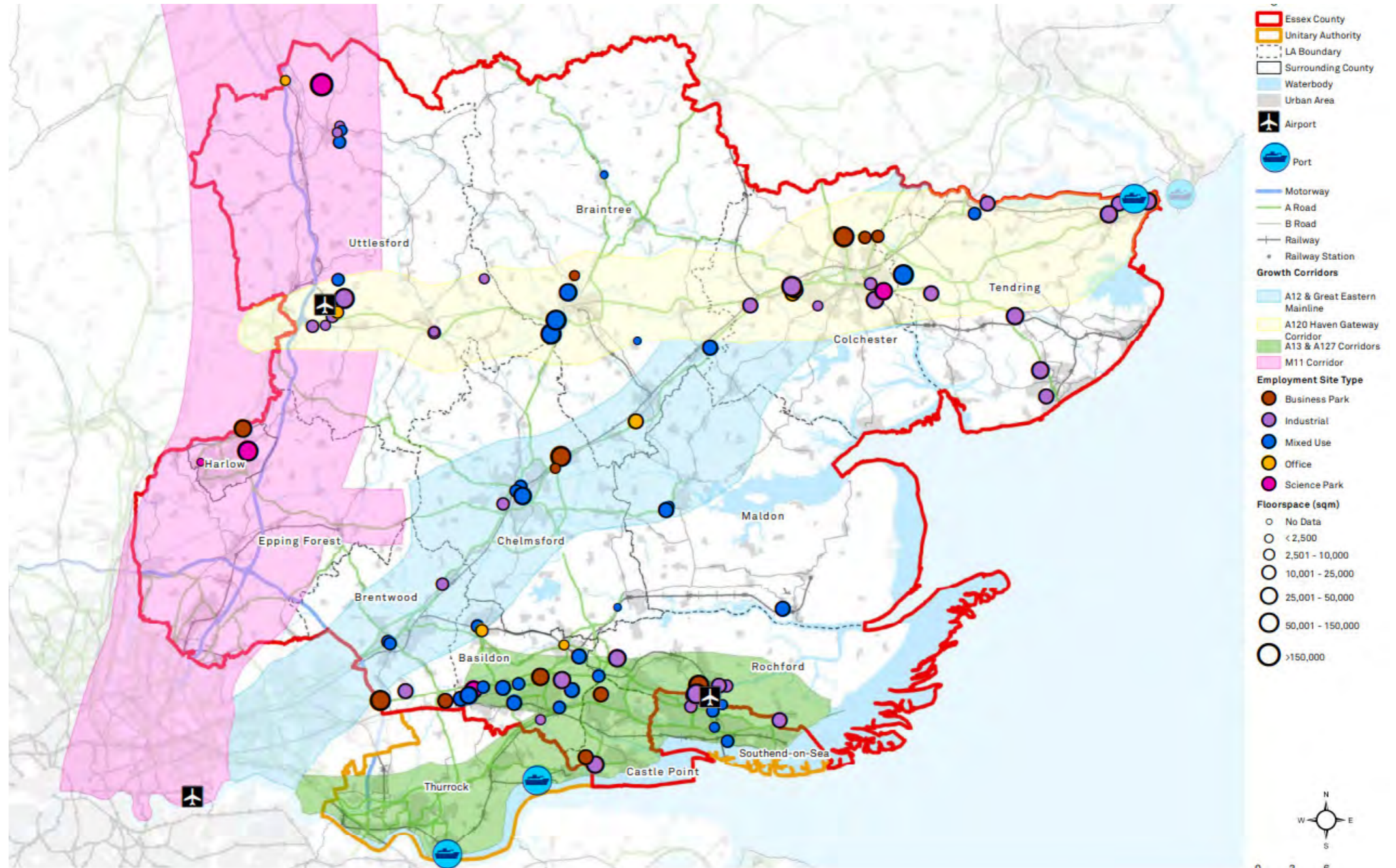


Figure 3.11.1: Employment Corridors and Identified Employment Sites in Essex and Capacity over 1000 sqm – Feb 2017



3.11.3 Wethersfield lies in the heart of the North Essex rural hinterland with access to the A120 and M11 corridors being restrictive due to the nature of the rural road network. In the more immediate rural area around Wethersfield, Halstead is a small commercial centre which links with Sudbury in Suffolk and Braintree to the South via A131 and has three ageing industrial areas where units are being lost to other uses (particularly close to the town centre).

3.11.4 Business activity in the Wethersfield area is limited with farming driving commercial activity and high proportions of out commuting. The focus of the local market is generally small unit accommodation in the office, industrial and warehouse sectors providing for a limited number of local occupiers and SME's. The closest comparable location above is Halstead although this town does benefit from superior links to the A120, Braintree and Sudbury.

reg. 12(5)(e)

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**Residential Uses**

3.11.6 The immediate settlement of Wethersfield is a relatively small village settlement with limited transactions and a spectrum of different residential property types. The settlement is broadly reflective of the CM7 postcode area within which it sits although there are some superior higher value villages (e.g Finchingfield) where value stems from pleasant and historic environments. Second hand sales values for residential property within the CM7 area range between reg. 12(5) per sq ft for residential houses. Flatted accommodation sits at a level below this (£260 per sq ft) reflecting that the area's residential demand is predominantly related to family housing.

3.11.7 Due to its location and relatively poor accessibility, values moving away from Chelmsford and Bishop's Stortford, which are well located for commuters, decline. Values are also higher towards Cambridge, but due to travel time and poor linkages Wethersfield does not fall within this catchment.

3.11.8 There are no current new build residential developments being marketed within the immediate vicinity of the site but generally speaking a new build premium of between 10% and 20% of averaged second hand sales values is a reasonable outline assumption.

3.11.9 Taking the view that new build development could provide its own environment and be designed and accessed in such a way as to minimise impacts from adjacent commercial areas (and providing it was publicly accessible), normal benchmark planning and development assumptions show a hypothetical 1 acre residential site notionally to be worth between reg. 12(5)(e) per net developable acre based on current market conditions.

**Other uses**

**3.11.10 Agricultural/Grazing Land Values:**

Crop producing agricultural land values in Essex it is estimated range from between reg. 12(5)(e) per acre currently (excludes any 'hope' value). Where there is hard infrastructure and impediment to traditional crop farming, livestock grazing land may typically let for between £100-£300 per year with capital values for this type of land being towards the lower end of the range above. There would also need to be fencing and other set up costs accounted for. Agricultural Land Value for testing purposes should be assumed at reg. per acre.

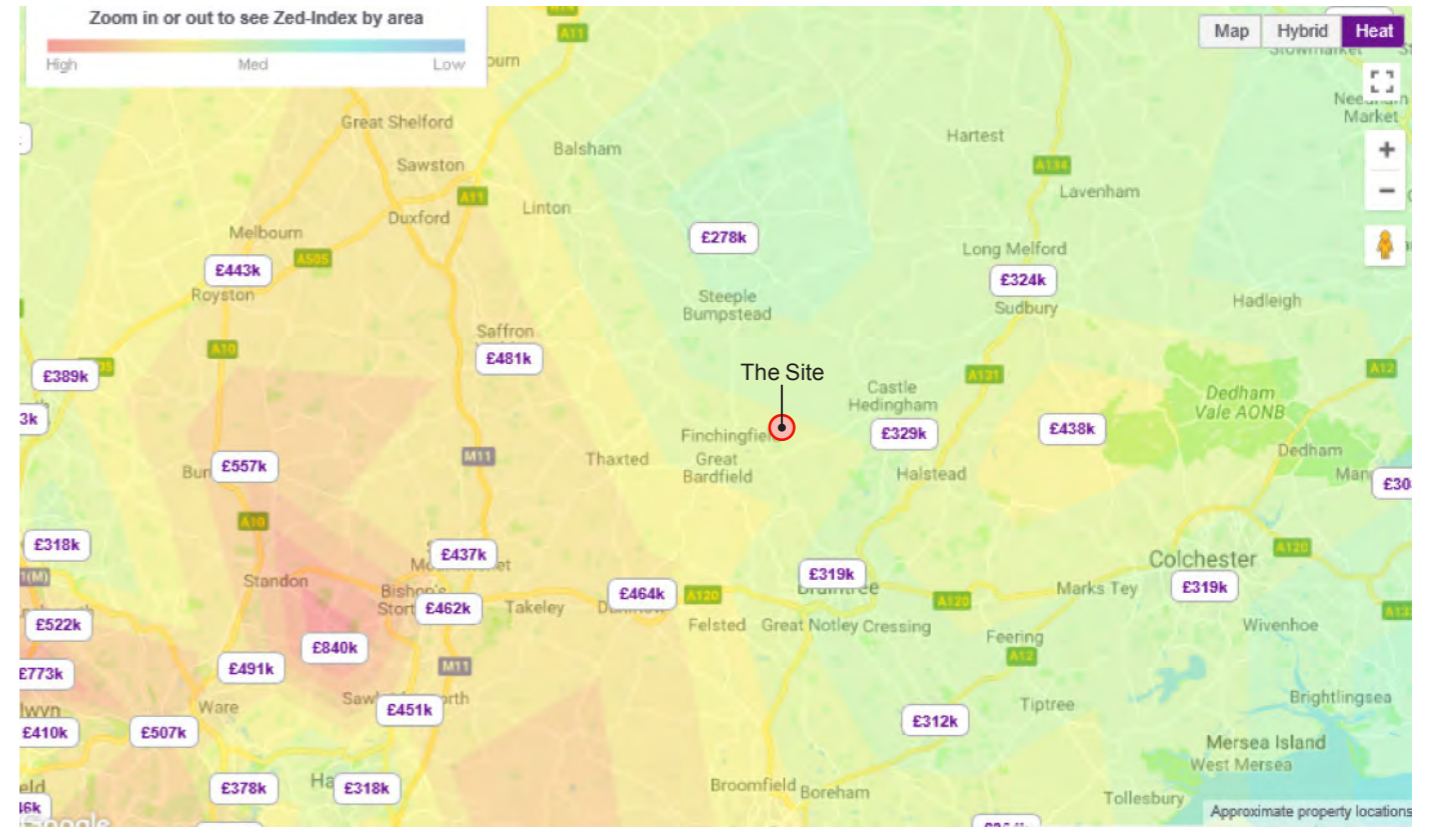


Figure 3.11.2: Zoopla Zed Index

3.11.11 **Solar Farms:** Where the capacity of distribution networks allow and planning permission is forthcoming rentals for such land are at a premium to agricultural values where rental of between reg. 12(5) per acre per annum may be available (this contrasts with higher rentals that were achievable before Government intervention on the feed in tariffs). Capital Values for the consented land could be appraised at circa reg. per acre.

3.11.12 **Drag / Motor racing / Proving etc:** These activities generally relate to a rent linked to turnover / profit and potentially contributions to upkeep and maintenance of hardstanding areas used. Evidence is extremely limited for these types of operation but we would estimate that such lets would serve mainly to assist mitigating liabilities associated with retaining the fixed hard-surface infrastructure.

3.11.13 **Secure Institution:** There is not an open market for prison land, and value is determined mainly through alternative use value, and urgency of the need. There are occasional transactions of secure institutions but these are very much driven by individual circumstances. We would not envisage land transacting for a prison at Wethersfield at greater than estimated commercial land values.

3.11.14 **Open and Partially Covered Storage:** Service yard accommodation may be a low cost alternative to development and the secure nature of the airfield may make this attractive for some prospective parties. Rental levels for open yard/storage space fluctuate in Essex dependant on location and use but vary between reg per sq ft dependant on location and infrastructure supporting the yard. A limited premium may be available for covered storage. We estimate that rental for secure yard space on hardstanding at Wethersfield may be in the region of reg. per sq ft (assumes hardstanding and utility servicing).



## 4 Land use strategies

### 4.1 Introduction

4.1.1 This section outlines three possible strategies covering a spectrum ranging from short-term, minimal investment ('Do Minimum') to a long-term strategy involving substantial infrastructure investment ('Do Maximum').

4.1.2 In summary, the strategies illustrated in the following pages are:

- A. **'Do Minimum'**: Essentially a 'holding strategy' which requires minimal infrastructure investment and retains maximum flexibility in the short-term by maintaining / expanding existing operations on the site and introducing a modest element of new housing.
- B. **'Do More'**: A medium-term strategy which introduces permanent, primarily non-residential land uses across the site. Depending on the mix and intensity of these uses, this strategy is expected to require moderate investment in upgrades to highways and other infrastructure.
- C. **'Do Maximum'**: A long-term strategy which seeks to promote and deliver a new, mixed use Garden Village on the site. This would need to be accompanied by a substantial investment in highways and other infrastructure.

4.1.3 It is important to note that these strategies are not necessarily mutually exclusive and could be combined into a 'hybrid' of more than one strategy. For example, the 'Do Minimum' strategy could evolve into the 'Do Maximum' strategy over time. Equally, some discrete elements of the 'Do More' strategy (e.g. a data centre or prison) could be implemented without prejudicing the long-term objectives of the 'Do Maximum' strategy.

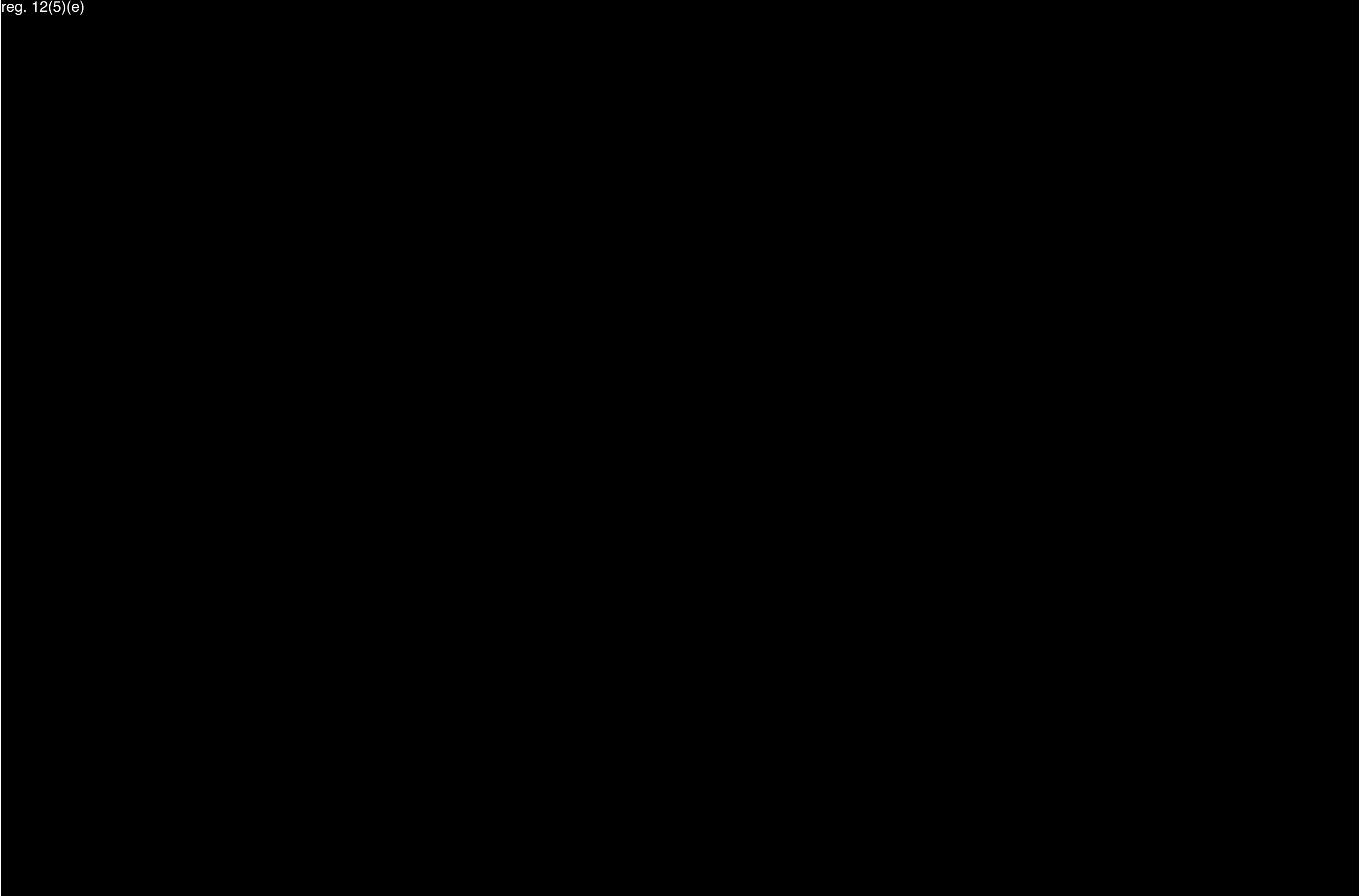
### 4.2 Composite Constraints Plan

4.2.1 To provide a common basis for illustrating how each strategy could be physically expressed on the site we have distilled the key site constraints onto a composite plan. This Composite Constraints Plan broadly defines the areas of the site within which new development could be introduced.

4.2.2 The constrained parts of the site have been categorised as 'Hard', 'Medium', 'Medium/Soft' and 'Soft', as follows.

- **'Hard'**: These include the Ancient Woodland as well as areas with a combination of constraints such as significant contamination, poor drainage and heritage features. These areas are assumed to be kept free from development.
- **'Medium'** and **'Medium/Soft'**: These are constrained by features such as existing commercial tenants, current residents and Woodland Trust planting. At this stage we have assumed that these areas will not be comprehensively redeveloped in the short term, but that there are likely to be some opportunities to introduce new development over time.
- **'Soft'**: These areas are constrained by virtue of being visually prominent parts of the site. We have assumed that this constraint can be overcome through design and mitigation, and thus these areas are considered available for development.

reg. 12(5)(e)





## 4.4 Strategy A: 'Do Minimum'

4.4.1 This is essentially a 'holding strategy' for the next 1-5 years which aims to increase revenues to offset site maintenance and operating costs, limit investment in highways and other infrastructure, and retain maximum flexibility to ensure that the long-term development potential of the site is not compromised by any short-term moves.

4.4.2 The key elements of the strategy are:

- Retain and expand the short-term tenant operations that currently exist on the site.
- Introduce new short-term uses within the developable areas of the site. These could include, for example, a solar farm, open storage, grazing, and recreational uses associated with the airfield.
- Introduce a modest number of new homes (approx. 100) to complement the existing residential community on the site. These homes could be accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche which would contribute to the sense of place and reduce the need to travel for day-to-day essentials.

4.4.3 Based on preliminary analysis of existing traffic generation it is expected that this strategy could be pursued without the need for significant upgrades to the local access routes to the site or highway capacity more generally. Similarly, it is not expected that major upgrades to utilities or other infrastructure would be required.

4.4.4 The 'Do Minimum' strategy could be accompanied by a marketing exercise which explores the opportunity to dispose of the site to one or more prospective purchasers (public, private or institutional).

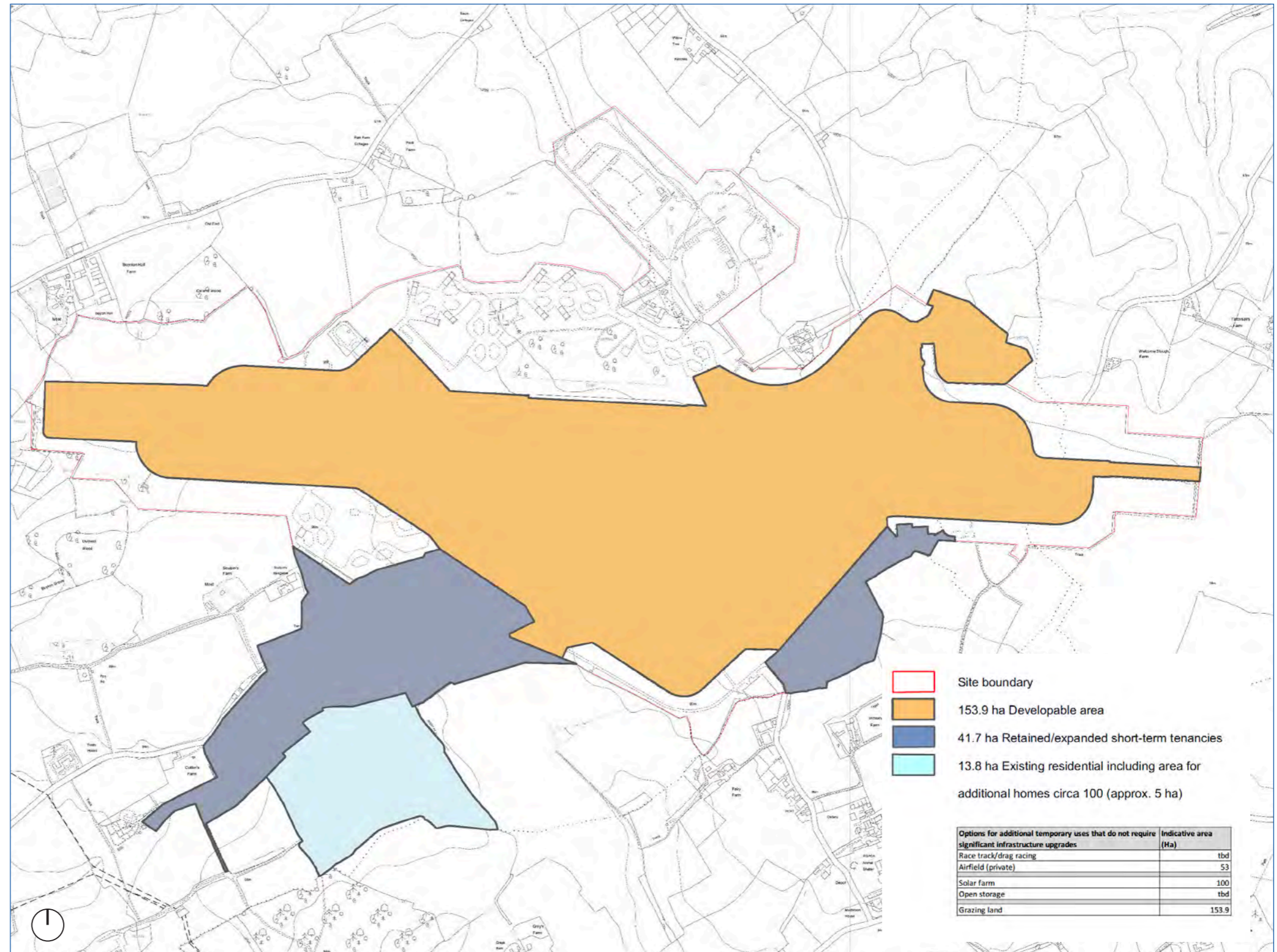


Figure 4.4.1: Strategy A: Do Minimum (not to scale)



**Planning Appraisal**

4.4.5 Strategy A's aim is to make productive use of the site (through a combination of permanent and temporary uses) without the need to invest in improvements to the transport network. This provides an income stream whilst work to explore the other Strategies is carried out, and avoids closing down any future land-use options.

**Planning Policy Issues**

4.4.6 This Strategy is designed to operate within the existing and likely emerging planning policy context. The potential uses for the majority of the site (storage, solar farm, grazing land and so on) should present little planning risk. The key area of challenge is the small amount of additional residential proposed to supplement the existing dwellings. There will need to be two key elements in making the case for this development:

- the social sustainability case of improving the residential environment through the provision of low-key community facilities such as a crèche and small shop, and improvements to the existing open space, along with the new dwellings; and
- a robust transport case demonstrating no impact on the existing transport network.

4.4.7 Community facilities will not be viable without some form of subsidy and management, and this would need to be taken on by the organisation that manages the site. This will be a burden until such time as Strategy B or C can be implemented, but is likely to be essential to securing planning permission for the additional residential.

4.4.8 This strategy is informed by the Composite Constraints Plan and, as such, is designed to minimise impacts in relation to landscape, heritage and visual impact. We consider that planning risks in relation to these issues are low.

**Planning Strategy**

4.4.9 There has been a significant shift in the timing of the adoption of the Local Plan since this project started, and the further work required of the Councils potentially gives opportunities for promoting Wethersfield for development. However, whilst the Inspector's letter was highly critical of the Local Plan process, it was generally supportive of the strategy of a series of Garden Communities. The failure of the Local Plan in its current form does not therefore suddenly transform Wethersfield into a site suitable for a Garden Village: it remains very poorly located, and making a case for development is highly challenging.

4.4.10 However, there will be a policy vacuum at Braintree for at least a year, and more likely a couple of years, whilst the Councils revisit their evidence base and re-start the Examination. Coupled with the potential absence of

a five-year housing land supply, this leaves Braintree District Council vulnerable to speculative applications for residential development. reg. 12(5)(e)

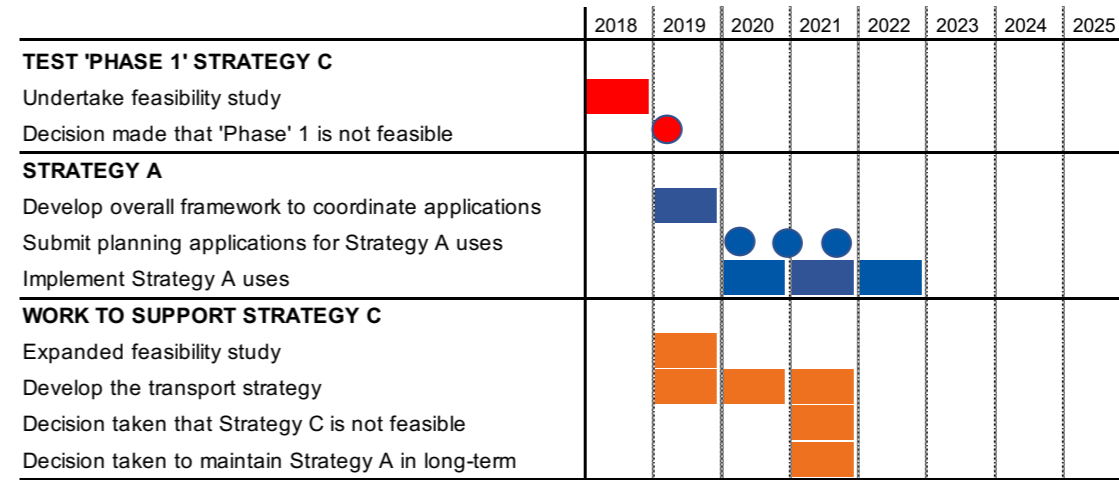
4.4.11 We recommend undertaking some high level feasibility work into a 'Phase 1' of Strategy C. A reasonably clear position could be reached at the end of 2018, and this would enable a decision to be made as to whether Strategy A still needs to be pursued. If a 'Phase 1' strategy is feasible, then any interim Strategy A uses would need to be very low cost and low key (e.g. grazing land, ongoing storage) as the intention would be to move towards the long-term vision of Strategy C.

4.4.12 If the decision in late 2018 / early 2019 is that a 'Phase 1' of Strategy C is not feasible, Strategy A can begin to be implemented immediately. This will secure short term uses that can generate an income stream (e.g. expanding existing employment uses, developing a solar farm) along with permanent uses that are designed to fit with a long-term strategy of a Garden Village (e.g. a small amount of residential).

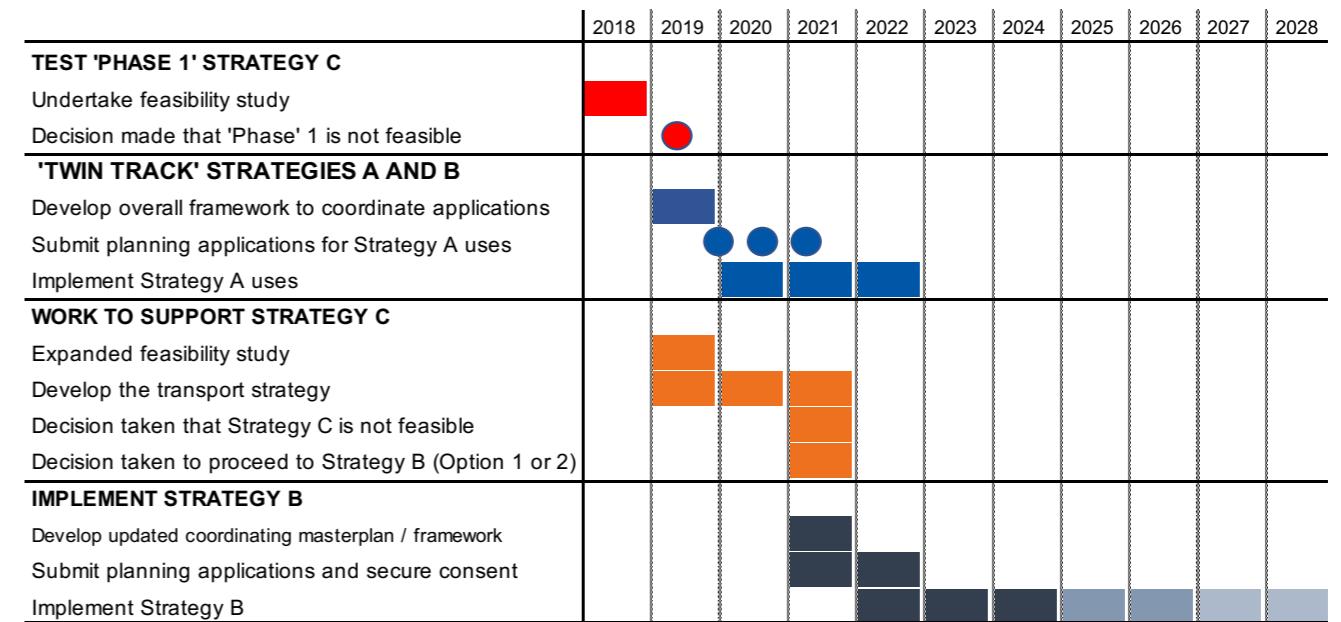
4.4.13 Planning applications will be required for some of these uses (especially the additional residential) but not for others that do not constitute 'development' (e.g. grazing land). It is likely that the Local Authority would react more positively to a series of planning applications if they are presented in the context of an overall coordinating 'Framework' for the site. For Strategy A this does not need to be a masterplan, but a set of fairly simple spatial scenarios brought together to create a coherent short to medium term plan for the site. We recommend that this is produced in collaboration with the Local Authority, and used to informally coordinate planning applications.

4.4.14 In parallel with the work to implement Strategy A, we recommend that feasibility work continues on the potential for the full Strategy C, and work on Strategy B land uses (such as the prison) is 'twin-tracked'. The structure for feasibility work on Strategy C could be broadly as follows:

- explore and test the potential for incorporating additional land surrounding the site to create a larger settlement that has a better chance of being viable. Testing to include high-level masterplanning and financial viability testing;
- explore a range of transport options, identifying pros and cons and setting out likely high-level costs to inform the viability testing. These transport options could include identification of further development opportunities - e.g. could new development be focused along a new road corridor joining Wethersfield to the West of Braintree Garden Community?



4.4.2: Strategy A - indicative programme with A as long-term use



4.4.3: Strategy A - indicative programme leading to Strategy B

4.4.15 If the feasibility studies indicate that there is little chance of securing a Garden Village, then either Strategy B needs to be implemented or Strategy A becomes the long-term use of the site, both with or without a 'Phase 1' residential development. The programmes above provide an indication of the likely timing of the Strategy A and B steps.

Key risk	Mitigation
Failure to secure permission for small-scale new residential	Support application with robust approach to community facilities, improved open space and social sustainability for existing residents. Demonstrate how it forms part of a bigger picture with a coordinating framework (see below)
Development implemented as part of Strategy A impacts negatively on the alternative futures for the site set out in Strategies B and C / prevents development coming forward.	Ensure that a coordinating framework explores how early uses can work with long-term vision of Strategies B and C.
Time and money are wasted on masterplanning and transport feasibility studies that demonstrate that a Garden Town cannot be delivered.	Devise a step-by-step approach to feasibility studies to avoid exposure to too much cost and complexity too early. Cannot eliminate this risk, only reduce it. Studies essential for decision-making.
Strategy A is seen as lacking ambition / not securing best use of land	Demonstrate that Strategy allows for longer-term development of the site through the coordinating framework.
Existing tenants on-site, with varying lease arrangements, constrain development options in the short term.	To be discussed.



### Highways and Transport Appraisal

4.4.11 Strategy A includes the retention and expansion of the existing short-term tenant operations, the retained MoD housing and the addition of approximately 100 new residential units. It has been assumed that each dwelling will generate one two-way vehicular movement per day, and the trip profile of the existing residential traffic as surveyed in March 2018 has been applied to the additional 100 residential units and the retained and expanded short term tenants to provide a robust assessment. To account for the trip generation associated with the expansion of the short-term tenancy uses, we have added an estimate of 50% of the baseline traffic to the existing site trip generation. The trip generation of the retained and expanded tenants (including short-term residential) is therefore calculated as 2,392 daily two-way trips, of which 245 and 171 occur in the AM and PM peak periods respectively.

4.4.12 The provision of a solar farm and open storage as part of Strategy A would be likely to generate only very minimal levels of traffic. For solar farms, trips would mainly be made by maintenance vehicles (small vans) in the region of 30-40 times per year. Similarly, trips associated with an open storage development would typically be by security staff, with occasional trips made by customers for the dropping off / picking up of stored goods.

4.4.13 Vehicular trips anticipated to be generated would be around 10 and 20 daily two-way traffic movements for the solar farm and open storage sites respectively, with up to 6 two-way movements in the peak hours. For this option, the overall trips generated by the site (including the retained and expanded land use traffic) would be around 2,422 daily movements, with 253 and 179 trips in the AM and PM peak hours. This is summarised in the table below.

4.4.14 A summary of the estimated two-way trips for Strategy A is provided below:

	Daily	AM	PM
Existing (for comparison)	1,341	159	111
Strategy A	2,422	253	179

Table 3.2.1 Strategy A – Two-way Vehicular Trips Summary

### Trip Generation Conclusion

4.4.15 Based on the assessment of each of the options within Strategy A, the daily level of vehicular traffic is anticipated to be of a similar scale to the trip generation of the existing operational site (i.e. the MDPGA and existing tenants' traffic).

### Transport Impact and Infrastructure Requirements

4.4.16 Strategy A is intended to facilitate short-term improvements and small-scale additions to the current site. As is presently the case, most or all person trips to and from the Site will need to be made by car, as there are very limited opportunities for travel by other modes. With regard to the proposed additional housing provision, existing local and county policy requires all housing sites to demonstrate how associated trips can be made by sustainable means, with car trips minimised; this will clearly not be achievable at the Wethersfield site in the short term and therefore any planning application will have to make a case that there are specific wider circumstances and benefits from the development which will offset this non-compliance and make the development acceptable on balance from a planning perspective.

4.4.17 It is noted that some of the potential land uses would attract a greater number of vehicular trips on special event days, however it is considered in principle that this level of traffic is still able to be supported on the existing local highway network without requiring major infrastructure upgrades or funding public transport services (on the assumption that event days themselves are relatively infrequent). That said, it should be noted that the Local Authorities may ask the developers to contribute towards transport infrastructure funds as part of future planning applications, depending on the distribution of development-related traffic (and particularly where this traffic passes through existing settlements and combines with increased traffic from other development sites). This would support the cost of maintaining or improving the carriageways and funding other local transport schemes.

4.4.18 In order to bring forward a planning application in connection with Strategy A, it is expected that a Transport Statement (TS) would be required. The TS would require pre-application scoping discussions with Essex County Council, and these would need to include agreement of specific development vehicle and person trip rates, a distribution of the expected vehicular traffic, and identification of any locations on the existing highway networks where significant congestion is observed at peak times, as these may require formal highway capacity modelling. A site Travel Plan may also be required; preparing this is likely to be challenging, given the high reliance on car transport by all existing and proposed uses at the Site.

### Engineering Appraisal

- Retained MOD Housing (148 dwellings);
- Additional housing (100 dwellings);
- Retained / Expanded Short Term Tenancies (assumed B1c/B2) up to 40,000 m<sup>2</sup>;
- Solar Farm (up to 100 Ha);
- Retained Airfield / Drag Racing Track (53 Ha);

### Assumptions:

4.4.19 A solar farm will not require any ancillary buildings associated with the use. However to be viable a suitable connection point is required to the UK power network in the area.

4.4.20 Retained airfield or a racing track will require up to 20,000 m<sup>2</sup> of ancillary buildings for storage and other uses.

### Initial Thoughts:

4.4.21 It is considered that the existing services / supplies to the wider airfield site would be able to accommodate the proposed land uses. The additional housing and commercial units will be located adjacent to existing settlements and existing buildings are to be utilised wherever practical, to ensure that infrastructure costs are minimised. However, new connections will be required for the additional housing.

4.4.22 The provision of a solar farm is likely to yield a medium to longer term benefit with regards to electrical energy although the supply must first be connected to the grid.

### Infrastructure Options:

Electricity – Optimise and supplement existing supply to work in tandem with potential on-site generation (Solar Farm);

Gas – Utilise existing connection (existing residential settlement) and supplement with LPG if required;

Water – Existing means unknown but harvesting and treatment on-site options.

Communications – Fibre connection will be essential and existing network may need to be reviewed and redistributed accordingly.

### Cost Risk:

4.4.23 Where 1 is minimal upgrades and 10 is significant infrastructure improvements for new supply:

Considered Cost Risk:	2
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### Property Appraisal

4.4.24 The option takes a relatively low risk approach and seeks to maximise existing assets rather than utilising the site to deliver any substantial growth.

4.4.25 The approach recognises the site's limitations in respect of commercial attractiveness and seeks to minimise/defray liabilities and obligations going forward and minimise expenditure in to the short to medium-term.

4.4.26 The commercial market for property is, therefore, fixed in a current context of use of existing structures. There are limited risks to changes of use within commercial classes. The grade of accommodation remains poor overall and achievable rental levels remain depressed in respect of the neighbouring areas.

4.4.27 The residential market for property is affected by limited amenities, the accessibility of property and the nature of surrounding development and exclusive possession areas. Additional residential development carries risk being outside of a settlement context and could be constrained by main site activities, security and context. This may be tempered by housing need arguments.

4.4.28 To further appraise existing use value a more detailed understanding of the site area of the various uses is required along with an accommodation schedule would be required. For comparator purposes we advise land and outline property values are applied at the following rates:

- Commercial - reg. [redacted] per acre
- Residential (existing un-refurbished) reg. [redacted] per sq ft NIA (capital value) -- assuming satisfactory access, services and utilities
- Residential New Build Per Acre - reg. [redacted]
- Agricultural - reg. [redacted] per acre

### Appraisal Summary

4.4.29 The Summary Table opposite draws together the appraisal of Strategy A against the Projects Objectives established by the client and consultant team. In summary:

- Strategy A is low risk, but the rewards are also low.
- Strategy A performs very poorly meeting the objective of maximising the amount of housing, as it delivers only around 100 new residential units.
- So long as Strategy A is seen as a 'holding' option leading to an alternative future, then it has merit in establishing short-term productive uses.

STRATEGY A: 'DO MINIMUM'		
Project Objectives	Commentary	Overview
Establishing optimum land value	<ul style="list-style-type: none"> <li>• Lowest GDV of all options.</li> <li>• However, also the lowest investment.</li> </ul>	
Achieving buy-in / planning certainty from Braintree District Council prior to disposal	<ul style="list-style-type: none"> <li>• Making the case for 100 additional residential units likely to be challenging.</li> <li>• Nature of storage uses needs to be long-term/low movement so as not to require transport improvements.</li> <li>• Otherwise, achieving buy-in/planning certainty is low risk.</li> </ul>	
Establish productive uses in the short-term (0-5 years)	<ul style="list-style-type: none"> <li>• Productive uses secured.</li> </ul>	
Deliver maximum number of homes achievable	<ul style="list-style-type: none"> <li>• May be able to secure modest number of new homes in short term to consolidate / strengthen existing community.</li> <li>• However, performs poorly against this objective.</li> </ul>	
Ensure that short-term/temporary uses do not create ransom situations	<ul style="list-style-type: none"> <li>• Strategy is designed as 'holding' option, ideally leading to an alternative strategy that makes more productive use of the site. Therefore designed to minimise ransoms and limiting future alternative land uses through short-term, easily 'reversible' uses.</li> <li>• Recommended production of coordinating frameworks will help to ensure options are kept open for the future.</li> </ul>	
Achieve buy-in from Essex County Council for access and highways proposals	<ul style="list-style-type: none"> <li>• No upgrades proposed. Will need to make robust case for no increase in capacity needed.</li> </ul>	
Ensure development can be successfully assimilated into the landscape	<ul style="list-style-type: none"> <li>• Very little change proposed. Many existing buildings are of low quality. Solar Farm may have some visual impact. No on-site landscape improvements (other than retaining and maintaining Woodland Trust planting) so may be risk of not working as sensitively with the landscape as other Strategies.</li> </ul>	
Retain ancient woodland and give consideration to sustainable uses for Woodland Trust planting	<ul style="list-style-type: none"> <li>• Retained.</li> </ul>	
Retain and optimise use of existing utilities capacity	<ul style="list-style-type: none"> <li>• Minor connections proposed relating to new service connections for proposed residential properties.</li> </ul>	
Ensure development respects areas of heritage within the site and surrounding areas	<ul style="list-style-type: none"> <li>• Retains heritage assets but very limited opportunities to enhance them or provide access due to low land values and continuing secure nature of majority of site.</li> </ul>	



## 4.5 Strategy B: 'Do More' Option 1: Lower infrastructure transport requirements and Option 2: Higher infrastructure requirements

### Strategy B: 'Do More' - Option 1: Lower transport infrastructure requirements

4.5.1 The 'Do More' strategy aims to bring the site into more productive use by gradually introducing permanent, primarily non-residential land uses over the medium term – approximately 5-15 years. Option 1 under Strategy B includes uses with generally lower transport infrastructure requirements.

4.5.2 The key elements of the strategy are:

- Retain and expand the existing tenant operations, converting them to permanent uses and upgrading the building stock when possible.
- Introduce a mix of new, non-residential uses including a prison, data centre, solar farm and recreational airfield.
- Introduce a modest number of new homes (approx. 100) to complement the existing community. These homes could be accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche which would contribute to the sense of place and reduce the need to travel for day-to-day essentials.

The 'Do More' strategy will require investment to improve the accessibility of the site. Upgrades to utilities and other infrastructure will also be required.

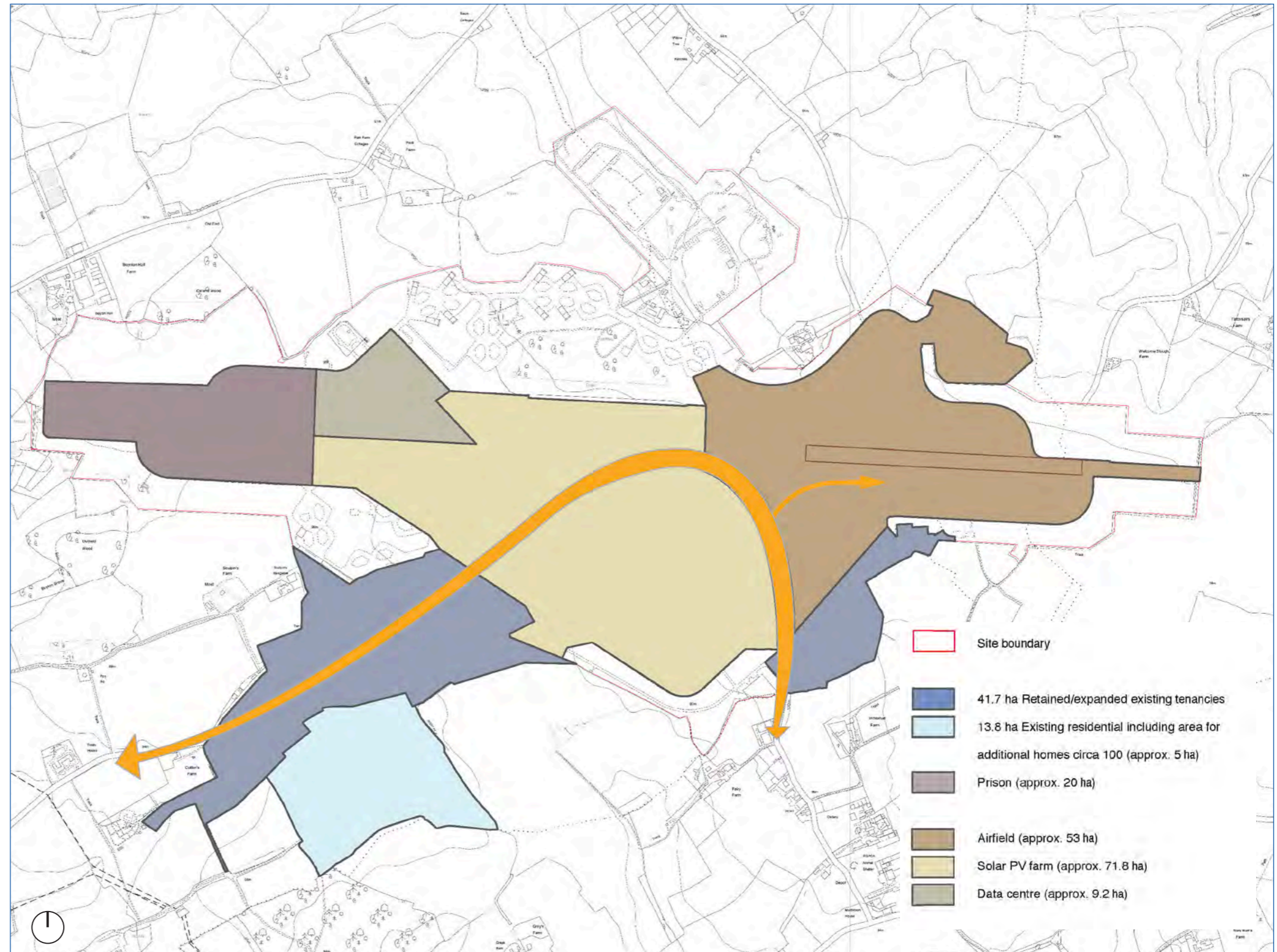


Figure 4.5.1: Strategy B: Do More - Option 1 (not to scale)



### Strategy B: 'Do More' - Option 2: Higher transport infrastructure requirements

4.5.3 The 'Do More' strategy aims to bring the site into more productive use by gradually introducing permanent, primarily non-residential land uses over the medium term – approximately 5-15 years. Option 2 under Strategy B includes uses with generally higher transport infrastructure requirements.

The key elements of the strategy are:

- Retain and expand the existing tenant operations, converting them to permanent uses and upgrading the building stock when possible.
- Introduce a mix of new, non-residential uses including a prison, open and covered storage and an R&D campus.
- Introduce a modest number of new homes (approx. 100) to complement the existing community. These homes could be accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche which would contribute to the sense of place and reduce the need to travel for day-to-day essentials.

The 'Do More' strategy will require investment to improve the accessibility of the site. Upgrades to utilities and other infrastructure will also be required.

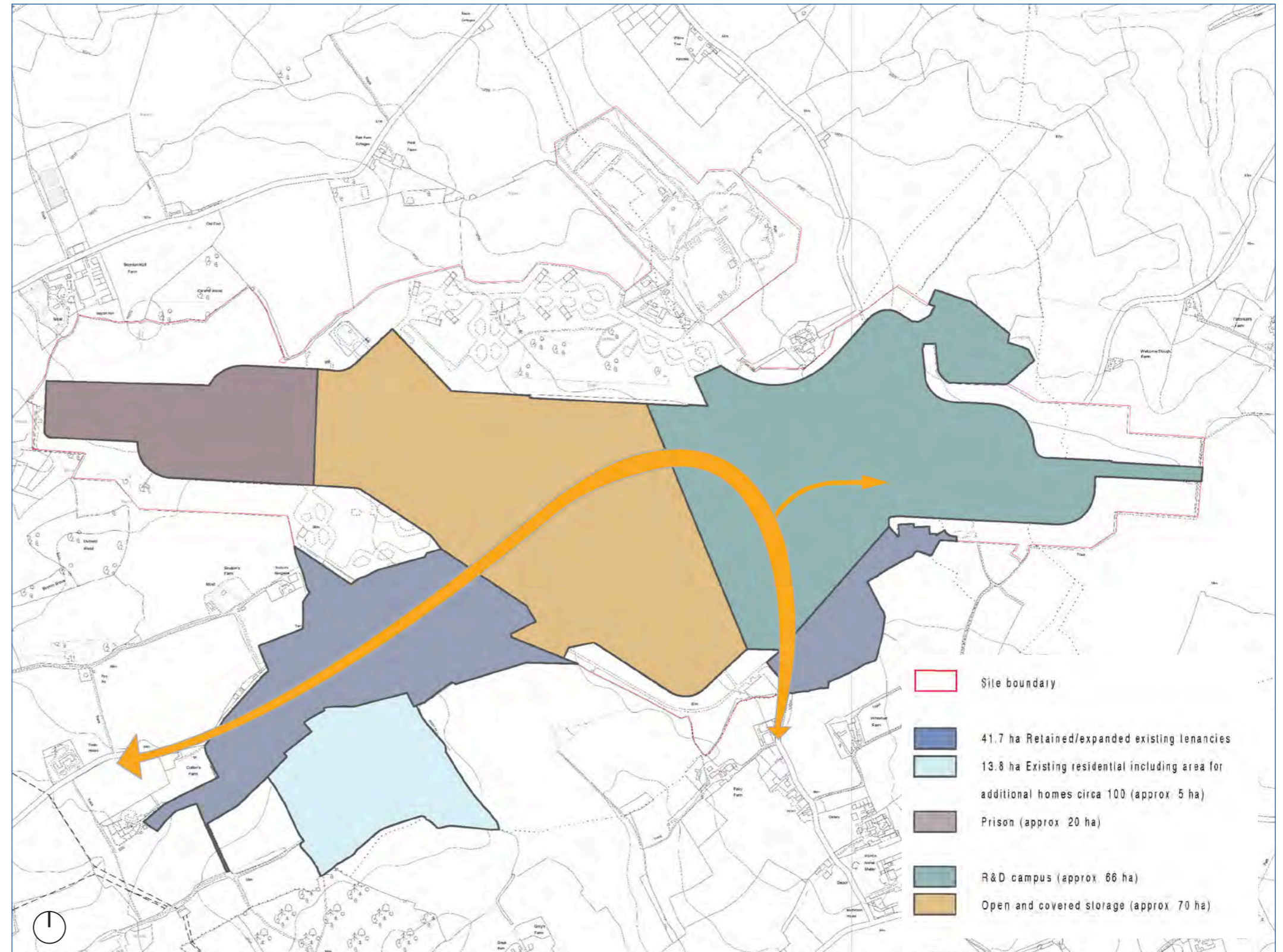


Figure 4.5.2: Strategy B: Do More Option 2 (not to scale)



**Planning Appraisal**

**Planning Policy Issues**

4.5.4 Both of the options within Strategy B could conform with current and likely emerging planning policy so long as they address the issue of the site having poor transport links. In addition to the challenges involved in achieving consent for the small-scale residential as identified in Strategy A above, the main risk area would be the proposed employment uses, where the strategy needs to incorporate:

- employment with a low density of employees – for example, continuing some of the storage functions on site or high-tech uses such as a data centre; and/or
- employment where a comprehensive approach to travel planning (such as shuttle buses) can be implemented – this might typically be a single user in a large campus, such as a research and development facility that would benefit from a relatively isolated and secure site.

4.5.5 Strategy B: Option 1 takes the approach of low-density uses, whereas Strategy B: Option 2 combines a campus-style employment use with low-intensity uses. Strategy B: Option 1 can be brought forward in the short term, but there is a high risk that Strategy B: Option 2 would require off-site transport improvements to go with its travel planning that make it more complex. This complexity would be reflected in (i) higher fees to undertake design work and technical studies; and (ii) potentially a longer timescale to negotiate planning application(s).

4.5.6 As for as Strategy A, we consider that planning risks in relation to landscape, visual impact and heritage issues are likely to be low.

**Planning Strategy**

4.5.7 As set out for Strategy A above, there has been a significant shift in the timing of the adoption of the Local Plan since this project started, and the further work required of the Councils potentially gives opportunities for promoting Wethersfield for development. Vulnerabilities in terms of the absence of an up-to-date Local Plan and potential problems with demonstrating a five-year land supply mean that there may be potential for a ‘Phase 1’ of Strategy C – perhaps as many as 500 new homes.

4.5.8 We recommend undertaking some high level feasibility work into a ‘Phase 1’ of Strategy C. A reasonably clear position could be reached at the end of 2018, and this would enable a decision to be made as to whether to

continue with this strategy. If the decision in late 2018 / early 2019 is that a ‘Phase 1’ of Strategy C is not feasible, we recommend ‘twin tracking’ Strategies A and B:

- Implement Strategy A immediately, securing short term uses that can generate an income stream (e.g. expanding existing employment uses, developing a solar farm) along with permanent uses that are designed to fit with the long-term strategy of a Garden Village (e.g. a small amount of residential).
- If possible, implement those elements of Strategy B that are compatible with a future Garden Village, such as a data centre and/or prison, both tucked away in positions where they are visually unobtrusive.
- A series of individual planning applications would be required. It may be helpful to agree an overall coordinating framework with Braintree District Council within which these applications can be considered. To retain flexibility, we recommend avoiding a formal planning status (i.e. no outline application or Supplementary Planning Document). This framework should consider how any permanent uses would work as part of a larger-scale, long-term Garden Village.

4.5.9 In parallel with the work to implement Strategy A, we recommend that feasibility work continues on the potential for the full Strategy C, and the site is promoted through the next iteration of the Local Plan as a site allocation. Whilst the current Local Plan has failed, we believe that a serious attempt to secure an allocation will need a significant evidence base – particularly in terms of transport – and so it is not realistic to take advantage of the current review. The programme opposite assumes that the emerging Local Plan is adopted around the end of 2019, setting the scene for a new Local Plan five years after this.

4.5.10 The structure for feasibility work on Strategy C would be based on the same starting point as suggested for Strategy C, that is:

- explore and test the potential for incorporating additional land surrounding the site to create a larger settlement that has a better chance of being viable. Testing to include high-level masterplanning and financial viability testing;
- explore a range of transport options, identifying pros and cons and setting out likely high-level costs to inform the viability testing. These transport options could include identification of further development opportunities - e.g. could new development be focused along a new road corridor joining Wethersfield to the West of Braintree Garden Community?

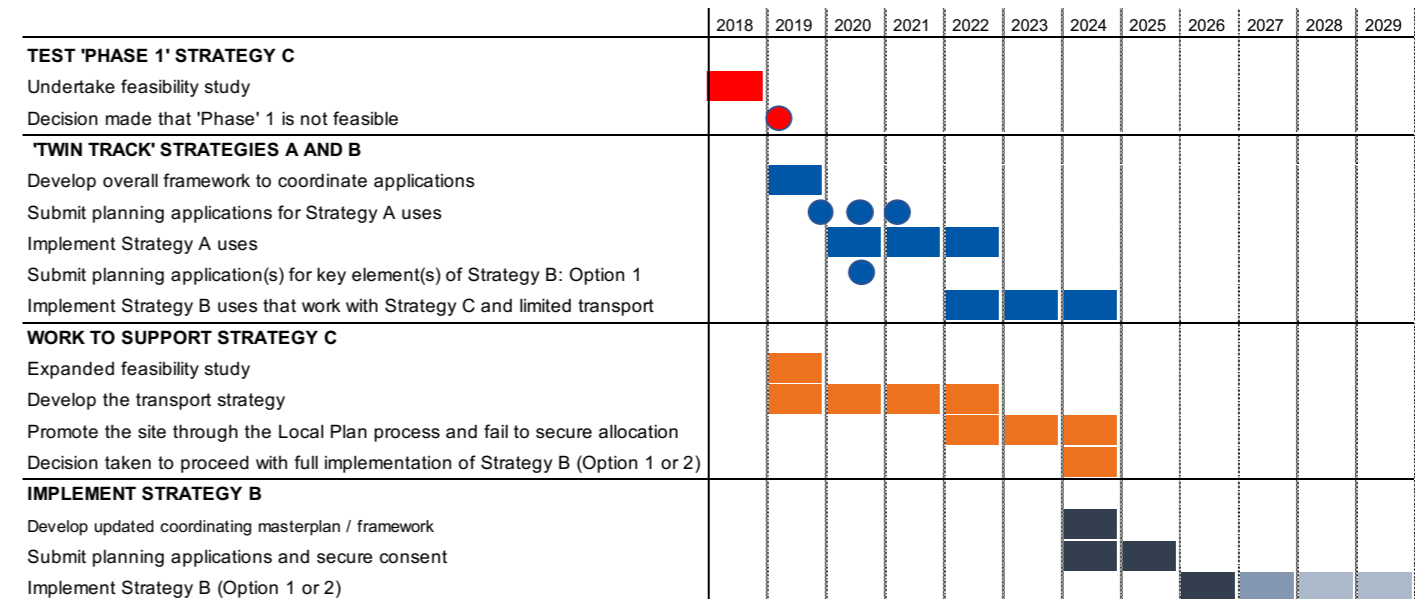


Figure 4.5.3: Strategy B indicative programme

4.5.11 So long as feasibility looks promising, this would then be expanded into a full masterplan and transport strategy, supported by a range of technical studies (ecology, visual impact, utilities etc) suitable for promoting the site through the Local Plan process.

4.5.12 For the purposes of this scenario, the programme above indicates what would happen if the site promotion fails to secure an allocation. In this case, the decision would be taken to proceed to full implementation of Strategy B (Option 1 or 2). This would involve producing an updated coordinating masterplan, and submitting a series of planning applications.

Key risk	Mitigation
Development implemented as part of Strategies A and B impacts negatively on the alternative future for the site set out in Strategies C / prevents development coming forward.	Ensure that a coordinating framework explores how early uses can work with long-term vision of Strategy C.
Time and money are wasted on masterplanning and transport feasibility studies that demonstrate that a Garden Village cannot be delivered.	Devise a step-by-step approach to feasibility studies to avoid exposure to too much cost and complexity too early. Cannot eliminate this risk, only reduce it. Studies essential for decision-making.
Suitable occupiers cannot be found for Strategy B: Option 2.	Market the site from the earliest stages of Strategy A. Once feasibility of moving to Strategy C is known, make decision on whether to continue marketing or settle for the lower-key Strategy B: Option 1.
Existing tenants on-site, with varying lease arrangements, constrain development options in the short term.	To be discussed.

**Highways and Transport Appraisal**

4.5.9 The estimated vehicular traffic impact associated with the Strategy B options are shown in Table 3.2.2 below:

	Daily	AM	PM
Existing (for comparison)	1,341	159	111
Retained / Expanded Land Uses	2,392	245	171
Option 1: Lower Infrastructure Requirements	4,169	611	515
Option 2: Higher Infrastructure Requirements	5,596	757	871

Table 4.5.1: Strategy B – Two-way Vehicular Trips Summary

**Trip Generation Conclusion**

4.5.10 The assessment of the Strategy B options has found that the proposed land uses would generate a higher level of vehicular trips than Strategy A as expected. It is noted that currently there is only a relatively small difference between the lower and higher infrastructure options. The options considered to be less intensive are presenting a relatively high level of vehicular traffic due to the scale of the proposed land uses and the limited consideration of operational proposals which is currently possible. The above assessment is therefore considered to present a robust estimate of the traffic impact of this strategy, and it is likely that the figures obtained from this initial analysis would be refined and reduced as a preferred scheme is developed in more detail.

**Transport Impact and Infrastructure Requirements**

4.5.11 In both options, it will be necessary to encourage as many trips as possible to be made by sustainable modes to justify provision of new services, as the currently estimated vehicular flows to these land uses are not of a scale which would support provision of brand new road infrastructure, and the opportunities to enhance the capacity of the existing road network for general car traffic are relatively limited. The trip profile of the Research and Development site used in the assessment is amenable to trips being made by sustainable modes, as demand is spread relatively evenly throughout the day and the land

use would still generate a significant number of trips during highway peak hours. Similarly, the regular visiting hours of a prison development would also be suitable for shuttle bus services.

4.5.12 The distribution of the traffic associated with Strategy B estimates linkages between the nearby towns and cities in the first instance, as well as including the most likely/attractive route towards Greater London. An early indication of the location and costs associated with possible junction improvement options for this strategy, based on the trip distribution exercise, has been developed and is included in the Transport Evidence Base report.

4.5.13 In order to bring this development strategy forward, a Transport Assessment (TA) covering all land uses of the chosen development option would be required to support an outline planning application for the Site, which would form the basis of future planning applications for each element of the Site. As well as the tasks associated with the Transport Statement described under Strategy A, the TA would be expected to provide details of a more extensive transport strategy for the Site, which would be designed to accommodate the expected level of trips by each travel mode.

**Engineering Appraisal: Strategy B - Option 1**

4.5.14 Assumed uses:

- Retained MOD Housing (148 dwellings);
- Additional housing (100 dwellings);
- Retained / Expanded Short Term Tenancies (assumed B1c/B2) up to 40,000m<sup>2</sup>;
- Prison (20 Ha – assumed building footprint of up to 75,000 m<sup>2</sup>);
- Solar Farm (up to 60 Ha);
- Retained Airfield (53 Ha);
- Data Centre (9 Ha - assumed building footprint of up to 20,000 m<sup>2</sup>).

**Assumptions:**

4.5.15 Proposed prison buildings have an area of 75,000m<sup>2</sup> with cell numbers in the region of 1,600.

4.5.16 Solar farm will not require any ancillary buildings associated with the use but will require infrastructure upgrades to connect into the existing electrical grid.

4.5.17 Retained airfield will require up to 20,000m<sup>2</sup> of ancillary buildings for storage and other uses.

4.5.18 The data centre is based on a building of up to 20,000m<sup>2</sup>. Any proposed data centre will have a very high electrical demand and therefore a possible on-site connection with the solar farm has been explored.

**Initial Thoughts:**

4.5.19 It is considered that generally the existing services / supplies to the wider airfield site may be able to accommodate the majority of the proposed land uses within this sub Strategy depending on the chosen 'mix'. However, considerable investment would be required for electrical infrastructure.

4.5.20 The additional housing and commercial units will be located adjacent to existing settlements and existing building utilised wherever practical, to ensure that infrastructure costs are minimised.

4.5.21 The provision of a solar farm adjacent to the Data Centre represents an opportunity to reduce the need for upgrading the electrical supply.

4.5.22 The introduction of a prison in the suggested location is likely to require significant new supplies and increased loadings (approximately 1.5 kW per cell in terms of electrical demand).

4.5.23 The proposed data centre is likely to warrant a significant electrical loading (1500 w/m<sup>2</sup> which equates to a demand of 30MW) which is likely to generate a need to upgrade the existing infrastructure within the airfield.

4.5.24 Without a significant contribution directly from the solar farm, this may require a 132kV supply at a very high cost. It may therefore make commercial sense to remove the data centre from Option 1.

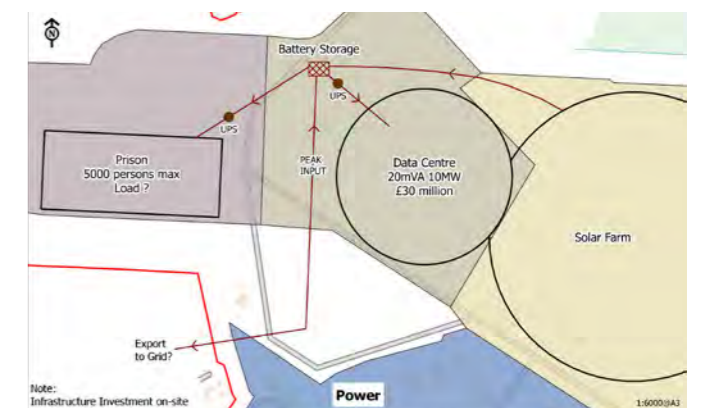
**Concerns:**

4.5.25 The introduction of a data centre and prison will generate a significantly increased demand for utilities, particular with regard to electricity and communications (data centre) and water (prison).

4.5.26 The concept of utilising the on-site solar farm, to help satisfy demand and reduce network load is an interesting consideration. However, demands and service requirements need to be aligned with resilience, independency and local back up.

4.5.27 A dedicated renewable generation system would thus need to meet peak capacity for each and this may be beyond practical provisions and realistic capital costs.

4.5.28 Below is a concept sketch of how the proposed land uses could interact to ensure that any renewable energy generated on-site would be used effectively and efficiently:



In summary, a combined Solar Farm and prison could have positive interdependency resulting in reduced infrastructure cost. The provision of a data centre would require considerable offsite electrical infrastructure regardless of whether a Solar Farm is provided or not.



**Cost Risk:**

4.5.29 Where 1 is minimal upgrades and 10 is significant infrastructure improvements for new supply.

Considered Cost Risk:	8
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**Engineering Appraisal: Strategy B - Option 2**

4.5.31 Assumed land uses:

- Retained MOD Housing (148 dwellings);
- Additional housing (100 dwellings);
- Retained / Expanded Short Term Tenancies (assumed B1c/B2);
- Prison (20 Ha – assumed building footprint of up to 75,000 m2);
- Research and Development Facility (66 Ha - assumed building footprint of up to 140,000 m2);
- Open / Covered Storage Facility (70 Ha – assumed covered footprint of 100,000 m2).

**Assumptions:**

4.5.32 Proposed prison buildings have an area of 75,000m2 with cell numbers in the region of 1,600.

4.5.33 Research and Development Facility will have a footprint of up to 140,000m2.

4.5.34 The covered storage facility equates to 25% of the overall open / covered storage facility and has an assumed footprint of up to 100,000m2.

**Initial Thoughts:**

4.5.35 It is considered that the existing services / supplies to the wider airfield site would not be able to accommodate some of the proposed land uses within this sub Strategy.

4.5.36 The additional housing and commercial units will be located adjacent to existing settlements and existing building utilised wherever practical, to ensure that infrastructure costs are minimised.

4.5.37 The Research and Development facility is likely to warrant significant increase utility loadings in the far eastern portion of the site, a position where there is limited existing service provision. This will have an impact on cost as there is likely to be a need to upgrade the existing infrastructure across the majority of airfield.

**Cost Risk:**

4.5.38 Where 1 is minimal upgrades and 10 is significant infrastructure improvements for new supply.

Considered Cost Risk:	7
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**Property Appraisal**

4.5.29 Given the location it is considered reasonable to assume **that commercial values would remain at a discount to Braintree values**, even with more substantial Option 2 improvements to road infrastructure, although both scenarios improve values on Strategy A. The market is therefore highly unlikely to support speculative commercial development given the uncertain demand, relatively low values and potential costs of provision/ refurbishment.

4.5.30 Flexibility in bringing forward proposals is necessary, as the demand for commercial development has not been tested, and a substantial amount of additional space is proposed). Given the levels of risk, development is most likely to be achievable through securing large scale single users. These requirements are scarce in the market and generally emanate from National / International concerns in the private market or large Public Authority requirements.

4.5.31 Overall the proposals from a property market perspective are felt to be highly speculative, and would likely require, in LSH's view, substantial public sector finance and intervention to bring forward. The road and other infrastructure proposed in order to make the site acceptable in transport terms has good potential to outweigh value achievable through the development proposed, based on what is known concerning current values.

4.5.32 To further appraise existing use value a more detailed understanding of the site area of the various uses is required along with an accommodation schedule would be required. For comparator purposes we advise land and outline property values are applied at the following rates for Strategy B options:

- Commercial, C2A, Open Storage and Data Centre - reg. per acre
- Residential (existing refurbished) reg. per sq ft NIA (capital value) – assuming satisfactory access, services and utilities
- Residential New Build Per Acre - reg.
- Agricultural - reg. per acre

**Appraisal Summary**

4.5.33 The tables overleaf draw together the appraisal of the two Strategy B options against the Project Objectives. In summary:

- Strategy B: Option 1 is likely to generate significantly lower GDV than Option 2.
- Strategy B: Option 2 is highly speculative and dependent on finding a single user with an interest in a large part of the site. The values generated are unlikely to outweigh investment needed in transport infrastructure.
- Both Strategy B options perform very poorly in meeting the objective of maximising the amount of housing, as both deliver only around 100 new residential units.
- Strategy B: Option 1 is essentially a continuum of Strategy A, potentially leading towards Strategy C, It has merit in delivering productive land uses in the short to medium term.

STRATEGY B: 'DO MORE' - OPTION 1: LOWER INFRASTRUCTURE REQUIREMENTS		
Project Objectives	Commentary	Overview
Establishing optimum land value	<ul style="list-style-type: none"> <li>Lower GDV than Strategy B1 Option 2, but may still require significant transport investment / travel planning. Therefore likely to perform poorly in relation to other Strategies in achieving balance between investment and return.</li> <li>However, around 79% of developable site area is in uses that need not be permanent (i.e. storage, continuation of the existing tenancies and the airfield use). This provides flexibility for future development of higher value.</li> </ul>	
Achieving buy-in / planning certainty from Braintree District Council prior to disposal	<ul style="list-style-type: none"> <li>Making the case for 100 additional residential units likely to be challenging.</li> <li>Although Strategy can potentially work under current planning policy context, the transport situation must be substantially improved to support the uses, along with ensuring than storage / existing tenancies do not generate vehicular movements in excess of current amount.</li> <li>Significant investment required.</li> </ul>	
Establish productive uses in the short-term (0-5 years)	<ul style="list-style-type: none"> <li>Can establish productive uses for most of site in the short term.</li> </ul>	
Deliver maximum number of homes achievable	<ul style="list-style-type: none"> <li>May be able to secure modest number of new homes in short term to consolidate / strengthen existing community.</li> <li>However, performs poorly against this objective.</li> </ul>	
Ensure that short-term/temporary uses do not create ransom situations	<ul style="list-style-type: none"> <li>Needs to be designed (both physically and in terms of legal agreements such as leases) to ensure site area in non-permanent uses can be released.</li> <li>Essential that prison is in non-prominent position, so that it does not visually intrude on potential future development of non-permanent uses.</li> <li>Recommended production of coordinating frameworks will help to ensure options are kept open for the future.</li> </ul>	
Achieve buy-in from Essex County Council for access and highways proposals	<ul style="list-style-type: none"> <li>Key to successful travel planning is to maximise sustainable non-car modes (e.g. shuttle buses for the prison) and to minimise movements associated with other uses (e.g. ensuring that retained/expanded existing tenancies are low-movement).</li> <li>Despite low-key nature of proposed uses, transport remains a very significant challenge.</li> </ul>	
Ensure development can be successfully assimilated into the landscape	<ul style="list-style-type: none"> <li>Potentially large footprint of prison may be challenging. Solar farm may have some impact. Minimal on-site improvements proposed (although prison will require landscape buffer).</li> </ul>	
Retain ancient woodland and give consideration to sustainable uses for Woodland Trust planting	<ul style="list-style-type: none"> <li>Retained.</li> </ul>	
Retain and optimise use of existing utilities capacity	<ul style="list-style-type: none"> <li>The proposed Data Centre introduces a significant cost implication with regards to electrical and data supply.</li> </ul>	
Ensure development respects areas of heritage within the site and surrounding areas	<ul style="list-style-type: none"> <li>Retains heritage assets but very limited opportunities to enhance them or provide access due to low land values and continuing secure nature of majority of site.</li> </ul>	

STRATEGY B: 'DO MORE' - OPTION 2: HIGHER INFRASTRUCTURE REQUIREMENTS		
Project Objectives	Commentary	Overview
Establishing optimum land value	<ul style="list-style-type: none"> <li>Potentially delivers higher GDV than Strategy B1 Option 1. However, this is contingent on attracting a significant R&amp;D tenant for a large part of the site - dependent wholly on external organisation, and not something that Homes England can control.</li> <li>Around 55% of the developable site area is in uses that need not be permanent (i.e. storage and continuation of the existing tenancies). This provides flexibility for future development of higher value.</li> </ul>	
Achieving buy-in / planning certainty from Braintree District Council prior to disposal	<ul style="list-style-type: none"> <li>Making the case for 100 additional residential units likely to be challenging</li> <li>Although Strategy can potentially work under current planning policy context, the transport situation must be substantially improved to support the uses, along with ensuring than storage / existing tenancies do not generate vehicular movements in excess of current amount.</li> <li>Will require robust transport strategy and investment (including Travel Plan incorporating significant sustainable/shared transport)</li> </ul>	
Establish productive uses in the short-term (0-5 years)	<ul style="list-style-type: none"> <li>Can establish productive uses for most of site in the short term.</li> <li>In trying to market for R&amp;D campus, does it make sense for that part of site not to be put into productive use so as to make it instantly available / attractive?</li> </ul>	
Deliver maximum number of homes achievable	<ul style="list-style-type: none"> <li>May be able to secure modest number of new homes in short term to consolidate / strengthen existing community</li> <li>However, fails to deliver this objective</li> </ul>	
Ensure that short-term/temporary uses do not create ransom situations	<ul style="list-style-type: none"> <li>Needs to be designed (both physically and in terms of legal agreements such as leases) to ensure site area in non-permanent uses can be released.</li> <li>R&amp;D campus is has more prominence than prison - needs to be of good quality to ensure potential high value uses (e.g. residential) can come forward in the future.</li> <li>Recommended production of coordinating frameworks will help to ensure options are kept open for the future.</li> </ul>	
Achieve buy-in from Essex County Council for access and highways proposals	<ul style="list-style-type: none"> <li>An R&amp;D campus has the potential to deliver sustainable transport modes - e.g. shuttle bus - that could go some way to addressing the transport problems.</li> <li>However, a high level of investment in transport infrastructure will be required to secure support for the Strategy.</li> </ul>	
Ensure development can be successfully assimilated into the landscape	<ul style="list-style-type: none"> <li>Potentially more challenging than Strategies A and C given the likely large footprint nature of both the R&amp;D campus and the prison. However, should be able to mitigate through good design.</li> </ul>	
Retain ancient woodland and give consideration to sustainable uses for Woodland Trust planting	<ul style="list-style-type: none"> <li>Retained</li> </ul>	
Retain and optimise use of existing utilities capacity	<ul style="list-style-type: none"> <li>Overall level of development is likely to generate a need for infrastructure upgrades across all parts of the site.</li> </ul>	
Ensure development respects areas of heritage within the site and surrounding areas	<ul style="list-style-type: none"> <li>Retains heritage assets. Potentially some opportunities to enhance them / provide access depending on exact nature of proposed development.</li> </ul>	



## 4.6 Strategy C: 'Do Maximum'

4.6.1 This is a long-term strategy to comprehensively redevelop the site to create a mixed use, self-contained and sustainable Garden Village. The plan opposite illustrates (very conceptually) how a Garden Village might be configured on the site.

4.6.2 The key elements of the strategy are:

- Approximately 2,400 - 3,600 new homes, a mixed use village centre comprising shops and community facilities, a substantial employment area, open space and green infrastructure.
- As with the other strategies, in the short-term there is also an opportunity to introduce a modest number of new homes (approx. 100) to complement the existing community. These homes could be accompanied by re-use of some of the existing buildings to provide local services such as a shop/café/crèche which would contribute to the sense of place and reduce the need to travel for day-to-day essentials.

4.6.3 It is important to recognise that development of a Garden Village at Wethersfield would require a step change improvement in the accessibility of the site. This could only be achieved through very substantial investment, involving both the public and private sectors.

4.6.4 In addition, to achieve buy-in from the District and County Councils it will be necessary to demonstrate that Wethersfield is a more sustainable and deliverable option than other potential sites to meet future housing needs within the District/County.

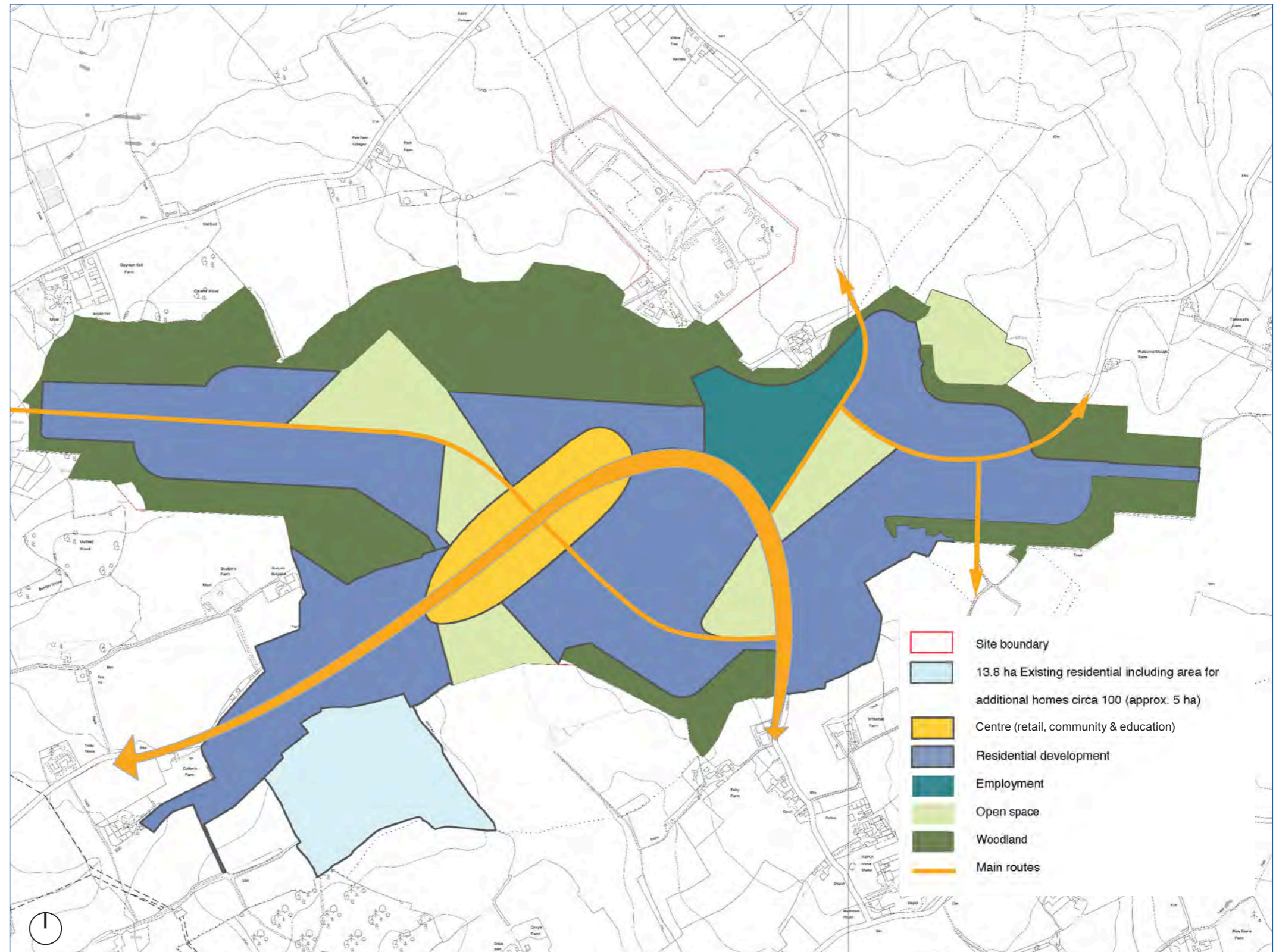


Figure 4.6.1: Strategy C: Do Maximum (not to scale)

**Planning Appraisal**

**Planning Policy Issues**

4.6.6 Strategy C’s Garden Village does not fit with emerging planning policy because:

- the spatial strategy focuses on locating new development along the existing east-west road corridor formed by the A12 and A120, and Wethersfield is distant from this corridor; and
- the lack of good transport connections is a significant obstacle to development - without major improvements, the site cannot be considered a sustainable location for development, and therefore fails to meet national and local planning requirements.

4.6.7 However, as discussed in Strategy A above and in Section 3.10, there has been a significant shift in the timing of the adoption of the Local Plan since this project started, and the further work required of the Councils by the Inspector potentially gives opportunities for promoting Wethersfield for development. Vulnerabilities in terms of the absence of an up-to-date Local Plan and potential problems with demonstrating a five-year land supply mean that there may be potential for a ‘Phase 1’ of Strategy C – perhaps as many as 500 new homes.

4.6.8 Prior to the Inspector’s findings, discussions with BDC planning officers indicated that, if transport infrastructure can be improved, Wethersfield has the potential in the longer term to become a significant residential-led development and one that could be considered in future Local Plan reviews.

4.6.9 The Inspector’s letter presents an opportunity to set the scene for Wethersfield becoming a major residential development, through an initial outline planning application for a substantial ‘Phase 1’ and then promoting through the Local Plan process. Whilst the current Local Plan has failed, we believe that a serious attempt to secure an allocation will need a significant evidence base – particularly in terms of transport – and so it is not realistic to take advantage of the current review.

**Planning Strategy**

4.6.9 As with Strategies A and B above, we recommend undertaking some high level feasibility work into a ‘Phase 1’ of Strategy C as an immediate priority. A reasonably clear position could be reached at the end of 2018, enabling a decision to be made to take a more muscular approach to securing development at Wethersfield through an initial planning application. If the decision is to proceed with an application, the work would need to be undertaken quickly in order to take advantage of the vulnerabilities in the Local Plan so that an application can be submitted before significant progress has been made, and certainly before adoption. The programme opposite shows an application being submitted at the end of 2019.

4.6.10 Assuming positive determination of the application, Reserved Matters applications would be worked up and submitted in a rolling programme from 2020 to 2023, with the ‘Phase 1’ scheme being implemented by 2026. In the meantime, parallel work on the wider Garden Village would continue to provide a robust and credible evidence base to promote the site as an allocation through the next iteration of the Local Plan. We have assumed that the next iteration of the Local Plan will follow on five years after the adoption of the currently emerging Plan.

4.6.11 As an allocation in the Local Plan becomes more certain, work would start on an outline planning application ready for submission on adoption of the updated Local Plan. Once approved, this would be followed by a rolling programme of Reserved Matters applications and the phased implementation of the Garden Village. Based on delivering a minimum of, say a total of 3,000 new homes (Including the 500 delivered in Phase 1) at the same rate as the proposed Garden Communities (around 200 per year) time-scale for completion is around 12.5 years, i.e. by around 2039.

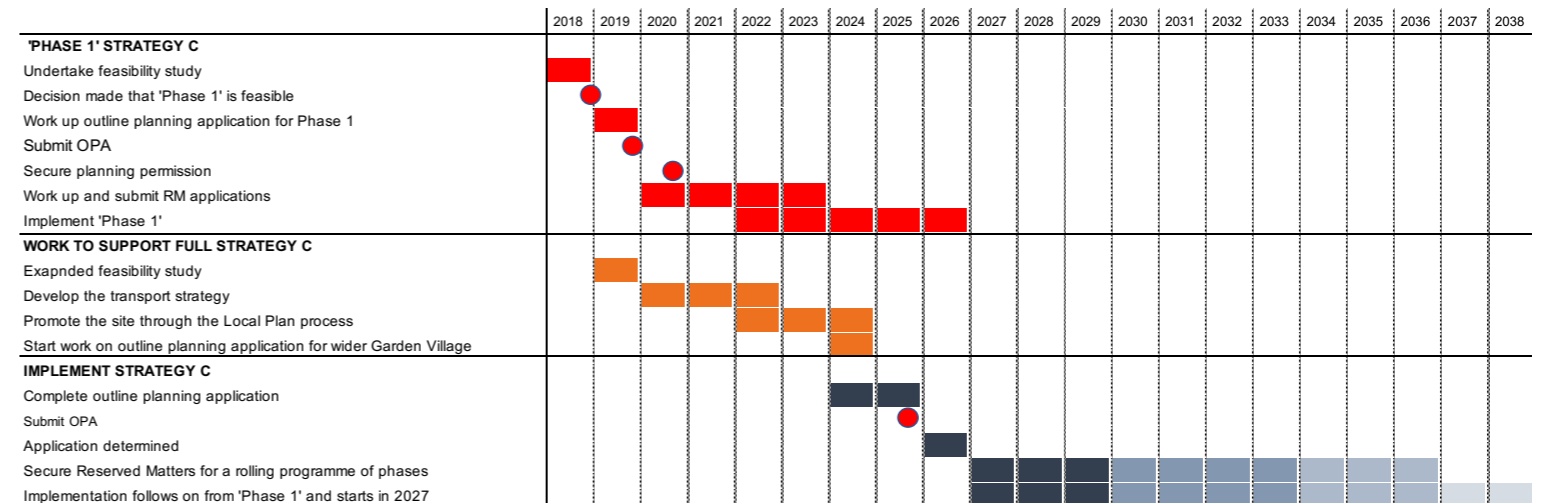


Figure 4.6.2: Strategy C indicative programme

Key risk	Mitigation
Time and money are wasted on masterplanning and transport feasibility studies that demonstrate that a Garden Town cannot be delivered.	Devise a step-by-step approach to feasibility studies to avoid exposure to too much cost and complexity too early. Cannot eliminate this risk, only reduce it.
A Garden Town cannot be achieved as transport issues cannot be solved viably.	Ensure that Strategy C is a continuum of Strategy A and relevant parts of Strategy B. If Strategy C cannot be taken forward, either Strategy A remains as the long-term use, or Strategy B is implemented in full.
Development implemented as part of Strategy A and/or B impacts negatively on the proposed Garden Town	Ensure that a coordinating masterplan/framework explores how early uses can work with long-term vision of a Garden Town. Continue to review coordinating framework through early years of the project to ensure that the Garden Town is protected.
Failure to secure allocation in Local Plan	Aim to avoid submitting a failed representation by continuing to build close working relationship with BDC officers to ensure that team is aware of any concerns / issues they may have, and address them through the Local Plan site allocation process.



**Highways and Transport Appraisal**

4.6.12 The traffic impact associated with Strategy C has been assessed for density options proposed, with the non-residential traffic impact remaining constant across all four density options. Greater consideration of the proportion of trips that will remain internal to the Site has been included in the assessments, given the mix of land uses proposed under Strategy C being amenable to linked trips (e.g. employment and school trips, and retail and residential trips). The vehicular traffic impact associated with the Strategy C options is shown in Table 3.2.3 below:

Option	Trip Type	Daily	AM	PM
Option 1 (30 dph)	External	22,058	2,510	2,271
	Internal	20,159	1,929	1,847
	<b>Total</b>	<b>42,217</b>	<b>4,440</b>	<b>4,118</b>
Option 2 (35 dph)	External	23,659	2,710	2,441
	Internal	20,559	1,979	1,889
	<b>Total</b>	<b>44,218</b>	<b>4,689</b>	<b>4,330</b>
Option 3 (40 dph)	External	25,260	2,910	2,611
	Internal	20,959	2,029	1,932
	<b>Total</b>	<b>46,219</b>	<b>4,939</b>	<b>4,543</b>
Option 4 (45 dph)	External	26,861	3,110	2,781
	Internal	21,360	2,079	1,974
	<b>Total</b>	<b>48,221</b>	<b>5,189</b>	<b>4,755</b>

Table 3.2.3

4.6.13 For information, the indicative number of trips made by non-car modes has also been calculated, and this is shown below in Table 3.2.4; these are additional to the vehicle-based trips. It should be noted that all trips associated with the 100 retained MoD housing units have been assumed to be made by car for robustness.

Option	Peak	Pedestrian	Cycle	Bus
Option 1 (30 dph)	AM	2,618	183	341
	PM	1,869	174	194
Option 2 (35 dph)	AM	2,692	186	345
	PM	1,919	187	201
Option 3 (40 dph)	AM	2,766	189	349
	PM	1,969	200	208
Option 4 (45 dph)	AM	2,841	192	353
	PM	2,019	213	215

Table 3.2.4 Strategy C Vehicular Trip Comparison – All Land Uses

**Trip Generation Conclusion**

4.6.14 From the analysis undertaken thus far, it is evident that the proposed land uses of Strategy C would generate a significantly higher level of daily and peak hour trips than the other strategies, regardless of the residential density chosen.

**Transport Impact and Infrastructure Requirements**

4.6.15 This magnitude of traffic is expected to significantly exceed the capacities of the local network junctions, both existing and within the realms of localised improvements. Consideration of the distribution of traffic associated with Strategy C estimates a high level of potential demand for travel between nearby existing and planned settlements such as the West of Braintree Garden Community. It will therefore be necessary to improve the highway network between these areas, as well as establishing non-car travel options, to avoid significant transport-related issues. The internal design of the Site would also need to be considered to maximise internal trips being made by sustainable modes.

4.6.16 A development of the size proposed would be capable of supporting certain service types to meet its own day-to-day needs; however, there would still need to be significant cross-movement of people for travel to a wider range of employment opportunities and for higher-order services. In combination with this, it is expected that there would need to be a credible “anchor” non-residential use within the proposed employment areas, so that the settlement does not in effect simply become a “dormitory” village. The size of the site does offer some potential to provide an attractive offer to potential businesses seeking secure locations without very large adjacent populations, but with enough nearby residential provision to cater to essential worker requirements; this will be an important part of the overall transport case.

34.6.17 The scale of the associated works needed to enable these land uses to come forward means that this is very much a long-term strategy for the Site, with the Local Planning Authority being likely to expect significant, “step change” improvements to the accessibility of the Site. While a high proportion of trips associated with certain uses would be expected to remain within the Site, delivery of a new link road between the West of Braintree Garden Community and the Site would offer a high-quality mitigation option; such a road would be suitable for both general traffic, larger vehicles, and would also have the potential to provide priority or dedicated road space for a “rapid transit” style of bus provision. Indicative costs associated with a 10km two by two lane dual carriageway route are estimated to be between **reg. 12(5)(e)** (including construction costs only). Clearly, this level of investment would require the scheme to be promoted and potentially part-funded through ECC’s transport infrastructure fund, with the economic and political benefits of the strategy being demonstrated by the applicant via the planning process.

**Engineering Appraisal**

- Retained MOD Housing (148 dwellings);
- Additional housing (3500 dwellings);
- Retail Development (2 Ha);
- Employment Land (10 Ha);
- Education Facility (11 Ha);
- Community Facility (D1/D2 – up to 3 Ha).

**Assumptions:**

4.6.18 The proposed retail development will have a building footprint totalling in the region of 8,000m2.

4.6.19 The employment land, thought to be a mixture of B1/ B2 and B8, will have a footprint totalling 35,000m2.

4.6.20 In terms of education provision, two 3-form entry primary schools and one 5-form entry secondary school – totalling approximately 2,200 pupils.

4.6.21 The community facilities would have a building footprint of up to 10,000m2.

**Initial Thoughts:**

4.6.22 This option represents a comprehensive redevelopment of the existing site to create a new community. At this stage there are significant delivery risks associated with the supply of major new services into the wider site.

4.6.23 It is unclear at this point, where the strategic services would need to originate from and whether a route into the site would be feasible.

4.6.24 An initial services strategy would need to be developed with the DIO and the affected utility providers to understand the strategic aspirations for the wider area in the medium to long term.

4.6.25 A new rural development, such as this, may provide an opportunity for the service providers to upgrade their infrastructure of increase the existing loadings in the vicinity of the site.

**Cost Risk:**

4.6.26 Where 1 is minimal upgrades and 10 is significant infrastructure improvements for new supply:

Considered Cost Risk:	10
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4.6.27 This process will be undertaken over a number of years and at significant cost to the developer.

Note: The Gross Development Value was assessed at between **reg. 12(5)(e)** with a land value element assumed at between **reg. 12(5)(e)** for this strategy.

All strategy comparator figures are assumed Gross of infrastructure and other costs and provided only as a means of scoping the options. The figures should, in no way, be taken to provide an assessment of any potential disposal receipts.

**Property Appraisal**

4.6.28 Strategy C delivers a new Garden Village of a population a little smaller than its nearest main neighbour Halstead.

4.6.29 The infrastructure to and from the A120 and within the place would cater for the population’s everyday needs and provide residential values that are comparable to neighbouring settlements and potentially uplifted if the quality of place can be provided.

4.6.30 The project is likely to be long-term and incremental. Absorption of the development would not be expected to be rapid given sales rates in more locationally attractive areas for commuters. 100 units per year delivery rate would make the strategy time-frame 25-35 years from commencement. Sales at rates significantly in excess of this may not be absorbed and would likely affect market price.

4.6.31 Despite the required step change in infrastructure to the south, this only plays to one side of the new village's potential catchment and cannot capture enhanced commercial or residential values that might arise through further improvements north and connections with Cambridge. In this way, and also lacking rail infrastructure, the site would be seen as a secondary location for commercial concerns and, to an extent, residential occupiers.

4.6.32 The primary settlement nodes in the current settlement pattern currently struggle to attract significant inward investment and the Wethersfield location cannot be uplifted in LSH's view to the extent that it is superior to these. Significant Infrastructure improvements might equate to a place that is broadly comparable with Halstead but potentially slightly higher averaged values given a better quality of property stock.

4.6.33 Strategy C is high risk given the planning context and the CPA's wish to deliver growth adjacent to Braintree in what would be seen as a more sustainable location for such growth.

### Appraisal Summary

4.6.34 The table opposite draws together an appraisal of Strategy C against the Project Objectives. In summary:

- Strategy C delivers the highest land value. However, it also requires the most significant investment in transport infrastructure. It will not be viable without some form of public subsidy, and may also require a larger development area than can be provided on site.
- It is the riskiest in terms of planning, and cannot be achieved in the short term. A significant change in planning policy context is required before Strategy C can be brought forward.

STRATEGY C: 'DO MAXIMUM'		
Project Objectives	Commentary	Overview
Establishing optimum land value	<ul style="list-style-type: none"> <li>• Highest GDV of all the strategies</li> <li>• However, investment (especially in transport infrastructure) is very significant</li> </ul>	
Achieving buy-in / planning certainty from Braintree District Council prior to disposal	<ul style="list-style-type: none"> <li>• Current and emerging planning policy does not support strategic allocation at Wethersfield, and current lack of transport infrastructure is a very significant obstacle to securing planning certainty for a Garden Village. Highly challenging planning policy position.</li> <li>• A major change in the trajectory of emerging planning policy is required to secure planning certainty. This will need to be achieved through a robust strategy which demonstrates that Wethersfield is a sustainable, viable and deliverable option for large-scale housing development. .</li> </ul>	
Establish productive uses in the short-term (0-5 years)	<ul style="list-style-type: none"> <li>• Strategy A could be implemented as a first phase whilst promoting the site for a Garden Community</li> <li>• Potential for some elements of Strategy B to be implemented early (e.g. prison) so long as these are designed to work with the long-term ambition for a Garden Community.</li> </ul>	
Deliver maximum number of homes achievable	<ul style="list-style-type: none"> <li>• Performs significantly better than the other strategies in delivering new homes</li> </ul>	
Ensure that short-term/temporary uses do not create ransom situations	<ul style="list-style-type: none"> <li>• Careful masterplanning required to ensure that early uses keep options open for future. But this is entirely feasible.</li> </ul>	
Achieve buy-in from Essex County Council for access and highways proposals	<ul style="list-style-type: none"> <li>• Likely to be extremely challenging, and require a long-term approach to secure support.</li> </ul>	
Ensure development can be successfully assimilated into the landscape	<ul style="list-style-type: none"> <li>• Finer grain of residential-led scheme should be easier to design to fit with landscape than larger footprints of other Strategies.</li> </ul>	
Retain ancient woodland and give consideration to sustainable uses for Woodland Trust planting	<ul style="list-style-type: none"> <li>• Retained</li> </ul>	
Retain and optimise use of existing utilities capacity	<ul style="list-style-type: none"> <li>• This process will be undertaken over a number of years and at significant capital cost to the developer.</li> <li>• Significant upgrades required.</li> </ul>	
Ensure development respects areas of heritage within the site and surrounding areas	<ul style="list-style-type: none"> <li>• Overall approach respects heritage and potentially provides opportunities for enhancing heritage and providing access when appropriate.</li> </ul>	



## 5 Summary and Recommendations for Next Steps

5.1.1 The appraisal of the Strategies shows that they have very different strengths and weaknesses: Strategy A at one end of the spectrum is low risk, low investment but also very low return; whereas Strategy C is very high risk, very high investment but also high return. The appraisal has reinforced the initial view from client and consultant team that Wethersfield's remoteness make it a very challenging site to develop, and very little can happen without very significant investment in infrastructure.

5.1.2 The Strategies are not 'either / or' options, but are instead a continuum of choices aimed at meeting Project Objectives by (i) securing some income from the land in the short to medium term; and (ii) keeping options open for future significant development.

5.1.3 There has been a significant shift in the timing of the adoption of the Local Plan since this project started, and the further work required of the Councils potentially gives opportunities for promoting Wethersfield for residential development. However, whilst the Inspector's letter was highly critical of the Local Plan process, it was generally supportive of the strategy of a series of Garden Communities. The failure of the Local Plan in its current form does not therefore suddenly transform Wethersfield into a site suitable for a Garden Village: it remains very poorly located, and making a case for development is highly challenging. Our view is that achieving the level of development proposed in Strategy C: Do Maximum is still a long-term option that will require at least another iteration of the Local Plan beyond the current version.

5.1.4 However, there will be a policy vacuum at Braintree for at least a year, and more likely a couple of years, whilst the Councils revisit their evidence base and re-start the Examination. Coupled with doubts over their five-year housing land supply, this leaves Braintree District Council vulnerable to speculative applications for residential development. There is therefore a window of opportunity of one to two years for bringing forward a 'Phase 1' of Strategy C through an application for residential development that balances numbers with relatively minimal transport and highway improvements.

5.1.5 reg. 12(5)(e) [redacted]  
[redacted]  
[redacted]  
[redacted]  
[redacted]  
[redacted]. In order to inform this decision, we recommend undertaking some transport-led feasibility testing / masterplanning of bringing forward up to around 500 homes at Wethersfield. This feasibility work could be completed by the end of 2018, enabling a decision to be made on the way forward at the end of 2018/beginning of 2019.

5.1.6 The programmes in Chapter 4's appraisal of the Strategies give an overview of the possible timescales for each of the approaches to planning and development, and makes recommendations to:

- test out a 'Phase 1' of Strategy C as a priority, making sure the work is structured to inform the other strategies should it fail;
- if the Phase 1 approach is not feasible, 'twin track' Strategies A and B, to bring forward income-generating uses in the short to medium term;
- undertake work to explore the feasibility of the full Strategy C in parallel with either (i) the development of the 'Phase 1' application or (ii) the twin-tracking of A and B; and
- make a decision on whether to proceed with Strategy C once the studies have provided greater clarity on the issues, and so proceed to an end state of Strategy A, B or C.

5.1.7 The flow chart opposite (figure 5.1.1) sets out this recommended approach, identifying where key decisions to proceed are required.

5.1.8 Our recommendations for next steps are:

- The immediate next step is to undertake feasibility work on a 'Phase 1' for Strategy C as a priority, enabling a decision to be made in early 2019 on the way forward. We are currently developing a brief / methodology for undertaking this work that also enables it to inform the Strategy A residential and the long-term Strategy C Garden Village, and aim to agree this with the client team in the next few weeks.
- If the 'Phase 1' strategy is feasible from viability, physical and political perspectives, work up an outline planning application for submission in 2019, prior to adoption of Section 1 of the Local Plan.
- If 'Phase 1' is not feasible, start implementation of Strategy A early in 2019. This will not prejudice bringing forward either Strategy B or C so long as it is developed within an overall coordinating framework. The work required to support this would include:
  - a feasibility study into a solar farm, exploring options for the scale / site coverage and testing interdependencies and viability in terms of finances and connecting to the energy network;
  - build on the 'Phase 1' feasibility study for a smaller amount of residential (around 100 units) and prepare planning application material; and
  - once the feasibility studies are nearing completion, develop a more refined version of the Strategy Plans to provide a coordinating framework.
- Strategy B: Continue to liaise with the Ministry of Justice to explore the feasibility of the prison(s), and secure a clearer definition of operational and spatial requirements. If the prison(s) proposals are found to be feasible, it is possible that they may progress quite quickly through the second half of 2018. Should this be the case it will be important to ensure that they are coordinated with the work being undertaken on 'Phase 1' of Strategy C, and that they are compatible with the long-term opportunity to achieve a Garden Village.

- In parallel with the 'Phase 1' feasibility work, develop a brief / methodology for undertaking further masterplanning technical / viability testing of Garden Village options over the next 6-12 months that includes:
  - exploring the potential for incorporating additional land surrounding the site to create a larger settlement through a land registry search and producing concept masterplan options;
  - exploring whether transport options identified through the feasibility work provide opportunities for development not immediately related to the Wethersfield site, but along the road corridor;
  - developing and testing concept masterplans similar in detail to the current Strategy C. The testing to include high-level viability appraisal (with cost assumptions for transport infrastructure included), and technical appraisal of key issues such as utility capacity. These concept masterplans to include elements of Strategy B as required (e.g. the prison) and/or show how a phased approach of Strategy A - Strategy B - Strategy C could work.
- Monitor the Local Plan process, and identify any opportunities to promote Wethersfield as an allocation.

5.1.9 The work to date has been informed through informal meetings with Braintree District Council officers, and we have established a positive relationship. This has been helped by a clear understanding by officers that Homes England and MOD are taking a long-term view of Wethersfield. reg. 12(5)(e) [redacted] we recommend continuing informal liaison on a regular basis to keep officers informed of emerging work.

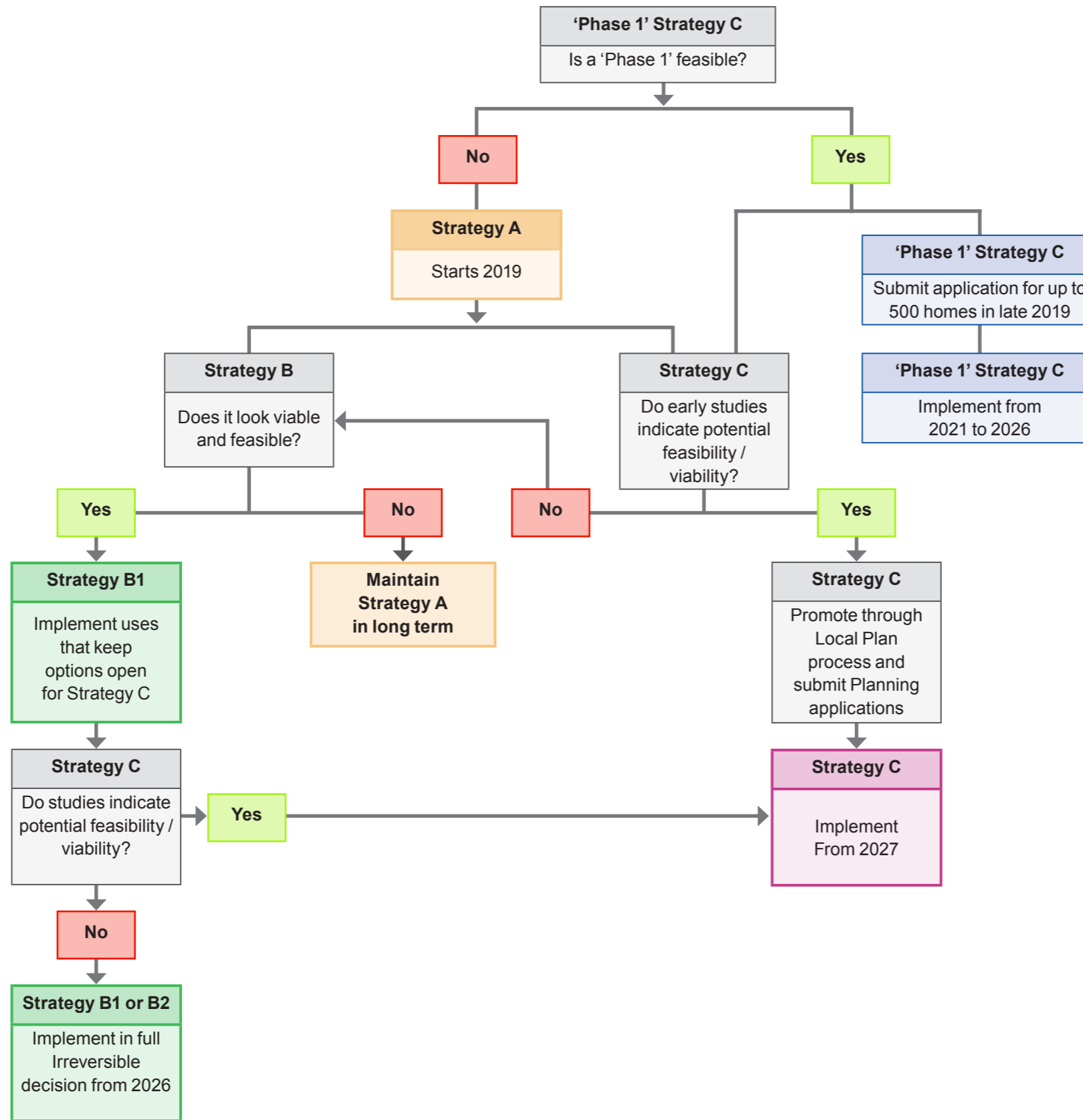


Figure 5.1.1: Flow chart





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