

www.landuse.co.uk

## Appendix 2 to Additional Sustainability Appraisal of North Essex Section 1 Local Plan

Workshop record

Prepared by LUC July 2019

Project Title: North Essex Section 1 Local Plan Additional Sustainability Appraisal

**Client**: North Essex Authorities

Version	Date	Version Details	Prepared by	Checked by	Approved by
3.0	17/7/2019	Final	Jon Pearson	Jon Pearson	Jeremy Owen
			Georgina Pratt		

Last saved: 17/07/2019 11:54



www.landuse.co.uk

## **Appendix 2 to Additional Sustainability Appraisal** of North Essex Section 1 Local Plan

Workshop record

Prepared by LUC July 2019



### **Contents**

1	Introduction Background to workshop Purpose of workshop and agenda Invitations and attendance	<b>2</b> 2 2 3
2	Presentations	5
3	Questions and answers	70
4	Discussion groups	74

### 1 Introduction

1.1 This document provides a record of the 'check and challenge' workshop held on 29 March 2019 as part of additional Sustainability Appraisal (SA) work by LUC for the North Essex Authorities' Section 1 Local Plan.

### Background to workshop

- 1.2 The North Essex Authorities (NEAs), comprising Braintree District Council (BDC), Colchester Borough Council (CBC), and Tendring District Council (TDC), commissioned LUC in 2018 to carry out additional SA work with respect to Section 1 of the shared Publication Draft Section 1 Local Plan. This commission was undertaken in response to the Inspector's concerns regarding the SA work undertaken to date.
- 1.3 Focussed consultation on a statement setting out the proposed method and scope of the additional SA work took place during Dec 2018-February 2019. One element of the proposed approach to the SA was a 'check and challenge' workshop. This workshop, to be held after draft results of Stage 2 of the SA had been produced, was originally intended to test the reasonableness of the emerging findings with officers from the NEAs plus invited stakeholders with interests and expertise in environmental, social and economic issues.
- 1.4 The method consulted on in the Method Scoping Statement has continued to evolve in light of consultation comments received on it and during drop-in sessions with site promoters and other stakeholders held jointly by LUC and the NEAs during January 2019. In response to requests for additional engagement, the scope of the 'check and challenge' workshop was expanded to allow site promoters and other stakeholders to attend, and the timing brought forward to allow early dissemination of draft results from Stage 1 of the SA and input to the approach to Stage 2.

### Purpose of workshop and agenda

- 1.5 The purpose of the workshop was to give attendees the opportunity to engage with the SA process. There was an opportunity to ask questions at the end of each agenda item, and a breakout session, the outputs of which were intended to help inform the next stage of SA work.
- 1.6 The agenda of the workshop is reproduced in Table 1.1.

Table 1.1 Agenda for workshop

Timing	Agenda item	Lead
11.00 - 11.15	Arrival and registration	
11.15 - 11.25	Welcome and introductions	Emma Goodings (Braintree DC)
11.25 - 11.45	Background to the Additional SA  Why the work was commissioned with reference to the Inspector's advice	Jeremy Owen (LUC)
11.45 - 12.15	Approach to the Additional SA  Explanation of the methodology being applied by LUC to the additional SA work	Stuart Langer (LUC)
12.15 - 13.00	Stage 1 draft findings  Presentation of the draft findings of the Stage 1 assessment and implications for the next stages of the additional SA work	Jeremy Owen (LUC)
13.00 - 13.30	Lunch break	
13.30 - 13.45	Identifying alternative spatial strategies  Introduction to the challenge of identifying reasonable alternative spatial strategies for assessment in Stage 2 of the SA	Jeremy Owen (LUC)
13.45 - 15.00	Breakout work groups  An opportunity for attendees to help define the principles to identify spatial strategies for assessment in Stage 2 of the SA	Facilitated by LUC team and North Essex Authorities' officers
15.00 - 15.20	Reports back	
	Reports back on the key principles from the breakout groups	
15.20 - 15.30	Next steps	Jeremy Owen (LUC)

### Invitations and attendance

- 1.7 Invitations were extended to the statutory consultees for the SA (Environment Agency, Historic England, Natural England) plus participants in the Examination hearings for the Section 1 Local Plan.
- 1.8 Attendees who identified themselves as representing an organisation at the workshop were as follows:
  - Alresford Parish Council
  - Andrewsfield New Settlement Consortium (ANSC)
  - Carter Jonas
  - Catesby Estates

- Campaign Against Urban Sprawl in Essex (CAUSE)
- · Chelmsford City Council
- Cirrus Land
- Clockhouse Town Planning
- Coggeshall PC
- Colchester BC
- Copford with Easthorpe Parish Council
- Campaign to Protect Rural England (CPRE), Essex
- Crest Nicholson & AM Planning
- DRPP
- East Colchester Churches/ Chelmsford Diocese
- Edward Gittins Associates
- Emery Planning
- Feering Parish Council
- Feering Neighbourhood Plan Committee
- GL Hearn
- Highways England
- Indigo
- Kelvedon Parish Council
- Lightwood Strategic
- Lightwood Strategic
- Marks Tey Parish Council
- Mid and South Essex Sustainability and Transformation Partnership (Clinical Commissioning Group 'CCG')
- Pigeon Investment Management
- Ptarmigan
- Savills
- Stop Erosion of Rural Communities in Local Essex (SERCLE)
- Shalford Parish Council
- Alsop Verrill representing 6 parish councils & SERCLE
- STOP 350
- Strutt and Parker
- The Wivenhoe Society
- Trinity Planning
- Turley
- Williams Group
- Williamson Developments Ltd
- Wivenhoe Town Council
- WYG

### 2 Presentations

- 2.1 The workshop included four presentations by LUC on the following subjects:
  - Background to the Additional SA
  - Approach to the Additional SA
  - Stage 1 draft findings
  - Identifying alternative spatial strategies
- 2.2 Copies of the four presentations are provided on the following pages.



# North Essex Local Plan Section 1 Additional Sustainability Appraisal Check & Challenge Workshop 29<sup>th</sup> March 2019

North Essex Additional SA Check & Challenge Workshop 29 March 2019

### **Purpose of the workshop**



- · Background to the additional SA
- · Explain our approach to the additional SA
- Share emerging findings from Stage 1
- Provide you an opportunity to ask questions
- Gain your help in shaping the next stage of work



### **Role of SA/SEA**

- To identify, describe and evaluate the likely significant effects on the environment of implementing the plan
- · ...and of reasonable alternatives
- Taking into account the objectives and geographical scope of the plan

SA extends the scope to also include social and environmental factors

North Essex Additional SA Check & Challenge Workshop 29 March 2019

### **Background to the SA**



### Inspector's concerns

- · Objectivity of the SA
- Clarity of the alternatives and reasons for selection
- Selection of the Garden Communities and combinations for assessment
- The reasons for selecting the preferred combination and rejecting others



### **Inspector's concerns**

"It has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require"

- Satisfied with the reasons for a minimum size threshold of 5,000 dwellings for a Garden Community
- Preferred strategy needs to be viable and deliverable including supporting infrastructure

North Essex Additional SA Check & Challenge Workshop 29 March 2019

### **Background to the SA**



#### Inspector's recommended approach

#### Stage 1

- Carry out an objective comparison of the individual Garden Community options at a range of sizes
- To assess Monks Wood at both 7,000 and 5,000 dwellings
- Take into account overflying aircraft and Andrewsfield airfield

"This stage will enable adequate reasons for taking forward or rejecting each of the Garden Community options"



### Inspector's recommended approach

### Stage 2

- · Assess alternative spatial strategies for the Plan area
- · Backed up by clear rationale and descriptions
- · To include at a minimum:
  - · Proportionate growth at and around existing settlements
  - · CAUSE's Metro Town proposal
  - One, two or more Garden Communities (dependent upon Stage 1)

North Essex Additional SA Check & Challenge Workshop 29 March 2019

### **Background to the SA**



#### Inspector's recommended approach

#### Stage 2

"Provided that the alternative spatial strategies are assessed objectively and with due regard to the evidence base, the second stage assessment should provide a sound basis for the selection of a preferred spatial strategy for the Plan (which may or may not include Garden Communities)"

 The NEAs will also need to give consideration to the relationship between SA of their Section 1 and Section 2 Local Plans



### **Complications**

- · Alternatives to Garden Communities
- · The Plan period and beyond
- The relationship between Section 1 and Section 2 Local Plans
- The relationship between North Essex and neighbouring authorities
- · Infrastructure requirements and aspirations

LUC suggested a refined method which was submitted to Inspector for comment

North Essex Additional SA Check & Challenge Workshop 29 March 2019



North Essex Local Plan Section 1

Additional Sustainability Appraisal

Approach to the Additional Sustainability Appraisal

North Essex Additional SA Workshop 29 March 2019

### Approach to the Additional SA Where to begin?



"In making these suggestions I rely on the principle that deficiencies in SA may be rectified, or "cured", by later SA work"

[Para 121, 8 June Inspector's letter]

Therefore the Additional SA Work builds on the previous SA work, utilising the existing evidence base (and new evidence provided by NEAs) and the **original SA objectives**.

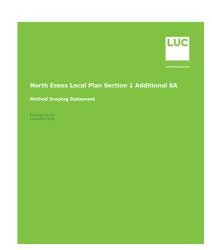
## Approach to the Additional SA Method Scoping Statement (MSS)



Draft MSS prepared, setting out LUC approach

Review of MSS by Inspector (Oct-Nov 2018)

Focussed consultation on the MSS (Dec 2018-Feb 2019)



## Approach to the Additional SA Site options



"The first stage in the further SA work should then be an objective comparison of individual GC site options at a range of different sizes" [Para 123, 8 June Inspectors letter]

### **Defining potential site options**

- Strategic 2,000 dwellings and above
- Deliverable promoted through 'call for sites' submissions
- Incremental do not already have planning permission; not allocated in Section 2 Local Plans

### **Approach to the Additional SA**



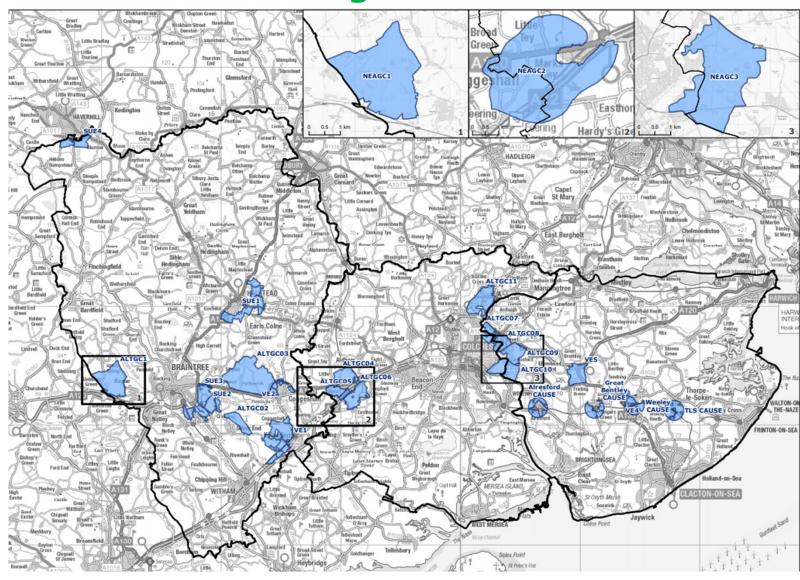
### **Garden Community Alternatives**

### **Categories of site option**

- Garden Communities in submission plan 'NEAGC'
- Alternative Garden Communities 'ALTGC'
- Strategic Urban Extensions 'SUE'
- Village Extensions (including CAUSE Metro Plan sites) 'VE'

## Approach to the Additional SA Sites assessed in Stage 1 SA





## Approach to the Additional SA Staged approach



As recommended by Inspector, Additional SA work has 2 stages:

Stage 1: SA of individual site options

Stage 2: SA of alternative spatial strategies

## Approach to the Additional SA Stage 1



As recommended by Inspector, Additional SA work has 2 stages:

Stage 1: SA of individual site options

GIS-based using new site assessment criteria

Results vs. criteria aggregated to results vs. SA objectives

Consistent assumptions about infrastructure and environmental mitigation

Stage 2: SA of alternative spatial strategies



### Approach to the Additional SA Stage 1 SA: Accessibility and environmental criteria applied in GIS

Access to Services	Environmental Harm
GPs, health centres	Heritage assets
Primary schools, middle schools, secondary schools, further and higher education facilities	Internationally, nationally and locally designated wildlife sites, Ancient Woodland, Priority Habitats
Local Centres, Town Centres, large employment areas	Designated landscapes
Railway stations, bus stops, cycle paths, public rights of way	Flood risk areas, source protection zones
Open spaces	Impact on AQMAs
	Exposure to noise from roads and railways
	Safeguarded minerals
	Agricultural land

## Approach to the Additional SA Stage 1: Accessibility buffers



### Stage 1a is based on 50% intersection with assumed walking catchments e.g.:

Access to services, facilities, transport and centres of employment	Acceptability of walking distance							
Site assessment criterion	Desirable	Acceptable	Preferred maximum	Unacceptable				
Proximity to services, facilities and employment: GP surgeries/ health centres	<= 400 m	401-800 m	801-1200 m	>1200 m				
Proximity to services, facilities and employment: primary or middle schools	<= 400 m	401-800 m	801-1200 m	>1200 m				
Proximity to services, facilities and employment:	<= 500 m	501-1000 m	1001-2000 m	>2000 m				

Etc.

## **Approach to the Additional SA Stage 1: Environmental buffers**



### Stage 1a based on 5% intersection with environmental buffers e.g.:

Environmental criteria	Likelihood of harm						
Site assessment criterion	Low	Medium	High				
Proximity to sources of air pollution	All other sites	N/A	Site is within AQMA				
Francisco de la companya de la compa	Site intersects with		Site intersects with				
Exposure to noise pollution from roads and railways	All other sites	Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB				
Intersection with mineral resources	All other sites	N/A	Intersects with Mineral Safeguarding Area				
Intersection with agricultural land	All other sites	Intersects with Grade 3	Intersects with Grade 1 or 2				

Etc.

## Approach to the Additional SA Stages 1a and 1b



Stage 1 carried out in two steps:

**Stage 1a** appraises site options based on the current situation – <u>existing</u> facilities and infrastructure

**Stage 1b** makes standardised <u>assumptions about</u> <u>new</u> facilities and infrastructure that may be provided at different scales of development and how these alter Stage 1a accessibility scores



LUC

### **Approach to the Additional SA Stage 1: Stage 1b consistent assumptions** for infrastructure provision

				Site C	apacity								
		2000 dwellings	2500 dwellings	3000 dwellings	3500 dwellings	4000 dwellings	4500 dwellings and above						
	Early Years		The development will provide new early years facilities on site										
	Primary and Middle Schools	The development will provide a new primary school on site											
	Secondary Schools	The developer Contributions to expand existing schools new second school on size											
	Youth Provision	New youth facilities will be provided on site											
cture	Open Space	Sufficient provision within site will be made											
rastri	New Local Centres	Sufficient provision within site will be made											
ng In	New Town Centres	This scale of growth is unlikely to support a new town centre											
Supporting Infrastructure	New Employment space	No assumptions have been made with regards to employment in each site											
S	Bus Rapid Transport	No assumptions have been made with regards to rapid transport											
	New Bus Services	Sufficient provision within site will be provided with the exception of VE4 (Weeley Central Garden Village) and VE5 (Tendring Central Garden Village) due to service constraints											
	New Railway Station	This scale of growth is unlikely to support a new railway station											
	Strategic Roads	No assumptions have been made with regards to strategic road provision											
	Primary Health Care			Sufficient provision within site will be made									

### **Approach to the Additional SA** Stage 1a example output



SA Criteria  - Proximity to:		GP.			Further						Open		of employ ment
Site Refere nce	re Site Name	GP surgerie s/ health centres	Primary or middle schools	Seconda ry schools	and higher educatio n facilities	Local centres	Town centres	Railway stations	Bus stops	Cycle paths	spaces and sports centres	Public Rights of Way	includin g employ ment areas and town centres
NEAGC1	Land West of Braintree	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Acceptable	Unacceptable
NEAGC2	Colchester Braintree Borders Garden Community	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Preferred Maximum	Desirable	Preferred Maximum
NEAGC3	Tendring Colchester Borders Garden Community	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Unacceptable	Preferred Maximum	Unacceptable	Preferred Maximum	Acceptable	Preferred Maximum

## Approach to the Additional SA Stage 1b example output



	riteria - nity to:	- GP surgerie	Primary	Seconda	Further and						Open spaces	Public	Centres of employ ment includin
Site Referen ce	Site Name	s/ health centres	or middle schools	ry schools	higher educatio n facilities	Local centres	Town centres	Railway stations	Bus stops	Cycle paths	and sports centres	Rights of Way (PRoW)	g employ ment areas and town centres
NEAGC1	Land West of Braintre e	Desirable	Desirable	Desirable	Unacceptable	Desirable	Unacceptable	Unacceptable	Desirable	Unacceptable	Desirable	Acceptable	Unacceptable
NEAGC2	Colchest er Braintre e Borders Garden Commun ity	Desirable	Desirable	Desirable	Unacceptable	Desirable	Unacceptable	Unacceptable	Desirable	Unacceptable	Desirable	Desirable	Preferred Maximum
NEAGC3	Tendring Colchest er Borders Garden Commun ity	Desirable	Desirable	Desirable	Unacceptable	Desirable	Unacceptable	Unacceptable	Desirable	Unacceptable	Desirable	Acceptable	Preferred Maximum

## **Approach to the Additional SA Stage 1 changes after consultation**

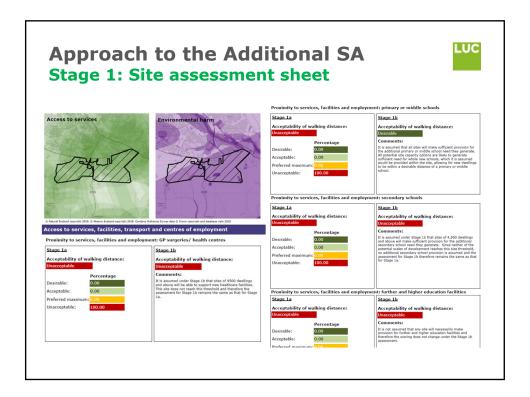


### Stage 1a amendments:

- % overlap with environmental / accessibility buffers
- · Site boundaries
- New site south of Haverhill
- New dwelling capacity options

### Stage 1b amendments:

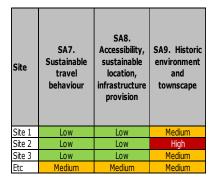
- Local Centres
- Town Centres
- Health services



## **Approach to the Additional SA Stage 1: Translate criteria to SA objectives**



					Sustai	nabilit	
Site Assessment Criterion	SA3. Improve health	SA4. Ensure and improve viability of centres	SA5. Achieve a prosperous, sustainable economy	SA6. Conserve and enhance wildlife and geological sites	SA7. Achieve more sustainable travel behaviour	SA8. Accessibility, sustainable location, infrastructure	
Proximity to services and facilities: primary or middle schools	No	No	No	No	Yes	Yes	
Proximity to services and facilities: secondary schools	No	No	No	No	Yes	Yes	
Proximity to services and facilities: local centres	No	Yes	Yes	No	Yes	Yes	
Proximity to services and facilities: town	No	Yes	Yes	No	Yes	Yes	



## Approach to the Additional SA Stage 2



As recommended by Inspector, Additional SA work has 2 stages:

### Stage 1: SA of individual site options

GIS-based using new site assessment criteria

Results vs. criteria aggregated to results vs. SA objectives

Consistent assumptions about infrastructure and environmental mitigation

### Stage 2: SA of alternative spatial strategies

Sites surviving Stage 1

Coherent spatial strategies

More qualitative assessment drawing on evidence provided by NEAs

## Approach to the Additional SA Stage 2: Identify spatial strategy options



- · Applied to sites surviving Stage 1 assessment
- Identify and assess **reasonable alternative** spatial strategies for the Plan area
- To include at a minimum:
  - Proportionate growth at and around existing settlements
  - · CAUSE's Metro Town proposal
  - One, two or more Garden Communities (dependent upon Stage 1) plus corresponding levels of proportionate growth

## Approach to the Additional SA Stage 2: Appraise spatial strategy options



Based on evidence provided by NEAs:

- Deliverability of each site including viability
- Infrastructure assumptions
- Mitigation assumptions
- Bus Rapid Transport evidence
- Other transport evidence

Different timescales considered:



## Approach to the Additional SA Reporting and consultation



#### Reporting

Report on the Additional SA, including:

- · Approach to and results of appraisal work carried out
- NEA reasons for selecting alternatives appraised and choosing the preferred strategy
- Format: addendum to original SA work

#### Consultation

Consultation on SA Addendum (and any changes proposed to Section 1 Local Plan), prior to resuming hearings



# North Essex Local Plan Section 1 Additional Sustainability Appraisal Check & Challenge Workshop 29th March 2019

North Essex Additional SA Check & Challenge Workshop 29 March 2019

### **Stage 1 draft findings**



- · High level objective appraisal using GIS
- To test out the principle of larger scale development at different locations
- · Includes:
  - Three Garden Community locations
  - Monks Wood alternative Garden Community
  - CAUSE suggested locations
  - · Other potential urban and village extensions
- · 26 locations in total appraised

## Stage 1 draft findings

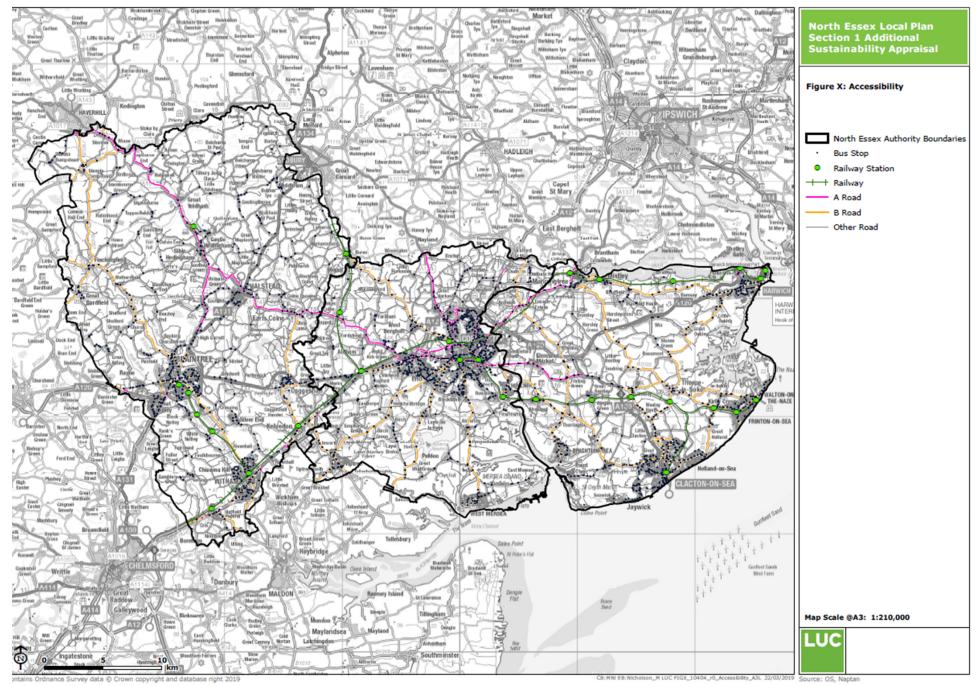


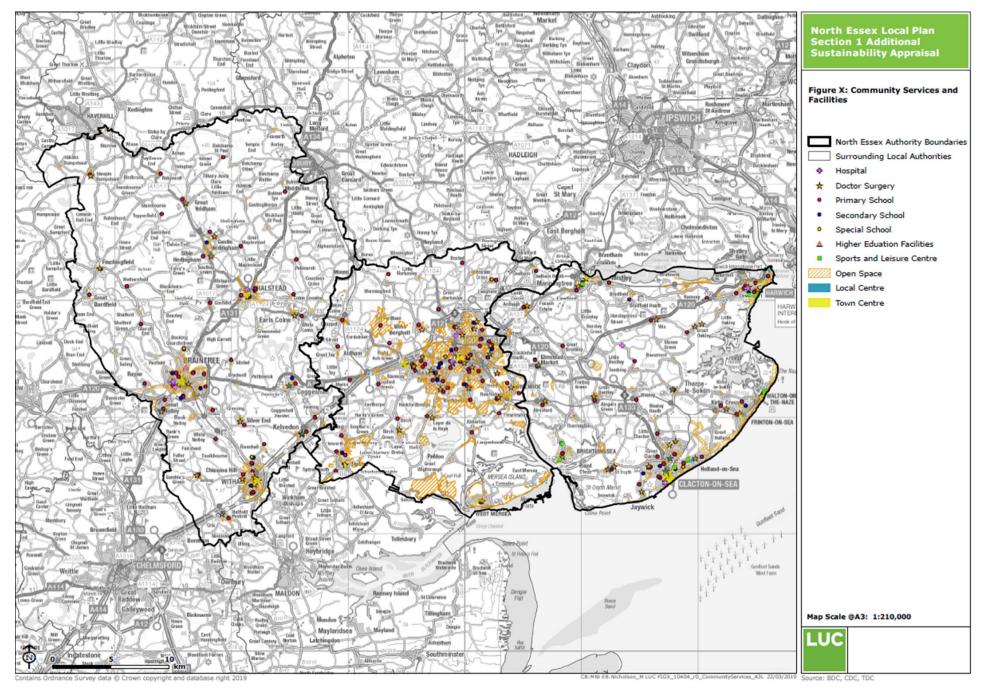
### Stage 1a assessment - existing situation

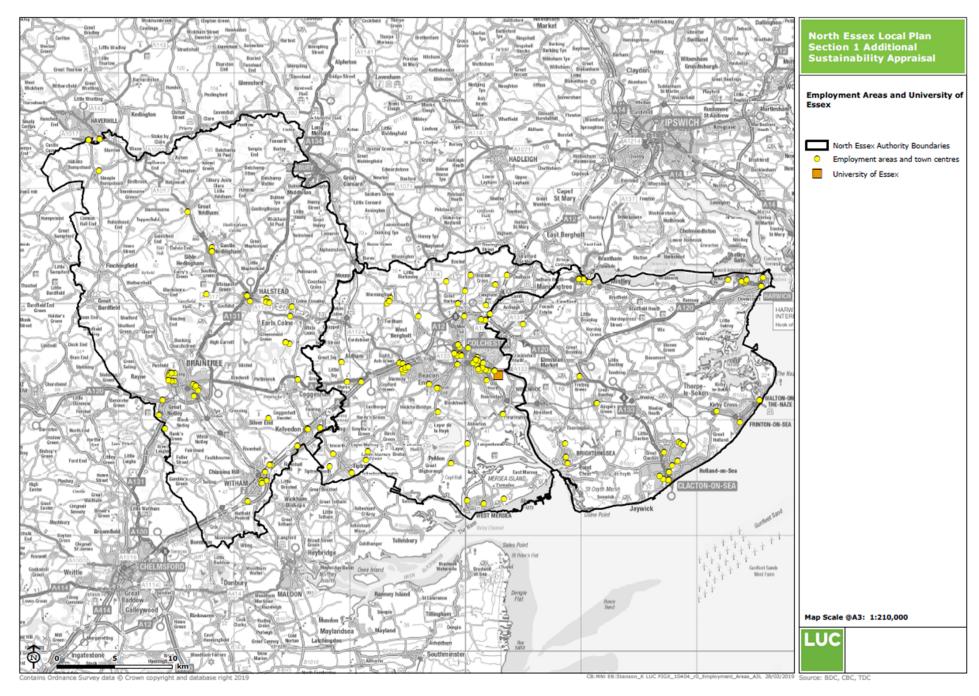
- Accessibility criteria (50% threshold)
- Environmental criteria (5% threshold)

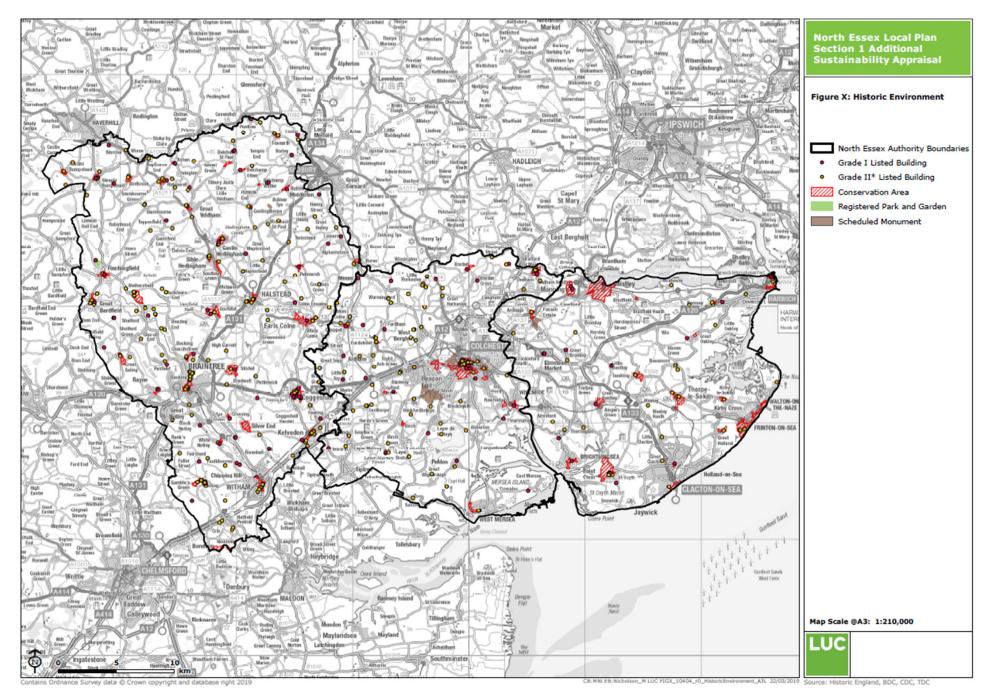
## Stage 1b assessment – factoring in potential new services/ facilities

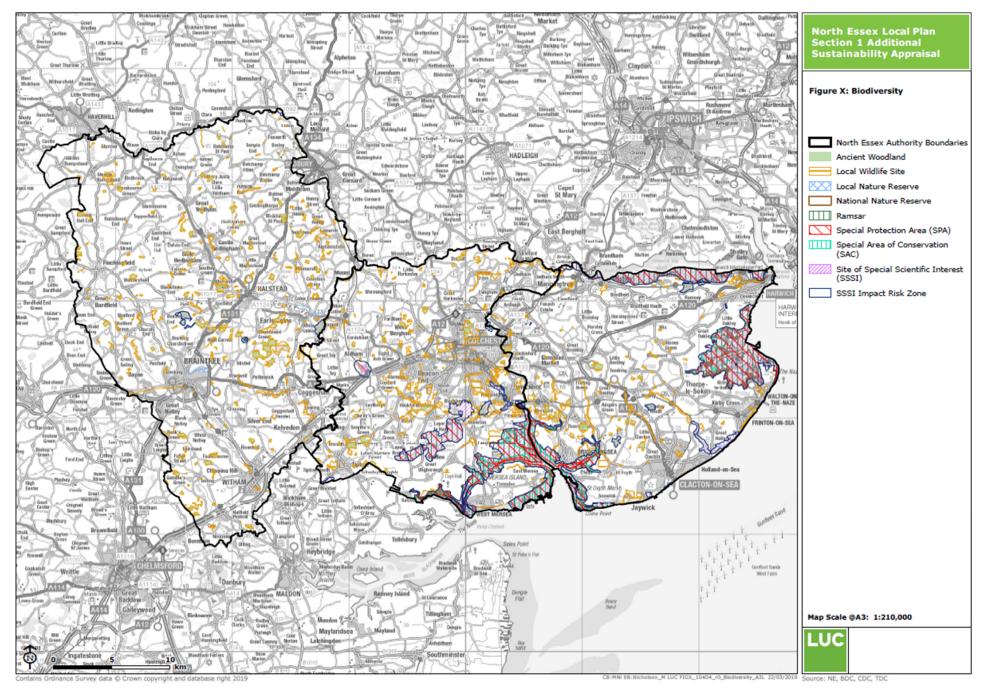
- Schools
- Local centres
- Health facilities
- Bus services
- Open space

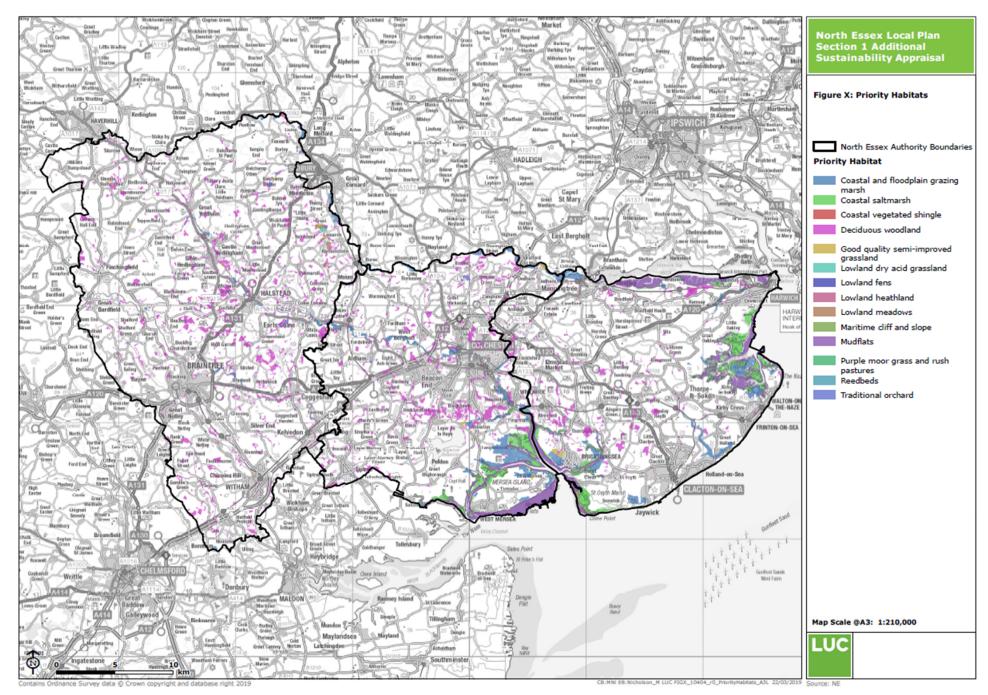


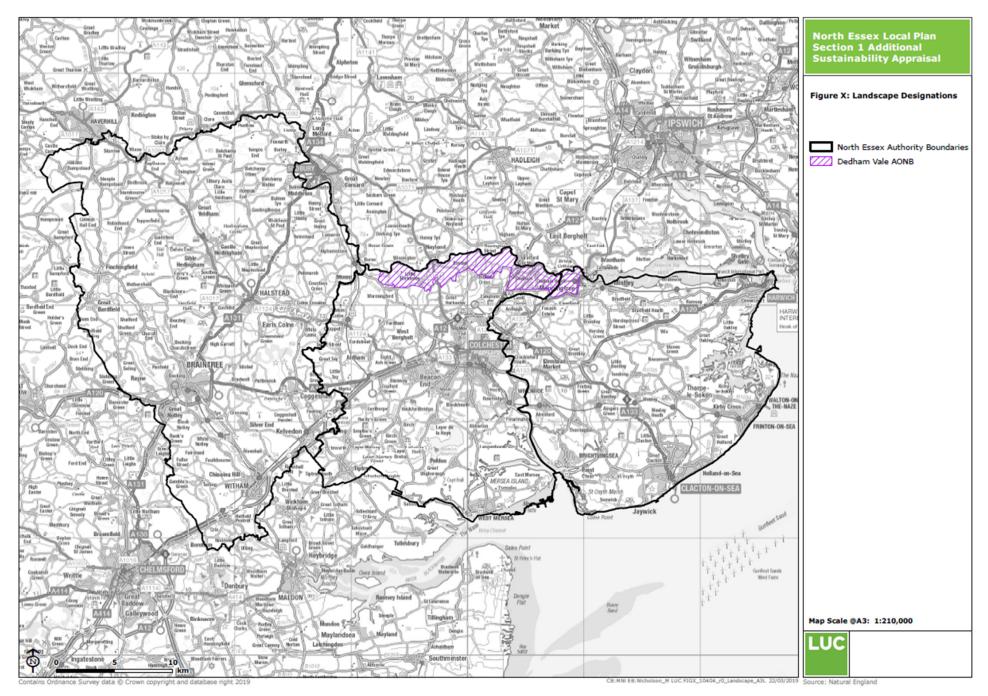


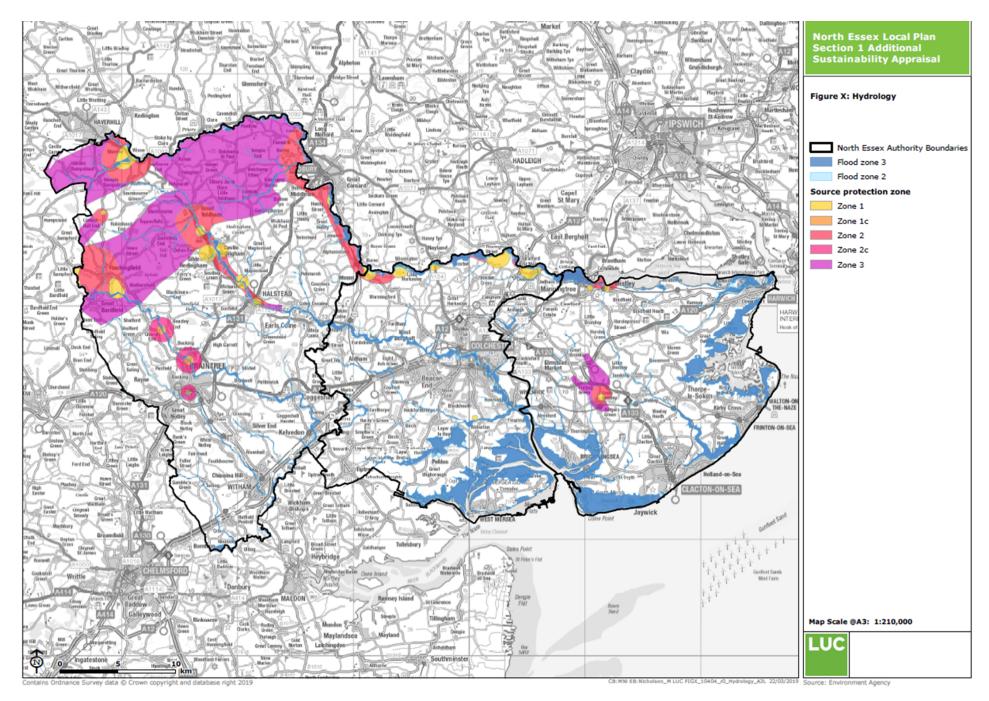


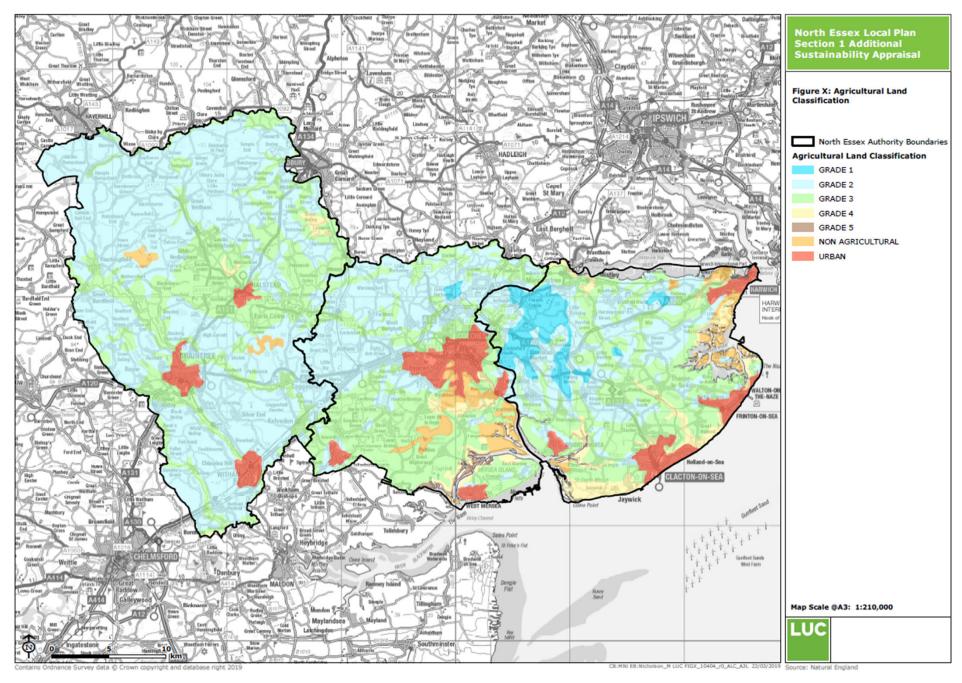




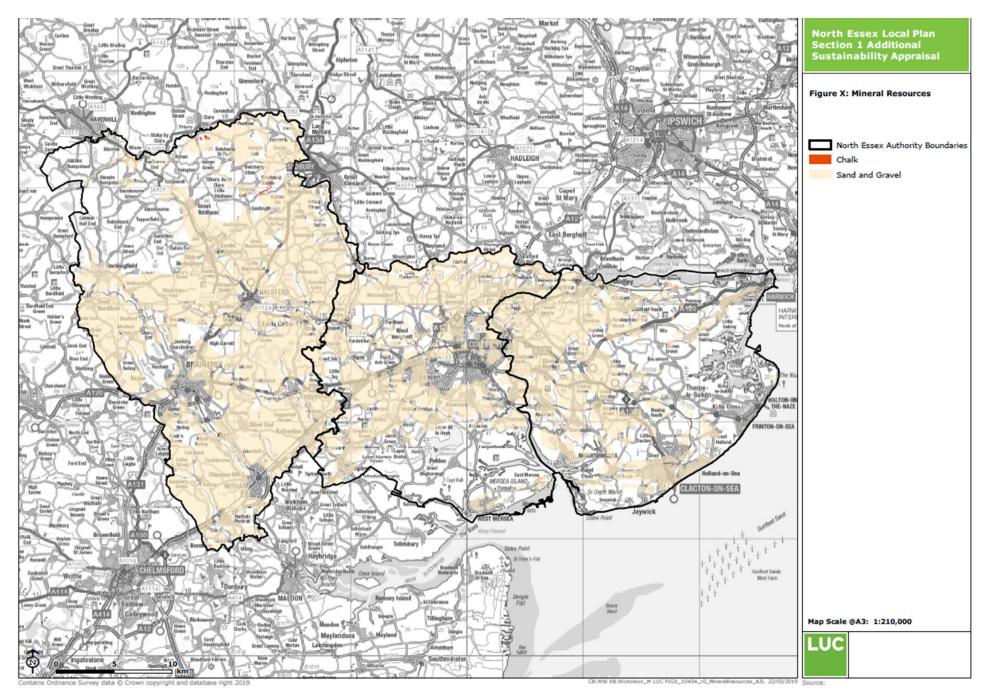






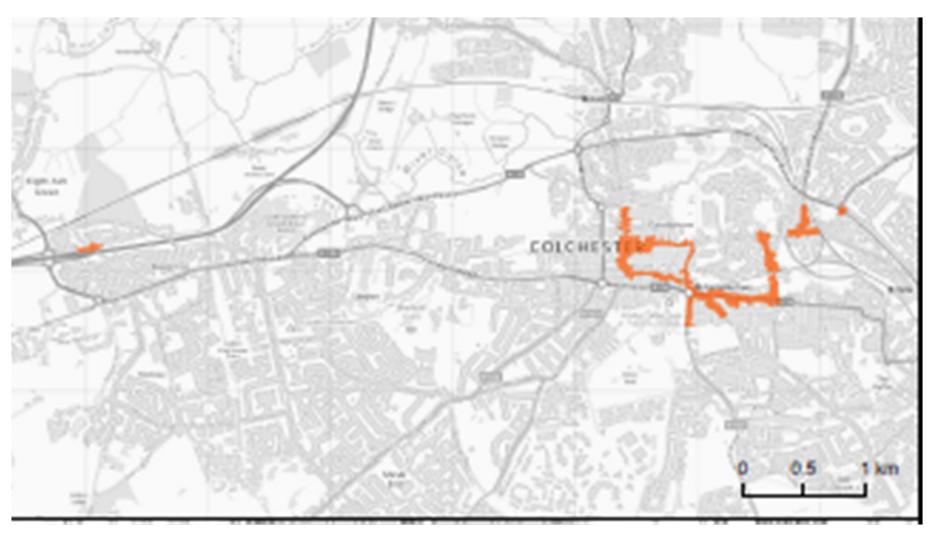


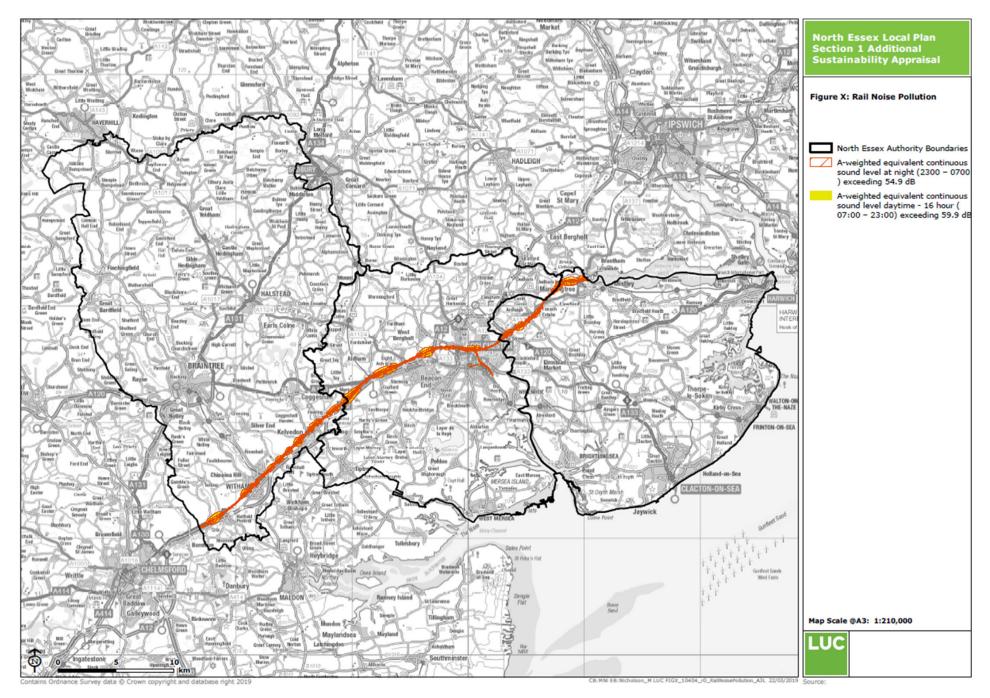
North Essex Additional SA Check & Challenge Workshop 29 March 2019

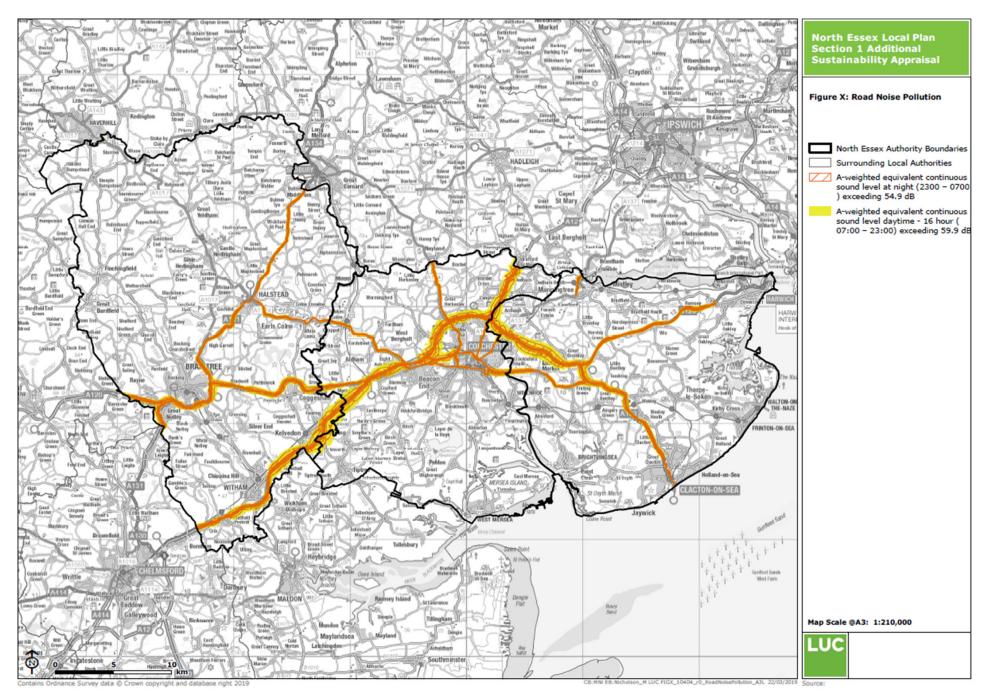


# **AQMAs**







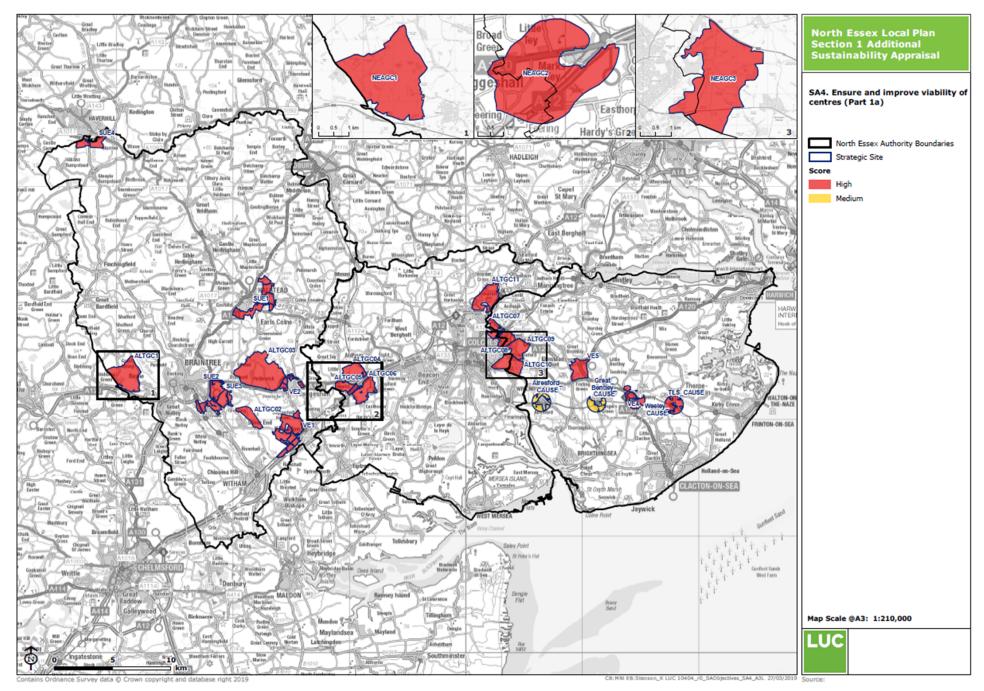


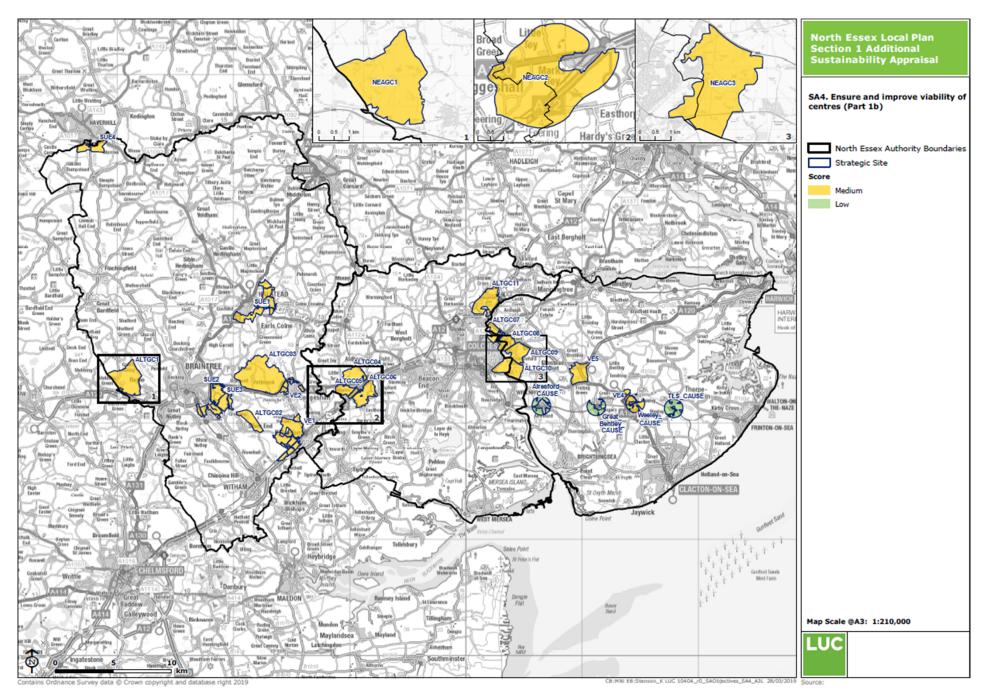
# Stage 1 draft findings

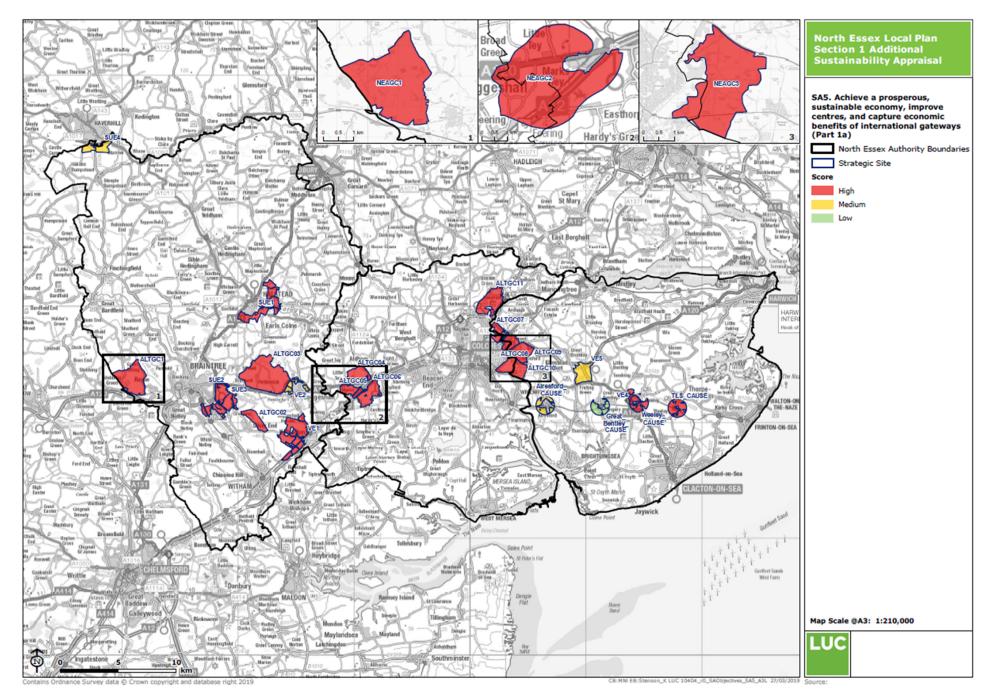


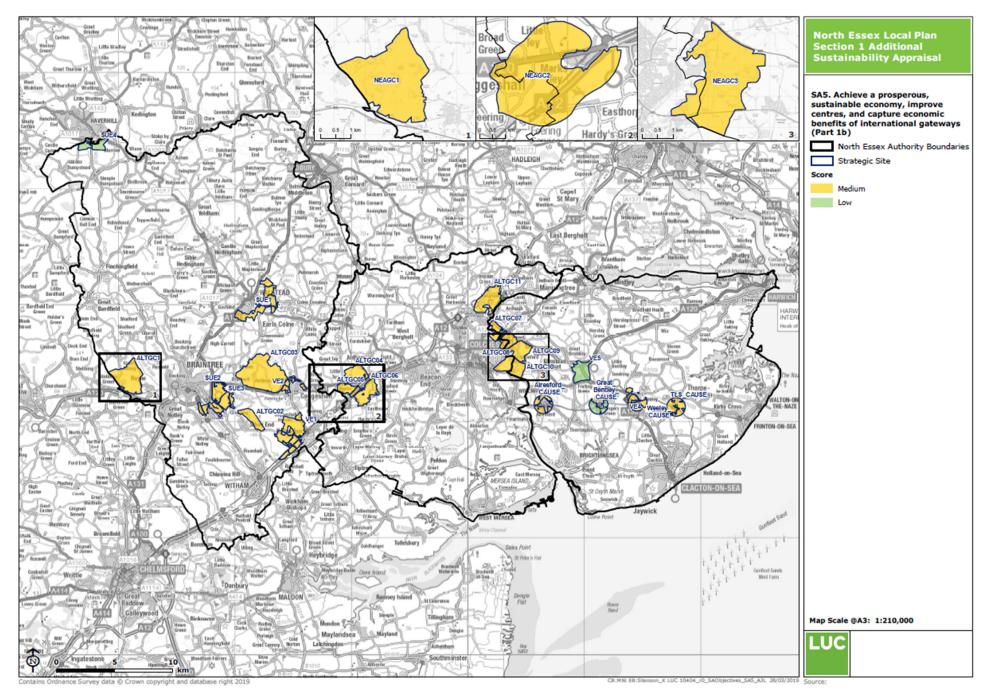
## **Purpose**

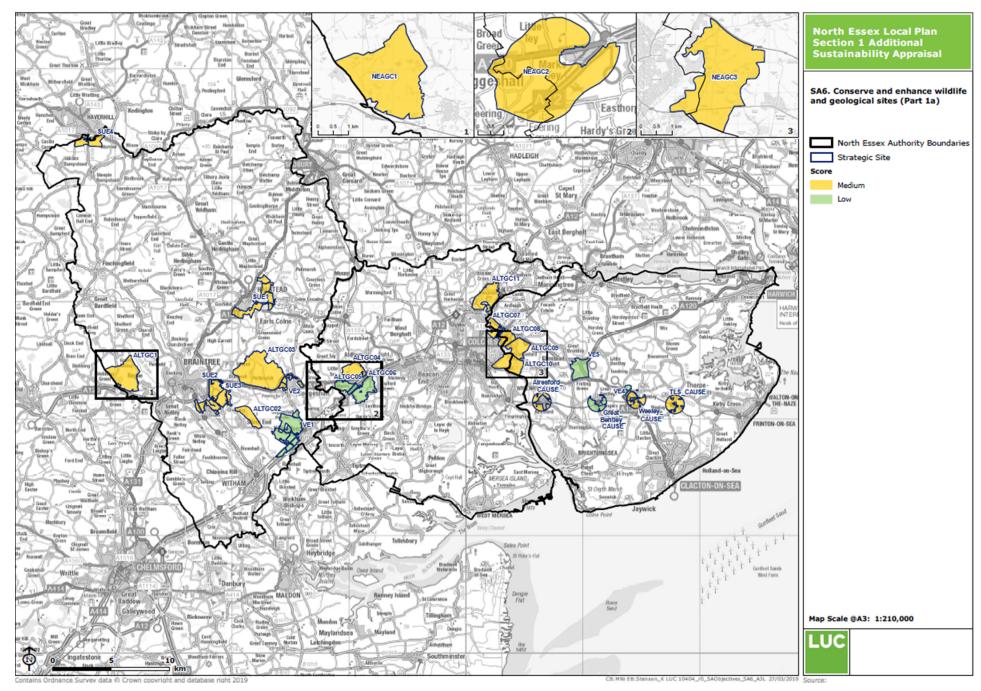
- To identify any potential showstoppers
- To see if any locations perform particularly strongly
- To see if any locations perform particularly poorly
- To narrow down potential locations to be included in spatial strategy alternatives



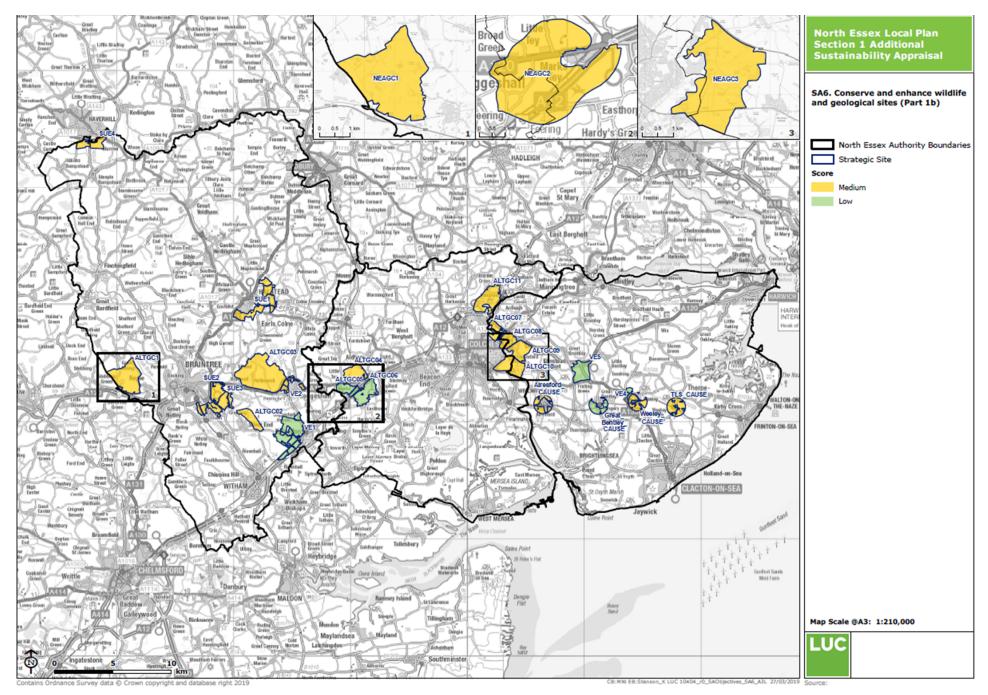




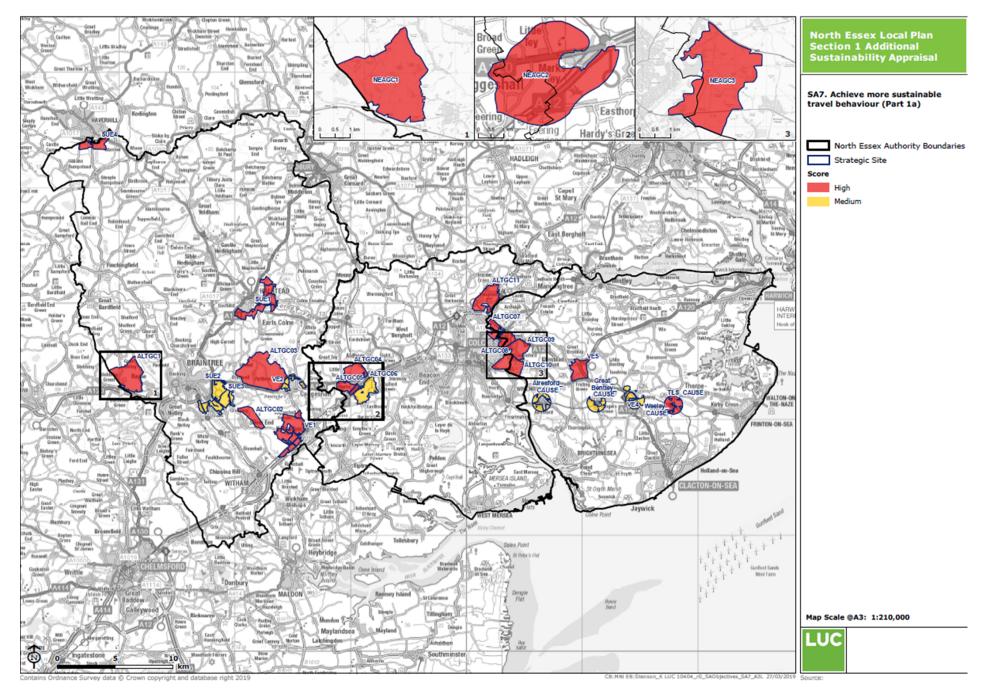


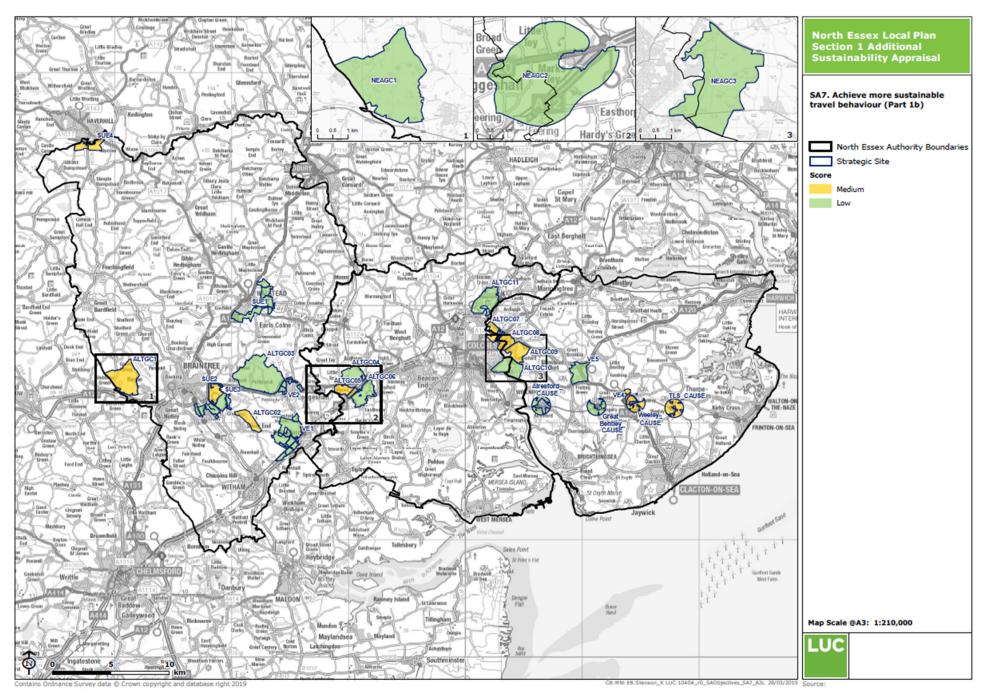


North Essex Additional SA Check & Challenge Workshop 29 March 2019

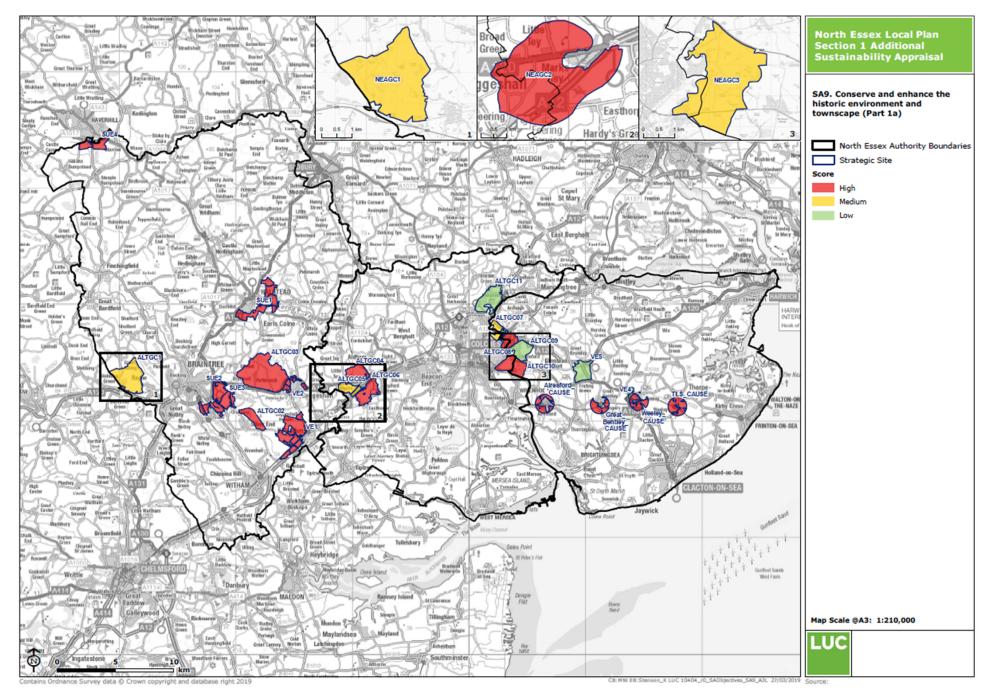


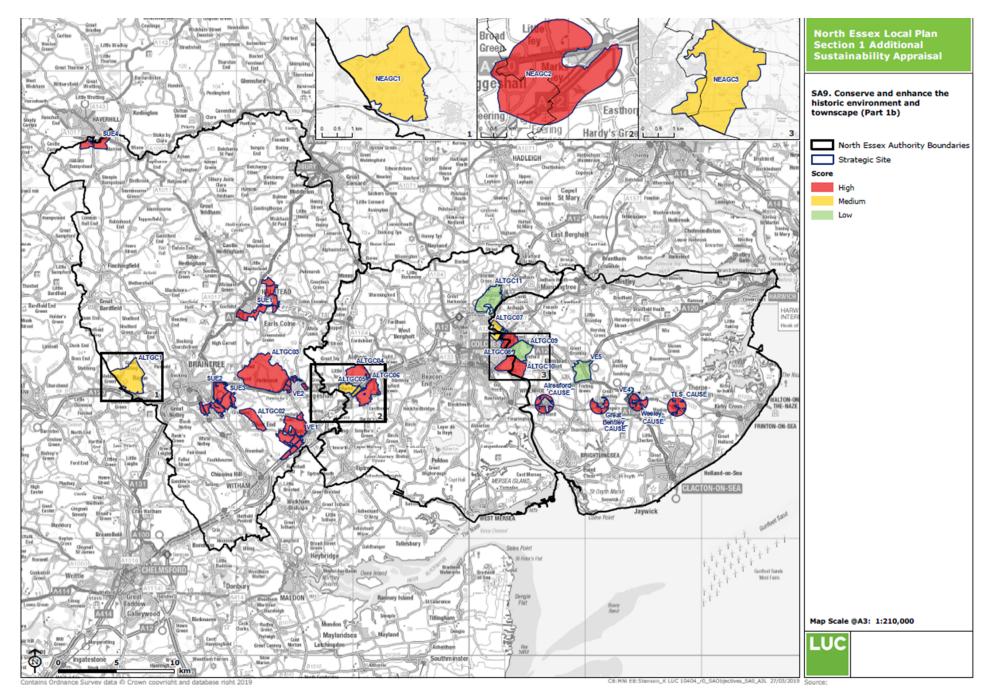
North Essex Additional SA Check & Challenge Workshop 29 March 2019

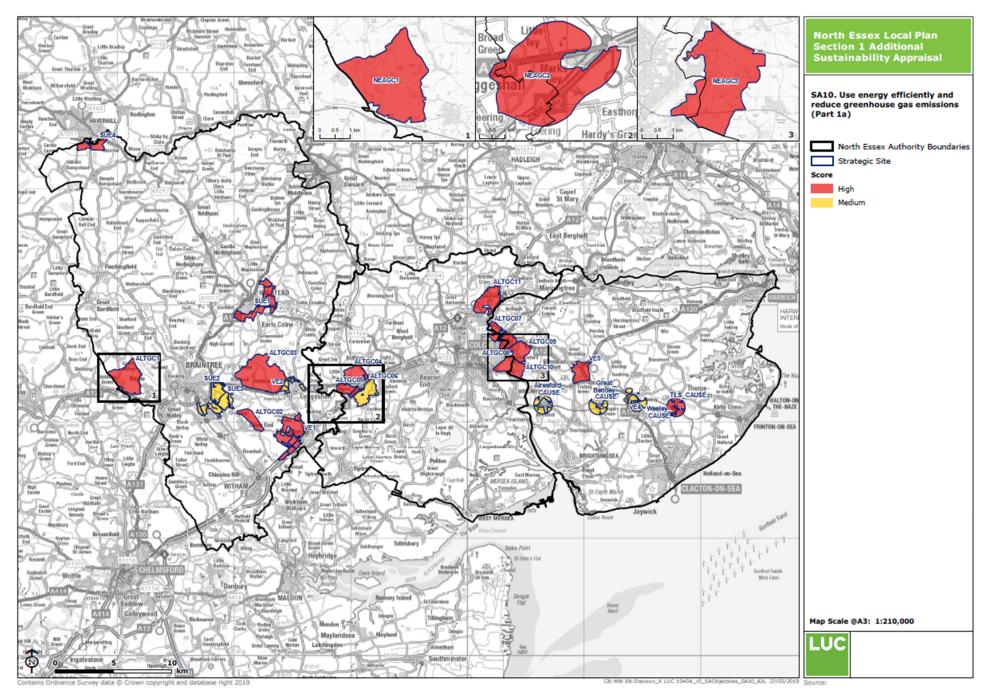




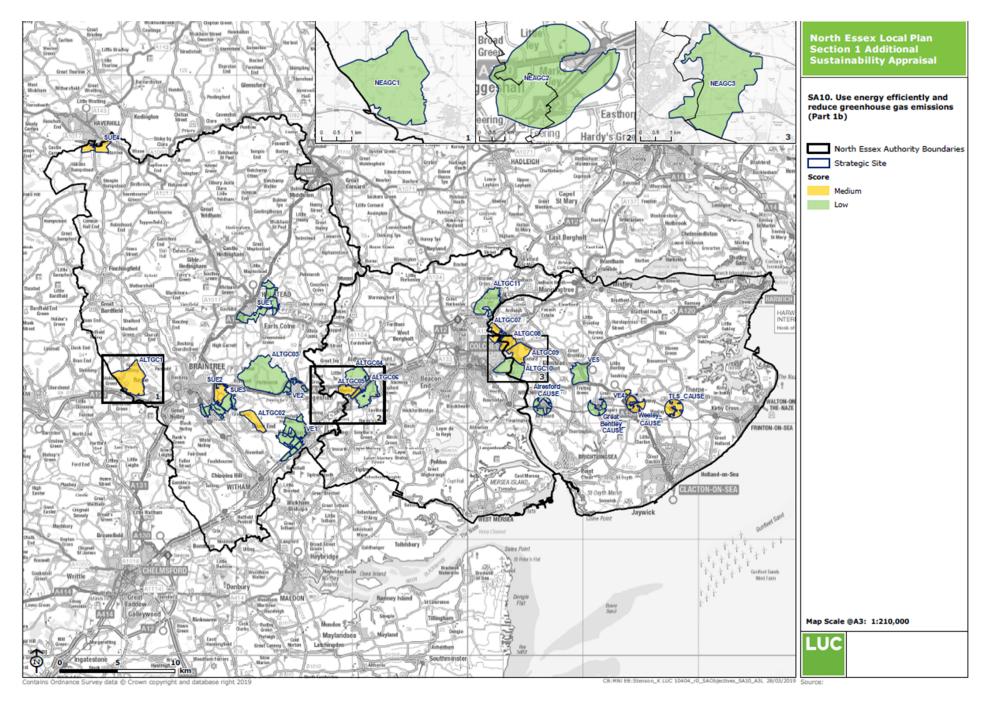
North Essex Additional SA Check & Challenge Workshop 29 March 2019

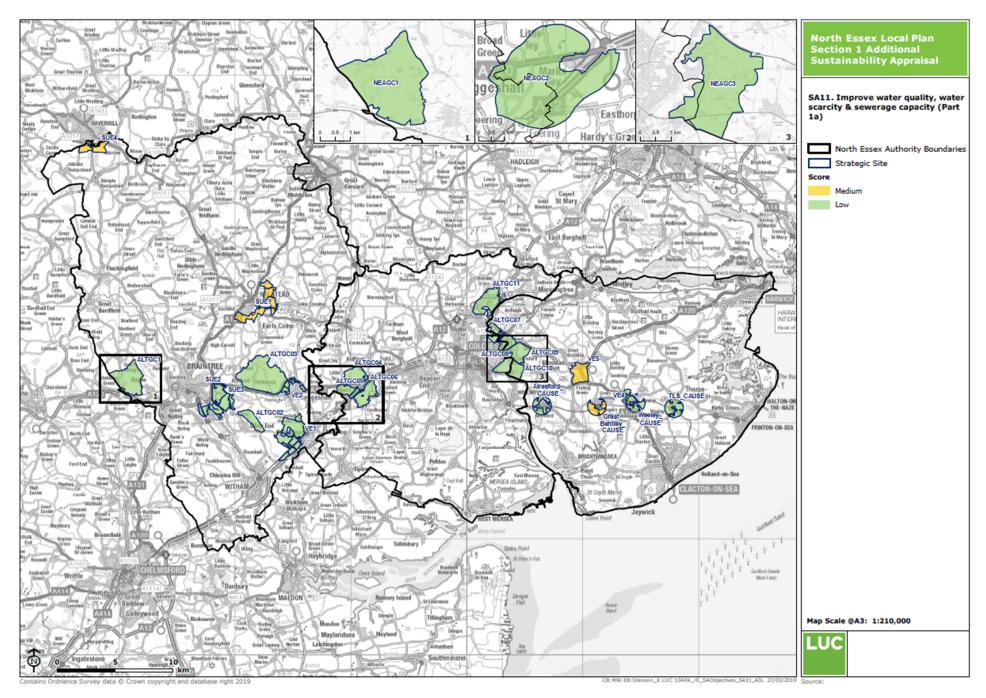


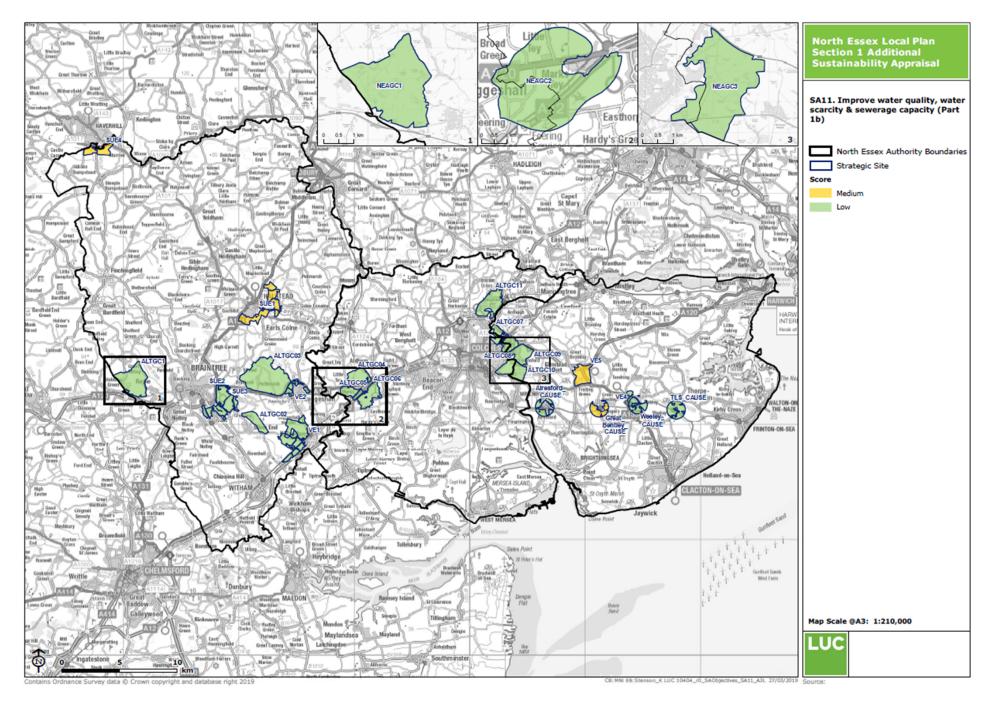


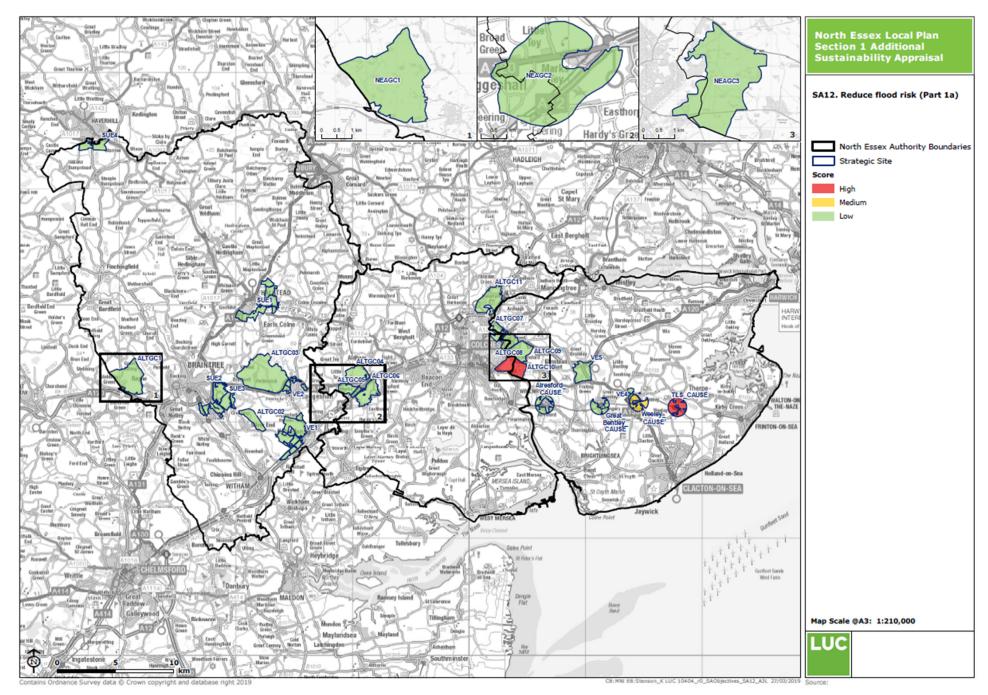


North Essex Additional SA Check & Challenge Workshop 29 March 2019

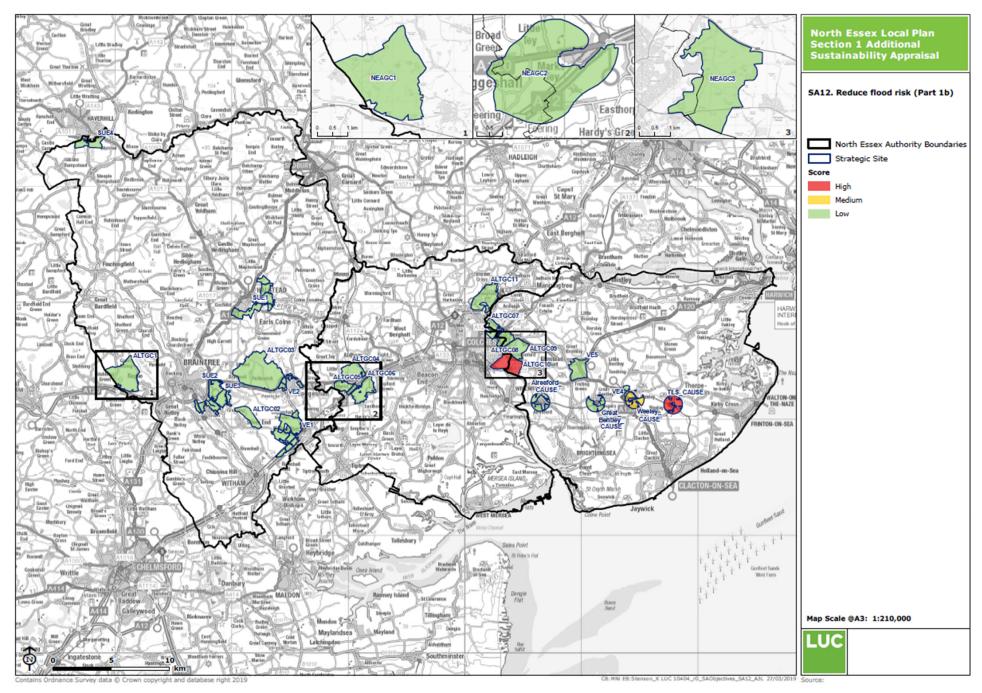




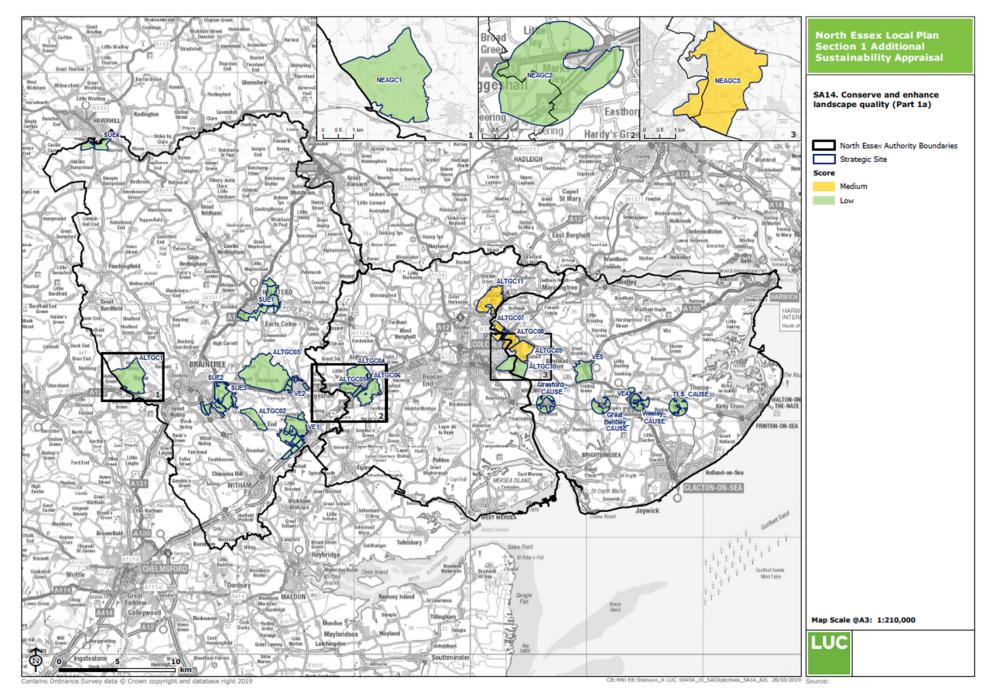


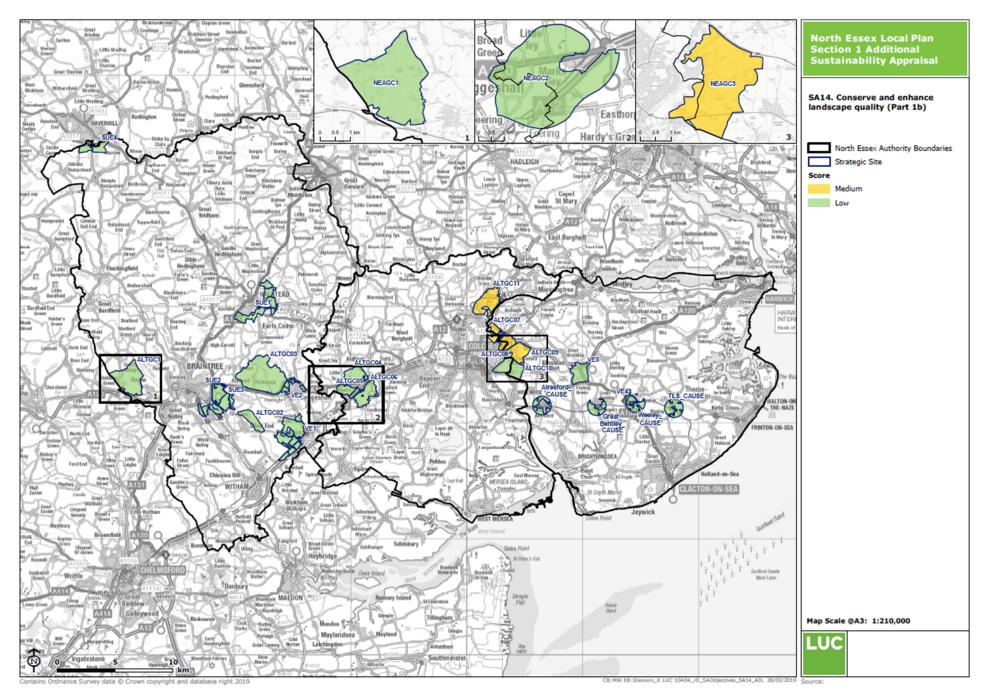


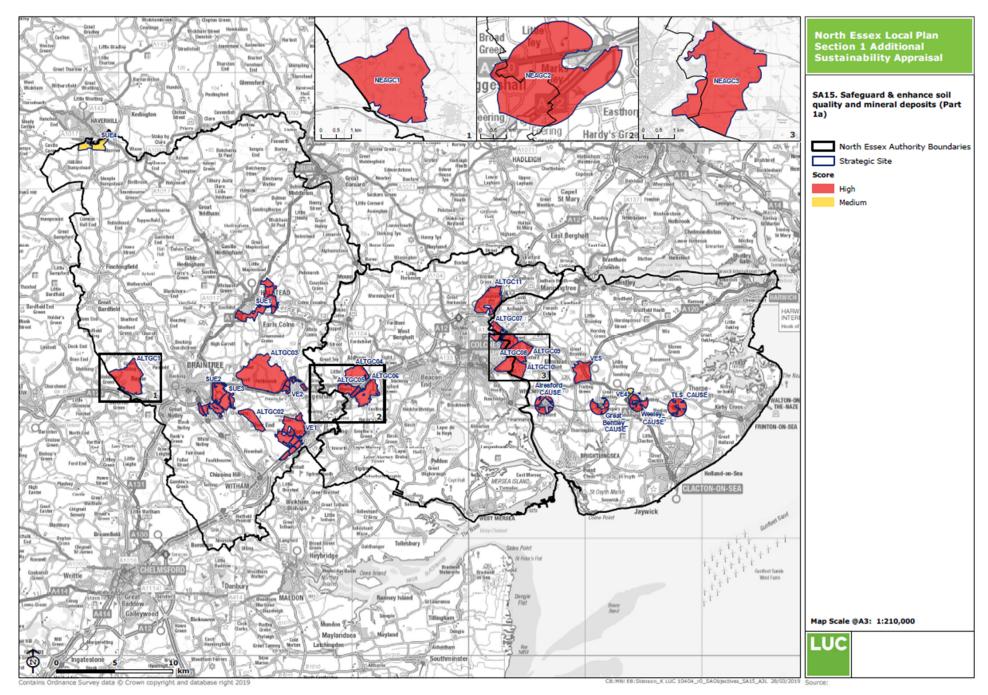
North Essex Additional SA Check & Challenge Workshop 29 March 2019

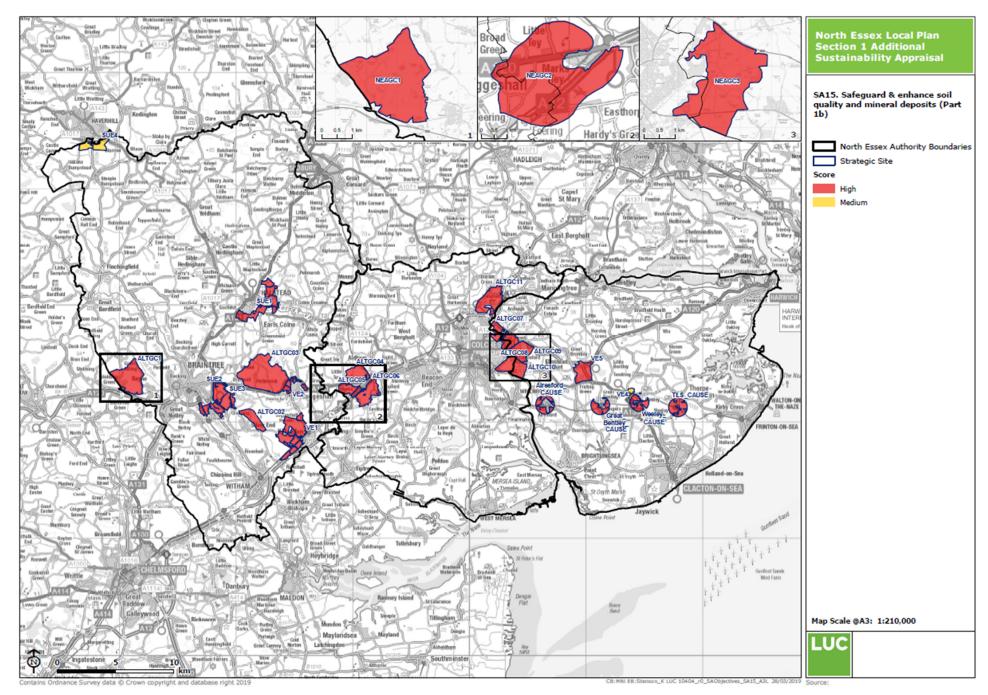


North Essex Additional SA Check & Challenge Workshop 29 March 2019









North Essex Additional SA Check & Challenge Workshop 29 March 2019

## Stage 1 draft findings



#### **Overall findings**

- No obvious potential showstoppers (possible exception being impact on AONB)
- Most sites would have an impact on BMV land
- Most sites would have an impact on Minerals Safeguarding Areas
- Heritage assets affect a number of sites
- Noise exposure and local wildlife sites also issues

North Essex Additional SA Check & Challenge Workshop 29 March 2019

## Stage 1 draft findings



#### **Overall findings**

- Locations close to existing services and facilities perform relatively well in Stage 1a for access criteria
- Other locations perform as well under Stage 1b once new services and facilities are factored in
- No locations perform relatively better across all SA objectives
- No locations perform relatively poorly across all SA objectives

## Stage 1 draft findings



#### The challenge

- Identifying reasonable alternative spatial strategies to take to Stage 2 of the assessment
- This is where we would welcome your input this afternoon

North Essex Additional SA Check & Challenge Workshop 29 March 2019



North Essex Local Plan Section 1

Additional Sustainability Appraisal

Check & Challenge Workshop

29th March 2019

## **Alternative spatial strategies**



#### **Recommendations of the Inspector**

- · Proportionate growth
- Three Garden Communities at different scales
- Monks Wood Garden Community at two scales
- Cause Metroplan

North Essex Additional SA Check & Challenge Workshop 29 March 2019

### **Alternative spatial strategies**

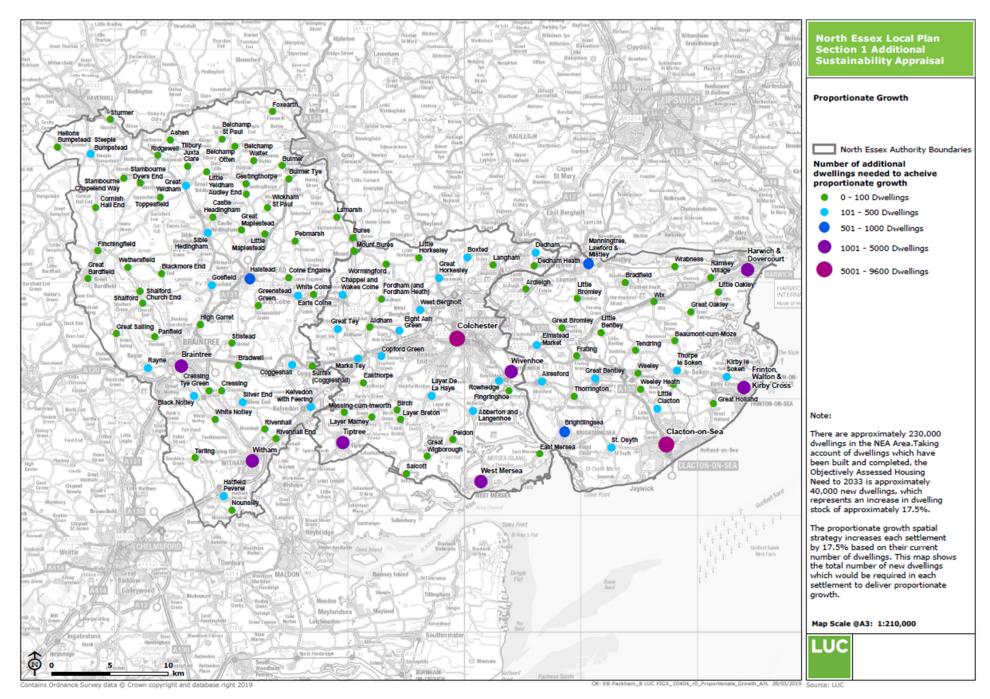


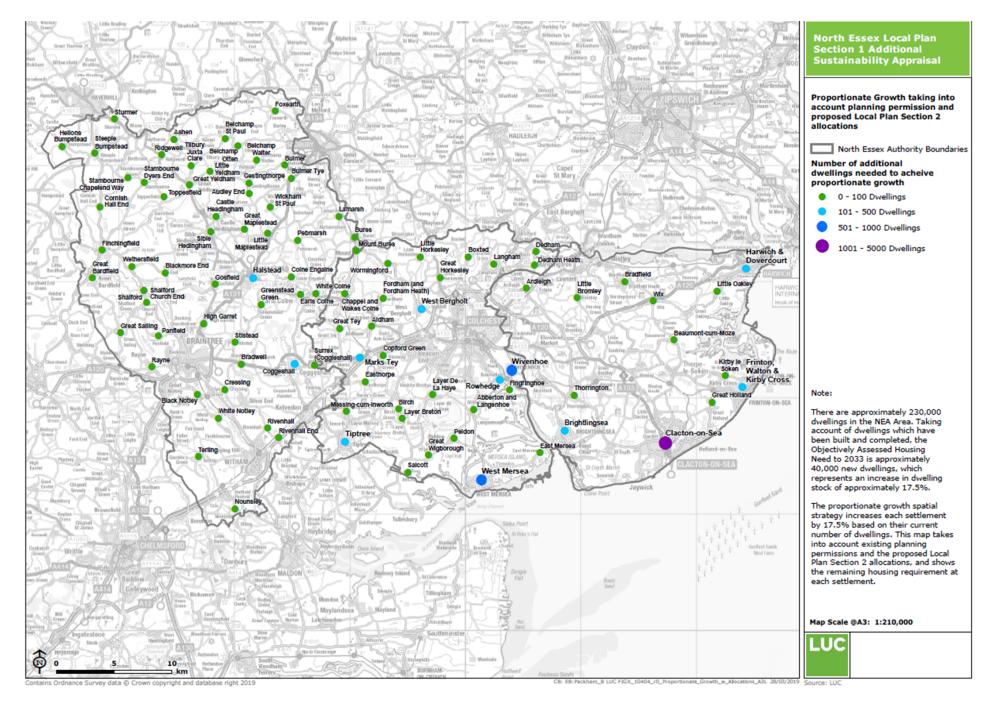
#### **Proportionate growth**

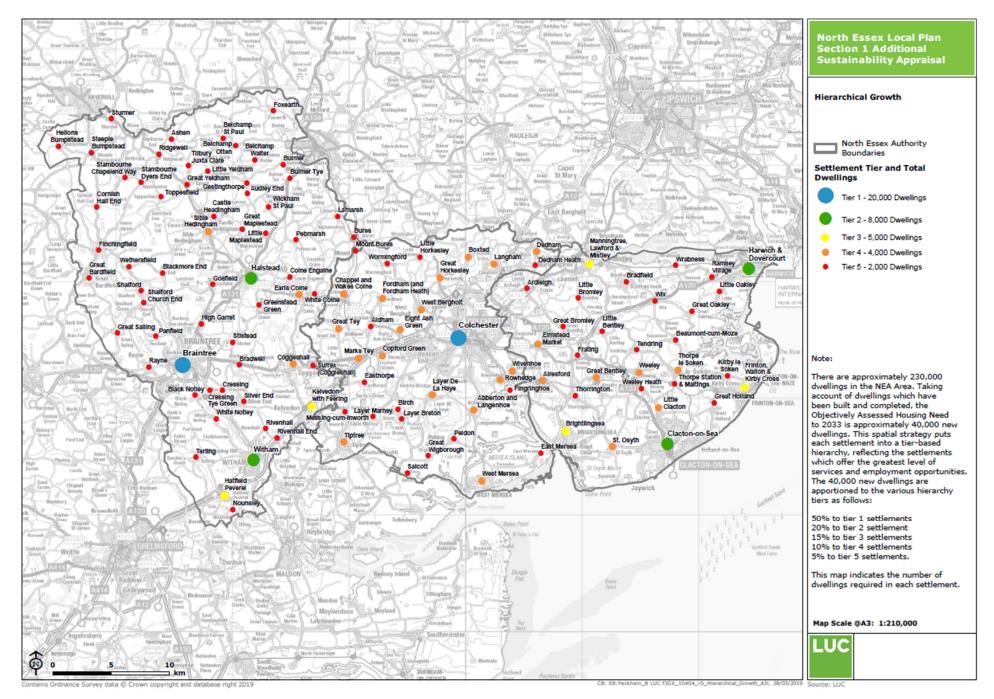
- Growth of each settlement in proportion to existing dwellings
- · Taking into account commitments and Section 2 allocations

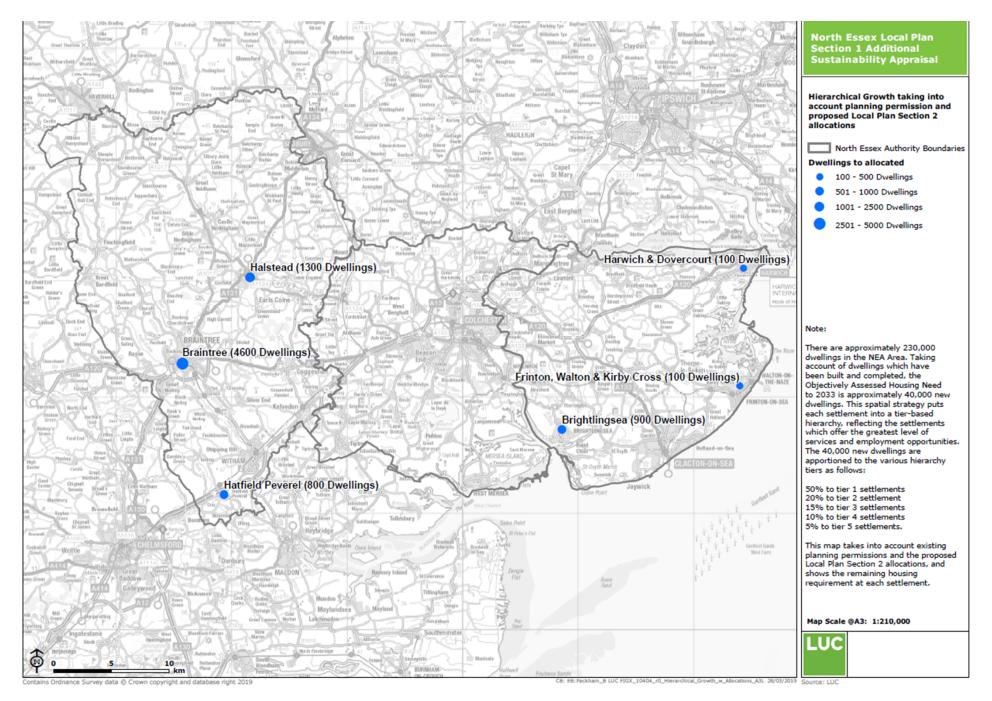
#### **Hierarchical growth**

- Allocates different proportions to different tiers of settlement:
  - 50% to tier 1 settlements
  - 20% to tier 2 settlement
  - 15% to tier 3 settlements
  - 10% to tier 4 settlements
  - 5% to tier 5 settlements
- Taking into account commitments and Section 2 allocations









## **Alternative spatial strategies**



#### The need for a rationale

- · Why garden communities?
- Why proportionate growth?
- · Why CAUSE Metroplan?
- · Why not urban extensions?

North Essex Additional SA Check & Challenge Workshop 29 March 2019

## **Alternative spatial strategies**



#### The need for guiding principles

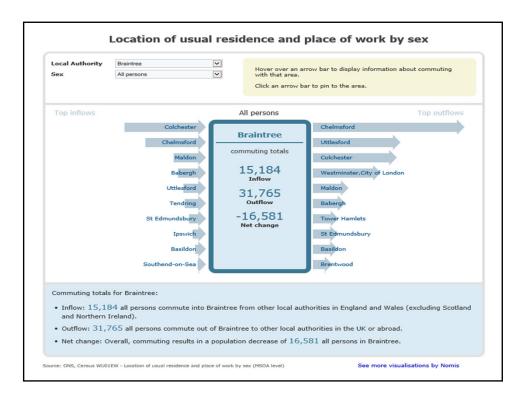
- · What we should be seeking to achieve and why
- The factors that should drive spatial strategy definition
- Taking into account:
  - · National planning guidance
  - The objectives of the plan

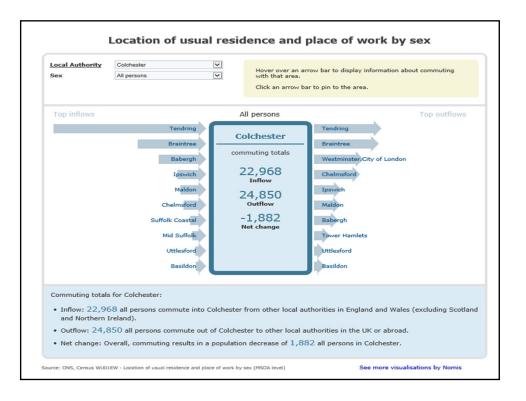
#### **Alternative spatial strategies**

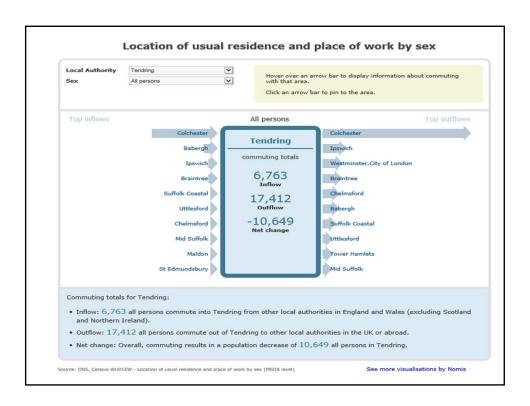


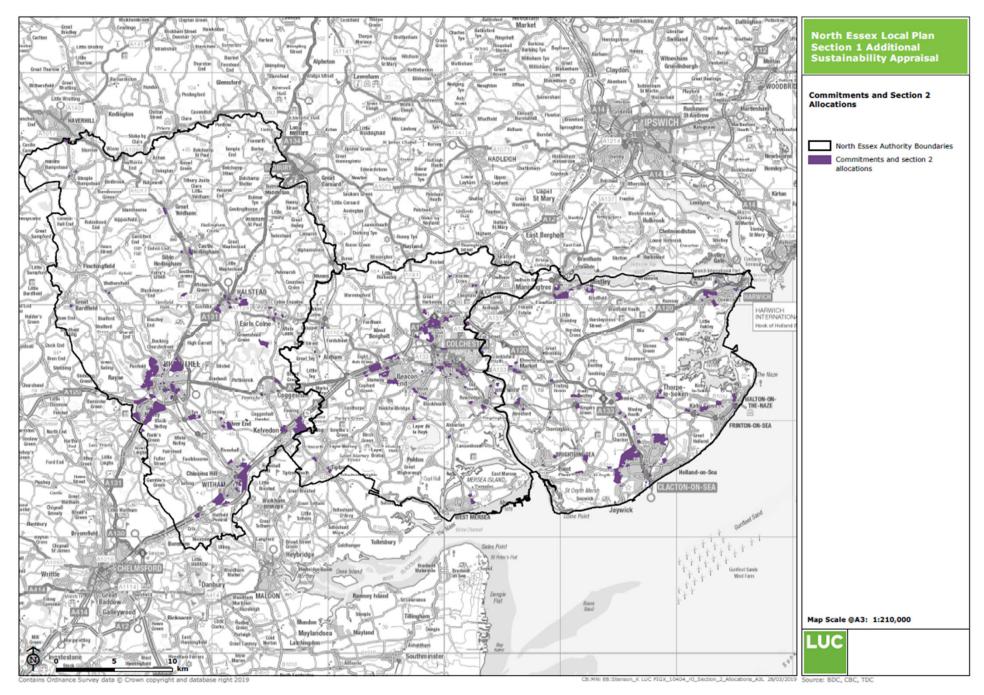
#### Some pointers to develop principles

- · Delivering homes where they are needed
- · Responding to travel patterns
- · Achieving modal switch
- · Relationship with existing communities
- Helping to deliver infrastructure
- · Supporting the economy
- Environmental protection and enhancement
- · Plan period or beyond









# **Break out groups**



## Identify spatial strategy principles

- Until 3.00pm
- Join your allocated table
- Facilitated by LUC/NEAs
- Volunteer to report back to the group
- Be willing to listen to the ideas of others
- Everybody should be allowed to input
- Seek consensus

# 3 Questions and answers

3.1 Question and answer sessions were held at the end of each of the presentations. The questions asked by attendees and corresponding answers provided by LUC are outlined below:

Q: What, when and how are changes to the SA methodology made and how do we find out what they are?

A: Some will be reported today, some will be judgements that we need to make that will then be discussed at the examination and published in the final version for comment.

Q: EU directive says you must assess the environment. What is the 'environment' given that there are no natural environments left in UK, everything is manmade?

A: Entirely right, environment is shaped by people, with exception of Essex coast. Our job is to address SEA topics set out in UK law (SEA Regulations). Standard practice is to consider change to environment as it is now. Even if not entirely natural, it still has value. Some value is given specific status, e.g. historic environment such as listed buildings and scheduled monuments, and others are not e.g. general landscape. While we have the ANOB, there are other landscapes with no designated status.

Q: Which bits of science are you using to measure these objectives?

A: The SA is a high level assessment based on professional judgment and the requirements of the SEA Regulations.

Q: There are 11 key matrices set out by the Kyoto agreements – are you using those?

A: No, we are using SA objectives. We don't go into all the science underpinning each environmental topic area. We make a judgement based on available evidence and give an informed view on likely effects of the plan.

Q: Government says Garden Communities should be on sites that are isolated, to avoid NIMBYs. By following government strategy, the councils are being led to plan Garden Communities which require a lot of infrastructure. The Councils need a lot of government grant without guarantee of the funding.

A: It's for the NEAs to assess whether Garden Communities and reasonable alternatives are deliverable and viable and LUC's job to appraise the sustainability of these; if NEAs say that the development is viable we would rely on their view.

Q: How do you differentiate between the role of the NEAs and LUC and the work that is being done - I imagine LUC keep a close eye on the viability?

A: We know Ringway Jacobs are doing the Bus Rapid Transit work. AECOM are doing other work. We have to place faith in their work.

Q: Should you be going a step back to take a spatial view?

A: The plan is at a specific stage at the moment; it does pose strategic questions which we address later this afternoon. We are taking a step back but not going back to the start.

Q: You refer to 5,000 dwellings as minimum size for a Garden Community. What's the basis of this?

A: It is to a certain extent about self-containment, but self-containment is a challenge because these days you can of course never force anyone to work where they live, only give the opportunity to.

Q: Section 1 and 2 are in conflict because there has to be a view on recreation facilities – the habitats and rich coastal area, what's in Section 2 will have a bearing on the Section 1, it could prejudice recreational facilities in section 2.

A: The Local Plan will comprise Section 1 and Section 2. They should not be seen in isolation but as mutually supportive. We can show relationship of site options to Section 2 allocations later in the workshop and developments that have been given planning permission.

Q: Access to primary schools is fundamental. What is the size of settlement required for a primary school?

A: I think this is about 1,000 dwellings. We will verify this with Essex County Council.

Q: Every site has got through Stage 1 of the SA, is this unusual?

A: It depends on the context, size of plan and area. In this case it has happened.

Q: Stage 1b is one dimensional - what about capacity of the service, trains are full, schools are full, etc.

A: These points are challenging for a strategic level appraisal. Our job is to look at the overall plan rather than get into the detail of each site, as would be done for a planning application. We are working with the authorities on the more important points. We know that some capacity issues can be addressed with funding but others can't.

Q: We know the mainline is full, when will that get picked up?

A: The NEAs will have to pick up on if an infrastructure asset is at capacity and the implications of this.

Q: Developments which generate infrastructure assets in themselves are great in theory but don't always come forward; how do you pick up on this?

A: This is a point that crops up at consultation - we will review comments and reflect them as appropriate. Our job is to appraise the plan and to comment on the uncertainties and provide reflections on certain points. It is not for the SA to determine whether the site is viable and deliverable, that is the NEAs' job and examined by the Inspector.

Q: There's a huge different in scale between 5,000 homes and Marks Tey at 23,000. They have a totally different impact on Colchester that will generate a huge impact in interaction on existing settlements. If you found anything over 10,000 is unsustainable because of transport impacts, does that rule out anything over that amount?

A: We are aware of the points being raised and we will take them into account as best we can.

Q: Capacity of demand – need 100 homes for a bus service. A lot of SA is at a single point in time. It would be more effective to have a CIL across the region to deliver services. A very narrow approach.

A: The reason we are looking at alternatives is to give a comparator. That's not to say there aren't other solutions; we will look at proportionate growth. We agree delivery of new facilities and infrastructure is a risk. In the report, we feel that there may be a need for more commentary - the assumptions are only good if they become reality. One way to look at that is to look at different timescales and we are already looking at end of the plan period and beyond; may be scope for different time scales.

Q: Transport infrastructure is key – already it prevents economic develop, e.g. no road west of Stansted but can go north and south; A12 is already overloaded and government are still delaying works. The work revolves around transport e.g. Canary wharf needed DLR to support.

A: It is fair to say that radial routes out of London are better served than east-west routes that do not go to London. We rely on the NEAs to determine what infrastructure is needed and deliverable.

Q: How are walking distances calculated.

A: At this high level, we calculate distances as the crow flies. It's an indicator; we can't measure every single route. But where there are obvious barriers to movement we will take them into account in our appraisal.

Q: The influence of central government policies such as HIF and LDV's leads to complications, e.g. Housing Infrastructure Find (HIF) bid vision published by Essex County Council for work on the A12 is linked to the Marks Tey developments but is effectively a bypass for housing before it's built.

A: Yes, it is difficult. Infrastructure phasing is being looked at by the NEAs.

Q: Stage 2 assessments - where is the sweet spot for the scale for development?

A: We intend to send to developers and site promoters a request for information about the sites they are promoting. The site information forms are an opportunity for site promoters to say what will be delivered at different scales. How you challenge that is another thing.

Q: What's fundamental is travel - the rural communities are used to getting on buses. Each different assessment criterion has different weight in sustainability. They appear to overlap, you give double the weight to some things.

A: Stage 1 GIS appraisal is a high level assessment of impact of each site; should be no weighting but provides information to make judgements of the effects. Transport is relevant to a lot of SA objectives e.g. carbon emission, access to services, etc. so it is appropriate for it to be reflected in lots of criteria.

Q: 2,000 dwelling cap is arbitrary. There are a lot of people objecting.

A: Our thinking is that this is a strategic plan and alternatives should be of sufficient scale to compare with the Garden Communities. Smaller sites should be Section 2 sites (although we are looking at proportionate growth, as requested by the Inspector) so there needs to set a cut-off somewhere between the two.

Q: The inspector requires a whole plan SA on how to get to 43k homes; we know there's a gap of 15%. 35k homes are from growth of smaller settlements. To fill the 7.5k gap, you're only going

to use sites of 2k plus, but proportionate growth is essential. If I was a small site promoter of c. 500 homes, I would feel disenfranchised. Section 2 only exists because of the process, you can find 7 sites of 1,000 dwellings. Even though the inspector raised any issues, but he also didn't ask for pre hearing. Fundamentally the plan still has got to make sense up to the 2030s.

A: This is one of the complications. Alternative sites below 2,000 dwellings to those sites allocated in the Section 2 Local Plans will be considered at the examination of those Local Plans. Section 1 looks beyond the plan period, the direction of travel beyond 2033, and the big decisions that are being made now for a long time after.

Q: Urban extensions are doing alright. They perform relatively well.

A: Urban extensions are some distance from services. They do not perform well based on existing service provision but once you factor in new services they do well.

# 4 Discussion groups

- 4.1 Following a presentation by LUC on the challenge of identifying reasonable alternative spatial strategies for assessment in Stage 2 of the SA, workshop attendees were allocated to groups designed to mix up different interest groups. The groups were then invited to discuss and propose principles that the alternative spatial strategies should follow, to help inform definition of these for the Stage 2 work. The groups were facilitated by, and notes taken by, NEA officers and representatives of LUC.
- 4.2 Key principles and other points arising from discussions by the seven groups are summarised below. The key points were reported back from a volunteer from each group to the other attendees in a plenary report back session, but these are not reported here to avoid duplication.

#### Table 1 notes

## **Key principles**

- Locational attributes responding to settlements strengths and enabling a wider choice of different types of locations to suit varying needs of communities
- Linking demographics to the type and location of housing including affordability providing the right homes in the right places, enabling choice
- Travel to work pattern corridors including travel to Chelmsford as it is considered a big influencer in some parts of the NEAs
- · Opportunities for alternative means of travel, including electric vehicles and cycles
- Viability and deliverability and cost benefit analysis (also responses to varying scales of growth); added value
- Self-containment where possible and connectivity between settlements (based on the Ted Gittins Strategy).

Other general discussion included the need for viability information to be available to inform the SA and not afterwards. Self-build being positively pursued as part of development strategies. A discussion around priorities in infrastructure delivery - prioritising what's most important and accepting that some development won't deliver everything. The landowner attempted to get the point across about land value capture in Garden Communities and influencing how that enables a different approach and unlocks funding etc. but rest of group non-responsive; just focussed on the more traditional development delivery model which all agreed fails to deliver the strategic infrastructure.

# Other points

- Existing infrastructure capacity to be taken into consideration
- Focus on existing infrastructure, particularly railway stations
- · Funding and viability is key
- Health care, including prevention
- Empowering local communities
- Proportionate growth (whilst it still works); only then look beyond this approach
- Importance of recreation existing open spaces serving growth areas
- Impact on various environmental assets including heritage and biodiversity
- Impact on existing town centres if new town centres established

#### Table 2 notes

## **Key principles**

- Locate new homes so as to minimise the need to travel to jobs
- Develop where there is spare capacity in existing infrastructure and take account of this
  capacity in Stage 1 SA; especially relevant for smaller scale developments that aren't big
  enough to require a new facility (e.g. new primary school) but nevertheless increase
  demand; cannot rely on promised new infrastructure to actually be provided
- Consider potential for new technologies (superfast broadband; driverless vehicles) to alter existing commuting patterns and invest in it to reduce pressure of new development on the transport network
- Direct development towards existing railway stations
- Provide a mixture of smaller and larger sites so that smaller sites can meet short term need while infrastructure required to support sustainable build-out of larger sites is delivered
- Development at lower tier settlements should have to make a larger contribution to infrastructure provision to bring services and facilities up to scratch
- Co-locate jobs and homes to help reduce the need to travel
- On balance, long term planning (beyond end of the Plan period) supported as it is the only
  way to deliver very large developments and the strategic infrastructure required to support
  them (economies of scale)

#### Table 3 notes

## Promoter of Lightwood's Monks Wood proposal:

- Existing settlements could accommodate more dwellings before jumping to the establishment of Garden Communities.
- As a principle, it would be sensible for each of the three authorities to seek to meet its own individual housing needs within their own area rather than crossing boundaries.
- There may be certain targeted strategic locations where we might want to promote a disproportionate level of new development.
- General view that you can achieve strategic growth without developments of the scale proposed as part of the current Garden Communities.

#### Wivenhoe Councillor:

- We should be producing a plan that meets the requirement to the end of the plan period only.
- NEA's current strategy is driven by the opportunity/desire to deliver new infrastructure, without sufficient guarantees over its funding, timing and delivery.
- Attracted to the 'proportionate growth' strategy, albeit with caps on development placed in certain locations where environmental/infrastructure capacity would be met/exceeded.

#### Representative of Marks Tey developers:

- Marks Tey could deliver 17,000 homes over 25-30 years.
- Always hearing that Colchester has met its capacity and therefore it is time to consider Garden Communities a long term strategy for growth.
- Good design is key to achieving self-sufficiency and employment opportunities, as seen at Poundbury.

# Resident of Copford and member of CAUSE:

 Some locations, including Copford, could accommodate a fair level of new development (400-600 homes) if planned by communities themselves through a Neighbourhood Planning approach.

#### NHS/CCG:

- Irrespective of location, new development should be designed to promote healthy lifestyles including opportunities for green infrastructure, recreation and viable health facilities.
- · Preference would be for one large development with sufficient critical mass to deliver a large

purpose-built health centre.

#### Site owner:

- Growth should be targeted to enable settlements to expand to their optimum size in terms of self-sufficiency one settlement at a time. Once one settlement has grown to its optimum level, you start expanding the next one, and so on.
- Transport infrastructure is fundamental and the strategy should be specifically aimed at supporting and/or delivering improved rail or road links east to west addressing the significant deficiency in the country's current transport network.

# Individual with interest in the historic environment:

• Focus development upon existing railway stations, including on the Braintree to Witham branch line, because the transport infrastructure is already in place.

The group was split between people who felt it sufficient to plan only for the period up to 2033 and those who felt that a longer-term strategic approach, beyond the plan period was required.

# Proportionate Growth (up to 2033) with a cap in certain locations

One solution would be to adopt a proportionate approach to growth for the remainder of the plan period to 2033, but with a firm indication in the Local Plan that new settlements or Garden Communities will be the approach the NEAs take to deal with growth requirements in the next plan period, giving more time to plan the proposals and secure necessary guarantees about infrastructure. Thus the current local plan would only need to identify a series of broad locations for post 2033 growth but with no commitment or reliance on them until the plan is reviewed.

With proportionate growth however, there was a feeling that some locations might not be able to accommodate the numbers that would be assigned to them under a straight 17.5% blanket increase in dwelling stock. Settlements like Brightlingsea, West Mersea and Wivenhoe, for example, are in potentially sensitive locations in terms of ecology and landscape and have limited road infrastructure and might warrant some form of 'cap' to reflect their practical capacity – whatever that might be.

The alternative strategy might be to cap development in those certain locations and perhaps instead of allocating land for 7,500 dwellings, we allocate for a smaller amount that still delivers the OAN (i.e. we eat into some of the reserve and plan for say 6,500 instead of 7,500).

#### Numerous smaller Garden Communities (post 2033)

Lightwood implied that it might be that instead of having such large Garden Communities, the longer-term strategy could be a greater number of smaller Garden Communities in strategic locations. As this would be a post 2033 strategy, it might not be necessary to test is as part of this SA, but if we did, we could be looking at an option that delivers a 5,000-6,000 home Garden Community in four or five locations.

# Metro Plan 'Plus' (up to 2033 and possibly beyond)

Another concept was a railway station-centred strategy for the Braintree to Witham branch line which is similar in many respects to CAUSE's Metro Plan. It might be worth developing an alternative option which extends Metro Plan principles to all railway stations across north Essex where land is available within an 800m radius – bring in places like Marks Tey, Kelvedon, White Notley, Cressing and possibly Wrabness as well as the Metro Plan stations (Alresford, Great Bentley, Weeley and Thorpe). This might help to ensure that growth is spread more fairly across North Essex, rather than focussed purely on Tendring stations. Perhaps up to 1,000 homes in each location up to 2033 and a further 1,000 in each location post 2033?

#### Building to optimum capacity

The concept of building up existing settlements to their maximum or optimum capacity was thought to be an interesting idea, but it was difficult to ascertain what that optimum level should be and how it might vary from settlement to settlement. In essence, it might be akin to the 'hierarchical' approach where larger settlements are expected to take more than smaller

settlements.

## Health-led strategy

The health-led option was either to have a very health-centred approach to the design of new development, irrespective of location (lots of green space, recreation etc.), or to go for as big a development as possible to support/deliver a high-capacity health facility. On the face of it, the current Garden Community strategy probably fits best with this concept.

#### East-West Transport Link

The idea that we should plan a major transport investment linking the country east to west was an interesting concept but one that that the proponent admitted was difficult under current government transport and planning policy. Most likely a post-2033 idea that would involve lots of authorities extending through the centre of England and Wales, rather than one for consideration in this plan period.

#### Table 4 notes

## **Discussion summary**

Key discussion points were around Hierarchical /Proportionate Growth, brownfield land, employment and the relationship with homes, travel patterns particularly road and rail, and existing infrastructure.

Proportionate growth sounds like a good starting point but it is not likely to be the answer. Need to then consider the practicalities of development around each village in the context of things like heritage.

Consider where the jobs are available in the District and where are the movements going. Suggested that a report on this subject by  $5^{th}$  Studio for Oxford-Milton Keynes-Cambridge arc is very good.

Is proportionate growth urban sprawl? Joining up the villages with each other which is something that you would not want to happen. Could look at landscape buffers as a way of addressing this.

Bottlenecks in infrastructure need to be identified and what you want to achieve; CIL could deal with many of these issues then once we know what is needed, how it can be funded and what the capacity is.

Could have a capped approach to the development of 2,500.

We could look at the vision for 2050 on the plan and look at where the certainty and uncertainty is.

Brownfield sites need to be looked at, but they also need to be viable and they could have a value for other uses such as employment. Suggestion that employment or other uses could be placed elsewhere. Suggested that these are not a silver bullet but they ought to be looked at and exhausted first

Need to look at whether the employment sites are viable or unviable.

Discussion about the A12 and the route that this is taking. Felt that we ought to spend the money on necessary infrastructure and not infrastructure to make the site bigger.

Hierarchical growth may be better than proportionate growth; maybe we should concentrate on employment and growth on corridors that are sustainable but where are the rail improvements?

How do you increase growth around the railway stations and getting people to the right places? Look at what is there now, including the transit corridors. NEAs are thinking too big; need to think about some smaller corridors.

How do the new and existing communities co-exist and what can you do for the new communities that also makes the environment better for the existing communities? Make sure the existing communities know what's happening and what benefits does it bring to them. How

can it be proved to be good?

Development at the moment is skewed to the west, there is infrastructure albeit capacity-constrained, but the most deprived areas are Tendring so perhaps growth should be concentrated there?

Think it should be a mixture of all the solutions and that it should be related to infrastructure and what is already there.

How can they deliver a bigger site and deliver this which is viable.

There is a role for urban extensions if they deliver the rapid transit benefits to the exiting communities and transport corridors into the primary settlement; show the improvements it can bring.

Making sure the cumulative impacts of the development are taken into account and the benefits analysis for the development and how it can be addressed.

# **Key principles**

- Funding considerations
- New technology and innovation
- Existing train stations
- Mix of scales
- Co-location of employment and homes
- Healthcare provisions
- Linked communities
- How each community can grow
- Transport based approach
- This plan period need to look at proportionate growth
- Existing infrastructure
- Brownfield
- Benefits to the existing communities
- Propose new rail if needs be
- Bus services should be viable and useful
- Traffic congestion and rail infrastructure
- Look at sites in combination
- Heritage
- · Recreational values

#### Table 5 notes

The main principle arising from this group discussion was to provide future growth based on the current pattern, arrangement, and hierarchy of settlements within the plan area.

The main reason for this is that the plan should make best use of existing facilities and services, rather than providing new ones only to serve new development. The opportunity that new development can bring in terms of increasing population around ailing services was also recognised. Furthermore, the opportunity for development to provide new services which can be used by existing residents and workers was also recognised.

Specific themes that were discussed are as follows:

- Building on existing settlements development should primarily be focussed on existing settlements where a good number of existing facilities and services already exist. The amount of development should, however, be capped based on an assessment of the existing capacity of infrastructure and scope for viable improvement.
- A transport approach the commuting and general transport movements within and to / from the NEA area set out in the presentation before lunch was recognised. There was broad agreement that providing opportunities for residents to travel more sustainably should be provided. There were two broad strands to this theme:
  - Internal movements the benefit of the CAUSE approach was to focus development on existing railway lines and stations where there is capacity. This approach

- recognises the relationship between Tendring and Colchester Town and should be utilised elsewhere to help promote movement within the NEA area by sustainable development.
- External movements the relationship between the plan area and London / Chelmsford / Stansted / M11 was recognised. It was considered that a review of trends in commuter behaviour should be undertaken. If it appeared that commuter trends were becoming ever more related to London then perhaps the strategy should be to curtail this by placing development in locations that were less connected to London. On the other hand, if the trends were relatively stable, it was recognised that there may be benefit in providing for greater connectivity to London. In this case, development should focussed on the London Ipswich Line.
- Create new railways the potential to create new railway infrastructure such as stations and lines was discussed, but it was mentioned that this is unlikely to be deliverable given the cost of this.
- Other forms of public transport rapid bus schemes were discussed as a potential to allow people to travel more sustainably. However it was mentioned that such services should be viable in the long term, as it was raised that often developer contributions last for some years and then bus services dwindle once this has stopped.
- Employment centre focus a focus on existing employment centres in the plan area would allow opportunities for people to travel to work more sustainably, by reducing potential travel distances. This strategy would seek to locate houses next to employment opportunities, even if there is no housing there already. However it was recognised that this sort of approach would require investment in services to ensure that people have access to facilities and services.

It was noted by some around the table that whilst focussing on existing settlements was a good idea, larger development sites can provide a greater level of critical mass which can in turn provide more services and facilities for existing and new residents and workers.

- Brownfield first development of existing brownfield sites should be prioritised as these are generally already serviced by facilities and services, and can help to support these. These may also result in less damage to wildlife.
- Landscape and ecological protection development locations should be located in the least sensitive areas in terms of landscape and ecology. However it was not known what evidence base was available for landscape assessment.

# Table 6 notes

The main themes this group decided to prioritise were:

- 1) Infrastructure
- 2) Employment
- 3) Traffic congestion

#### **Infrastructure**

On infrastructure, each of these topics were discussed:

- Water supply, although it was important not to build near sources of supply.
- Transport rail and road to be considered equally, rail capacity was said to be overloaded.

Infrastructure provision should consider the commuting outflow from Braintree and from Tendring to Colchester. The train was agreed to be the most sustainable mode of transport for commuting. It was queried whether commuting patterns can be broken down into urban and rural areas for better insight.

Additionally, there is retail comparison and employment outflow. Opportunities to consolidate retail should be a priority.

Travelling by car to London can be assumed not to be reliable and using a train to access London is quicker.

There was fear that developments may not fully complete and therefore SA needs to

encapsulate different stages of development – at the end other plan period and when the development is complete.

#### **Employment**

It was stated that employment should be a prioritised whereby the focus is not solely on housing numbers but employees should be retained in the area and reduce out commuting. Employment provision through mixed-use areas was suggested.

Centres of employment were identified and links to higher education should be incorporated into the strategy. Not only University of Essex but also links to Cambridge University, the Medtech Chelmsford/Harlow/Southend triangle, and Anglia Ruskin's specialism in nursing and health and social care. Assessment of areas of employment should be included:

- Great Notley is a logistics hub but employment density was thought to be low e.g. Ocado's automated warehouse
- Retail is still an important employer
- Consideration for quality of jobs on offer
- Projected growth corridors and Stansted growth should guide strategy
- Local Enterprise Partnership strategy
- Consider attractive locations for start-ups or working from home, not just business parks.

Thoughts about needing to work less and having more leisure time due to automation were also expressed.

#### Traffic congestion

For traffic congestion, the main areas of concern were:

- East to west routes through Colchester
- A133 from Clacton to Colchester
- Stanway and A12
- A120 Galleys Corner
- Braintree and Halstead town centres.

Developments which facilitate junction improvements were a priority but agreed to be quite tricky. It was suggested that existing infrastructure is improved rather than build where new infrastructure is needed, e.g. west of Braintree. Every settlement has congestion issues.

Noted that new technology is coming for electric and driverless cars.

There were a couple of difficulties understanding the maps because it was unclear if the spatial strategies should be for 43,000 or 7,500. The map which displayed proportionate growth were thought to show 8 dwellings per village (actually 20) but this was thought to be unrealistic to deliver and likely would result in large developments concentrated on few villages. Overall, the traffic increase from rural areas was thought to be unsustainable as modal switch impossible. Proportionate growth was not considered to be a viable option.

#### Table 7 notes

Proportionate growth scenario is too arbitrary. Any such approach to growth should look at each settlement in detail to discern whether or not growth is possible based on local constraints, infrastructure/service provision (within the settlement in question as well as the infrastructure in the locality of the new growth) and the relationship with other settlements.

Development at scale provides the opportunity to address sustainable transport (walking, cycling and public transport provision) and energy (on site capture and storage/use) objectives which would not be possible at smaller developments.

The West of Braintree Garden Community should be assessed in combination with the land put forward in Uttlesford DC's plan and not in isolation.

Commuting is a driver of growth that should influence spatial strategies, i.e. growth options should be assessed in relation to how they can improve commuting patterns through new infrastructure delivery. However any large scale growth must have new employment

opportunities provided alongside new housing.

New large scale growth sites should be staggered in their delivery timings so that development doesn't happen all at once and put too much strain on services and infrastructure within the area.

New development should improve and complement existing town centres, otherwise new centres risk sucking the life out of established retail and leisure areas in existing settlements.

Congestion charges and toll roads should be considered as a way to reduce car use and charge road users/businesses for the cost of roads.

New strategic road improvements to the A12 and A120 will mean that sections of the (future) old A12 and (future) old A120 should be used as public transport priority routes.

Heritage impacts should include Grade II listed buildings and a proper assessment of landscape should take place because landscape can be a heritage asset as well as an environmental one.

The relationship of new growth options should be assessed against emerging and made Neighbourhood Plans.

Potential for growth options to support rural broadband expansion, public transport subsidies, and brownfield redevelopment should be included as assessment criteria.

Growth options which could support a rail loop (at Cressing) on the Braintree branch line should be viewed favourably as this will increase the capacity and frequency of rail services along that line.