



## **Bures Neighbourhood Plan 2021 – 2037**

### **Reg 16 stage submission draft consultation responses**

Covering the parishes of Bures St Mary (in Suffolk) and Bures Hamlet (in Essex), the 'Bures Neighbourhood Plan' was submitted to Babergh District Council and Braintree District Council for formal consultation in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). Led by Babergh District Council, that took place between Monday 29 September and Friday 14 November 2025. Eighteen representations were received. All are listed below and copies are attached.

The Bures Neighbourhood Plan Team, on behalf of the two parish councils, were also invited to respond to any new issues raised. Their reply is also included in this document.

<b>Ref No.</b>	<b>Consultee</b>
(1)	Essex County Council
(2)	Suffolk County Council
(3)	Hertfordshire County Council
(4)	Babergh District Council
(5)	Braintree District Council
(6)	Colchester City Council
(7)	Mount Bures Parish Council
(8)	Historic England
(9)	Colchester Natural History Society
(10)	Environment Agency
(11)	Water Management Alliance
(12)	Essex Police
(13)	Fisher German LLP (obo National Grid Electricity Transmission)
(14)	Resident - Child
(15)	Resident - Firth
(16)	Resident - Harrison
(17)	Resident - Hill
(18)	James Lawson Planning Ltd (obo client)
(19)	Response from Bures Neighbourhood Plan Team

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Braintree District Council  
Causeway House  
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Our Ref:  
Date: 12 November 2025  
Telephone: 0333 01 0558

Dear Sir/Madam,

**BURES NEIGHBOURHOOD PLAN 2021 – 2037, SUBMISSION VERSION (REGULATION 16)**

Thank you for consulting Essex County Council (ECC) on the Bures Neighbourhood Plan (the Plan). ECC provides the following response, which reflects ECC's role as the Minerals and Waste Planning Authority, the Highway and Transportation Authority, the lead authority for education (including early years and childcare), the Lead Local Flood Authority and our responsibility for providing and delivering supported and specialist housing (adult social care children and other) and public health services. Comments also reflect ECC's lead role covering climate change and net zero carbon and green and blue infrastructure.

The ECC response outlines where changes need to be made to ensure ECC can deliver its statutory responsibilities and recommends other changes for consideration.

Please contact me if you require further information or would like to discuss this response in more detail.

Yours sincerely,

**Kevin Fraser**

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## **ECC RESPONSE TO BURES NEIGHBOURHOOD PLAN 2021 – 2037, SUBMISSION VERSION (REGULATION 16)**

### **Everyone's Essex**

Everyone's Essex, the Council's organisation strategy, sets out a strategic aim for a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local and Neighbourhood Plans that are being prepared across the county, at its borders and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses. The response reflects this aim.

### **Essex County Council's Neighbourhood Planning Guide (2019)**

This document provides information on which of ECC services may need to be considered when carrying out neighbourhood planning, weblinks to relevant policy guidance and advice on how to engage with ECC. Essex County Council's Neighbourhood Planning Guide can be found [here](#).

The response that follows reflects the order of the Plan.

### **The Planning Context**

ECC, as the Minerals and Waste Planning Authority (MWPA), welcomes reference to the Essex Minerals Local Plan (2014) (MLP) and the Essex and Southend-on-Sea Waste Local Plan (2017) (WLP) forming part of the development plan for the area in paragraph 12. Although Neighbourhood Plans should not seek to establish policy for minerals and waste land uses, they should include context on such matters, as relevant to the area. ECC recommend that clarity is provided on this matter and the role of the MLP and WLP in planning terms as follows:

ECC recommend paragraph 12 is amended to read:

Essex County Council is the Minerals and Waste Authority for the Bures area within Essex and is responsible for the production of mineral and waste local plans. The Development Plan in Bures therefore also comprises the Essex Minerals Local Plan 2014 (MLP) and the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP), which should inform the preparation of planning policies and assessing applications for mineral and waste development.

The role of the MLP is to ensure a steady and adequate supply of mineral resources to facilitate development over the Local Plan period and beyond and is currently being reviewed. Essex County Council must be consulted on all non-mineral related development proposed within a Minerals Safeguarding Area (MSA) that meet thresholds defined in the MLP. A Mineral Resource Assessment may need to be undertaken in advance of development. The MLP designates Mineral Consultation Areas (MCAs) at a distance of 250m around active quarries, other mineral infrastructure and mineral deposits permitted for or allocated for extraction. A Mineral Infrastructure Impact Assessment may need to be undertaken.

The Waste Local Plan (WLP) designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centres. ECC must be consulted on all non-waste related development within these areas to ensure that the proposed development would not adversely impact on their existing or future operation. A Waste Infrastructure Impact Assessment may need to be undertaken.

The Policies Map identifies Mineral Safeguarding Areas within the Plan area.

A MLP Review has commenced to extend the plan period from 2029 to 2040. The review has completed five stages:

- a Regulation 18 consultation in March/April 2021
- a 'Call for Sites' exercise in February/March 2022
- a second 'Call for Sites' exercise in September 2022
- an informal engagement on Policy S6 of the Minerals Local Plan in February/ March 2022
- a further Regulation 18 public consultation in February and March 2024, which was re-run May to July 2024 to take into account an omitted site

No sites are being considered within the Plan area. A Preferred Approach (Regulation 18) consultation will be undertaken in Summer 2026.

The Plan area includes land within a Mineral Safeguarding Area (MSA) due to the presence of sand and gravel deposits beneath the ground and a Waste Consultation Area (WCA) (see Appendix 1). The Plan area contains no sites that are subject to a Mineral Consultation Area.

The site subject to a WCA is located at Ferriers Farm Pit, Ferriers Lane, Bures Hamlet (ESS/82/19/BTE). The permission is for a non-hazardous and inert waste recycling facility to include the importation of inert waste, the sorting and treatment of inert waste materials to recover aggregates, hardcore, soils, through manual sorting and separation and the use of crushers and a screeners. The export of recovered materials, including aggregates, hardcore, soils and the export of residual waste.

### **Our Vision for Bures**

ECC welcomes the aim to prioritise walking and cycling to help get people healthier and to gain access with nature. ECC support the principle of establishing multifunctional greenways to promote sustainable and active travel movements and contribute to health and wellbeing. Any design of new routes will be required to be consistent with cycling infrastructure design ([LTN 1/20](#)) and to be coherent (allow people to reach day to day destinations easily); direct, safe, comfortable and attractive, as referenced in paragraph 1.5.2 of the guidance.

*Our village will remain well connected with the world beyond and will provide safe streets and improved direct, safe walking and cycling routes.*

### **Our Natural Environment, Biodiversity and Wildlife**

ECC notes that paragraph 82 makes reference to the emerging Suffolk Local Nature Recovery Strategy which will identify priority actions for nature and map specific areas for improving habitats for nature recovery.

ECC requires reference is also made to the published [Essex Local Nature Recovery Strategy \(ELNRS\)](#), which maps out Areas of Particular Importance for Biodiversity which should be protected and Strategic Combined Opportunity Areas, where there is identified high biodiversity value areas with opportunities for creating new or improving existing habitats . The ELNRS sets priorities and proposes actions to guide efforts for nature recovery, including supporting landowners and farmers in creating and enhancing habitats. Beyond just wildlife, it seeks to deliver wider environmental benefits like flood protection, carbon capture, and better soil quality.

#### Policy BP4: Biodiversity

ECC require reference is made to ‘multifunctional’ green infrastructure (GI) in criteria d and the final paragraph to read:

*d) Contribute towards enhancing, restoring or maintaining existing multifunctional green infrastructure (such as priority habitats or corridors to those sites);*

*Development should through effective layout and design, recognise the location of existing multifunctional green infrastructure and support appropriate uses and functions e.g. through incorporation of invertebrate, swift or bat boxes into the design of built infrastructure*

This is consistent with the National Planning Policy Framework (NPPF), which incorporates green design principles by promoting sustainability (paragraph 16a), efficient use of land (paragraph 129), and biodiversity (paragraph 187a), mitigation and adaptation of climate change (paragraph 20d), the inclusion of trees in new developments (paragraph 136), and improved design quality (paragraph 137). This is further supported by recommendations and advice provided in the Essex Green Infrastructure Strategy Objectives to create high quality multifunctional GI and improve connectivity between people and wildlife. The ELNRS promotes the use of nature-based solutions, such as green roofs, urban greening, green corridors, and sustainable urban drainage systems in new development projects, to enhance biodiversity, mitigate climate change impacts and improve quality of life for residents.

The Green Infrastructure Planning and Design Guide, published by Natural England, provides practical, evidence-based guidance on integrating nature-rich, climate-resilient green infrastructure into new developments and public spaces. It supports planners and designers in delivering high-quality, multifunctional landscapes that benefit both people and nature. [https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design\\_Guide - Green Infrastructure Framework.pdf](https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design_Guide_-_Green_Infrastructure_Framework.pdf)

ECC require an additional requirement to require development proposals to have regard to both the Essex and Suffolk Local Nature Recovery Strategies to read:

*Development proposals must be designed to maximise opportunities for the preservation, restoration, enhancement, and connection of natural habitats having regard to the Essex and the Suffolk Local Nature Recovery Strategies or future replacements.*

#### Policy BP5: Protection of Wildlife

ECC require reference is made to ‘multifunctional’ green infrastructure in criteria d (see response to Policy BP4 to read:

*Developments that are within or adjacent to existing multifunctional green or blue corridors set out in Figure 19, should use features to enhance and improve this area such as incorporate wildlife friendly design features as set out in Bures Design Code EE.06- Wildlife Friendly Features.*

## **Preserving our Green Spaces**

### Policy BP7: Local Green Spaces

Paragraph 1 should be amended to refer to ‘*inappropriate development*’ as referenced in following the suggested deletion of paragraph 2.

*In accordance with the NPPF the areas listed below and shown in Figure 27 are designated as Local Green Spaces and will be protected from inappropriate development.*

ECC require paragraph 2 is deleted from the policy as it repeats reference to NPPF in paragraph 1 and incorrectly refers to Green Belt policy. The Plan area is not covered by any Green Belt designation.

~~*In accordance with the NPPF, these will be protected from inappropriate development in accordance with Green Belt Policy.*~~

## **Improving Water Quality in the River Stour**

### Policy BP9: Foul Water and Waste Infrastructure

ECC notes reference in paragraph 113 as Essex being one of the driest areas of the country under significant pressure from potable water demand. Reference is made to new development as a minimum being required to meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan (Policy LPP 72), namely 110 litres per person per day. The Government is committed to reviewing the Building Regulations 2010 to allow LPAs to introduce tighter water efficiency standards in new homes. In the meantime, LPAs in areas of serious water stress are encouraged to agree tighter standards than the optional 110 l/p/d following advice in the [Written Ministerial Statement](#) ‘The Next Stage in Our Long Term Plan for Housing Update’ from 2023.

Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development. Since the adoption of the Braintree Local Plan the [Shared Standards in Water Efficiency for Local Plans](#) (June 2025) has been published. This is part of a joint initiative by Natural England, the Environment Agency, and water companies (Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water) endorsed by Water Resources East. Suggested model policy wording is provided under the heading ‘Draft policy: Water Resources and Sustainable Growth’ (page 7). It is sought that these recommended policies be incorporated into the Plan.

ECC recommend the policy is amended to make reference to improving water efficiency consistent with the Shared Standards as set out below. The policy should read:

### **Policy BP9: Foul Water, ~~and~~ Waste Infrastructure and Water Efficiency**

*To protect water quality, the capacity of the existing wastewater infrastructure system should be confirmed prior to any development work taking place.*

*All new development proposals should incorporate sufficient wastewater infrastructure upgrades appropriate to their mix and scale of buildings and their use on site. Capacity and upgrades should be confirmed with relevant water companies.*

*Water efficiency standards in new homes should aim to achieve a design standard of up to 85 litres/person/day (l/p/d). Where there is insufficient justification for 85 l/p/d, for example on viability grounds or local environmental risks, a design standard that is more stringent than building regulations should be implemented such as 90 or 95 l/p/d.*

*The tightest standards of water efficiency in new, extended or redeveloped non-household development should aim to achieve full credits in the BREEAM water calculator, with a minimum of 3 credits in WAT013.*

*All major non-household developments should include water saving measures and water reuse in their designs.*

The supporting text should read:

*Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development. The Shared Standards in Water Efficiency for Local Plans (June 2025) are developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to provide advice and evidence on how to secure higher water efficiency standards for new homes and commercial developments.*

### **Climate Change and Flooding**

The Plan should make reference to it being located within the Essex Climate Action Commission's (ECAC) recommended [Climate Focus Area](#) (CFA), which is formed of the Blackwater and Colne River catchment areas. The CFA has been established to demonstrate best practice in sustainable land use management and help implement the recommendations in the ECAC's report [Net-Zero: Making Essex Carbon Neutral \(July 2021\)](#).

Figure 1: Map of ECACs Climate Focus Area





The overall goal of the CFA is to achieve net zero carbon emissions through carbon reduction and carbon sequestration methods (eg. Afforestation, reforestation, improved forestry or agricultural practices, and revegetation). The secondary goal of the CFA is to become more climate change resilient by:

- improving soil health and access to natural green space and increasing biodiversity
- reducing air pollution,
- reducing flooding,
- reducing the urban heat island effect,
- improving the amenity and liveability of Essex communities

#### Policy BP10: Flood Risk Management

ECC, as the Lead Local Flood Authority (LLFA) for Essex require the following amendments to the policy to incorporate the drainage hierarchy, reference to the [Sustainable Drainage Design Guide for Essex](#) and requirements for sustainable drainage (SuDS) to be considered as part of landscape strategies.

ECC require a new paragraph 4 to read:

*The discharge of surface water should be as high up the drainage hierarchy as possible, the hierarchy is as follows:*

- *[Rainwater re-use](#) (rainwater harvesting/greywater recycling)*
- *An [adequate soakaway](#) or other infiltration system*
- *[Hybrid solution](#) of infiltration and discharging to a surface water body*
- *To a [surface water body](#) (e.g. an ordinary watercourse)*
- *To a surface water sewer, highway drain, or other drainage system*
- *To a combined sewer*

ECC require a new paragraph 5 to refer to the [SuDS Design Guide for Essex](#) which sets the local standards for sustainable surface water drainage that the LLFA require to be applied with regards potential allocations in a Neighbourhood Plan, planning applications for new developments,

promoting natural drainage features in a way which does not increase the risk of flooding anywhere else and encourages rainwater re-use. This includes the use and application of natural SuDS, rainwater re-use and promotion of multifunctional benefits to the environment and community in accordance with the NPPF and PPG. This Guide, together with the National Standards, strongly prioritise local needs and the use of nature-based green infrastructure SuDS solutions covering the four key pillars of water quantity, quality, biodiversity and amenity in SuDS design. These seek to ensure any developments /projects do not increase the risk of flooding and promote water re-use.

*SuDS should comply with the Sustainable Drainage Systems Guide for Essex.*

ECC require the current paragraph 5 to refer to multifunctional green infrastructure and additional examples of providing SuDS.

*Proposals should incorporate Sustainable Drainage Systems (SuDS) that are appropriate to the scale and nature of the development and designed to be an integral part of the multifunctional green infrastructure. These may include:*

- *Attenuation ponds, basins, swales, rain gardens/bio retention areas, permeable paving;*
- *Planting;*
- *Rainwater harvesting and storage features;*
- *Green roofs.*

ECC require a new paragraph 8 to refer to SuDS being included within any landscape strategies.

*SuDS should be included in the landscape strategy to ensure they are pleasant areas for the residents and their families.*

## **Community Facilities**

### Policy BP12: Community Assets

ECC recommended reference be made to Our Vision for Bures to the provision of improved direct, safe walking and cycling routes consistent with cycling infrastructure design ([LTN 1/20](#)), as referenced in paragraph 1.5.2 of the guidance.

ECC require criteria d be amended to read:

- c. Alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by safe direct cycling or walking.*

## **Meeting the Bures Housing Needs**

### Policy BP17: Community Led Development

ECC support this policy to encourage community owned or led renewable energy schemes in paragraph 1 which will contribute to addressing the climate crisis. However, the policy makes no other reference to renewable energy schemes. NPPF supports initiatives involving community-

led renewable energy schemes which help achieve zero carbon targets and secure energy supply. They should be supported unless they unduly adversely impact the landscape or important natural features. NPPF, paragraph 168 a and b state that when determining planning applications LPAs should recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions.

Consequently, ECC require the following be added to the policy to read:

Community owned or led renewable energy schemes (including micro photovoltaic or bio-mass projects and battery storage) will be supported subject to the following criteria:

- i. The siting and scale are appropriate to its setting and position in the wider landscape;
- ii. It does not give rise to unacceptable landscape or visual impact, either in isolation or cumulatively with other development;
- iii. It does not create an unacceptable impact on the amenities of local residents;
- iv. It does not have an unacceptable impact on a feature of natural, historic (including its setting) or biodiversity importance.

The primary purpose of such projects is understood to be for the supply and benefit of local communities.

Any such projects that result in the loss of good quality agricultural land will not be supported.

The following additional paragraphs should be inserted to provide the necessary context to read:

In any sustainable energy policy there is a need for a mix of technologies, locations and scales. National Planning policy supports initiatives involving community-led renewable energy schemes which help achieve zero carbon targets and secure energy supply. They should be supported unless they unduly adversely impact the landscape or important natural features. The NPPF acknowledges that even small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions and alleviating fuel poverty.

Community energy projects involve groups of people coming together to purchase, manage, generate, or reduce consumption of energy. This includes (but is not limited to), solar panels, wind farms, hydro power, rural heat networks, battery storage, electric vehicle charging points, car clubs and fuel poverty alleviation schemes. Programmes are usually not-for-profit, and profits raised from projects are reinvested back into the communities which they power.

The government is establishing GB Energy that will work alongside communities and local authorities to develop renewable energy projects to generate up to 8 GW of energy. The government recognises the role of community groups play in efforts to reduce their contribution to climate change and offers a range of support to community energy projects such as funding to enable both rural and urban communities to access grant funding to develop local renewable energy projects.

In a rural area like the Plan area, there may be suitable locations where appropriately scaled projects could be accommodated to assist a shift away from dependence on fossil fuels.

However, it is imperative to be aware of the possible impact on food security arising from the installation of very large solar projects on productive land in rural areas.

## **Housing Growth**

### Policy BP18: New Housing Development

ECC suggests the following amendment to paragraph 1 to provide clarity with regards the requirement for the location of new development.

*New housing developments will be required to prioritise access to services and public transport, and minimising environmental impact.*

ECC require criteria a is amended to encourage movements by active and sustainable modes.

- a. Be in close proximity to local services and amenities by active and sustainable movements*

## **Design**

### Policy BP19: Design

ECC welcomes reference to incorporating new trees into development in criteria j and reference to them not blocking future views, particularly those identified in Policy BP3, which relate to the surrounding landscape. However, NPPF, paragraph 136 requires applicants and local planning authorities to work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users. Detailed guidance is provided in the Essex Design Guide (EDG) - [Highways Technical Manual - planting in sight splays](#). ECC seeks to be consulted upon any relevant tree planting in proximity to the highway, walking and cycling routes where the future height, breadth and root growth may impact upon user safety. This should be referenced in the reasoned justification.

ECC welcome reference in paragraph 4 to new developments being encouraged to use innovative approaches to design and opportunities to deliver water efficiency measures and decentralised energy systems powered by a renewable or low carbon source and associated infrastructure including community-led initiatives. With regards to water efficiency please refer to the response to Policy BP9 and with regards renewable or low carbon community led initiatives to Policy BP17.

To deliver sustainable and healthy communities in Greater Essex, we need to make sure homes and buildings themselves are designed to be highly energy efficient, have low running costs, incorporate renewable energy technologies, use materials and resources efficiently and are resilient to changes in climate. They should be built using high quality, natural and local materials where possible, and be designed to be re-used and adaptable in future. Building in this way means that we deliver wider objectives including energy security, reducing fuel poverty, stimulating local economic growth, minimising waste, and improving the health, comfort, and wellbeing of people living and working in Essex.

Through the Essex Planning Officers' Association (EPOA) led by the Climate and Planning Unit at ECC, the following evidence-led planning policies, guidance and advice, has been prepared.

- EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025  
- GE1: Operational Energy and Carbon (net zero) in homes and buildings
- EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025) -  
GE2 Embodied Carbon and Circular Economy in homes and buildings

The policies are required to be embedded in local plans, strategies and other planning documents that guide development in Greater Essex. ECC considers the policies are deliverable now, flexible, viable, and help prevent the need for additional new homes needing to be 'retrofitted' in future years. The evidence supporting these policies can be viewed on the EDG [here](#).

Please refer to the Open Legal Advice B briefing note which can be viewed [here](#). This advises that Local Planning Authorities can require higher building fabric and energy efficiency standards than those set in Building Regulations for new development coming forward now and crucially in advance of adopted local plan 'net zero' policy. The advice highlights that the model policies and evidence base can also be used by those drafting and bringing forward neighbourhood plans in advance of Local Plans.

ECC require the following additional paragraphs be added to the policy to read:

*All new buildings must be designed and built to be Net Zero Energy and Carbon in operation having regard to Policy GE1 as set out in the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero). They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.*

*All development proposals must demonstrate the measures taken to minimise embodied carbon (subject to meeting Policy GE1 5 requirements first) and how circular economy principles have been embedded into the design having regard to Policy GE2 as set out in the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy.*

Given the Plan is cross boundary between Essex and Suffolk, ECC require paragraph 8 is amended to also make reference to the [Essex Parking Guidance](#) (2024). The Suffolk and Essex Parking Guidance is a material consideration, rather than a part of the Plan, to which new development will need to have regard to at an early stage of the design process.

The [Essex Parking Guidance](#) (2024), Part 1 provides detailed guidance for most development applications across Essex, provides the foundations for Part 2, and seeks to assist:

- the local planning authorities in determining appropriate levels of parking provision for new developments;
- developers in preparing plans for the development of land; and
- the determination of planning applications by ensuring that applications submitted include an appropriate level of cycle parking, car parking, and electric vehicle parking provision; and parking designs and arrangements that operate effectively and safely.

The Part 2 guidance has been prepared with regards new Garden Communities (GCs) and Large-Scale Developments (LSDs), which are expected to achieve exemplar sustainable mobility outcomes and therefore necessitate more progressive parking provision, either to better match demand or as a mechanism to reduce demand. The Part 2 guidance adopts an Accessibility Tool to establish how well connected a development is and its potential to achieve sustainable transport outcomes.

ECC require paragraph 8 is amended to read:

*All future developments should have regard to the ~~accord with~~ Suffolk Guidance for Parking (2023) or the Essex ~~Design Guide: Parking~~ Guidance Design in relation to parking and EV charging points*

### **Economy**

ECC welcomes new commercial development proposals being supported and in particular the provision of flexible employment spaces, where they conform with other local plan policies.

The EDG and in particular the EPOA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) helps to guide the pre-application and planning application process for mobile (4G/5G). Growth has an impact on existing or planned cellular network capacity. It will be essential for early collaboration between developers, local planning authorities and mobile network operators (or their infrastructure partners) to identify suitable locations for new or upgraded masts that minimise impact on the local community and environment while effectively addressing connectivity needs.

For information, ECC published its Digital Strategy and action plan in June 2022 which seeks to ensure that by the end of 2025:

- Superfast speeds will be available at all premises in Essex
- Gigabit-capable services available at more than 85% of premises in Essex
- 4G services available at over 99% of the Essex geography
- 5G services available at all key employment locations and in identified priority areas

ECC welcome Community Action 9: Full Fibre Broadband which seek the provision of full-fibre broadband as a local priority for which the Parish Councils will continue to lobby. To ensure that our most disadvantaged residents are not further disadvantaged by digital exclusion, it is advised that suppliers of broadband connectivity selected for new housing projects are able to provide social tariffs/the equivalent, to enable residents to afford connectivity in their own homes. This will also be important if Community Action 11: Bures Business Hub providing the provision of flexible employment spaces for local businesses is to be provided.

ECC require Community Action 9 be amended to read:

*The Parish Councils will work with BDC and ECC to effectively accelerate the installation of affordable and reliable gigabit speed broadband and 5G mobile connectivity throughout the parishes and at Community and / or Business hubs and to establish an effective outreach programme that facilitates inclusion of those who currently remain digitally excluded.*

ECC require an additional paragraph be added under 'New Businesses' to ensure the latest technology is provided to new businesses as well as a fully enabled connection of the developed areas to **at least two** open access network provider, enabling future occupiers to subscribe to gigabit broadband services without the need for further engineering work. Technology has progressed since the adoption of Braintree Local Plan Policy LPP46 – Broadband.

All new commercial developments and other appropriate developments / uses must be served by a gigabit broadband connection to the premises and 4G / 5G mobile connectivity. Connection should include the installation of appropriate cabling within the homes or business units (or other buildings) as well as a fully enabled connection of the developed areas to at least two open access network provider, enabling future occupiers to subscribe to gigabit broadband services without the need for further engineering work.

### **Getting Around and Sustainable Transport**

ECC require reference is made to active travel as this generally relates to walking and cycling.

*Objective: To encourage the use of active and sustainable forms of transport, to reduce dependency on the private car, while recognising that, as a rural area, remoter residents are reliant on the private car to access essential services and facilities.*

### **Policy BP23: Walking and Cycling Network**

ECC require paragraph 1 to be strengthened to read:

*Where appropriate to the size and scale, new built developments coming forward in the neighbourhood area will be required ~~should have regard to~~ consider the following:*

ECC require reference to 'maintain' is deleted as this is covered by reference to 'connected to' in the policy. New development will be required to connect to and improve nearby and wider networks. In addition, the future maintenance of any routes would not necessarily be the responsibility of the developer.

- a) New development or change of use applications should be well connected to, ~~maintain,~~ and seek to improve the functionality and quality of the walking and cycling network in and beyond the village.*

ECC require reference to 'freedom of use' is replaced by 'accessibility' to provide more clarity.

- b) Good safe direct connections to the walking and cycling network should be a design priority, taking opportunities to improve accessibility ~~freedom of use~~ and road safety for pedestrians and cyclists.*

ECC require the following amendments to provide clarity.

- c) Development proposals which provide ~~retain or incorporate~~ safe, attractive, and direct walking and cycling routes within and beyond the ~~on-site and which appropriately~~*



~~mitigate the impact of additional transport movements in the village created through the development scheme will be supported.~~

ECC require an amendment for existing footpaths and pedestrian cut throughs to also be enhanced where directly related to the impact of the development.

- d) Existing footpaths and pedestrian cut-throughs in the village are protected, and where necessary enhanced.*

Further clarification is necessary to distinguish between 'footpaths' and 'Public Rights of Way (PRoW)'. Generally the former is a path for walking and the latter can be a footpath, bridleway, or restricted byway. Reference to the maintenance and enhancement of PRoW is covered within paragraph 1 of Policy BP24 and should be deleted from this policy.

Further guidance on the adoption and maintenance of roads, footpaths and open spaces can be viewed on the EDG – Highways Technical Manual [here](#). The LPA may adopt and maintain footpaths essential to the functioning and appearance of development. Where this is not practical alternative arrangements will be required to ensure appropriate maintenance and funding thereof.

- e) New footpaths are designed to current Suffolk County Council and Essex County Council guidance and standards so they can be ~~recognised as Public Rights of Way~~ and be adopted by the relevant Highway Authority Essex or Suffolk County Council Highway Authority.*

ECC require reference is made to the [Highway Code Changes \(January 2022\)](#), which introduced a 'hierarchy of road users' that prioritises those most at risk on our roads. Now, drivers must be aware that pedestrians, cyclists, horse riders, carriage drivers and motorcyclists, as the most vulnerable road users, and should take priority over cars.

- g) The design will conform with the Highway Code ~~Department for Transport~~ user-hierarchy guidelines, so that it will make provision for pedestrians first, cyclists ~~second~~, and public transportation ~~third, and over~~ private vehicles ~~last~~.*

ECC require criteria i), as set out below is moved to Policy BP24 – Public Rights of Way.

#### Community Action 12: Sustainable Transport Improvements

ECC recommend the identified transport improvements A to I are reported for consideration to the Braintree Local Highway Panel (LHP) which covers potential schemes regarding traffic management improvements; tackling congestion; PRoW improvements; cycling schemes; passenger transport improvements; minor improvement schemes and aesthetic improvements. In order to progress potential schemes, the parish council will need to make a case for funding via the LHP. The LHP is able to consider locally requested measures that are not able to be prioritised for funding through other dedicated highways budgets but meet the desires of the local community. The LHP will prioritise the local concerns and make recommendations to the ECC Cabinet Member for the implementation of highway schemes that meet the concerns of local people.



Community Action F identifies that the parish councils will seek to access grant aid to provide public electric car charging points. ECC has been undertaking significant work with regards EV Charging which includes the following:

- [EV Charge Point Strategy \(Phase 1 2023 - 2025\)](#)
- [EV Charging Map](#)
- [Request a Charging Point](#)

#### Community Action 13: Rail and Bus Services

ECC recommend reference is also made to engaging with the Essex and South Suffolk Community Rail Partnership - [here](#).

#### Policy BP24 – Public Rights of Way

ECC seek criteria i, as set out in Policy BP23 is incorporated in this policy to read:

- i) Development that will be clearly visible from a Public Right of Way should consider the appearance of the proposal from the right of way and incorporate green landscaping to reduce any visual impacts.*

## **Bures Design Guidance and Codes, February 2023**

Some of the comments seeking amendments to the Plan are repeated with regards the Design Guidance, where appropriate and to ensure consistency between the two documents.

### **01 Introduction**

#### **01.1 Purpose of this document**

Reference is made to the National Planning Policy Framework (2021). The document will need to reflect the NPPF version published in December 2024 throughout.

#### **01.3 Design guidance and best practice**

Reference is made to the National Planning Policy Framework (2023). The document will need to reflect the NPPF version published in December 2024 throughout.

Whilst reference is made to the EDG (2018), the description should make reference to the new themes that have been added around Ageing Population, Digital and Smart Technology, Health and Wellbeing, Active Design and Garden Communities were added.

Reference is made to Section 1 of the 2013 - 2033 - Braintree District Local Plan adopted in February 2021. Reference should also be made to Section 2, which was adopted in July 2022.

### **04. Design Guidance and Codes**

#### **EE. Environmental and energy efficiency**

ECC refer to the comments provided to the Regulation 16 Plan - Policy BP19: Design regarding the need to make sure homes and buildings themselves are designed to be highly energy efficient, have low running costs, incorporate renewable energy technologies, use materials and resources efficiently and are resilient to changes in climate. The response seeks to recommend two additional paragraphs be added to the policy regarding work undertaken through the Essex Planning Officers Association (EPOA) led by the Climate and Planning unit at ECC, in terms of:

- EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025 - GE1: Operational Energy and Carbon (net zero) in homes and buildings
- EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025) - GE2 Embodied Carbon and Circular Economy in homes and buildings

Please refer to the Open Legal Advice B briefing note which can be viewed [here](#). The advice highlights that the model policies and evidence base can also be used by those drafting and bringing forward neighbourhood plans in advance of Local Plans and that they can also be incorporated within Design Guides and Codes SPDs via one of the following means:

ECC require the following additional paragraphs be added to this section to read:

*All new buildings must be designed and built to be Net Zero Energy and Carbon in operation having regard to Policy GE1 as set out in the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero). They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.*

All development proposals must demonstrate the measures taken to minimise embodied carbon (subject to meeting Policy GE1 6 requirements first) and how circular economy principles have been embedded into the design having regard to Policy GE2 as set out in the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy.

#### EE 04. Flood Mitigation

ECC welcome the early consideration of SuDS in the development process and scheme design. As the LLFA, ECC is a statutory consultee in responding to major planning applications in relation to sustainable drainage systems and seeks early involvement in the preparation of planning applications and any potential site allocations in a Neighbourhood Plan. More information on the pre-application process can be found [here](#). This could include the need for additional spaces for SuDS within land parcels to allow source control measures and water quality improvements; rainwater/storm water re-use, for irrigation and potential option/solution to manage surface water flooding and to help mitigate water scarcity, and the need for both individual and community rainwater harvesting. LLFA would seek to secure the multifunctional benefits of SuDS to deliver green and blue Infrastructure and support high quality development and water efficiency.

ECC recommend reference is made to arrangements for SuDS maintenance and their adoption. It is the LLFA's preference that the drainage network and its accompanying SuDS features are adopted by a public body where possible to ensure lifelong maintenance, and any body should be engaged early in the design process.

#### *Storage and slow release*

As LLFA, ECC expects the management of surface water to follow the [drainage hierarchy](#). With concern over climate change and increasing risk of water scarcity, re-use of rainwater wherever possible should be utilised. Therefore, in accordance with the drainage hierarchy contained in [Approved Document H of the Building Regulations, Planning Practice Guidance](#) and the need to mitigate against water scarcity, all surface water run off must aim to be discharged as high up the following hierarchy as possible:

- Rainwater re-use (rainwater harvesting/greywater recycling)
- An adequate soakaway or other infiltration system
- Hybrid solution of infiltration and discharging to a surface water body
- To a surface water body (e.g. an ordinary watercourse)
- To a surface water sewer, highway drain, or other drainage system
- To a combined sewer.

#### *Permeable Paving*

Guideline 2 should be amended to refer to 'footways' rather than 'footpaths'.

Reference is made to Regulations, standards, and guidelines relevant to permeable paving and sustainable drainage on page 80. As the LLFA, for outline applications, preliminary ground investigations, or a desk top study highlighting the potential capacity for infiltration should be provided. For full applications or where necessary for discharge of conditions applications, full detailed infiltration testing needs to be provided in line with [BRE365](#) and the infiltration testing

methods found in chapter 25.3 of the [CIRIA SuDS Manual C753](#). This should include the locations and results. The lowest found rate should be used as a conservative approach.

Reference should be made to the [SuDS Guide for Essex](#) which sets the *local* standards for sustainable surface water drainage that the LLFA require to be applied in the preparation of Local Plans and planning applications for new developments, promoting natural drainage features in a way which does not increase the risk of flooding anywhere else and encourages rainwater re-use. This includes the use and application of natural SuDS, rainwater re-use and promotion of multifunctional benefits to the environment and community in accordance with the NPPF and PPG. This Guide, together with the National Standards, strongly prioritise local needs and the use of nature-based green infrastructure SuDS solutions covering the four key pillars of water quantity, quality, biodiversity and amenity in SuDS design. These seek to ensure any developments /projects do not increase the risk of flooding and promote water re-use and the latest SWMP information

#### EE 06. Wildlife Friendly Features

ECC support guideline 1 but seeks reference is made to ‘*street trees*’ and ‘*multifunctional*’ green infrastructure and tree planting impacting upon the highway is undertaken in consultation with ECC, as highway and transportation authority, having regards to the EDG - [Highways Technical Manual - planting in sight splays](#).

ECC welcome guideline 3 and 5 which require development to achieve biodiversity net gain and provide new habitats and wildlife corridors and to create wildlife corridors in the surrounding countryside by proposing new green links and improving the existing ones. ECC requires reference is made to the published [Essex Local Nature Recovery Strategy \(ELNRS\)](#), which maps out Areas of Particular Importance for Biodiversity which should be protected and Strategic Combined Opportunity Areas, where there is identified high biodiversity value areas with opportunities for creating new or improving existing habitats . The strategy sets priorities and proposes actions to guide efforts for nature recovery, including supporting landowners and farmers in creating and enhancing habitats. Beyond just wildlife, it seeks to deliver wider environmental benefits like flood protection, carbon capture, and better soil quality.

ECC recommend reference is made to establishing ‘*multifunctional greenways*’ to promote sustainable and active travel movements and contribute to health and wellbeing. Any design of new routes will be required to be consistent with Cycling infrastructure design guidance ([LTN 1/20](#), paragraph 1.5.2) and to be coherent (allow people to reach day to day destinations easily); direct, safe, comfortable and attractive.

#### 04.4 Checklist

##### Street grid and layout:

- Are the new points of access appropriate in terms of patterns of movement?
- Do the points of access conform to the statutory technical requirements?

ECC recommend reference is made requiring development to have regard to the standards set out in the [EDG - Highways Technical Manual](#), and in particular the [Street Type Table](#) which outlines the key design features of streets and the numbers of dwellings they should serve.

### Car parking

The [Essex Parking Guidance \(2024\)](#), Part 1 provides detailed guidance for most development applications across Essex, provides the foundations for Part 2, and seeks to assist:

- the local planning authorities in determining appropriate levels of parking provision for new developments;
- developers in preparing plans for the development of land; and
- the determination of planning applications by ensuring that applications submitted include an appropriate level of cycle parking, car parking, and electric vehicle parking provision; and parking designs and arrangements that operate effectively and safely.

The Part 2 guidance has been prepared with regards new Garden Communities (GCs) and Large-Scale Developments (LSDs), which are expected to achieve exemplar sustainable mobility outcomes and therefore necessitate more progressive parking provision, either to better match demand or as a mechanism to reduce demand. The Part 2 guidance adopts an Accessibility Tool to establish how well connected a development is and its potential to achieve sustainable transport outcomes.

ECC recommend the Parish Council suggest any preferred locations where a charging point would be advantageous via the following link here. Although ECC cannot guarantee their delivery, all suggestions are gratefully received and will help identify demands for charge points and inform future delivery.

### **Chapter 5 - Delivery**

ECC recommend for the reasons outlined below that ECC is identified as a specific 'Actor' with regards the planning and development process in the Plan area.

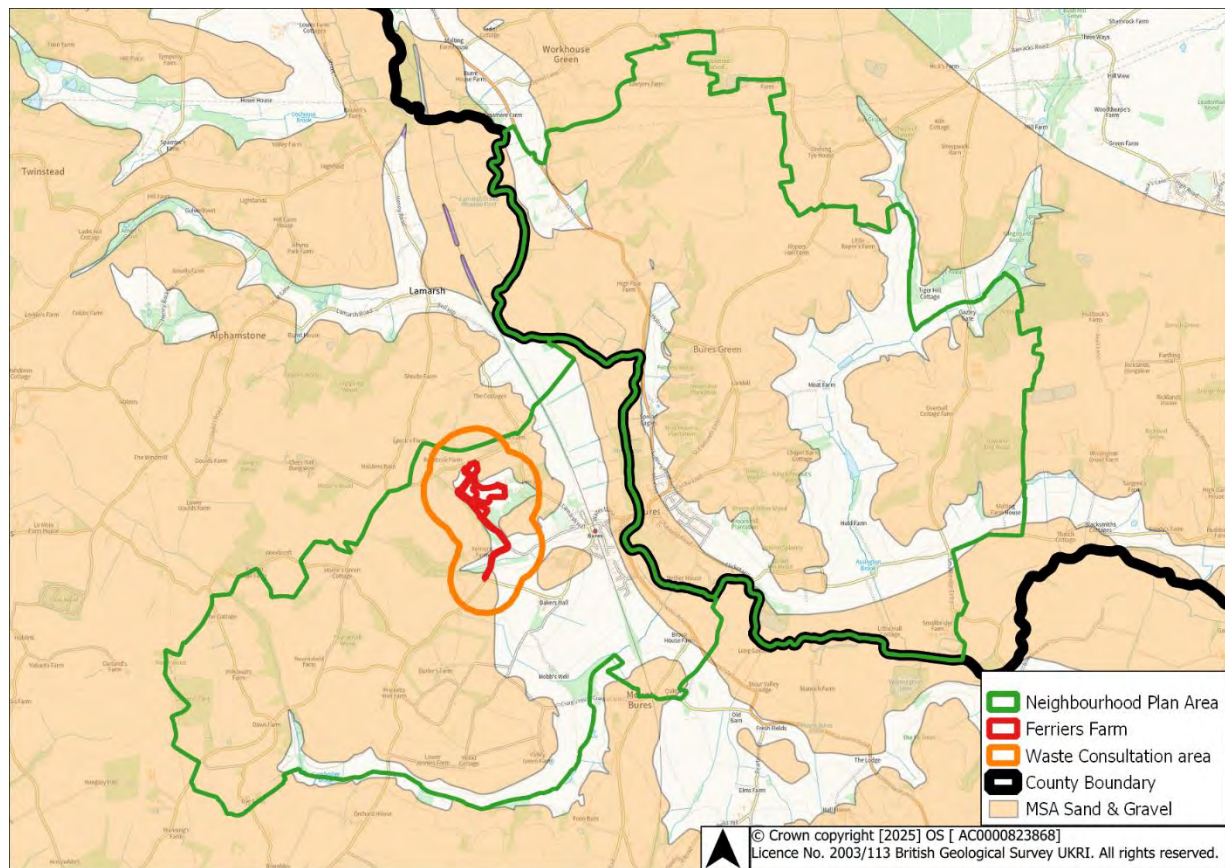
Reference is made to Statutory Consultees being required to consider the design guide and codes when commenting on planning applications. ECC is a statutory consultee as being the

- Minerals and Waste Planning Authority,
- the Highway and Transportation Authority,
- the lead authority for education (including early years and childcare),
- the Lead Local Flood Authority, and
- our responsibility for providing and delivering supported and specialist housing (adult social care children and other) and public health services.

ECC also has a key role covering climate change and net zero carbon and green and blue infrastructure.

In responding to planning applications and other development matters ECC will need to consider statutory plans including the Minerals Local Plan, Essex and Southend-on-Sea Waste Local Plan and the new Local Transport Plan 4, national planning policy guidance, specific ECC policy guidance documents, the EDG and other EPOA guidance.

## Appendix 1 – Mineral Safeguarding Area for Sand and Gravel and Mineral and Waste Sites in the Plan area





Date: 14<sup>th</sup> November 2025  
Enquiries to: Busranur Serin  
Tel: 01473 265631  
Email: [neighbourhoodplanning@suffolk.gov.uk](mailto:neighbourhoodplanning@suffolk.gov.uk)



Planning Policy Team,  
Babergh District Council,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
IP1 2BX

Sent via email:  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Dear Paul Bryant,

### **Submission Consultation version of the Bures Neighbourhood Plan**

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Bures Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~striketrough~~.

## Flooding

It is recommended to update Figures 33, 34 and 35 with the 2025 Environmental Agency National Predicted Flood Maps<sup>1</sup>, which were made available on 25<sup>th</sup> March 2025. The figures in the Neighbourhood Plan are still displaying map versions from 2023, and while these may still be relevant it is beneficial for the longevity of the Neighbourhood Plan to use the most up to date data available. This is to accord with NPPF paragraph 170 of avoiding 'inappropriate development in areas at risk of flooding', and paragraph 172 of 'taking into account all sources of flood risk'. This would ensure compliance with Basic Condition A.

## General

### *Consultation Statement – Regulation 14 Consultation – Overview*

Within the table, the activity of "Parish councils went through the amendments of the NP which were agreed by the NP steering group" is marked as 'Date X' and should be updated with the correct date or date range.

### *Figure 64 - Bures NP Findspots (Suffolk and Essex Historic Environment Record, 2025)*

It is suggested to put a box around this figure to make it clear that the text underneath goes with the map. This will ensure compliance with NPPF paragraph 16, part d of being clear and unambiguous.

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If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Busranur Serin  
Planning Officer  
Growth, Highways, and Infrastructure

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<sup>1</sup> <https://flood-map-for-planning.service.gov.uk/map?cz=592123.2,234950.2,14.993843&seg=sw,lr>



### (3) Hertfordshire County Council

**E from:** Hertfordshire County Council  
**Rec'd:** 13 October 2025  
**Subject:** HCC response - Bures Hamlet and Bures St Mary Neighbourhood Plan - Regulation 16 Consultation

To whom it may concern,

Thank you for the opportunity to comment on the Bures Hamlet and Bures St Mary Neighbourhood Plan Regulation 16 consultation. This response relates to the services of the Growth & Environment Department, which also incorporates other services provided by the county council where relevant.

Having reviewed the document published online, Hertfordshire County Council does not consider the content and in particular the policies, would have an impact on HCC services and as such does not wish to provide any comments at this stage.

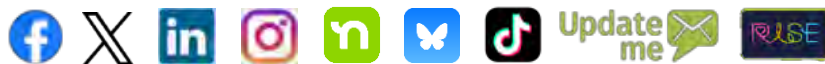
Kind regards,

**Jamie Glazebrook**

Senior Planning Officer | Growth & Infrastructure Unit | Growth & Environment  
Hertfordshire County Council

Address: Farnham House, Six Hills Way, Stevenage, SG1 2ST. Postal Point: SFAR016.

T: 01992 555578 (25578) M: 07855 183940 E: [jamie.glazebrook@hertfordshire.gov.uk](mailto:jamie.glazebrook@hertfordshire.gov.uk)



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We act  
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We champion  
Equality & fairness

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## (4) Babergh District Council

Our ref: Bures NP R16 Response

Dated: 14 November 2025

From: Planning Policy Team, Babergh and Mid Suffolk District Councils

To: Ann Skippers (Independent Examiner)

cc: Alan Massow, Carolyn Johnson (Braintree District Council)

Sent by e-mail

Dear Ann, (All)

- **Submission draft Bures Neighbourhood Plan 2021 - 2037**
- **Comments from Babergh District Council**

This response is made for and on behalf of Robert Hobbs (Head of Strategic Planning at Babergh & Mid Suffolk District Councils).

The Bures Neighbourhood Plan Team are to be complemented again on bringing forward such a comprehensive plan. We also welcome the changes made in response to our Regulation 14 comments (October 2024), in particular the amendment to the settlement boundary around Bures St Mary (Figure 54) which now sensibly includes the housing development at Pikes Marsh.

There are parts of the Plan where we feel that some additional clarity is needed. We also note that some matters described, for example, the references to our progressing a Part 2 Joint Local Plan, are now out of date simply because decisions made elsewhere have overtaken what is described on this submission draft plan. We cover these and our other observations in the attached document.

In our Regulation 14 response we mentioned that the Government were proposing to set out new mandatory housing requirement figures for each local planning authority area. They were published with the new National Planning Policy Framework (NPPF) in December 2024 and confirmed that, for Babergh District Council, the figure had risen by c.86 per cent to 775 new dwellings per annum. It was for that reason that we decided to undertake a full Joint Local Plan Review rather than proceed with a Part 2 Plan. No decisions have been made yet on how all of this might directly impact on, from our perspective, Bures St Mary.

We trust that our comments are helpful and will be happy to answer any questions.

Yours sincerely,

Paul Bryant

Neighbourhood Planning Officer | Babergh & Mid Suffolk District Councils

T: 01449 724771 / 07860 829547 | E: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)



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**Babergh and Mid Suffolk District Councils**  
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) / [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

## Comments from Babergh District Council on the Reg 16 submission draft Bures NP

### General comments

**NPPF cross-references.** All appear to be correct apart from para 281 which should read: 'In the NPPF (December 2024) paragraph 105 states that ...'

The addition of **Glossary** is welcomed. The given definitions for 'Affordable Housing' and 'Community Led Development' both still appear to be from the now archived December 2023 NPPF. The changes are small but these definitions should be amended, as necessary.

### The Planning Context

**Para 10:** The second sentence requires a modification to address the reference made to our Joint Local Plan Part 2. We suggest: 'This is now expected to set out in the Joint Local Plan Review'.

As **para 180** is a repeat of paragraph 10, the same modification will be needed there.

For **para 181**, we suggest that the second sentence be amended to read: 'These are now expected to be set out in the Councils Joint Local Plan Review'.

Staying with para 181, to bring the last two sentences up-to-date, we suggest: 'Following a Call for Sites undertaken in early 2024, the Councils published information relating to that in September 2025. It shows that one site; the garages off Claypits Avenue, Bures St Mary, has been submitted for consideration. A further Call for Sites exercise, due to end in January 2026, is being carried out.'

### Our Natural Environment, Biodiversity and Wildlife

**Para 76:** The inclusion of this paragraph is welcomed. For contextual reasons, we suggest this and paragraph 75 are swapped around so, NPPF first, then district level.

**Para 82:** This now updated paragraph refers to the emerging Suffolk Local Nature Recovery Strategy. With that now finalised (October 2025), it would be sensible to bring the third sentence up to date. Mention should also be made to the Essex Local Nature Recovery Strategy. We suggest:

'Both Essex County Council (in July 2025) and Suffolk County Council (in October 2025) have now put in place Local Nature Recovery Strategies (LNRS). These focus on highlighting and revitalising natural habitats across the respective counties.'

Footnote 21 could be amended to also include a hyperlink to the Essex LNRS webpage:

<https://www.essex.gov.uk/about-council/plans-and-strategies/environment-and-planning/local-nature-recovery-strategy#>

### Our Trees

#### Policy BP6: Locally Valued Trees.

Presumably, an oversight while preparing the submission draft Plan, and noted for action in the Consultation Statement (page 51) ~ delete the struck out words at the end of the policy that refer to private gardens.

## Improving Water Quality in the River Stour

### Policy BP8: River.

As now worded, this policy is much improved over previous iterations. To allow a proportionate approach to be taken through the decision making process, we suggest that the second paragraph could be amended to read as follows (or similar):

‘Where new housing or other significant new development schemes are proposed, capacity impact statements should be confirmed with the relevant water companies, such as Anglian Water.’

### Policy BP9: Foul Water and Waste Infrastructure.

The wording of this policy is unchanged from the pre-submission draft plan other than the addition of the final sentence in the second paragraph.

Having previously felt that this was the better of the two policies when comparing BP8 and BP9 in the Reg. 14 pre-submission draft plan, we now question whether there is a need for Policy BP9. We note that our colleagues at Braintree District Council are suggesting that the policy wording could be reframed and would be supportive of that if the Examiner were so inclined to agree.

## Community Facilities

### Policy BP12: Community Assets (criterion a).

From Figure 41 we can see that most, but not all of the ‘Key Community Buildings’ are located in Bures St Mary. We can also see that the latter part of para 144 explains that the two LPAs have adopted differing marketing periods for when a change of use to a community asset is proposed; those being 12 months in Braintree, and 6 months in Babergh. Para 144 concludes by saying that these marketing periods “*will continue to be the case for applications in this NP Area.*”

A tension therefore exists, given the cross-boundary nature of this Plan, that is further complicated by **criterion a.** which specifically calls for a ‘minimum of 12 months’ marketing period, so contra to what para 144 tells us.

To overcome this, we suggest that this criterion could be amended to read as follows:

- a. It can be demonstrated that the current use is not economically viable and is not likely to become viable. Supporting financial evidence should be provided, including evidence of genuine attempts made to advertise the premises for sale/let over a sustained marketing period. That marketing period may first need to be agreed with relevant planning authorities but should be for not less than six months and, preferably, for not less than 12 months.

## Meeting the Bures Housing Needs

**Community Action 7: Community Safety.** As an addition to the Plan, the placement of this Community Action on page 72 seems odd. A more appropriate location would perhaps be after Policy BP19 where the last paragraph there refers to development being built with safety and security in mind.

We also note that, on page 123, this action is called 'Enhancing the Village Centre', so ask the Bures NP Team if they could confirm which title is correct - this or the aforementioned 'Community Safety'?

## Housing Growth

**Para 183:** To note that the Chambers Bus Depot scheme referred to here was considered by our Planning Committee on 16 April 2025 [so after this NP had been submitted], and was approved. The Grant of Planning Permission notice was subsequently issued on 31 July 2025.

### Policy BP18: New Housing Development.

We consider that the first paragraph is unnecessary and should be deleted. The requirement to prioritise access to services and public transport is adequately covered by criterion a., and there are policies elsewhere (e.g. BP4 and BP5) that address environmental impact.

## Design

**Policy BP19: Design.** Some observations / comments below.

- Criterion g. The cross reference should be to Design Code BU 02. There is no code BF-02.
- Criterion h. To allow some flexibility, could the criteria be amended to read: ' ... ensure, where practical, that at least 50% of the frontage ...'
- Criterion i. Can the Bures NP Team confirm if the cross reference to Policy BP13 is correct? Local Green Spaces are covered under Policy BP7.
- Criterion k. There is no 'Design Code SP07 - Shop Fronts'. Presumably, this should read Design Code BU 07?
- A formatting error? Suggest that the sentence after criterion k. be labelled as criterion l.
- For the paragraph that ends with 'set out in Design Code- EE01 to EE07 this should read: ' ... set out in Design Codes EE 01 to EE 06'. [There is no code EE 07].
- To future proof the penultimate paragraph we suggest this be amended to read: 'Where appropriate, and in relation to parking and EV charging points, all future developments should have regard to the latest guidance published by Essex County Council (currently the '2024 Essex Parking Guidance') or by Suffolk County Council (currently the 'Suffolk Guidance for Parking, October 2023').'
- For the final paragraph, a suggestion that this be reworded as follows: 'Support will also be given to new development proposals that achieve Secured by Design (SBD) award / accreditation, where they are built with safety and security in mind.'

See also our comment above re moving Community Action 7 to sit after Policy BP19.

## Historic Environment

**Para 231.** Including a cross reference to Appendix F would be a helpful addition, perhaps at the end of the second sentence which could be amended to read as follows:

'These have been locally identified and assessed as part of developing the Bures Neighbourhood Plan using guidance published by Historic England (see Appendix F).'

## **Policy BP21: Heritage Assets [...].**

Some clarification re what is required from the heritage statement would be useful. We suggest:

‘This will describe the significance of the asset, the works being proposed and why, and how the significance of the asset will be affected by those proposals, along with any mitigation measures.’

Also, a note about **NdHA 19. Bures Cricket Pavilion**. [Para 148 and the assessment on page 187 also apply].

The local community will be painfully aware that the Cricket Pavilion was destroyed by fire in September of this year. It is also understood that they are determined to see a new pavilion come forward in its place. With the Examiners permission, the NP Team may wish update para 148 to refer to those matters.

A separate question is whether or not to retain the Cricket Pavilion as a listed NdHA. If removed, other consequential changes will be needed: re-numbering the list in Policy BP21, updating Figure 70, updating the Policy Maps, and updating the table at Appendix F. All could be done.

The alternate might be to retain the designation as such but to place this for now at the of the Policy, almost as a footnote, and perhaps with the following wording:

No.19 - Bures Cricket Pavilion. Having met the assessment criteria to qualify as a NdHA the Pavilion was lost to a fire in September 2025. The community are determined to see a new Pavilion come forward in its place which may also be suitable to qualify as a NdHA. If so, that could be assessed through future reviews of this Neighbourhood Plan.

## **Getting around and Sustainable Transport**

### **Policy BP24: Public Rights of Way.**

We note that this policy has been re-worded so that it is broadly in line with the suggestion put forward in our Reg 14 response. As now written, the first paragraph feels garbled and we would encourage the Bures NP Team to agree to revert back to our previously suggested wording, which we repeat below:

Where appropriate, new development will be expected to maintain and enhance the existing Public Rights of Way (PRoW) network. Proposal that might lead to the loss of or the degradation of an existing PRoW will be expected to make suitable alternate provision of at least an equivalent standard.

Development schemes that would also help deliver the proposed new routes listed below and identified in Figure 90 will also be supported in principle:

1. Riverside Walk
2. Jubilee Grove Link to Mount Bures Level Crossing
3. Millenium Bridge to Bures Mill
4. Yorley Farm to Corn Hall
5. St Edmunds Hill to Lamarsh

[Nb: Routes 4 & 5 are also being promoted through the adopted Little Cornard NP 2022]

....

The Policy now also has two additional paragraphs at the end. For the second of those we suggest that the following might be more helpful:

‘Any proposed improvement to the PRow network should consider and help deliver routes that meet the needs of all users, including cyclists, horse riders, people with limited mobility, and those with pushchairs and wheelchairs.’

#### **The ‘Bures Design Guidance and Codes (AECOM, 2023)’ document**

Having revisited the Design Guidance document as part of our review of Policy BP19, we see that it now contains outdated references to the National Planning Policy Framework (i.e., on page 5) and that some of the key documents identified on pages 8 - 9 may also be outdated. This is particularly relevant to mention of the 2006 Babergh Local Plan. We are also aware that the ability for Neighbourhood Plan Groups to now request that modifications be made to these Design Guidance documents has been further compromised by the withdrawal of the Locality technical support programme. A sympathetic approach to the Design Guidance document might be required.

[Ends]



## **(5) Braintree District Council**

**E from:** Braintree District Council  
**Rec'd:** 11 November 2025  
**Subject:** Bures Neighbourhood Plan – Regulation 16 Consultation: Braintree DC Response

Dear Mr Paul Bryant,

I am writing to confirm that Braintree District Council's formal response to the Bures Neighbourhood Plan (Submission Draft, March 2025) has now been considered by the Council's Planning Sub-Committee and was endorsed for submission on its 6<sup>th</sup> of November 2025 meeting.

In line with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the Council's response has been submitted to form part of the consultation record. The response reflects both strategic planning considerations and input from Development Management officers, ensuring that the comments provided are comprehensive and consistent with the adopted Braintree District Local Plan 2013–2033 and the National Planning Policy Framework (2024).

For your information, I have attached the relevant report as was presented and endorsed by the Planning Sub-Committee meeting, confirming the decision to approve submission of the Council's response.

We would be grateful if you could confirm receipt of our response and include it as part of the consultation documentation for consideration by the appointed Examiner.

Please do not hesitate to contact us should you require any clarification or additional information.

Kind regards,

Katerina Zangelidou RIBA  
Planning Policy Officer

Braintree District Council | Causeway House, Bocking End, Braintree, CM7 9HB

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**Agenda Item:** *[For Governance Use]*

<b>Report Title:</b> <i>Bures Hamlet and Bures St Mary Neighbourhood Plan</i>	
<b>Report to:</b> Local Plan Review Sub - Committee	
<b>Date:</b> 06/11/2025	<b>For:</b> Recommendation
<b>Key Decision:</b> No	<b>Decision Planner Ref No:</b> N/A
<b>Report Presented by:</b> Alan Massow – Principal Planning Policy Officer	
<b>Enquiries to:</b> Katerina Zangelidou – Planning Policy Officer	

## 1. Purpose of the Report

- 1.1 This report provides Braintree District Council's response to the **Bures Neighbourhood Plan Submission Draft (January 2025)** under Regulation 16. It sets out the Council's position, including strategic conformity, deliverability considerations, and feedback from Development Management colleagues, to inform the Examiner and support decision-making.
- 1.2 The Bures Neighbourhood Plan is a joint Neighbourhood Plan between Bures Parish Council in Braintree District and Bures St Mary parish council in Babergh District Council. Officers at Babergh District Council have been taking the lead on the neighbourhood plan process and the consultation documents are being held on their website. Once a decision is required to send the document to referendum and adopt it then this decision will need to be made by both local authorities.

## 2. Recommendations

### 2.1 Recommendation 1:

- 2.1.1 Endorses the general direction and vision of the Bures Neighbourhood Plan.
- 2.1.2 Notes the feedback provided by Planning Policy and Development Management officers and supports suggested clarifications to ensure the Plan is implementable and consistent with national and local policy.
- 2.1.3 Requests that the Neighbourhood Plan explicitly acknowledge its alignment with the adopted Local Plan (2013–2033) and the ongoing Local Plan review.

- 2.2 These recommendations are intended to guide the Council's formal consultation response and do not commit the Council to any financial expenditure.

### 3. Summary of Issues

- 3.1 The Bures Neighbourhood Plan seeks to guide development and manage change in the parish to 2037. The Council has considered the Plan against:

3.1.2 The adopted **Braintree District Local Plan 2013–2033**;

3.1.3 The **National Planning Policy Framework (NPPF, 2024)**;

3.1.4 The need for policies to be deliverable and enforceable through the planning application process.

#### 3.2 Current BDC Position:

3.2.1 The Council broadly supports the Plan's objectives, including promoting high-quality design, protecting local character, enhancing biodiversity, supporting community infrastructure, and encouraging sustainable travel.

3.2.2 Minor clarifications are recommended, particularly to:

1. Ensure off-site biodiversity net gain is achievable and legally secure;
2. Correct terminology regarding **Green Buffer Policy** versus Green Belt references;
3. Update references to NPPF paragraph numbers and Permitted Development Rights;
4. Introduce flexibility in parking, drainage, and utility policies to reflect practical constraints.

### 3.3 Introduction

3.3.1 Braintree District Council (BDC) welcomes the submission of the **Bures Neighbourhood Plan** under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The Council recognises the considerable work and community engagement that has gone into preparing the Plan and commends the Parish Council and Steering Group for developing a clear local vision for the future of Bures.

3.3.2 This response has been prepared by the Council's **Planning Policy Team** in its capacity as the Local Planning Authority. It is intended to assist the independent Examiner in considering whether the Plan meets the **Basic Conditions** and other statutory requirements.

### 3.4 General Comments

3.4.1 Braintree District Council (BDC) welcomes the strong community involvement and positive vision articulated through the Bures Neighbourhood Plan. The Plan demonstrates a clear understanding of the parish's local distinctiveness and identifies a range of themes—such as housing, design, biodiversity, and infrastructure—that are consistent with the principles of sustainable development set out in the **National Planning Policy Framework (NPPF, 2024)**.

3.4.2 The Council considers the Plan to be broadly in conformity with the **strategic policies** of the **Braintree District Local Plan 2013–2033** (adopted **2022**), particularly in its recognition of Bures as a sustainable rural settlement where growth should be proportionate to local needs and the village's capacity to accommodate change.

3.4.3 The Council particularly welcomes:

1. The **strong emphasis on design quality**, reflecting the village's historic character and sense of place;
2. The **commitment to environmental enhancement**, including policies promoting biodiversity net gain, green infrastructure, and climate change mitigation;
3. The recognition of the need to **support community facilities** and local services that sustain village life; and
4. The proactive approach to **managing transport and parking pressures**, which are often key issues in smaller rural settlements.

3.4.4 That said, the Council considers there are several areas where minor clarifications or rewording would enhance the Plan's **effectiveness and consistency** with national and local policy. In particular:

1. Some policies (notably those on design, drainage, and biodiversity) could benefit from clearer links to Local Plan Policies and guidance.
2. Certain technical references—for example, to the Green Belt, permitted development rights, or national policy paragraph numbers—require factual updates to reflect the **NPPF (2024)** and current legislation.
3. The implementation section could more explicitly set out how monitoring will take place and how the Parish Council intends to respond to potential changes in strategic policy or evidence.

3.4.5 Overall, BDC supports the Neighbourhood Plan's intent and considers that, subject to modest refinements, it provides a robust and locally distinctive framework for guiding development in Bures over the plan period to 2037.

### 3.5 Relationship with the Local Plan

- 3.5.1 The Bures Neighbourhood Plan sits within the wider development plan for the area, alongside the **Braintree District Local Plan 2013–2033** (adopted 2022).
- 3.5.2 The Local Plan identifies Bures Hamlet as a **Key Service Village**, where a limited amount of growth is supported to help maintain services and meet local housing needs, consistent with the settlement hierarchy. The Neighbourhood Plan's policies should therefore **align with this strategic approach**, supporting development within or adjacent to the existing settlement boundary where it meets identified local needs and respects environmental constraints.
- 3.5.3 The Neighbourhood Plan does not allocate major new development sites, which is appropriate in the context of the adopted Local Plan. However, where the Plan introduces settlement boundaries, site-specific criteria, or additional local designations (such as Local Green Spaces or green buffers), these should be demonstrably consistent with the Local Plan evidence base and mapping.
- 3.5.4 The Council also notes that the **Braintree District Local Plan is currently under review**, to ensure it remains consistent with national policy, updated evidence, and the Government's wider planning reforms. While the Neighbourhood Plan will continue to form part of the statutory development plan once made, it is advisable for the document to acknowledge this evolving context. A short statement recognising the potential need for a future partial review of the Neighbourhood Plan would demonstrate flexibility and strengthen its long-term relevance.
- 3.5.5 In summary, the Neighbourhood Plan aligns well with the adopted Local Plan's strategic framework and can play a valuable role in adding locally specific detail to planning decisions. Ensuring consistent terminology and acknowledging the Local Plan review will help maintain coherence between the two plans and avoid any policy tension during implementation.

### 3.6 Comments on Specific Themes

- 3.6.1 **Housing:** The Plan's housing policies appear broadly consistent with Local Plan Policy LPP1 and the village hierarchy, but the text should clarify how local needs have been identified and how the policies relate to potential future housing growth.
- 3.6.2 **Design and Heritage:** The emphasis on local character and high-quality design is strongly supported. The policies reflect the local character and historic environment of Bures and the guidance on building form, materials and streetscape is broadly supported.
- 3.6.3 **Green Infrastructure and Environment:** The inclusion of local green spaces and biodiversity policies is positive and aligns with LPP63, LPP66 and the

NPPF's principles on nature recovery. It would be helpful to ensure that the supporting evidence (e.g., green space assessments) is clearly referenced.

3.6.4 **Sustainability and Climate Change:** Policies promoting active travel, energy efficiency, and sustainable drainage are welcomed.

3.6.5 **Infrastructure and Transport:** The Council supports the identification of local transport priorities, particularly improved pedestrian connectivity and management of parking pressures. The policy wording could more clearly distinguish between aspirations and land-use policies.

### 3.7 Comments Informed by Development Management Consultation

3.7.1 In preparing this response, the Planning Policy Team consulted Development Management (DM) officers to ensure that the policies are deliverable and clear for use in decision-making. The following observations reflect their professional input and operational experience.

#### 3.7.2 Policy BP4 – Biodiversity

3.7.3 DM colleagues note that off-site **biodiversity net gain (BNG)** must be secured for a **minimum of 30 years**. Such provision cannot be located on unrelated land outside an applicant's control unless it forms part of a **designated habitat bank** with legally secured long-term management. Clarifying this requirement will ensure Policy BP4 aligns with the **Environment Act 2021** and statutory BNG regulations.

#### 3.7.4 Policy BP7 – Local Green Spaces

3.7.5 The penultimate paragraph refers to *Green Belt Policy*, which is not applicable in Braintree District. The correct reference is to the **Green Buffer Policy** in the adopted Local Plan. Retaining "Green Belt" terminology could cause confusion, particularly in light of recent national policy updates.

#### 3.7.6 Policy BP8 – Sustainable Drainage

3.7.7 The second paragraph should include the qualifier "**where necessary**", as the current wording appears to apply to all new developments regardless of scale or site characteristics. This adjustment would ensure proportionality and flexibility in applying the policy.

#### 3.7.8 Policy BP9 – Foul Drainage and Utilities

3.7.9 DM colleagues question whether this policy is needed, as water companies are responsible for providing capacity upgrades under their statutory duties. They are statutory consultees and would normally object if capacity were insufficient.

The policy could therefore be reframed to refer to this process rather than creating a local requirement.

### 3.7.10 Policy BP19 – Parking and Access

3.7.11 Paragraph (h) may not always be achievable given the existing character of Bures and the need to maintain appropriate **off-street parking** provision. A more flexible approach would help balance design aspirations with practicality.

## 3.8 Design Guidance and Codes

3.8.1 DM officers recommend updating paragraph references to align with the **NPPF (2024)**. In addition, the statement on page 63 regarding **Permitted Development Rights (PDR)** in Conservation Areas is inaccurate: PDRs remain in force but are **more restricted**, not removed. This section should be corrected for factual accuracy.

### 3.8.2 Conclusion

3.8.3 Braintree District Council supports the overall intent and direction of the Bures Neighbourhood Plan and commends the Parish Council for its extensive community engagement.

3.8.4 Incorporating the above clarifications—particularly those arising from **Development Management consultation**—will help ensure the Plan is **clear, consistent, and deliverable**, while fully aligned with national and local planning policy.

3.8.5 The Council looks forward to continued collaboration with Bures Parish Council as the Plan proceeds to independent examination.

3.8.6 The recommendations support the Council's corporate priorities:

- **Communities:** Ensuring policies support thriving, sustainable local communities.
- **Environment:** Protecting biodiversity and green infrastructure.
- **Fit for the Future:** Ensuring policies are deliverable, enforceable, and aligned with ongoing Local Plan review.

## 3.9 Rationale:

The proposed feedback ensures the Plan is robust, locally distinctive, and consistent with both statutory and corporate objectives.

## 4. Consultation

- 4.1 The Neighbourhood Plan will be subject to a referendum.

## **5. Options**

### **5.1 Options Considered:**

- 5.1.2 Option 1: Submit the formal response incorporating DM comments and minor clarifications.
- 5.1.3 Option 2: Submit a response without DM input (not recommended due to potential deliverability issues).
- 5.1.4 Option 3: Delay response pending further consultation (not recommended given statutory deadlines).

- 5.2 **Option 1** is the preferred option.

## **6. Financial Implications**

- 6.1 The cost of neighbourhood planning is normally covered by grant funding from Government once a decision to send a plan to referendum is made. Funding has yet to be confirmed.

## **7. Legal Implications**

- 7.1 The Neighbourhood Plan could be subject to legal challenge.

## **8. Local Government Review - Implications**

- 8.1 The Council is required to have an adopted Local Plan which is less than five years old. The Council is undertaking a review of the Local Plan currently which is planned to be submitted for examination by December 2026. It is therefore currently anticipated that the new Plan would be adopted in 2027.
- 8.2 Once adopted, the Plan will be the adopted Development Plan for Braintree District until a new Local Plan is developed for the new Unitary Authority Area.
- 8.3 A neighbourhood once adopted forms part of the development plan for the district and would be carried over. There is no requirement to review a Neighbourhood Plan so it would be in force until withdrawn or reviewed.

## **9. Other Implications**

- 9.1 There are no other implications arising from this report at the current time.



## **10. Equality and Diversity Implications**

- 10.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
  - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
  - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 10.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 10.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

## **11. Next Steps**

- 11.1 An examination of the neighbourhood plan is being arranged.

## **12. Background Papers**

- 12.1 Bures Regulation 16 Neighbourhood Plan.  
<https://www.babergh.gov.uk/w/bures-neighbourhood-plan>
- 12.2 Braintree District Local Plan 2013–2033;  
[local-plan-2033-s1-and-s2-pdf-minus-maps](#)
- 12.3 The National Planning Policy Framework (NPPF, 2024);  
[National Planning Policy Framework](#)

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## (6) Colchester City Council

**E from:** Colchester City Council  
**Rec'd:** 13 November 2025  
**Subject:** Bures NP Consultation response

Good afternoon,

Please find attached a copy of Officer comments to the Bures Hamlet and Bures St Mary neighbourhood plan Regulation 16 consultation.

Regards,

Shelley Blackaby  
Principal Planning Policy Officer (Environment) | Colchester City Council

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\* \* \* \*

### **Colchester City Council Officer comments on Bures Hamlet and Bures St Mary Neighbourhood Plan**

Thank you for consulting Colchester City Council on the Bures Hamlet and Bures St Mary Neighbourhood Plan in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The following comments are submitted by Officers as a technical response to the consultation.

Colchester's Local Plan Committee agreed consultation on the Colchester Preferred Options draft Local Plan on 10 November 2025. The Preferred Options Local Plan designates land in neighbouring Mount Bures as a Local Green Space. Draft Policy GN3 (Local Green Spaces) states:

'The following areas, which are shown on the policies map, are designated as Local Green Space. These are green spaces that are demonstrably special to the local community and hold a particular local significance.

- a) Land at Middlewick Ranges
- b) Mount Bures village green

Local Green Spaces are also designated in neighbourhood plans and are shown on the policies map.

Proposals for development within Local Green Spaces will only be supported in very special circumstances and considered against policies for the Green Belt as set out in the NPPF.'

Justification for the Mount Bures village green Local Green Space designation was provided by Mount Bures Parish Council. The justification explains how the criteria in NPPF paragraph 107 are met and this justification is included as an appendix to the [Environment Topic Paper](#)<sup>1</sup>.

Officers request that the part of the village green within the neighbourhood plan area is designated as Local Green Space, and listed in Policy BP7 and shown on the policies map, for completeness and to recognise the importance of the village green. A map of the village green is shown below.



Secondly, Colchester City Council notes that a Housing Needs Assessment was undertaken to inform the Neighbourhood Plan but understandably it only considered the needs of residents in Bures Hamlet and Bures St Mary. It did not consider communities outside the Neighbourhood Plan area. As any proposals for rural exception sites should be based on evidence demonstrating a local need, this Council considers the wording of Policy BP16 and the explanatory text at paragraphs 173 and 174 should be amended to make clear that the policy applies only to Bures Hamlet and Bures St Mary.

Colchester City Council is planning to meet ambitious growth targets through preparation of a new local plan. To accommodate the new housing target of 1300 new dwellings per year all settlements were considered to take more housing. Mount Bures was discounted because it was considered to be unsustainable due to its remote location, lack of public transport or alternative transport modes and lack of services and facilities. It is therefore considered important to adopt a similar approach in the Neighbourhood Plan.

Finally, Officers have been told that Mount Bures Parish Council were not consulted as part of the Regulation 14 draft neighbourhood plan consultation. However, Officers note that Mount Bures Parish Council did submit representations to the Regulation 14 consultation as detailed in the Consultation Statement. As a neighbouring authority, Mount Bures Parish Council should have been directly notified of the Regulation 14 consultation.

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<sup>1</sup> <https://cbccrmdata.blob.core.windows.net/noteattachment/CBC-null-Environment-tp-Environment%20Topic%20Paper%20July%202025.pdf>

## **MOUNT BURES PARISH COUNCIL**

Parish Clerk Kevin B. Money

.....  
Website: <https://e-voice.org.uk/mountburespc/>



### **MOUNT BURES PARISH COUNCIL RESPONSE TO SECTION 16 CONSULTATION ON BURES HAMLET AND BURES ST MARY NEIGHBOURHOOD PLAN, NOVEMBER 2025**

#### **Introduction**

Mount Bures is a lightly populated rural parish with some 3 km of shared boundary on the south eastern side of the parish of Bures Hamlet. The parish of Mount Bures lies entirely within the Colchester City Council District.

The largest settlement in Mount Bures, a group of some 30 houses with no services, lies adjacent to the boundary with Bures Hamlet on a prominent hill top with extensive views over neighbouring countryside. This settlement lies 1.8km from the Bures Hamlet Village Centre and was recognised as 'distinctively separate' from Bures Hamlet in the 2016 Farmer Report into the Special Qualities of the Dedham Vale AONB - Evaluation of Area Between Bures and Sudbury. The draft Bures Hamlet Neighbourhood Plan submitted for examination covers the settlements of Bures Hamlet and Bures St Mary but also includes the areas of rural countryside around the villages.

This includes the open countryside up to the boundary with the parish of Mount Bures.

#### **Consultation**

A Neighbourhood Plan needs to meet the requirements set out in the Neighbourhood Planning Regulations and the basic conditions set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

Mount Bures was not included in the Neighbourhood Plan Forum led consultations during the development of the Neighbourhood Plan, reflecting its separateness from the settlements of Bures Hamlet and Bures St Mary. Similarly Mount Bures was not included in the Neighbourhood Plan Sustainability Appraisal or surveys of the housing needs of the settlements of Bures Hamlet and Bures St Mary which are not applicable in any way to Mount Bures.

Nevertheless, a Neighbourhood Forum/Parish Council is required by Part 5 section 14 of the Neighbourhood Planning Regulations to undertake a pre-submission consultation on the Neighbourhood Plan proposals. It is required, inter alia, to consult any statutory consultees whose 'interests are affected' including neighbouring parish councils and other authorities. Mount Bures Parish Council's only input to the development of the Bures Hamlet Neighbourhood Plan was by seeking, on the advice of Braintree District Council, to have the small area of land lying within the Bures Hamlet boundary and used as a 'village green' by Mount Bures residents designated as Local Green Space. No response was received to this request and despite this clear indication of an 'interest affected' Mount Bures was not included in the pre-submission consultation. Including Mount Bures in this consultation as required by the Neighbourhood Planning Regulations would have enabled Mount Bures Parish Council to identify and discuss this and other omissions from the plan. It is regrettable that the proper process of consultation was not followed in this instance.

Yours

*KB Money*

Kevin B. Money – Parish clerk to Mount Bures Parish Council

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By e-mail to:  
Mr Paul Bryant  
Neighbourhood Planning Officer  
Babergh and Mid-Suffolk District Councils

Our re: PL00755566  
Your ref:  
Date: 18/11/2025

Direct Dial: [REDACTED]  
Mobile: [REDACTED]

Dear Paul,

**Ref: Bures Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.

We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:  
<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours faithfully,

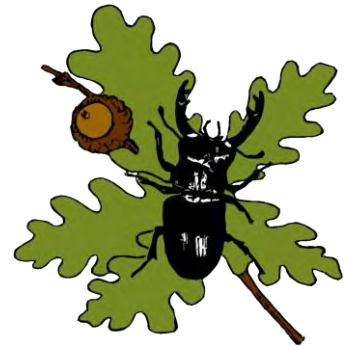
Ross McGivern  
Historic Places Adviser, East of England  
[ross.mcgivern@HistoricEngland.org.uk](mailto:ross.mcgivern@HistoricEngland.org.uk)

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## (9) Colchester Natural History Society

COLCHESTER NATURAL HISTORY SOCIETY



Braintree District Council

10th October 2025

### **Bures Neighbourhood Plan**

Colchester Natural History Society (CNHS) welcomes the opportunity to comment on the Bures Neighbourhood Plan. Comments are:

#### **Policy BP1: Landscape, Dedham Vale National Landscape and Stour Valley Project Area.**

This policy is supported. We would add that there is a duty to conserve National Landscapes and National Parks and it is therefore suggested that text is added requiring a 'Dark Skies' policy for the Dedham Vale National Landscape relationship to Bures, such that it is protected from development illumination.

#### **Policy BP2: Bures Rural Lanes.**

This policy is supported. There is growing recognition for the valuable biodiversity offered by quiet lanes, verges and hedgerows.

#### **Policy BP3: Key Views.**

This policy is supported.

#### **Policy B4: Biodiversity.**

This policy is supported. Whilst it is acknowledged that the statutory minimum 10% biodiversity net gain (BNG) is quoted, it is suggested that the policy could seek a minimum of 20%.

#### **Policy B5: Protection of Wildlife.**

This policy is supported. Green corridors and green links, especially between existing important nature areas, such as SSSI, LNRS and County Wildlife Sites should be a key requirement. It is therefore suggested that "required" replaces "encouraged".

#### **Policy B6: Locally Valued Trees.**

This policy is supported. We would add that any "unprotected trees" should be reviewed for possible addition to the list of those with a Tree Protection Order.

**Policy B7: Local Green Spaces.**

This policy is supported. The green spaces identified also have a benefit to wildlife habitats.

**Policies B8 & B9: River and Foul Water and Waste Infrastructure.**

These policies are supported. They are combined to reflect the importance of blue corridors and their margins as being equally important to wildlife species that benefit in river and riverside margins. Clear unpolluted water courses, including those that serve the river are vital.

**General Comment.**

The Plan demonstrates a broad and in-depth attention to biodiversity, wildlife landscapes and habitats, extending to Community Actions such as Action 1: Protecting Local Biodiversity. Such actions combined with the Plans policies provide a strong base in meeting the statutory requirement for Local Nature Recovery Strategies.

Pete Hewitt

For Colchester Natural History Society

creating a better place  
for people and wildlife



Mrs J Wright  
Bures St Mary Parish Council  
38 The Paddocks  
BURES  
Suffolk  
CO8 5DF

**Our ref:** AE/2025/130899/01-L01  
**Your ref:** Reg 16  
**Date:** 12 November 2025

Dear Mrs Wright,

## **BURES NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

### **BURES ST MARY AND BURES HAMLET**

Thank you for consulting us on the Submission Publication for the Bures Neighbourhood Plan.

We aim to reduce flood risk, while protecting and enhancing the water environment.

We are pleased to see that our previous comments made at Regulation 14 stage on flood risk, water resources, biodiversity net gain and wastewater treatment have been taken into account.

However, we note that the comments we raised previously around Contaminated Land and Source Protection Zones have not been incorporated and fully taken into account within the Plan, to address the environmental risks posed by the growth proposed over the Plan period. Our previous comments (raised in our letter dated 28 October 2024 and referenced AE/2024/129807/01) were as follows:

#### ***“Contaminated Land***

*For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures. This is because Bures Neighbourhood Plan Area is a source protection zone 2 and 3 as well as on a principal Aquifer. For any planning application the prior use should be checked to ensure there is no risk of contamination.*

### **Source Protection Zones**

*Your plan includes areas which are located on Source Protection Zones 2 and 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>".*

We recommend that our previous comments issued to the Regulation 14 Draft Plan are taken into account and an adequate policy included.

If our comments are not adequately addressed, the Plan may fail to meet the basic conditions as set out in the '[Planning Practice Guidance, found: Neighbourhood planning - GOV.UK \(www.gov.uk\)](#)', specifically section D) Sustainable Development.

We trust that this advice is useful.

Yours sincerely,

**Miss Amy Smart**  
**Sustainable Places Planning Advisor**

Team e-mail: [Planning.Eastanglia@Environment-agency.gov.uk](mailto:Planning.Eastanglia@Environment-agency.gov.uk)  
Team number: 02084 745242

Environment Agency, Bromholme Lane, Brampton, Huntingdon, PE28 4NE

## (11) Water Management Alliance

**E from:** Water Management Alliance  
**Rec'd:** 29 September 2025  
**Subject:** RE: Notice of consultation on R16 Bures N'hood Plan (ends 14 Nov 2025)

Good afternoon,

Thank you for the below consultation.

Having screened the consultation, the site in question lies outside the Internal Drainage Districts of the East Suffolk Water Management Board, and as per our Planning and Byelaw Strategy. The Board has no comments to make.

Yours sincerely,



**Fern Crofts,** (she, her, hers)  
Assistant Sustainable Development Officer  
Water Management Alliance  
T: 01553 819630 | [Planning@wlma.org.uk](mailto:Planning@wlma.org.uk)

Registered office: Pierpoint House, 28 Horsley's Fields, Kings Lynn, Norfolk, [PE30 5DD](postcodes/pe305dd)  
t: 01553 819600 | e: [info@wlma.org.uk](mailto:info@wlma.org.uk) | [www.wlma.org.uk](http://www.wlma.org.uk)  
What3Words: [caring.employ.visit](https://www.what3words.com/caring.employ.visit)

WMA members: [Broads Drainage Board](#), [East Suffolk Water Management Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [Pevensey and Cuckmere Water Level Management Board](#), [South Holland Drainage Board](#), and [Waveney, Lower Yare and Lothingland Drainage Board](#)

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Defenders of the Lowland Environment

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## (12) Essex Police



### FAO Bures NP Consultation

c/o Planning Policy Team, Babergh District Council

Via email to: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

**Ms. Heather Gurden**

Strategic Designing Out Crime Manager

Essex Police HQ

Springfield, Chelmsford

Essex, CM2 6DN

12<sup>th</sup> November 2025

To Whom it May Concern,

The Essex Police Designing out Crime Office (DOCO) welcomes the opportunity to comment on the Bures Neighbourhood Plan 2021- 2037.

We gladly welcome the inclusion of Secured by Design accreditation and for incorporating the need for crime to be considered a material consideration as detailed in the below Policies

- **Policy BP7 Local Green Spaces**
- **Policy BP11 Community Buildings**
- **Policy BP19 Design**

The perception of crime and the fear of crime can be an influential factor in determining the synergy and ongoing sustainability of the wider community. Essex Police would recommend developers consider the foreseeability of crime and maximise on the opportunity to design such issues out, as to prevent the need for bespoke situational crime prevention measures in the future. Engagement with the DOCO will garner the opportunities for crime and help support developers to expedite requirements within the documentation such as Policy BP19 Design *'All new development should seek to achieve a Secured by Design (SBD) award / accreditation following SBD guidance ensuring all development is built with safety and security in mind'*.

We welcome the inclusion of Secured by Design within the draft Neighbourhood plan in relation to the Local Green Spaces (Policy BP7 Local Green Spaces). Such inclusion would reflect upon current Home Office Agenda, such as the Violence against Women and Girls initiative, whereby collaborative working will ensure that the proposed development and the public realm spaces attributed to the community are fully inclusive, created for the benefit for all, with safety and security considered at its core.

If there are any further queries around embedding designing out crime practices within the project, please do not hesitate to contact [designingoutcrime@essex.police.uk](mailto:designingoutcrime@essex.police.uk).

Yours Faithfully

**Heather Gurden AD Cert ED&CP, LCGI, MSyl, CAS**

Strategic Designing Out Crime Officer (SDOCO)

HQ Local Policing Support Unit

Email: [designingoutcrime@Essex.police.uk](mailto:designingoutcrime@Essex.police.uk)

*[PLEASE NOTE: This page has intentionally been left blank]*



Our Ref: 105181-024

13 November 2025

Babergh District Council  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)  
via email only

Fisher German LLP  
The Estates Office  
Norman Court  
Ashby de la Zouch  
LE65 2UZ

t. 01530 412821  
[fishergerman.co.uk](http://fishergerman.co.uk)

Dear Sir /Madam,

**Bures Neighbourhood Plan Regulation 16 Consultation September – November 2025  
Representations on behalf of National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

**NGET assets within the Plan area**

Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

**Asset Description**

4YL ROUTE TWR (001 - 073): 400kV Overhead Transmission Line route: BRAMFORD - PELHAM - BRAINTREE 1 BRAMFORD - RAYLEIGH MAIN 2

4YLA ROUTE TWR (001 - 061): 400kV Overhead Transmission Line route: BRAINTREE - PELHAM - RAYLEIGH MAIN and BRAINTREE - BRAMFORD - RAYLEIGH MAIN

Plans showing details of NGET assets are attached to this letter. **Because the Neighbourhood Plan Designated Area crosses over two districts, we have also provided a separate map for each local authority area (Babergh District and Braintree District).** Please note that these plans are illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

### New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

### Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.



Regulated by  
**RICS**



We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Angela Brooks MRTPI, Partner**

[ngplanning@fishergerman.co.uk](mailto:ngplanning@fishergerman.co.uk)

Fisher German LLP  
The Estates Office  
Ashby de la Zouch  
LE65 2UZ

**Tiffany Bates, Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

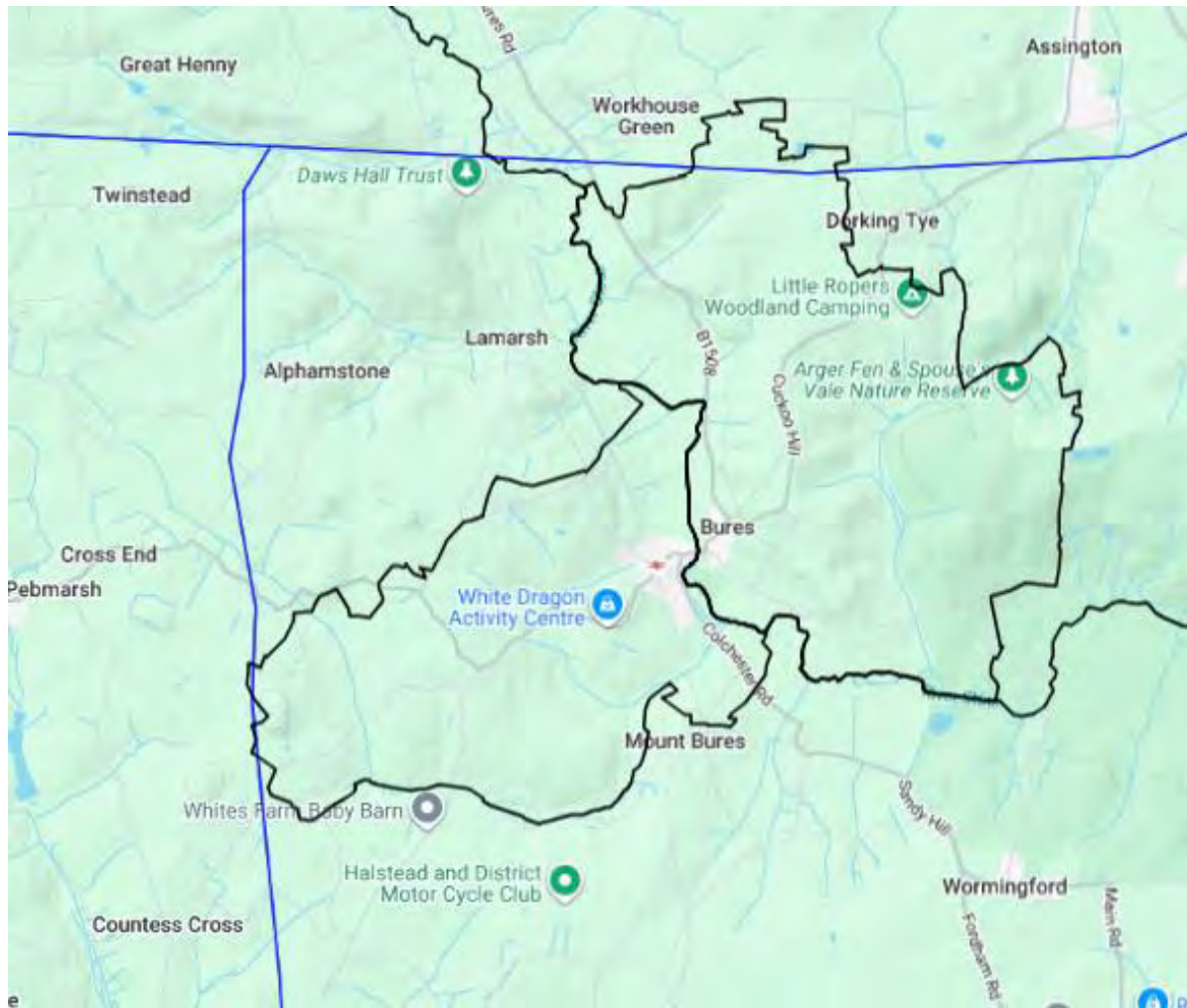
National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Angela Brooks MRTPI  
Partner**

For and on behalf of Fisher German LLP



Blue lines in above plan represent assets crossing the Neighbourhood Plan Designated Area.

## Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgrid.com/document/345326/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here:

<https://www.nationalgrid.com/document/349291/download>

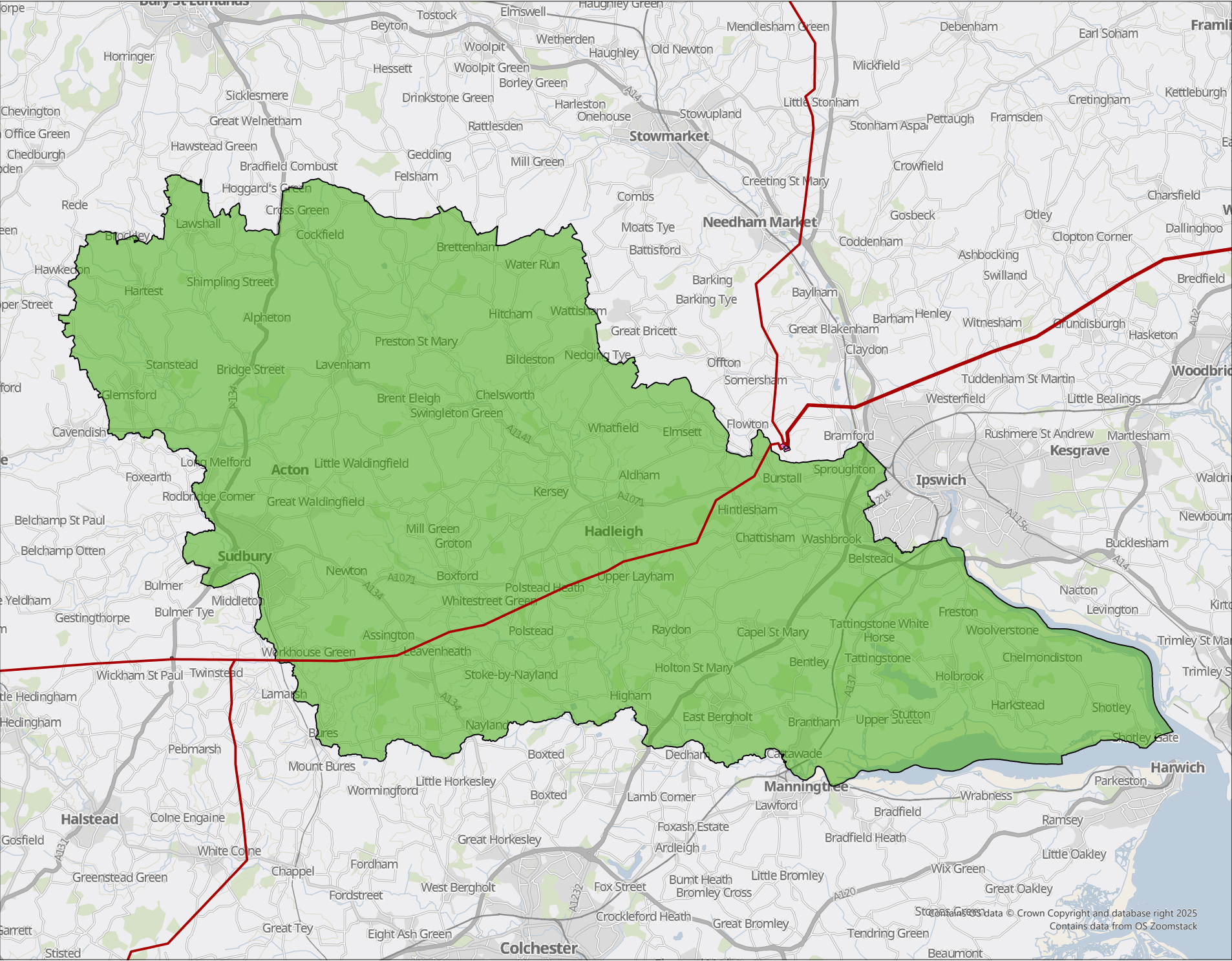
## How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website:

<https://lsbud.co.uk/>

For local planning policy queries, please contact: [ngplanning@fishergerman.co.uk](mailto:ngplanning@fishergerman.co.uk)





OVERVIEW WINDOW

LEGEND:

- Cable
- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: **nationalgrid**

SCHEME: PLANNING INTERACTION

TITLE: LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:143,000 @ A3

DATE: 20/05/2025

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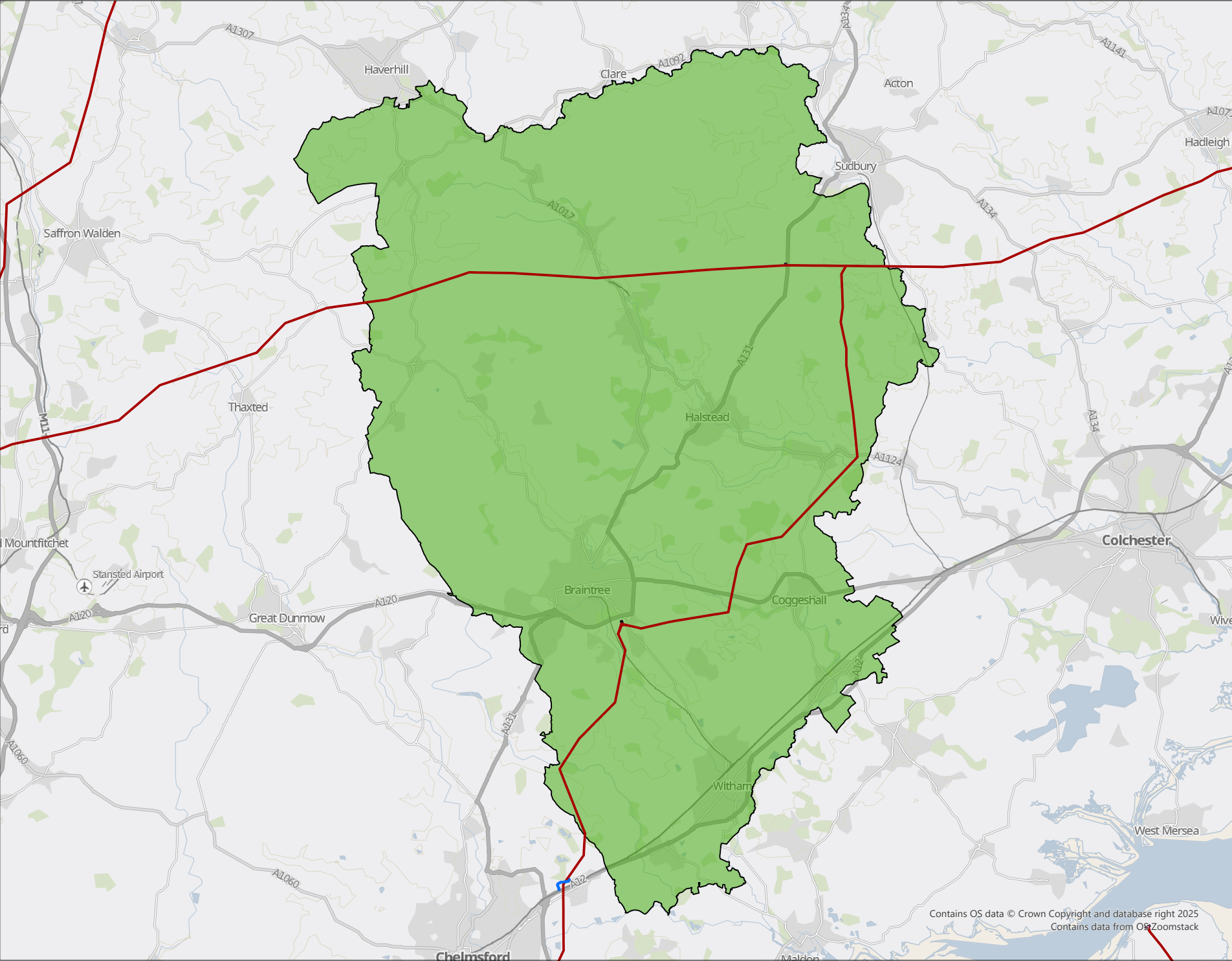
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# fisher german

The Estates Office, Norman Court  
Ashby de la Zouch,  
Leicestershire, LE65 2UZ  
01530 412821  
fishergerman.co.uk

DRAWING REF:  
NG-2025-03-MT-OP-LPA- Babergh



OVERVIEW WINDOW

LEGEND:

- Cable
- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: **nationalgrid**

SCHEME: PLANNING INTERACTION

TITLE: LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:150,000 @ A3

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**fisher  
german**

The Estates Office, Norman Court  
Ashby de la Zouch,  
Leicestershire, LE65 2UZ  
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fishergerman.co.uk

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### (14) Resident - Child

# Consultation Response Form

# Submission draft Bures Neighbourhood Plan 2021 - 2037

**Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)**

## Section One: Respondents Details

**All respondents should complete Part A. If you are an Agent please complete Part's A & B**

Part A: Respondent	
Title / Name:	Mr Child
Job Title (if applicable):	
Organisation / Company (if applicable):	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your representation(s)

To which part of the Plan does your representation relate? (You may wish to complete a separate forms if you multiple comments)

Paragraph No.	91	Policy No.	BP6
---------------	----	------------	-----

Do you support, oppose, or wish to comment on the above? (Please tick one answer)

Support		Oppose	
Support with modifications		Have Comments	✓

Please give details of your reasons for support / opposition, or other comment here:

*Please be as brief and concise as possible ..*

I believe that the southern boundary of the Woolpit Downs site, adjacent to Colne Road, should be listed as having trees of special environmental importance. It features a line of mature trees that are home to a diverse range of wildlife, including birds of prey, owls, and other species dependent on the existing ecosystem. Moreover, these trees provide a valuable visual backdrop to the southern boundary of Bures as a village. They should be granted Tree Preservation Orders.

*(Continue on separate sheet if necessary)*

What improvements or modifications would you suggest?

*Please be as brief and concise as possible ..*

As mentioned above, I believe that the southern boundary of the Woolpit Downs site, adjacent to Colne Road, should be listed as having trees of special environmental importance and that these trees should be granted Tree Preservation Orders.

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the responses through written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider that a hearing should be held, please explain why this is necessary.

Please note that the decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

*Please be as brief and concise as possible ..*

*(Continue on separate sheet if necessary)*

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	√
The final 'making' (adoption) of the Bures Neighbourhood Plan by both Babergh District Council and Braintree District Council	√

<b>Signed:</b> 	<b>Dated:</b> 6 October 2025
--	------------------------------

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**(15) Resident - Firth**

**Consultation Response Form**  
**Submission draft Bures Neighbourhood Plan 2021 - 2037**

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

**Section One: Respondents Details**

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Ms Firth
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your representation(s)

To which part of the Plan does your representation relate? (You may wish to complete a separate forms if you multiple comments)

Paragraph No.		Policy No.	Policy BP3 : Key Views
---------------	--	------------	------------------------

Do you support, oppose, or wish to comment on the above? (Please tick one answer)

Support		Oppose	✓
Support with modifications		Have Comments	

**Please give details of your reasons for support / opposition, or other comment here:**

*Please be as brief and concise as possible ..*

The assessment of key views fails to identify an important view from Mount Bures village green and the Public Right of Way (PROW) in this location, looking north / north east, towards Bures Hamlet village in the valley.

This is high land and the first public view of Bures when approached from Chappel / Wakes Colne. It is frequently enjoyed by local residents, walkers, cyclists and runners.

The view to Bures Village also provides an important connection for Mount Bures residents, who are reliant on Bures village for all services and amenities including schools, shops, church, parks, pub, etc. The visual relationship reduces the feeling of isolation and detachment from this community.

It is essential that this view is also included in the assessment of key views.

Appendix C of the NP covers Key Views further and provides justification for each view. For view 14 for example it is stated that the justification is that this is the “*First view of Bures in its setting when approaching from Earls Colne*”. The view from Mount Bures at the junction of Hall Road and the PROW, just inside the NP area, is equally if not more important than view 14 given that the view from Mount Bures can be appreciated from the public right of way and village green/local green space area for a more prolonged period.

The NPPF at paragraph 187 (a) makes clear that planning policies and decisions should protect and enhance valued landscapes. The Adopted Braintree Local Plan Policy LPP1 and LPP67 states that proposals must protect the intrinsic character and beauty of the countryside. The NP presently also fails to accord with Basic condition a) – National policy and guidance , and Basic condition e) – Strategic Policies in Adopted Plans.

Whilst we do not support the current wording we believe this could be addressed as indicated below.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ..*

The key view from Mount Bures village green and the Public Right of Way (PROW) should be included in Policy BP3 and Appendix C. It should also be shown on the NP Policies Map.

We also believe a site visit to this location by the examiner is essential.

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the responses through written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider that a hearing should be held, please explain why this is necessary.

Please note that the decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible ..*

To allow discussion and evidence on this important issue if required.

*(Continue on separate sheet if necessary)*

## **Section Two: Your representation(s)**

To which part of the Plan does your representation relate? (You may wish to complete a separate forms if you multiple comments)

<b>Paragraph No.</b>		<b>Policy No.</b>	Policy BP7 : Local Green Space
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**Do you support, oppose, or wish to comment on the above? (Please tick one answer)**

<b>Support</b>		<b>Oppose</b>	✓
<b>Support with modifications</b>		<b>Have Comments</b>	

**Please give details of your reasons for support / opposition, or other comment here:**

*Please be as brief and concise as possible ..*

The assessment of Local Green Spaces under Policy BP7 lists out a number of Local Green Spaces. This policy however fails to identify the important Green Space at Mount Bures.

We understand this area been put forward by Mount Bures Parish Council and has also been included in the draft Colchester Local Plan.

As residents we know the value of this important and prominent space for the local and wider community. It is used by walkers, runners, cyclists and those enjoying the views of the Stour Valley towards Bures Hamlet and Bures St Mary. The Bures NP must also consider those residents who carry out business or use the NP area and this includes those using the space at Mount Bures.

The NPPF sets out the importance of Local Green Space at paragraph 106 and 107. The Adopted Braintree Local Plan Policy LPP1 and LPP67 both states that proposals must protect the intrinsic character and beauty of the countryside. The NP presently fails to accord with Basic condition a) – National policy and guidance , and Basic condition e) – Strategic Policies in Adopted Plans, and should be amended as below.

Whilst we do not support the current wording we believe this could be addressed as indicated below.

*(Continue on separate sheet if necessary)*

### **What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ..*

The Mount Bures Village Green should be added to Policy BP7 as a protected Local Green Space, the area of which should match that shown in the draft Colchester Local Plan policies map (as reported to Colchester Local Plan Committee 10<sup>th</sup> November 2025) and as we understand has been put forward by Mount Bures Parish Council.

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the responses through written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider that a hearing should be held, please explain why this is necessary.

Please note that the decision on whether to hold a hearing is entirely at the discretion of the Examiner.

### **I consider that a hearing should be held because ...**

*Please be as brief and concise as possible ..*

To allow discussion and evidence on this important issue if required.

*(Continue on separate sheet if necessary)*

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Bures Neighbourhood Plan by both Babergh District Council and Braintree District Council	✓

**Signed:** .....

**Dated:** 14/11/25



## (16) Resident - Harrison

**Rec'd:** 1 October 2025  
**Subject:** [Bures Development Plan]

We should accept these local plans and work to implement them.

\* \* \* \*

Consultation email sent to interested residents etc. Friday 26 September 2025

Dear Sir / Madam,

### **Notice of consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 ~ The Bures Neighbourhood Plan 2021 - 2037**

This e-mail is from the Planning Policy Team at Babergh District Council. Working in collaboration with our colleagues at Braintree District Council, we are operating as the lead local authority on this matter.

Your contact details have been provided by those working on the Bures Neighbourhood Plan specifically so that we can notify you that this it is now being made available by us for the next round of formal public consultation. That exercise starts on Monday 29 September 2025 and it will end at 4:00pm on Friday 14 November 2025.

Through this email and the attached letter, we invite you to read the submission draft Plan and, if you wish to do so, to submit a written representation (comment). Any comments that you do make at this stage should focus on what changes need to be made to this Plan so that it can meet what are described as the 'basic condition tests'. These are explained in the letter.

If you do make a representation, please note that (1) your comments cannot be treated as confidential and, (2) with the exception of personal contact details, they will be published online at the end of the consultation period. They will also be shared with the two Parish Councils so they can respond to any new issues raised, and also with the person we appoint to independently examine this Plan, so that they can be taken into consideration.

The submitted Plan and the other documents can be found on our website by visiting:  
<https://www.babergh.gov.uk/w/bures-neighbourhood-plan>

Our colleagues at Braintree are also bringing their Bures NP webpage content up to date:  
<https://www.braintree.gov.uk/planning-building-control/neighbourhood-planning/14>

Arrangements have also been made for printed copies of the submitted Plan to be made available for viewing in Bures at the following locations: St Mary's Church (CO8 5AA), Bures Baptist Church (CO8 5JG), the Bank House Tea Room (CO8 5AD), Bures Community Centre (CO8 5BX), and at Beautiful You Hairdressers (CO8 5AD). We thanks those locations for the assistance.

You can also let us know if you wish to continue to be kept updated on the progress of this Plan (e-mail being our preferred method), specifically, when we publish the independent examiner report and if/when both district councils formally adopt this Plan.

If you would prefer not to receive further updates from us, simply reply to this e-mail saying, "Please delete my contact details", and we will take care of the rest.

Yours faithfully,

Paul Bryant  
Neighbourhood Planning Officer | Planning Policy Team  
Babergh & Mid Suffolk District Councils – Working Together  
E: ... / T: .....



*[PLEASE NOTE: This page has intentionally been left blank]*

## **(17) Resident - Hill**

**Rec'd:** 14 November 2025

**Subject:** Bures Neighbourhood Plan R 16, BP 1-5

Dear Ladies and Gentlemen,

I write to make a few comments on the above. As a Mount Bures resident living in close proximity to the Plan area, I regret to say that very little of this close proximity is mentioned in the Plan, nor was there any consultation with Mt. Bures, although a part of the Plan area is geographically in Mount Bures. This is an omission which I find very regrettable due to the closely knit communities and joint activities and facilities between Mount Bures, Bures Hamlet and Bures St. Mary.

Local Green Space is considered very important (BP1 to 5), and yet, in the Plan, there is no mention of the small area of land on the boundary in Hall Road as a Village Green as had been requested by Mount Bures Parish Council. This piece of land is also used as a footpath between the Brookhouse path and FP21, by walkers from the local area, Mount Bures and Bures and from further afield.

The Views from this part of the Green and the above mentioned FP21 are extraordinarily beautiful and must be considered an asset of local value, but it was not mentioned in the Plan, in spite of the fact that it is enjoyed by people from many communities.

BP 2 Para 59 Protected Lanes, mentions attempts to retain the traditional landscape and nature of "protected lanes" however it fails to demonstrate what measures would be taken to safeguard these assets. It also fails to be more precise as to what is considered a development other than building. I would suggest to give better protection to these lanes, with their trees, hedges and wildflower verges, in case of intensification of agriculture, field enlargement and amalgamation.

I hope you will take some of my comments on board, and remain

Yours sincerely

*[PLEASE NOTE: This page has intentionally been left blank]*

## (18) James Lawson Planning Ltd (obo Client)

**E from:** James Lawson  
**Rec'd:** 14 November 2025  
**Subject:** Bures Neighbourhood Plan Regulation 16 Consultation - Policy BP18 Representations  
**Attached:** Bures NP Reg 16 Con Reps – JLP 17.11.24.pdf; BNP - Old Barn Road BH Location - JLP 17.11.25.pdf; BDCLP SC 29.9.25 – Minutes – 10.10.25..pdf, and, BDCLP Sub-Cttee 24.9.25 [the WeTransfer file].

Dear Community Planning Team,

We are pleased to submit representations in response to the BNP Regulation 16 Consultation which are *attached*.

A document (40MB file) is also sent via WeTransfer.

We trust this is in order and look forward to receiving acknowledgement that the representations are safely received in due course.

regards

James Lawson BA (Hons) MA MRTPI  
**Director**



**M** 07967 655680  
**T** 01206 510095  
**E** [james@jameslawsonplanning.co.uk](mailto:james@jameslawsonplanning.co.uk)  
**W** [jameslawsonplanning.co.uk](http://jameslawsonplanning.co.uk)  
36 Oxley Parker Drive, Colchester, Essex, CO4 5XQ

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\* \* \* \* \*

**Babergh District Council note:** With agreement from Mr Lawson, please note that this representation is presented as follows:

Cover e-mail	This page
Bures NP Reg 16 Con Reps - JLP 17.11.24.pdf	The representation comprising a two page letter dated 14 November 2025
BNP - Old Barn Road BH Location - JLP 17.11.25.pdf	An A3 site location map of the Old Barn, Mount Bures
BDCLP Sub-Cttee 24.9.25 ... 'the WeTransfer file'	An abridged version of the agenda and reports presented to the Braintree District Council Local Plan Sub Committee meeting on 24 September 2025
BDCLP SC 29.9.25 - Minutes - 10.10.25..pdf	The published minutes from the above Local Plan Sub Committee meeting.

**Bures NDP Consultation  
C/o Planning Policy Team  
Babergh District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX**

e: [james@jameslawsonplanning.co.uk](mailto:james@jameslawsonplanning.co.uk)

t: 01206 510095

Co. Reg. No. 13100476

14<sup>th</sup> November 2025

**By Email Only:**  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Dear Planning Policy Team,

**Bures Neighbourhood Plan 2021-2037 Submission Version 2025: Regulation 16 Consultation – Draft Defined Development Boundary & Site at Old Barn Road, Mount Bures (Bures Hamlet Parish) \***

**Introduction**

We write on behalf of the landowner of the site at Old Barn Road, Mount Bures, and are **Supportive** of the Neighbourhood Plan vision, objectives and policies, subject to a **Revision** to align the draft Neighbourhood Plan (NP) with the emerging housing strategy for Braintree District.

**Defined Development Boundary – Old Barn Road, Mount Bures (Bures Hamlet Parish)**

At the meeting of the Braintree DC Local Plan Sub-Committee on 24<sup>th</sup> September 2025, it was resolved to identify a **Defined Development Boundary** to incorporate existing development and an adjoining site at Old Barn Road, Mount Bures, within Bures Hamlet Parish.

The purpose of the new Development Boundary is to assist in the delivery of a limited 'affordable housing led' scheme to meet the pressing need for affordable housing in the Neighbourhood Plan Area, as set out in the Housing Needs Survey and Housing Needs Assessment (NP evidence base).

The Approved Minutes of the 29<sup>th</sup> September 2025 Local Plan Sub-committee Meeting, along with a location plan of the Old Barn Road Site are enclosed with this representation.

A copy of the Committee Schedule which includes the Officer Recommendation and details of the Defined Settlement Boundary, to form the basis of the Braintree DC Local Plan (Regulation 18) Preferred Options Consultation in February 2026, is sent via WeTransfer.

**Submission Version Neighbourhood Plan – Requested Revision**

In light of the above, the following revision is requested;

**Policy BP18: New Housing Development**

**Revise the second paragraph of the policy to read;**

“New housing development should be located within the defined settlement boundaries for Bures Hamlet and Bures St Mary, as shown in Figure 54 and on the Policies Map, including within any additional defined settlement boundary at Old Barn Road, Mount Bures (within Bures Hamlet Parish) which may be designated as part of the review of the Braintree Local Plan.

New housing development should meet the following criteria as well as being compliant with other relevant policies in this plan:

- a. Be in close proximity to local services and amenities
- b. Be of a scale that is appropriate to the site location, character and setting and its surroundings

We consider that this revision is consistent with the Neighbourhood Plan objective to meet the housing needs of the village, particularly the pressing need for affordable housing evidenced in the Housing Needs Survey and Housing Needs Assessment.

We consider that this revision would enable the Neighbourhood Plan to be in general conformity with the Braintree District Local Plan 2041, at such a time as the local plan is adopted.

We trust this submission is of assistance and look forward to working with the Neighbourhood Plan to meet its identified housing needs.

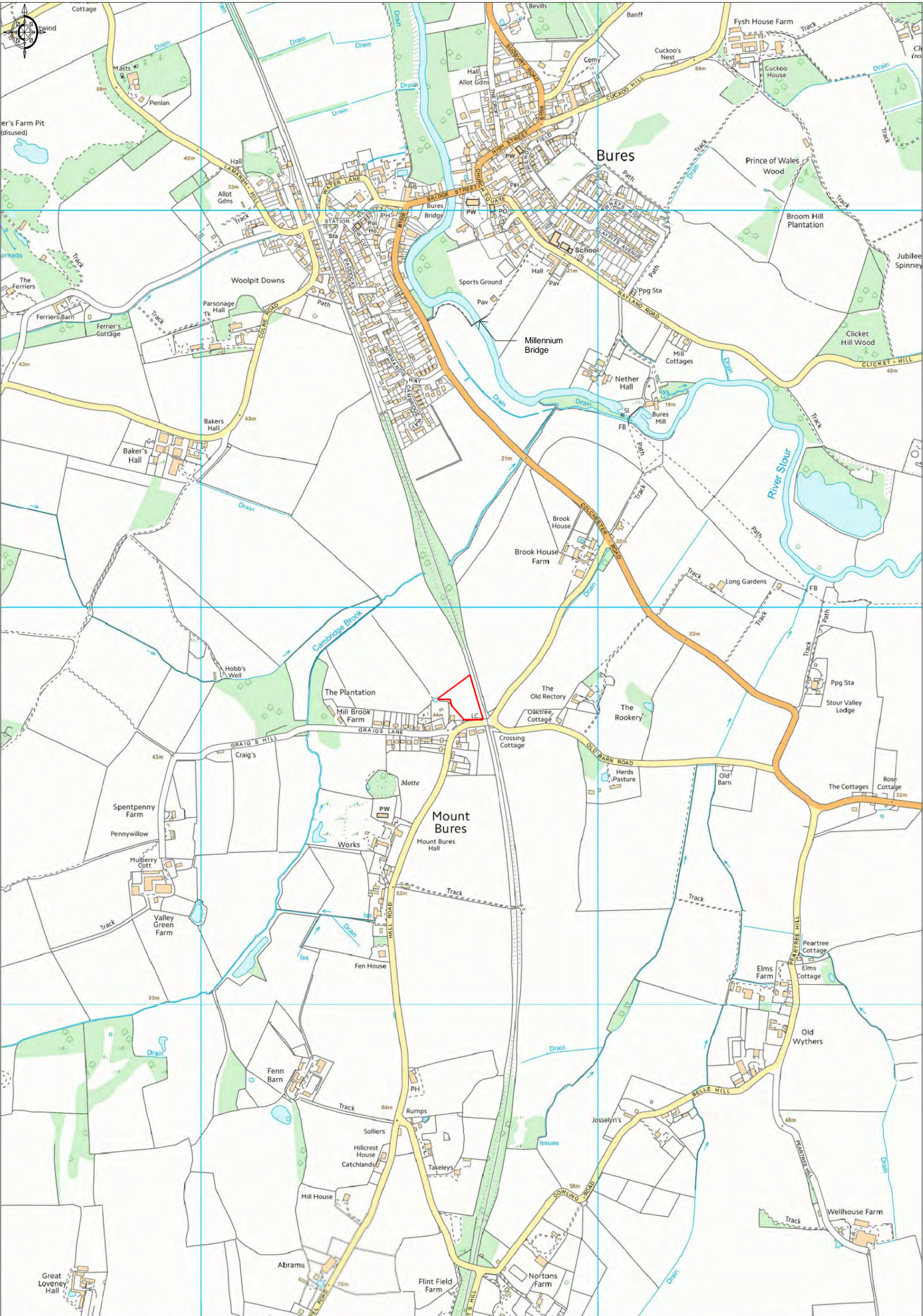
Yours faithfully



**James Lawson**  
**James Lawson Planning Ltd**  
Encs



SITE LOCATION PLAN



\* Note:- Site lies wholly within Bures Hamlet Parish/Braintree DC Area



## **IMPORTANT NOTICE FOR VIEWERS OF THIS DOCUMENT**

This is an abridged version of the agenda and papers presented to the meeting identified below.

It is specific to and accompanies the representations from James Lawson Planning Ltd (obo their client) on the submission draft Bures Neighbourhood Plan. That Plan was made available for public consultation between 29 September and 14 November 2025. In separate correspondence, Mr Lawson confirmed that it is the site identified as BURE2070 in item 5 that is most relevant. Non-relevant content has therefore been removed where it has been practical to do so.

Anyone wishing to see the full Sub-committee meeting papers can still do so via this link:

<https://braintree.cmis.uk.com/braintree/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/1395/Committee/6/Default.aspx>



# **LOCAL PLAN SUB-COMMITTEE AGENDA**

**Wednesday, 24th September 2025 at 6.30pm**

**Council Chamber, Braintree District Council, Causeway House,  
Bocking End, Braintree, CM7 9HB**

**THIS MEETING IS OPEN TO THE PUBLIC**

Members of the public will be able to view and listen to this meeting via YouTube.

To access the meeting please use the link below:

<http://www.braintree.gov.uk/youtube>

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**Members of the Local Plan Sub-Committee are requested to attend this meeting to transact the business set out in the Agenda.**

Councillor J Abbott  
Councillor K Bowers  
Councillor L Bowers-Flint  
Councillor G Butland  
Councillor J Coleridge  
Councillor T Cunningham  
Councillor M Fincken

Councillor J Martin  
Councillor A Munday  
Councillor I Parker  
Councillor F Ricci  
Councillor G Spray (Chairman)  
Councillor T Walsh

Members unable to attend the meeting are requested to forward their apologies for absence to the Governance and Members Team on 01376 552525 or email [governance@braintree.gov.uk](mailto:governance@braintree.gov.uk) by 3pm on the day of the meeting.

D GASCOYNE  
Chief Executive

## **PUBLIC SESSION**

## **Page**

### **1 Apologies for Absence**

### **2 Declarations of Interest**

To declare the existence and nature of any Disclosable Pecuniary Interest, or Other Registrable Interest relating to items on the agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.

### **3 Minutes of the Previous Meeting**

To approve as a correct record the minutes of the meeting of the Local Plan Sub-Committee held on 31st July 2025 (copy previously circulated).

### **4 Public Question Time**

Only Registered Speakers will be invited by the Chairman to speak during public question time.  
Please see the agenda notes for guidance.

### **5 Braintree District Local Plan Review - Further Small Site Allocations** **6 - 49**

### **6 Braintree District Settlement Fringe Study - Landscape Sensitivity Assessment 2025** **50 - 211**

### **7 Large Scale Strategic Sites Assessment - North Area** **212 - 283**

### **8 Braintree District Local Plan Review - General Progress Update**

### **9 Urgent Business - Public Session**

To consider any matter, which in the opinion of the Chairman, should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.

### **10 Exclusion of the Public and Press**

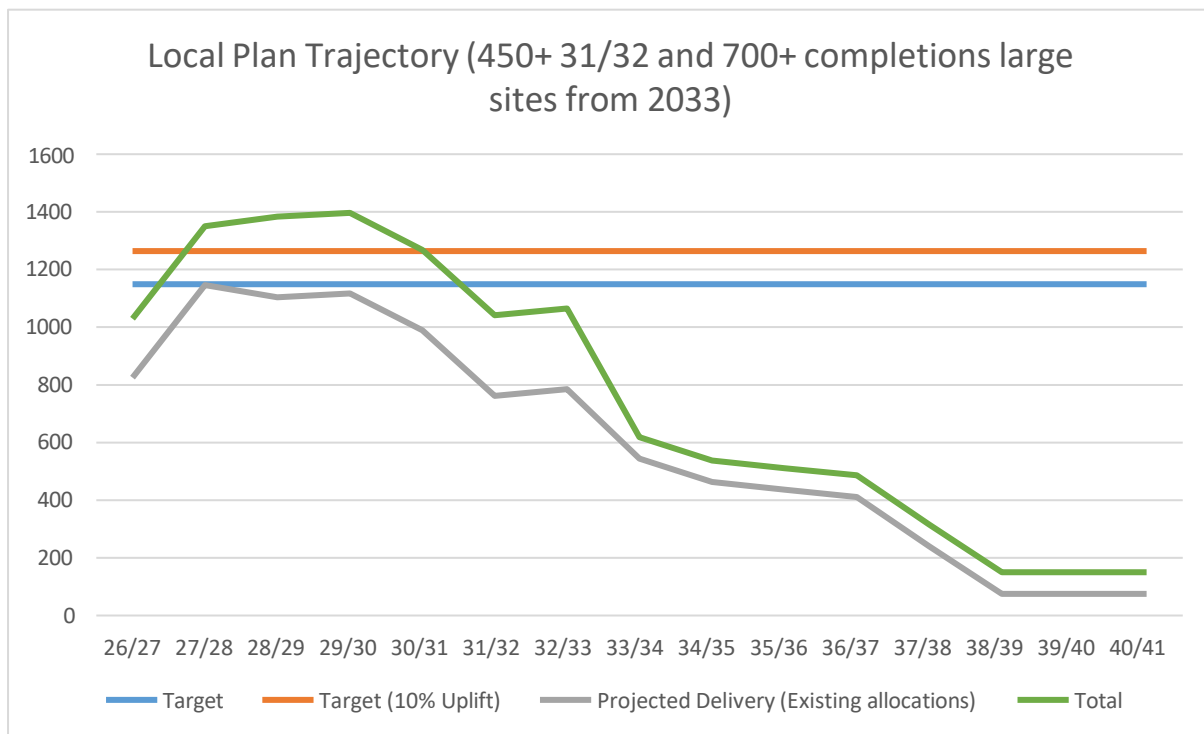
To agree the exclusion of the public and press for the consideration of any items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972.

*At the time of compiling this agenda there were none.*

<b>Report Title:</b> Braintree District Local Plan Review – Further Small Site Allocations	
<b>Report to:</b> Local Plan Sub-Committee	
<b>Date:</b> 24th September 2025	<b>For:</b> Decision
<b>Key Decision:</b> No	<b>Decision Planner Ref No:</b> N/A
<b>Report Presented by:</b> Alan Massow – Principal Planning Policy Officer	
<b>Enquiries to:</b> Alan Massow – Principal Planning Policy Officer	

## 1. Purpose of the Report

- 1.1 Braintree District Council is in the process of reviewing its Local Plan. As part of this process, it is necessary to identify sufficient sites to meet its identified housing target. Currently the Council need to provide 1149 new homes per year as per the Standard Housing Methodology. This figure needs to be kept under review and can change twice a year as new information is published.
- 1.2 The current adopted Local Plan will be considered out of date in February 2026. This means that the higher standard methodology figure will need to be considered from then.
- 1.3 The Council has undertaken a series of meetings to select sites to meet its housing target. However, when considering the likely delivery and capacity of those sites it is likely that a shortfall in 5 year supply could occur in the new Local Plan. A shortfall presents a risk that speculative development proposals are more difficult to resist and is therefore advisable to address in order that the Council retains control over where new development should take place.
- 1.4 The graph set out below shows the current housing supply trajectory with the draft allocations which have been identified so far and agreed at Local Plan Sub Committee meetings which took place from May to July 2025. This shows insufficient supply for years 26/27. From 30/31 the trajectory starts to dip down again. For medium to longer term growth post 30/31 larger sites are currently being considered at Local Plan Sub Committee meetings in September and October. However, the insufficient supply shown in 26/27 needs to be addressed.
- 1.5 The current identified short term shortfall is approximately 250 homes.



1.6 This report revisits a number of sites which have previously been to the Local Plan Sub-Committee and re-assesses them to see if they could be allocated. This would include sites which may for example have had local support from a parish council or if a site could overcome previous planning concerns by reducing its extent to a more appropriate level.

1.7 The following table summarises all the sites and likely capacity.

1.8

Reference	Address	Capacity	Note
ASHE2009	Foxes Road, Ashen	35	Reduced extent. Smaller capacity
BOCN2038	Land to the south of Highfield Stile Road, Bocking.	5	Less than 10, narrow access unadoptable.
BULM2056	The Bungalow, Bulmer Tye, Sudbury	8	Less than 10.
BULM2059	Land adj to Ryes Lane, Bulmer Tye	8	Less than 10.
BULM2062	Land adj Kitchen Hill, Bulmer.	128	Appeal decision.
BURE2070	Land at Old Barn Road, Mount Bures, Bures Hamlet	17	Adjacent to village outside district boundary.
BURE2071	Woolpit Downs, Parsonage Hill, Bures	43	Adjacent to Mount Bures. Local support.

PANF2508	Land North West of Panfield Lane, Braintree	100	Previously recommended for allocation. Assumption that spine road at Panfield Lane will be delivered.
RAYN2236	Land to the West of Rayne	490	Reduced extent away from Flitchway North of The Street, with reduced capacity.
RIDG2248	Land East of Ashen Road and North of the Former Kings Head Public House, Ridgewell	12	Backland development.
SHAL2263A	Land at Levelly Field North of Stondonfield, Church End, Shalford. Part 1.	Part of site below.	Possibility of Neighbourhood Plan identifying part of site for housing and public right of way to primary school.
SHAL2263B	Land at Levelly Field North of Stondonfield, Church End, Shalford. Part 2.	220	Possibility of Neighbourhood Plan identifying part of site for housing and public right of way to primary school.
STEB2285	Land West of North Road, Steeple Bumpstead	12	Probably less than 10
TOPP2294	Land off Park Lane, Toppesfield	2	Below threshold, could be included in development boundary.
TOPP2295	Adj 22 Park Lane, Toppesfield	4	Below threshold, could be included in development boundary.
WITN2252	Land North of Witham	125	Reduce site extent.
<b>TOTAL</b>		<b>1871</b>	

- 1.9 On the assumption that all site recommendations in the report are agreed, then an additional **417 dwellings** could be added to the Local Plan trajectory. It should be noted that the final capacity of each of the sites in the report would be subject to planning approval and the capacity may increase or decrease depending on other planning factors such as design, ecology and highways considerations.

## **2. Recommendations**

- 2.1 Recommendation 1 – That ASHE2009 – Foxes Road, Ashen is not allocated for residential development.
- 2.2 Recommendation 2 – That BOCN2038 – Land to the south of Highfield Stile Road, Bocking is not allocated for residential development.
- 2.3 Recommendation 3 – That BULM2056 – The Bungalow, Bulmer Tye – is not allocated for residential development.
- 2.4 Recommendation 4 – That BULM2059 – Land adj to Ryes Lane, Bulmer Tye is not allocated for residential development.
- 2.5 Recommendation 5 – That BULM2062 – Land adj Kitchen Hill, Bulmer is not allocated for residential development.
- 2.6 **Recommendation 6 – That BURE2070 – Land at Old Barn Road, Mount Bures, Bures Hamlet has a defined development boundary.**
- 2.7 Recommendation 7 – That BURE2071 – Woolpit Downs, Parsonage Hill, Bures is not allocated for development.
- 2.8 Recommendation 8 – That CASH2078 – Public House with Car Park, 1 Crouch Green, Castle Hedingham is not allocated for development.
- 2.9 Recommendation 9 – That CASH2079 – Land behind Memories, Crouch Green Castle Hedingham is not allocated for development.
- 2.10 Recommendation 10 – That CRES2107 – Land to the north of Polecat Road is not allocated for development.
- 2.11 Recommendation 11 – That EARL2120 – Land at Woodpeckers, Lowesfield Earls Colne is not allocated for development.
- 2.12 Recommendation 12 – That EARL2126 – Land north of Station Road, Earls Colne is not allocated for development.
- 2.13 Recommendation 13 – That FEER2131 - Little Barrows, Worlds End Lane, Feering is allocated for up to 5 self and custom build dwellings.
- 2.14 Recommendation 14 - That GNBN2154 – Land to the rear of 110 London Road, Braintree is included within the development boundary for Braintree.
- 2.15 Recommendation 15 – That GRYE2175 – Land north of Little Yeldham Road, Little Yeldham (Adj Great Yeldham) is allocated for residential development.
- 2.16 Recommendation 16 – That GRYE2176 – Land West of Nuns Walk is included within the development boundary for Great Yeldham.

- 2.17 Recommendation 17 – That HELI2206 - Land south east of Haverhill Road, Pale Green, Helions Bumpstead is not allocated for residential development.
- 2.18 Recommendation 18 – That KELV2215 – Land North East of Cranes Lane, Kelvedon is allocated for residential development and other uses as described in permission 23/00816/OUT.
- 2.19 Recommendation 19 – That part of site KELV2221 – Land adj Davey House, London Road, Kelvedon is allocated for 10 dwellings.
- 2.20 Recommendation 20 – That PANF2508 – Land North West of Panfield, Braintree is not allocated for residential development at this time.
- 2.21 Recommendation 21 – That RAYN2236 is proposed for residential and recreational development, limited to the area North of The Street Rayne.
- 2.22 Recommendation 22 – That RIDG2248 – Land East of Ashen Road and North of the Former Kings Head Public House, Ridgewell is not allocated for residential development.
- 2.23 Recommendation 23 – SHAL2263A and SHLA2263B Land at Levelly Field North of Stondonfield Church End, Shalford, are not allocated for residential development at this time.
- 2.24 Recommendation 24 – STEB2285 – Land West of North Road, Steeple Bumpstead is allocated for residential development.
- 2.25 Recommendation 25 – That TOPP2294 and TOPP2295 – Land off Park Lane Toppesfield are included within the development boundary for Toppesfield.
- 2.26 Recommendation 26 – That WITN2252 Land North of Witham is part allocated for circa 125 dwellings.

### **3. Summary of Issues**

- 3.1 The following sites have either been previously considered by the Local Plan Sub-Committee or have recently gained planning permission. The sites for consideration include those which have had some parish council support or sites which could be amended to lessen any previously identified planning impacts. The site assessments below should be read in conjunction with the previous reports. Any further assessment or considerations have been included in this report.

#### **Ashen**

- 3.2 ASHE2009 ....
- 3.3 A smaller section ...

...

This is a larger site adjacent to Ballingdon near Sudbury. The site was subject to a planning appeal in 2023 which was dismissed on appeal. The site capacity proposed at the time was for 8 dwellings and the site area was smaller than that submitted through the call for sites, being a section toward the northern part of the site adjacent to Kitchen Hill/Bulmer Road. It is unlikely that a larger capacity would be suitable in this location therefore it is not proposed to allocate this site.

- 3.4 **Recommendation 5 – That BULM2062 – Land adj Kitchen Hill, Bulmer is not allocated for residential development.**

### **Bures**

- 3.5 BURE2070 – Land at Old Barn Road, Mount Bures, Bures Hamlet – 0.7ha, 17 dwellings

- 3.6 The site was proposed for 8 affordable homes. The site has few constraints other than a public right of way running adjacent to its boundary, and the Sudbury Branch line. Whilst it is below the threshold for allocation, a development boundary could be drawn around the site to enable it to come forward. Alternatively, the site could come forward as a rural exception scheme. Given the nature of the proposal and that it has some support from Mount Bures (which the site is adjacent to), then it is recommended that a development boundary be identified around this site.

- 3.7 **Recommendation 6 – That BURE2070 – Land at Old Barn Road, Mount Bures, Bures Hamlet has a defined development boundary.**

- 3.8 BURE2071 – Woolpit Downs, Parsonage Hill, Bures 1.6ha up to 43 dwellings.

- 3.9 The site is a greenfield site adjacent to Bures Hamlet. The site is open and rural. Access would be difficult from Colne Road, and the track on the northern boundary is narrow and only capable of having one vehicle at a time. A Colne Road access would likely require the removal of mature trees which would have a negative impact on the character and appearance of the area.

- 3.10 **Recommendation 7 – That BURE2071 – Woolpit Downs, Parsonage Hill, Bures is not allocated for development.**

### **Castle Hedingham**

- 3.11 CASH2078 – ...

- 3.12 The site is below .....



3.13 As Witham is a main town with the majority of services being available, it is proposed to allocate a smaller portion of this site for approximately 125 dwellings.

3.14 **Recommendation 26 – That WITN2252 Land North of Witham is part allocated for circa 125 dwellings.**

#### **4. Consultation**

4.1 The Local Plan will be subject to two rounds of consultation at Regulation 18 and Regulation 19.

#### **5. Options**

5.1 Option 1 – That the sites recommended for allocation in the report and included in the draft Local Plan.

5.2 Option 2 – That alternative sites are included for allocation in the Local Plan.

5.3 Option 1 is the preferred option.

#### **6. Financial Implications**

6.1 Production of the Local Plan is covered by the existing Local Plan budget.

#### **7. Legal Implications**

7.1 The Local Plan could be subject to legal challenge.

#### **8. Other Implications**

8.1 N/A

#### **9. Equality and Diversity Implications**

9.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
- (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
- (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

- 9.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic. *(Describe the specific equality and diversity implications of the proposal, any adverse findings and the proposed mitigation).*

## **10. List of Appendices**

- 10.1 Appendix 1 – Site Maps.

## **11. Background Papers**

- 11.1 Local Plan  
National Planning Policy Framework  
National Planning Practice Guidance



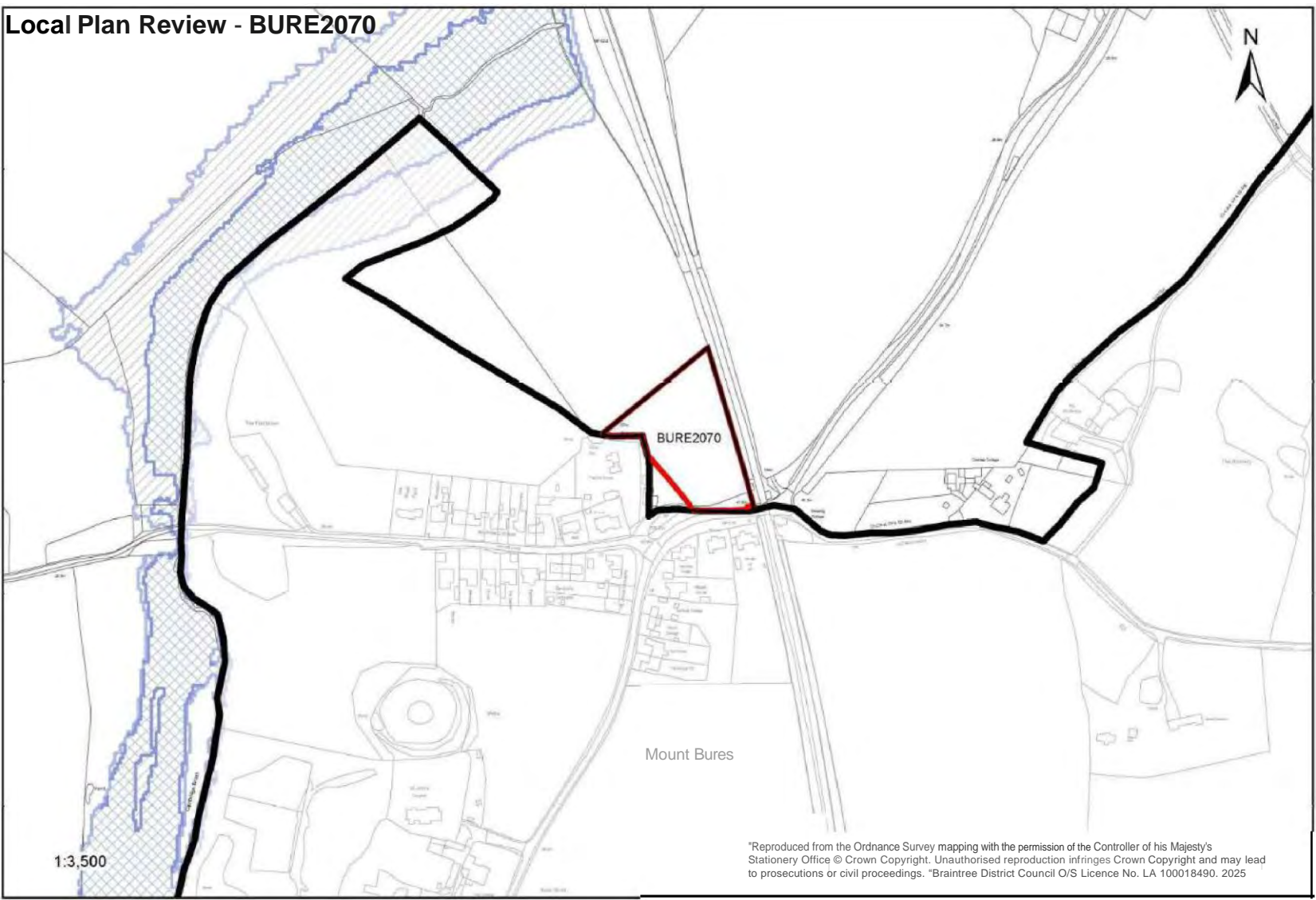
# **Braintree**

## **District Council**

Braintree  
District Local  
Plan Review

Local Plan Sub  
Committee 24<sup>th</sup>  
September  
2025

Local Plan Review - BURE2070



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# Minutes



## Local Plan Sub - Committee 24th September 2025

### Present:

<b>Councillors</b>	<b>Present</b>	<b>Councillors</b>	<b>Present</b>
J Abbott	Yes	J Martin	Yes
K Bowers	Yes	A Munday	Yes
L Bowers-Flint	Yes	I Parker	Yes
G Butland	Yes	F Ricci	Yes
J Coleridge	Yes (from 7.13pm)	G Spray (Chairman)	Yes
T Cunningham	Yes	T Walsh	Apologies
M Fincken	Yes		

### Substitute

Councillor A Hooks attended the meeting as a substitute for Councillor T Walsh.

Councillor J Beavis was also in attendance until 8.25pm.

Councillor D Garrod was also in attendance.

Councillor D Holland was also in attendance.

Councillor R Ramage was also in attendance until 8.30pm.

Councillor M Staines was also in attendance until 9.10pm.

Councillor W Taylor was also in attendance until 8.25pm.

Councillor R van Dulken was also in attendance.

### Braintree District Local Plan Review – Public Question Time Registration and Meeting Procedure

At the commencement of the meeting, Councillor G Spray, the Chairman of the Local Plan Sub-Committee, made two announcements.

Councillor Spray referred to the procedure for registering to speak at meetings of the Local Plan Sub-Committee during Public Question Time. Councillor Spray reminded everyone that the deadline for registering to speak was 12noon on the second working day before

the Sub-Committee's meeting. Councillor Spray asked people to comply with this deadline in order to assist the Council in administering the registration process.

Councillor Spray made reference also to the procedure to be followed at this meeting of the Sub-Committee when reviewing small sites and considering large strategic sites put forward as part of the 'call for sites' process. People who had registered for Public Question Time would be invited to speak immediately prior to consideration of the relevant Agenda Item/site and maps showing each site would be displayed at the meeting as part of the Officers' presentations. Members of the Sub-Committee would be invited to recommend and to determine each site individually.

Members of the Local Plan Sub-Committee were reminded that the Government had set an increased target for the number of new houses to be built in the District, which the Council was expected to meet. As the number of houses identified so far for inclusion in the new Local Plan fell short of the number required, it had been agreed that the Sub-Committee should reconsider some of the potential smaller sites which had been put forward. It had been suggested that particular attention could be given to sites in the North of the District; those supported by Parish/Town Councils; and those where a smaller area of a site might be acceptable.

## 81 **DECLARATIONS OF INTEREST**

**INFORMATION:** The following interests were declared:

On behalf of Members of the Sub-Committee, Councillor G Spray, the Chairman of the Local Planning Sub-Committee, declared a joint non-registerable interest in Agenda Item 5 – 'Braintree District Local Plan Review – Further Small Site Allocations' as Councillors D Garrod, D Holland, M Staines and R van Dulken, who were speaking at the meeting during Question Time were Elected Members of Braintree District Council, who were known to them.

On behalf of Members of the Sub-Committee, Councillor Spray declared a joint non-registerable interest also in Agenda Item 7 – 'Large Scale Strategic Sites Assessment – North Area' as Councillor D Garrod, who was speaking at the meeting during Question Time was an Elected Member of Braintree District Council, who was known to them.

Councillor G Butland declared a non-registerable interest in Agenda Item 5 – 'Braintree District Local Plan Review – Further Small Site Allocations' as Councillor P Rawlinson (sites GRYE2175 and GRYE2176) and Councillor J Willis (site RAYN2236), who were speaking at the meeting during Question Time were known to him, but he had not discussed the sites with them.

Councillor Butland declared a non-registerable interest also in Agenda Item 7 – ‘Large Scale Strategic Sites Assessment – North Area’ as Mr J Pearce (site FINC2502) and Councillor R Duffin (site FINC2502), who were speaking at the meeting during Question Time were known to him and he had met them as part of discussions about the local Neighbourhood Plan. Councillor Butland stated that the meeting(s) had been in the presence of Officers.

Councillor T Cunningham declared a non-registerable interest in Agenda Item 5 – ‘Braintree District Local Plan Review – Further Small Site Allocations’ as Councillor P Rawlinson (sites GRYE2175 and GRYE2176), who was speaking at the meeting during Question Time was known to him. Councillor Cunningham stated also that he had received representations regarding a proposed development site in Rayne, but that he had not indicated his position about this site.

Councillor Cunningham declared a non-registerable interest also in Agenda Item 7 – ‘Large Scale Strategic Sites Assessment – North Area’ as Mr J Pearce (site FINC2502) and Councillor R Duffin (site FINC2502), who were speaking at the meeting during Question Time were known to him. Councillor Cunningham stated that he had indicated support for Finchingfield and Wethersfield Joint Neighbourhood Plan and the Working Group for Former RAF Wethersfield Airbase, Sculpins Lane, Wethersfield (site FINC2502). Councillor Cunningham left the meeting when site FINC2502 was considered and determined, but he returned to the meeting for the consideration of the remainder of Item 7.

Councillor M Fincken declared a non-registerable interest in Agenda Item 7 – ‘Large Scale Strategic Sites Assessment – North Area’ (sites COLE2100, GGHR2141, GGHR2142, GGHR2416 and HASA2179) as an Elected Member of Halstead Town Council. Councillor Fincken stated that he had not been involved in any discussions which had taken place at meetings of the Town Council when sites affecting the possible provision of a bypass for Halstead had been discussed and he had not expressed any views about the sites.

Councillor A Hooks declared a non-registerable interest in Agenda Item 5 – ‘Braintree District Local Plan Review – Further Small Site Allocations’ (site RAYN2236) as the Chairman of Rayne Parish Council. Councillor Hooks stated that she had not been involved in any decisions made by the Parish Council regarding this site.

Councillor J Martin declared a non-registerable interest in Agenda Item 5 – ‘Braintree District Local Plan Review – Further Small Site Allocations’ (site WITN2252) as an Elected Member of Witham Town Council. Councillor Martin left the meeting when this site was considered and determined, but she was present for the consideration of the remainder of Item 5.

Councillor A Munday declared a non-registerable interest in Agenda Item 7 – ‘Large Scale Strategic Sites Assessment – North Area’ (sites COLE2100, GGHR2141, GGHR2142, GGHR2416 and HASA2179) as an Elected Member and Chairman of Halstead Town Council. Councillor Munday stated that he had not been involved in any discussions which had taken place at meetings of the Town Council when sites affecting the possible provision of a bypass for Halstead had been discussed and he had not expressed any views about the sites.

Councillor I Parker declared a non-registerable interest in Agenda Item 5 – ‘Braintree District Local Plan Review – Further Small Site Allocations’ (sites GRYE2175 and GRYE2176) as the promoter of the sites was known to her via a member of her family, but they were not a close associate of hers; and as Councillor P Gentry and Councillor P Rawlinson, who were speaking about these sites at the meeting during Question Time, were known to her, but she had not discussed the sites with them.

Councillor Parker declared a non-registerable interest also in Agenda Item 7 – ‘Large Scale Strategic Sites Assessment – North Area’ (site FINC2502) as someone who was speaking at the meeting during Question Time was known to her.

Councillor F Ricci declared a non-registerable interest in Agenda Item 5 – ‘Braintree District Local Plan Review – Further Small Site Allocations’ as Councillor P Rawlinson (sites GRYE2175 and GRYE2176), who was speaking at the meeting during Question Time was known to him.

In accordance with the Code of Conduct, Councillors remained in the meeting, unless stated otherwise, and took part in the discussion when the Items/sites were considered.

## 82 **MINUTES**

**DECISION:** That the Minutes of the meetings of the Local Plan Sub-Committee held on 24th July 2025 and 31st July 2025 be approved as a correct record and signed by the Chairman.

## 83 **QUESTION TIME**

### **INFORMATION:**

There were eleven statements made about Agenda Item 5 – ‘Braintree District Local Plan Review – Further Small Sites Allocations’. The statements related to the following sites:-



BURE2070 – Land at Old Barn Road, Mount Bures, Bures Hamlet  
BURE2071 – Woolpit Downs, Parsonage Hill, Bures  
Little Yeldham  
GRYE2175 – Land North of Little Yeldham Road, Little Yeldham  
GRYE2176 – Land West of Nuns Walk, Great Yeldham  
HELI2206 – Land South-East of Haverhill Road, Pale Green, Helions Bumpstead  
RAYN2236 - Land to the West of Rayne (North of The Street)  
STEB2285 – Land West of North Road, Steeple Bumpstead  
TOPP2294 and TOPP2295 – Land off Park Lane, Toppesfield

There were five statements made about Agenda Item 7 – ‘Large Scale Strategic Sites Assessment - North Area’. The statements related to the following sites:-

FINC2502 – Former RAF Wethersfield Airbase, Sculpins Lane, Wethersfield  
HASA2179 - Land North and East of Halstead  
Halstead  
STUR2293 – Land South of Haverhill

Where possible, all statements were made immediately prior to the Local Plan Sub-Committee’s consideration of each site.

Principally, these Minutes record decisions taken only and, where appropriate, the reasons for the decisions.

## 84 **BRAINTREE DISTRICT LOCAL PLAN REVIEW – REGULATION 18 DRAFT ALLOCATIONS – FURTHER SMALL SITE ALLOCATIONS**

**INFORMATION:** Consideration was given to a report on proposed small development sites for possible inclusion in the Braintree District Local Plan Review. It was reported that as part of the review of the Local Plan, the Council was required to identify development sites across the District to meet the housing target set by the Government’s Standard Housing Methodology, which was currently 1149 new homes per year.

A number of Local Plan Sub-Committee meetings had taken place from May to July 2025 in order to identify possible development sites to meet the housing target. However, concern had been expressed that the capacity of these sites and the delivery rate could lead to a shortfall in the requisite five year housing land supply amounting to approximately 250 homes. In the circumstances, some of the small sites which had been submitted as part of the ‘call for sites’ process were being re-considered.

It was hoped that the allocation of some larger, strategic sites which were currently being considered by the Local Plan Sub-Committee during September and October

2025 would address a further anticipated shortfall in the housing supply from 2030 and 2031 onwards.

Members of the Local Plan Sub-Committee were requested to re-assess a number of small sites and to determine if they could be allocated for development. These sites included those which had support from a Parish/Town Council and sites where planning concerns could be overcome by reducing capacity. It was anticipated that 417 dwellings could be identified as a consequence of this re-assessment. It was noted that development on each site would be subject to planning permission being granted and that the capacity of a site could increase or decrease depending on other planning factors such as design, ecology and highway considerations.

Inset maps identifying each site were attached in an Appendix to the report.

In accordance with the statutory Plan making process, the draft Local Plan would be subject to public consultation at the Regulation 18 and Regulation 19 stages of the Plan making process.

#### **DECISION:**

- (1) That site ASHE2009 – Foxes Road, Ashen is not allocated for development.
- (2) That site BOCN2038 – Land to the South of Highfield Stile Road, Bocking is not allocated for development.
- (3) That site BULM2056 – The Bungalow, Bulmer Tye is not allocated for development.
- (4) That site BULM2059 – Land adj. to Ryes Lane, Bulmer Tye is not allocated for development.
- (5) That site BULM2062 – Land adj. to Kitchen Hill, Bulmer is not allocated for development.
- (6) That site BURE2070 – Land at Old Barn Road, Mount Bures, Bures Hamlet has a defined development boundary.
- (7) That site BURE2071 – Woolpit Downs, Parsonage Hill, Bures is not allocated for development.
- (8) That site CASH2078 – Public House with car park, 1 Crouch Green, Castle Hedingham is not allocated for development.

- (9) That site CASH2079 – Land behind Memories, Crouch Green, Castle Hedingham is not allocated for development.
- (10) That site CRES2107 – Land to the North of Polecat Road, Cressing is not allocated for development.
- (11) That site EARL2120 – Land at Woodpeckers, Lowesfield, Earls Colne is not allocated for development.
- (12) That site EARL2126 – Land North of Station Road, Earls Colne is not allocated for development.
- (13) That site FEER2131 - Little Barrows, Worlds End Lane, Feering is not allocated for up to five self-build and custom-build dwellings.
- (14) That site GNBC2154 – Land to the rear of 110 London Road, Braintree is included within the development boundary for Braintree.
- (15) That site GRYE2175 – Land North of Little Yeldham Road, Little Yeldham (adj. Great Yeldham) (smaller area than previously proposed) is allocated for development.
- (16) That site GRYE2176 – Land West of Nuns Walk, Great Yeldham is included within the development boundary for Great Yeldham.
- (17) That site HELI2206 - Land South-East of Haverhill Road, Pale Green, Helions Bumpstead is not allocated for development.
- (18) That site KELV2215 – Land North-East of Cranes Lane, Kelvedon is allocated for residential development and other uses as described in planning permission 23/00816/OUT.
- (19) That part of site KELV2221 – Land adj. Davey House, London Road, Kelvedon is allocated for the development of 10 dwellings.
- (20) That site PANF2508 – Land North-West of Panfield Lane, Braintree is not allocated for development.
- (21) That site RAYN2236 – Land to the West of Rayne (area of land to the North of The Street, Rayne) is not allocated for development.
- (22) That site RIDG2248 – Land East of Ashen Road and North of the former Kings Head Public House, Ridgewell is not allocated for development.

- (23) That sites SHAL2263A and SHLA2263B - Land at Levelly Field, North of Stondonfield, Church End, Shalford are not allocated for development.
- (24) That site STEB2285 – Land West of North Road, Steeple Bumpstead is allocated for development.
- (25) That sites TOPP2294 and TOPP2295 – Land off Park Lane, Toppesfield are included within the development boundary for Toppesfield.
- (26) That site WITN2252 - Land North of Witham is part allocated for development (the proposed area for development is to be reduced to avoid the loss of a hedgerow and the potential density is to be assessed).

A motion to not allocate a defined development boundary at site BURE2070 – Land at Old Barn Road, Mount Bures, Bures Hamlet was moved and seconded, but on being put to the vote the motion was declared LOST. Furthermore, in a correction to the Agenda report, it was stated that Mount Bures Parish Council had not supported the development of this site.

Councillor J Martin left the meeting when site WITN2252 – Land North of Witham was considered and determined.

After consideration of this Item the meeting was adjourned for a short comfort break from 8.18pm to 8.30pm.

## 85 **BRAINTREE DISTRICT SETTLEMENT FRINGE STUDY – LANDSCAPE SENSITIVITY ASSESSMENT 2025**

**INFORMATION:** As part of the review of Braintree District Local Plan, the Council was updating its evidence base and it had commissioned The Landscape Partnership to produce a District Settlement Fringe Study. This study assessed the capacity of the landscape on the fringes of nine key settlements in the District to accommodate housing development. The settlements were the main towns of Braintree, Halstead and Witham and the key service villages of Coggeshall, Earls Colne, Hatfield Peverel, Kelvedon and Feering and Sible Hedingham. Silver End had also been included in the assessment as it had been included as part of a previous study published in 2015.

Several parcels of land containing landscape features had been identified around each of the main towns and key service villages/village. These parcels of land had been assessed for their landscape sensitivity and each parcel had been allocated a score of either low, medium-low, medium, medium-high, or high sensitivity. It was reported that the term ‘sensitivity’ had replaced the term ‘capacity’, which had been used in the previous study.

The Landscape Sensitivity Assessment established the relative sensitivity of different areas of landscape and it included an assessment of susceptibility to landscape change, visual change, identification of landscape value and an assessment of overall landscape sensitivity. The findings of the Study would be added to the evidence base for the emerging Local Plan and the Study would be used in the assessment of development sites going forward on the assumption that less sensitive landscapes should have a greater capacity to accept development than landscapes of higher sensitivity.

As part of the Study, a review had been undertaken of existing green buffers within the District to assess which settlements were separated, the effectiveness of that separation, the land uses within a buffer, and the case for the retention, extension, or removal of a buffer. The outcome of this review was summarised in the Agenda report. Guidance had also been included setting out how green buffers should be assessed. This stipulated that a separation distance of less than 500 metres between settlements could justify the provision of a green buffer. Recommendations had been made to extend some of the existing buffers. However, it had also been recommended that three green buffers within Braintree should be removed. These were land between Bocking and High Garrett; land between Deanery Hill and Bocking Church Street, Bocking; and land at Blackwater Nature Reserve, Straits Mill, Bocking.

**DECISION:** That the Braintree District Settlement Fringe Study: Landscape Sensitivity Assessment 2025 be approved as part of the evidence base for the emerging Braintree District Local Plan, subject to the green buffer between Bocking and High Garrett being retained.

86 **BRAINTREE DISTRICT LOCAL PLAN REVIEW – REGULATION 18 DRAFT ALLOCATIONS – LARGE SCALE STRATEGIC SITES ASSESSMENT – NORTH AREA**

**INFORMATION:** Consideration was given to a report on proposed large scale strategic sites for inclusion in the Braintree District Local Plan Review. It was reported that as part of the review of the Local Plan, the Council had carried out a 'call for sites' process in which developers, landowners and their agents had been invited to submit sites to be considered for allocation in the Local Plan. The report related to proposed larger scale site allocations for the Northern part of Braintree District.

The report provided an assessment of sites which had been put forward which had an estimated capacity of more than 500 dwellings. Such larger scale sites could help the Council to meet its identified housing needs in the medium to long term and beyond the Plan period.

It was reported that the Government's Standard Housing Methodology calculation had identified the need for a significant increase in the number of houses to be provided in the District. This represented a significant challenge and it was likely that several large scale sites would need to be identified for inclusion in the Plan. Early trajectory work had indicated that sufficient sites should be identified in the Local Plan to provide an additional 700-1150 house completions per year from 2030. It was estimated that three or more new large-scale sites would be required to achieve that target. Consideration would also have to be given to the lead-in time for such larger developments and the likely infrastructure which would be needed to support them.

Members of the Sub-Committee were requested to determine which sites located in the Northern area of the District should be allocated for development.

Maps showing the location and extent of each site were attached as Appendices to the report.

#### **DECISION:**

- (1) That site EARL2125 – Colne Valley Golf Club, Earls Colne is not allocated for development.
- (2) That site FINC2502 - Former RAF Wethersfield Airbase, Sculpins Lane, Wethersfield is allocated for re-development as identified on the Inset Map contained in the draft Local Plan and that 'Draft Policy LPPXX – Former Airbase RAF Wethersfield', as set out below, is included within the new Local Plan.

#### **'Draft Policy LPPXX – Former Airbase RAF Wethersfield**

A Development Plan Document or Area Action Plan is to be produced for the former airbase at Wethersfield. The document will seek to meet the following criteria:-

- To identify appropriate viable uses, locations and scale of potential development for Wethersfield Airbase.
  - That any development on the site minimises landscape impact.
  - That any development on the site would protect and enhance sensitive historic and natural assets.
  - The integration of the site into the wider countryside in order to maximise recreational opportunities.'
- (3) That sites COLE2100 - Land East of Blue Bridge, Halstead, GGHR2141 - Land to South-East of Halstead, GGHR2416 - Land East of Colchester Road,

Halstead and HASA2179 - Land North and East of Halstead are allocated as a strategic growth location.

- (4) That site GGHR2142 – Land West and North of Star Stile Cottages, Star Stile Road, Halstead is included within the strategic growth location proposed above (Recommendation (3)).
- (5) That site GOSF2158 - Land at Aylewards Farm, Gosfield is not allocated for development.
- (6) That site STUR2293 – Land South of Haverhill is not allocated for development.

Councillor T Cunningham left the meeting when site FINC2502 – Former RAF Wethersfield Airbase, Sculpins Lane, Wethersfield was considered and determined.

87 **BRAINTREE DISTRICT LOCAL PLAN REVIEW – GENERAL PROGRESS UPDATE**

There was nothing to report under this Item.

During the course of their discussions, Members moved, seconded and agreed, as required by the Constitution, that the meeting be extended beyond 9.30pm to enable all business on the Agenda to be transacted.

The meeting commenced at 6.30pm and closed at 10.03pm.

Councillor G Spray  
(Chairman)

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## Bures Neighbourhood Plan – Reg 16 Consultation | (19) Bures Neighbourhood Plan Team

### Comments from the Bures NP Steering Group on the Reg 16 representations – Dec 2025

Please see below the comments from Bures Neighbourhood Plan Steering Group on the responses received by Babergh DC at the Reg. 16 stage of the NP process.

Reg 16 doc ref	Respondent	Bures NP ref	Bures Steering Group comment
1	Essex CC	Para 12	<p>No objection to replacing the final two sentences, but with the minimum wording necessary to convey what has been asked.</p> <p>While we thank ECC for their comments, as a general observation, the Bures NP Team felt that some of their requests went to a level of their policy detail that does not need repeating in our neighbourhood plan.</p>
		Page 10 - Our Vision for Bures	This change seems unnecessary. Only change if this is seen as required by the Examiner.
		Policy BP4 d., and final paragraph	No objection to the inclusion of the word 'multifunctional', but only if this is seen as required by the Examiner.
		Policy BP4	<p>No objection to adding a reference to Natural England Green Infrastructure Planning and Design Guide, and the inclusion of the suggested wording:</p> <p><i>Development proposals must be designed to maximise opportunities for the preservation, restoration, enhancement, and connection of natural habitats having regard to the Essex and the Suffolk Local Nature Recovery Strategies or future replacements.</i></p>

		Policy BP5	No objection to the inclusion of the word 'multifunctional', but only if this is seen as required by the Examiner.
		Policy BP7	No objection to the suggested change.
		Policy BP9	We accept that our policy (BP9) covers general principles but the inclusion of so much detail seems unnecessary, and may not translate across our neighbourhood plan area as a whole given that it is part in Essex and part in Suffolk.
		Policy BP10	<p>No objection to including the suggested changes, but with the minimum wording needed to convey the meaning of the policy.</p> <p>Any new paragraph 5 will need to refer to the latest Sustainable Drainage System guidance published by both Essex County Council and by Suffolk County Council. We suggest:</p> <p><i>'Developments to adhere to Essex and Suffolk policies in this regard and adhere to Sustainable Drainage Design Guides and SUDS Guides for Essex and Suffolk.'</i></p>
		Policy BP12 c.	See also our response above to ECC's comment on 'Our Vision for Bures'. The words 'safe' and 'direct' are seen as unnecessary and urban in approach to paths.
		Policy BP17	<p>No objection to the addition of the following new criteria:</p> <p><i>h. Community owned or led renewable energy schemes (including micro photovoltaic or bio-mass projects and battery storage) will be supported subject to the following criteria:</i></p> <p><i>i. The siting and scale are appropriate to its setting and position in the wider landscape;</i></p>

			<p><i>ii. It does not give rise to unacceptable landscape or visual impact, either in isolation or cumulatively with other development;</i></p> <p><i>iii. It does not create an unacceptable impact on the amenities of local residents;</i></p> <p><i>iv. It does not have an unacceptable impact on a feature of natural, historic (including its setting) or biodiversity importance.</i></p> <p><i>The primary purpose of such projects is understood to be for the supply and benefit of local communities.</i></p> <p><i>Any such projects that result in the loss of good quality agricultural land will not be supported.</i></p>
		BP17 – new supporting text?	Including all of this text (page 9 of ECC’s response) seems excessive. Perhaps a summarised version could be included in our Plan?
		Policy BP18	Agree to the suggested change.
		Policy BP19	<p>While grateful for ECC’s support for this policy, we are also unsure if of the request for a new paragraph to refer specifically to their policies GE1 and GE2 is appropriate, or necessary.</p> <p>As mentioned above, we also felt that such an addition does not recognise that ours is a cross boundary plan, and we are not aware of an equivalent officer association agreement in Suffolk.</p>
		Community Action 9	<p>Agree with the proposed amendment but ECC’s suggestion at this point seems to fail to recognise the cross-boundary nature of our Plan, i.e., the reference to ‘BDC and ECC’ presumably means ‘Braintree District Council and Essex County Council.’</p> <p>The following would be more applicable to our NP area as a whole:</p>

			<p>'The Parish Councils will work with <i>the relevant county and local planning authorities</i> to effectively accelerate the installation of affordable and reliable gigabit speed broadband and 5G mobile connectivity <i>across the neighbourhood plan area</i> and at Community and/or Business hubs and to establish an effective outreach programme that facilitates inclusion of those who currently remain digitally excluded.'</p>
		Policy BP22 'New Businesses'	<p>No objection to the suggested change but we are unsure about some of the specifics, e.g., connections to at least two open access network provider[s].</p>
		Policy BP23	<p>No objection in general to the proposed changes but, on the proposed change to criterion b., we refer back to our thoughts above on the use of words 'safe, direct'.</p> <p>We know that rural paths in many cases can only offer indirect routes.</p>
		Community Action 12	<p>Welcome the suggestion to report these local priorities to the Braintree Local Highway Panel.</p>
		Community Action 13	<p>Agree to the suggested change.</p>
		Design Guidance and Codes	<p>The Design Guidance and Codes document was produced by AECOM through the Locality Technical Support programme. That programme is no longer available so getting AECOM to make further changes may not be possible.</p> <p>Please also see the comment from Babergh DC on this matter.</p>

<b>2</b>	<b>Suffolk CC</b>	Fig 33, 34, and 35	Agree that it would be sensible to change these three figures in line with 2025 Environmental Agency National Predicted Flood Maps.
		Reg 14 Consultation Overview	Parish Council meetings took place in November 2024 and January 2025.
		Fig 64	Agree to suggestion of placing a box around Figure 64 for clarity.
<b>3</b>	<b>Herts CC</b>	No comments.	Response noted.
<b>4</b>	<b>Babergh DC</b>	NPPF cross-ref's	Agree to the change.
		Glossary	Agree to changes to definitions of Affordable Housing and Community Led Development.
		Para 10 / Para 180	Agree. Second sentence should refer to the 'Joint Local Plan Review'.
		Para 181	<p>Agree that the second sentence should be amended to read: <i>'These are now expected to be set out in the Councils Joint Local Plan Review'.</i></p> <p>Also agree to the proposed change to the last two sentences so they read: <i>'Following a Call for Sites undertaken in early 2024, the Councils published information relating to that in September 2025. It shows that one site; the garages off Claypits Avenue, Bures St Mary, has been submitted for consideration. A further Call for Sites exercise, due to end in January 2026, is being carried out.'</i></p>
		Para 76 and 75	Reverse order agreed – National, then district.
		Para 82	<p>Agree to change of wording to read:</p> <p><i>'Both Essex County Council (in July 2025) and Suffolk County Council (in October 2025) have now put in place Local Nature Recovery Strategies (LNRS). These focus on highlighting and revitalising natural habitats across the respective counties.'</i></p>

			Also agree to the suggestion to amend footnote 21.
		Policy BP6	Agree. The words ' <del>and in private gardens</del> ' should have been deleted from this policy.
		Policy BP8	Agree amendment to the second paragraph to read:  <i>'Where new housing or other significant new development schemes are proposed, capacity impact statements should be confirmed with the relevant water companies, such as Anglian Water.'</i>
		Policy BP9	Please see reply below to Respondent 5 [Braintree DC] on this.
		Policy BP12 (a)	Understand the tension between Babergh and Braintree policies and accept the suggested rewording of criterion a:  <i>'It can be demonstrated that the current use is not economically viable and is not likely to become viable. Supporting financial evidence should be provided, including evidence of genuine attempts made to advertise the premises for sale/let over a sustained marketing period. That marketing period may first need to be agreed with relevant planning authorities but should be for not less than six months and, preferably, for not less than 12 months.'</i>
		Community Action 7	Agree that moving this CA to after Policy BP19 make sense.
		Community Action 7 (page 72 and 123)	Comment noted. Amend this CA title to read: ' <i>Community Safety and Enhancement of the Village Centre</i> '
		Para 183	Agree to amending this paragraph to bring it up to date. We suggest: ' <i>The Chambers Bus Depot site (ref no. DC/24/01103/FUL) has been granted planning permission for 14 apartments/houses and a commercial unit.'</i>

		Policy BP18	Agree to the deletion of the first paragraph that begins with 'New housing developments will prioritise ...' .
		Policy BP19	Agree to all the proposed changes. We can also confirm that: <ul style="list-style-type: none"> <li>• Criterion i. should refer to Policy BP7</li> <li>• Criterion k. should refer to BU 07</li> </ul>
		Para 231	Agree. Amend the end of second paragraph to read: <i>'These have been locally identified and assessed as part of developing the Bures Neighbourhood Plan using guidance published by Historic England (see Appendix F).'</i>
		Policy BP21	Agree. Add to the end of the opening paragraph: <i>'This will describe the significance of the asset, the works being proposed and why, and how the significance of the asset will be affected by those proposals, along with any mitigation measures.'</i>
		BP21 (NdHA 19) and Appendix F (pg 187)	<p>The comments on the Cricket Club Pavilion are noted. If the Examiner would allow, we suggest:</p> <p>Amending entry 19 in Policy B21 to read: <i>'19. Bures Cricket Pavilion - note: lost to fire 9.9.25'</i></p> <p>In Appendix F, page 187, add the suggested text below the photograph next to the assessment so it reads:</p> <p><i>Note: Having met the assessment criteria to qualify as a NdHA the Pavilion was lost to a fire 9<sup>th</sup> September 2025. The community are determined to see a new Pavilion come forward in its place which may also be suitable to qualify as a NdHA. If so, that could be assessed through future reviews of this Neighbourhood Plan.</i></p>

		Policy BP24	<p>Agree that we should revert back to the previously suggested wording. Also agree with suggestion to amend the final paragraph to read:</p> <p><i>'Any proposed improvement to the PRow network should consider and help deliver routes that meet the needs of all users, including cyclists, horse riders, people with limited mobility, and those with pushchairs and wheelchairs.'</i></p>
		Design Guidance and Codes	Understand the point made and we hope for sympathetic approach.
<b>5</b>	<b>Braintree DC</b>	Policy BP4	<p>Agree to the addition of the following at the end of point c), rather than replacing point b)</p> <p><i>'Off-site biodiversity net gain (BNG) must be secured for a minimum of 30 years. Such provision cannot be located on unrelated land outside an applicant's control unless it forms part of a designated habitat bank with legally secured long-term management.'</i></p>
		Policy BP7	According to NPPF paragraph 108 (Dec 2024), our understanding is that use of the words 'Green Belt Policy' is correct.
		Policy BP8	See change agreed above in response to Babergh DC's suggestion.
		Policy BP9	<p>Comment noted. Suggest replacing the current wording with:</p> <p><i>In line with their responsibilities with regard to new development, Anglian Water and the Environment Agency will ensure that the capacity of the existing waste water infrastructure system is able to cope. Where this is not the case, upgrades and capacity will be provided as appropriate.</i></p>
		Policy BP19 h.	Change agreed. See also Babergh DC's suggestion re this policy.



		Design Guidance and Codes	See also our response to Babergh DC's comments on this. Agree to making these changes if it is possible.
<b>6</b>	<b>Colchester City Council</b>	Policy BP7 Request to add a Local Green Space	The Bures NP Team note that a section of the identified land in Mount Bures outside of the designated neighbourhood plan area has been and is still being used as a 'green', but they do not accept at this time that there is a need to allocate the part of it which falls within Bures Hamlet as a Local Green Space through Policy BP7.
		Policy BP16	Agree. First bullet point to begin as suggested: ' <i>A Housing Needs Survey of Bures Hamlet and Bures St Mary residents ...</i> '
		Para 173 and 174	Suggest that the change is not necessary but, in paragraph 173, we could amend 'HNA' to read 'HNA (AECOM, Dec 2022)'
		Consultation Reg.14	Mount Bures Parish Council were on the list of statutory bodies contacted by Jenny Wright [Clerk to Bures Hamlet PC] at the start of the Reg 14 pre-submission consultation stage.
<b>7</b>	<b>Mount Bures PC</b>	Consultation Reg.14	See also above. An email was sent to Kevin Money (Clerk to Mount Bures Parish Council) on 1 <sup>st</sup> September 2024. Evidence is available.
<b>8</b>	<b>Historic England</b>	No new comments.	Response noted.
<b>9</b>	<b>Colchester Nat. History Society</b>	Comments on Policies BP1 through to BP9	We thank Colchester Natural History Society for their support for our Policies BP1, BP2, BP3, BP4, BP5, BP6, BP7, BP8, & BP9.
<b>10</b>	<b>Environment Agency</b>	Policy BP18	We would have no objection to adding the additional paragraph, if the Examiner considers it necessary:  <i>The Bures NP Area is on a principal Aquifer and is in source protection zone 2 and 3. Land that may have been affected by contamination as a result of its previous use or that of the</i>

			<i>surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk in line with EA recommendations.</i>
<b>11</b>	<b>Water Management Alliance</b>	No comments.	Response noted.
<b>12</b>	<b>Essex Police</b>	Policies BP7, BP11, & BP19	The support for these policies is noted.
<b>13</b>	<b>Nat. Grid Electricity Transmission</b>	Reference made to NGET assets.	We note that NGET assets cross over our designated plan area. No further action required.
<b>14</b>	<b>Mr Child</b>	Request for trees at Woolpit Downs to be included as Locally Valued Trees / given TPO status.	Mr Child appears to be referring to the group of Oaks and other trees along Colne Road leading to Parsonage Hill which, in response to our Reg 14 consultation exercise, have been identified as Locally Listed Trees #25, and are shown in Appendix D on the map on page 151 and in the table entry on page 160.
<b>15</b>	<b>Ms Firth</b>	Request for additional Key View from Mount Bures	The Bures NP Team considered a number of views towards and within Bures Hamlet and Bures St Mary when preparing our Plan. Responding to this representation, our current thinking is that this view does not have sufficient compositional quality, or identifiable focus, or point of interest to warrant inclusion at this time.
<b>16</b>	<b>Harrison</b>	Support for the NP.	We welcome the support for the Bures NP.
<b>17</b>	<b>Hill</b>	Request for additional Green Space.	Please see our response to Colchester City Council's comment on this matter.

		Policy BP2	Other impacts on rural lanes would not be covered by planning. In response to this representation we propose that an additional action be added to Community Action 14 Walking Routes as follows: <i>F. Rural Lanes will continue to be considered for Quiet Lanes Status to help to ensure their continued special features are protected.</i>
<b>18</b>	<b>James Lawson</b>	Policy BP18. Request to add a reference to Old Barn Road, Mount Bures	No change due to the suggestion being to add a development boundary. Policy BP18 refers to the settlement boundaries around the parishes of Bures Hamlet and Bures St Mary in this NP area and not to development boundaries.

### **Additional note for the Examiner re Key View # 17**

Key View # 17 - View along track from Lamarsh towards Bures.

When reviewing our Plan, we have noted that the directional arrows for Key View #17; the 'View along the track from Lamarsh to Bures' which are shown on Figure 14, page 23 (repeated as page 129), and on the inset map on page 145 of our Plan all have these pointing towards Lamarsh rather than from the Lamarsh track towards Bures.

We do not think that anybody has been disadvantaged and propose to correct the error in the next version of our Plan.