

**Braintree District Council**

**Sustainability Appraisal of the Main  
Modifications to the Braintree District  
Section 2 Local Plan  
Braintree District Local Plan 2013-2033**

**Draft report**

Prepared by LUC

November 2021

**DRAFT ONLY – DRAFT FINAL TO BE PUBLISHED TUE 23<sup>rd</sup> NOVEMBER**



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to the Braintree District Section 2 Local Plan  
Braintree District Local Plan 2013-2033**

Version	Status	Prepared	Checked	Approved	Date
1.	Draft Report	S Newman S Temple M Mc Ginley	J Pearson	T Livingston	08.11.2021

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# Chapter 1

## Introduction

**LUC was appointed by Braintree District Council (hereafter referred to as ‘BDC’ or ‘the Council’) in September 2021 to carry out the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Main Modifications to the Braintree District Section 2 Local Plan 2013-2033 (hereafter referred to as the 'Section 2 Local Plan').**

**1.1** Braintree District's emerging Local Plan will replace the adopted Core Strategy<sup>1</sup> and the Local Plan Review saved policies<sup>2</sup>. It will guide future growth and direct new development in the District up to 2033. The emerging Local Plan comprises two distinct sections:

- Section 1 of the Local Plan prepared jointly by the North Essex Authorities (i.e. BDC, Tendring District Council, and Colchester Borough Council) outlines the strategic vision for growth and development in North Essex and forms the first part of each authorities' respective Local Plans. It contains policies on sustainable development, overall housing and employment needs, infrastructure, place shaping, the spatial strategy and the development of the Tendring/Colchester Borders' Garden Community.
- Section 2 of the Local Plan provides more detailed policies and site allocations for Braintree District.

**1.2** Place Services of Essex County Council undertook the SA, incorporating SEA, of the Publication Draft Section 1 Local Plan<sup>3</sup> while LUC undertook the SA of the Publication

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<sup>1</sup> Braintree District Council (2014) Core Strategy (online) Available at: <https://www.braintree.gov.uk/downloads/file/2204/bdc-core-strategy>

<sup>2</sup> Braintree District Council (2005) Local Plan Review (online) Available at: [http://www.planvu.co.uk/bdc/contents\\_written.htm](http://www.planvu.co.uk/bdc/contents_written.htm)

<sup>3</sup> Place Services of Essex County Council (2017) North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19) Sustainability Appraisal (pdf) Available at: <https://www.braintree.gov.uk/downloads/file/1551/sa-neass-non-tech-summary-june-17>

Draft Section 2 Local Plan<sup>4</sup>. The Publication Draft Local Plan and supporting evidence base, including two accompanying Section 1 and Section 2 SA Reports, was submitted to the Secretary of State for independent examination in October 2017.

**1.3** Following the Examination hearings in July 2021, BDC prepared a schedule of proposed Main Modifications to the Section 2 Local Plan and the reasoning behind each proposed modification. The Examination process has resulted in the Inspector proposing nearly 100 Main Modifications across the Plan; these changes are necessary in order for the Plan to be found sound and to allow it to be adopted by BDC.

**1.4** The purpose of this SA Addendum is to consider whether the proposed Main Modifications are likely to have any new or different sustainability effects to those identified in the SA of the Publication Draft Section 2 Local Plan and, if so, to appraise those effects. It should be noted that this is an addendum to the 2017 SA Report and that the two documents should therefore be read together. This SA Addendum is also supported by an addendum to the 2017 Non-Technical Summary.

This SA Addendum focusses on the 'Main Modifications' to the Section 2 Local Plan only. Additional 'Minor Modifications' have also been proposed by the Inspector to address non-substantive matters such as typographical, factual and grammatical errors. These Minor Modifications are not subject to SA as they do not have the potential to lead to significant sustainability effects.

## Braintree District Local Plan

### Background

**1.5** The Braintree District Core Strategy was adopted in February 2011<sup>5</sup>. It contains policies that replace some of the Local Plan Review policies (adopted in 2005) while other policies from the 2005 plan have been saved<sup>6</sup>. The Core Strategy identifies four strategic growth locations, which will act as a focus for future development in the District, and two regeneration areas to promote the economic viability of the key service villages. Masterplans have been prepared for:

- North West Braintree (Land west of Panfield Lane)

- Land West of the A131, Great Notley
- Sible Hedingham (Premdor and Rockways)
- South West Witham, north of Hatfield Road (Lodge Farm)
- Land North-East of Witham (in Rivenhall Parish) off Forest Road

**1.6** A Strategic Housing Market Assessment (SHMA) was produced in 2014 to update BDC's evidence on housing need<sup>7</sup>. The SHMA indicated that between 761 and 883 new dwellings would be required per year in the District to 2026; this is substantially more than the annual provision in the Core Strategy (based on the old East of England Regional Strategy target) of 273 dwellings per year. In light of this new housing evidence and the new national policy requirements in the National Planning Policy Framework (NPPF), BDC resolved in June 2014 not to proceed with its draft Site Allocations and Development Management Plan, for which Publication consultation had been completed, and instead commence work on a new Local Plan.

**1.7** The Braintree District Local Plan will include all major planning policy for the District in a single document, comprising two distinct sections: Section 1 and Section 2. Once complete, it will replace both the Core Strategy and the Local Plan Review saved policies.

**1.8** In a response to the significant population, housing and employment growth experienced in recent years in North Essex, which is predicted to continue, the North Essex Authorities (NEA) agreed to work together to coordinate and deliver strategic growth, particularly housing and employment development, with the necessary supporting infrastructure. Section 1 of the Local Plan was prepared jointly by the NEA and outlines the strategic vision for growth and development in North Essex. It forms the first part of each authorities' respective Local Plans.

**1.9** Section 2 of the Local Plan, to which this SA Addendum relates, sets out more detailed policies and site allocations for Braintree District.

### Section 1 Local Plan

**1.10** Section 1 of the Local Plan includes policies on sustainable development, overall housing and employment needs, infrastructure, place shaping, the spatial strategy and the development of a cross-boundary Garden Community –

<sup>4</sup> LUC (2017) Braintree District Publication Draft Local Plan Section 2 – Sustainability Appraisal Report (pdf) Available at: <https://www.braintree.gov.uk/downloads/file/1540/sa-section-2-main-report-june-17>

<sup>5</sup> Braintree District Council (2014) Core Strategy (online) Available at: <https://www.braintree.gov.uk/downloads/file/2204/bdc-core-strategy>

<sup>6</sup> Braintree District Council (2005) Local Plan Review (online) Available at: [http://www.planvu.co.uk/bdc/contents\\_written.htm](http://www.planvu.co.uk/bdc/contents_written.htm)

<sup>7</sup> Braintree District Council (2014) Strategic Housing Market Assessment (online) Available at: <https://www.braintree.gov.uk/downloads/file/3120/bdc011-strategic-housing-market-assessment-shma-2014>

the Tendring/Colchester Borders' Garden Community. The preparation of the Section 1 Local Plan comprised a number of stages which are summarised in **Table 1.1**. Each stage in the preparation of the Section 1 Local Plan was accompanied by an SA Report.

**1.11** It was agreed with the Planning Inspectorate that the Section 1 Local Plan would be subject to examination in advance of the Section 2 Local Plans.

**1.12** The initial examination hearings took place between 16th and 25th January 2018 with an additional day for Matter 1 on 9th May 2018<sup>8</sup>. Following the hearings, the Inspector concluded that the Section 1 Local Plan was not sound in its current form. The Inspector wrote to the NEAs in June 2018, advising them of the further steps required in order for the Section 1 Local Plan to be made sound and legally compliant. Several shortcomings were identified by the Inspector, most notably in relation to the selection and deliverability of two of the three proposed Garden Communities.

**1.13** In his letter, the Inspector offered the Councils advice and options for how best to proceed. Having considered his advice, the Councils confirmed in October 2018 that they remained committed to using Garden Communities principles to secure the future housing requirements in North Essex and would produce additional evidence to address each of the Inspector's concerns. Additional evidence was prepared, including an Additional SA Report, and a six-week public consultation was undertaken from 19th August to 30th September 2019. Following this, additional hearing sessions were held from 14th to 30th January 2020.

**1.14** The Inspector issued a further 'post hearing letter' on 15th May 2020. The Inspector concluded that, as submitted, the Section 1 Local Plan did not meet the Government's tests of soundness. He judged that two of the three (West of Braintree and Colchester/Braintree Borders) proposed Garden Communities were not demonstrated to be economically viable or deliverable - making the overall plan unsound.

**1.15** The Inspector was of the view that the shortcomings with the Section 1 Plan could be overcome by the following Main Modifications:

- the removal of the West of Braintree and Colchester/Braintree Borders Garden Communities, retaining only the Tendring/Colchester Borders Garden Community, and,

- the inclusion of a new policy (SP1A 'Recreational disturbance Avoidance and Mitigation Strategy (RAMS)').

**1.16** The Main Modifications to Section 1 of the Local Plan and its accompanying SA Addendum Report were published for consultation from 27th August to 9th October 2020.

**1.17** The Inspector issued his final report on 10th December 2020, which concluded that, subject to the incorporation of the final set of Main Modifications, the Section 1 Local Plan met the required tests which enabled it to proceed to formal adoption.

**1.18** Section 1 of the Braintree District Local Plan 2013-2033 was formally adopted on 22nd February 2021<sup>9</sup>.

For Braintree, the Section 1 Plan notably includes Policy SP4 which sets out the minimum housing requirement of 716 dwellings per annum and 14,320 new homes in total over the period 2013 to 2033. Through Policy SP5, the Section 1 Plan also sets an employment land requirement for Braintree of 20.9 to 43.3 hectares for that period.

## Section 2 Local Plan

**1.19** Section 2 of the Local Plan outlines the specific policies and site allocations for Braintree District. The preparation of the Section 2 Local Plan comprised a number of stages, which are summarised in **Table 1.1**.

It was agreed with the Planning Inspectorate that the Section 1 Local Plan would be subject to Examination in advance of the Section 2 Local Plan. This accounts for the lapse of time since the most recent SA Report for the Section 2 Local Plan was undertaken.

## Main Modifications

**1.20** In August 2020, two Inspectors were appointed to examine the 'soundness' of the Section 2 Local Plan. BDC prepared a Draft Schedule of Recommended Modifications to the Section 2 Local Plan<sup>10</sup> (May 2021) in advance of the hearing sessions which took place in July 2021. Following the Examination hearings, a Final Schedule of Main Modifications to the Section 2 Local Plan has been prepared by the

<sup>8</sup> Matter 1 relates to legal and procedural requirements; key issues; Vision and strategic objectives (chapter 1)

<sup>9</sup> Tendring District Council, Colchester Borough Council, and Braintree District Council (2021) North Essex Authorities' Shared Strategic Section 1 Local Plan [online] Available at: <https://www.braintree.gov.uk/downloads/file/3022/local-plan-2013-2033-section-1-adopted-february-2021->

<sup>10</sup> Braintree District Council (2021) Local Plan Examination of Section 2 Further Suggested Changes to the Local Plan Section 2 (pdf) Available at: <https://www.braintree.gov.uk/directory-record/1059457/sdbdc008a-1-3-further-suggested-changes-to-the-local-plan-may-2021>

Inspector, which this SA Addendum relates to. The proposed modifications take into account the matters raised by representations, hearing statements and through the hearing sessions. The Inspector considered these modifications necessary for soundness.

**1.21** The most significant modifications to the Section 2 Local Plan relate to eight policies, namely:

- Policy LPP17: Housing Provision and Delivery.
- Policy LPP20: Strategic Growth Location - Former Towerlands Park Site.
- Policy LPP21: Policy Strategic Growth Location - North West Braintree.
- Policy LPP22: Strategic Growth Location - Land at Feering.
- Policy LPP23: Strategic Growth Location - Wood End Farm, Witham.
- Policy LPP53: Provision for Open Space, Sport and Recreation.
- Policy LPP67: Natural Environment and Green Infrastructure.
- Policy LPP 68: Protected Species, Priority Species and Priority Habitat.

**1.22** The Main Modifications to these and other policies are detailed in **Appendix D**, with commentary on the SA implications of each proposed modification.

### Relationship with other plans and programmes

**1.23** The Section 2 Local Plan is not prepared in isolation and is greatly influenced by other international, national, county and local level plans. The SEA Regulations require a review of

the environmental and sustainability objectives set out in relevant plans and programmes at the international and national levels, which is detailed in **Chapter 3** and **Appendix A** of this SA Addendum. However, the following county and local level plans are also likely to influence the Section 2 Local Plan and have been taken into consideration during the plan preparation and SA process (please note that this list is not exhaustive):

- Everyone's Essex: Draft Plan for Essex 2021-2025<sup>11</sup> (Essex County Council, 2021)
- Net Zero: Making Essex Carbon Neutral<sup>12</sup> (Essex County Council, 2021)
- Essex Coast Recreational disturbance Avoidance & Mitigation Strategy (RAMs) Supplementary Planning Document<sup>13</sup> (Place Services, 2020)
- Local Flood Risk Management Strategy<sup>14</sup> (Essex County Council and Place Services, 2018)
- North Essex Rapid Transit Study<sup>15</sup> (Essex Highways, 2017)
- Economic Plan for Essex 2017-2021<sup>16</sup> (Essex County Council, 2017)
- Anglian River Basin Management Plan<sup>17</sup> (Environment Agency, 2015)
- Essex Public Rights of Way Improvement Plan<sup>18</sup> (Essex County Council, 2009)
- Essex Landscape Character Assessment<sup>19</sup> (Chris Blandford Associates, 2003)
- Climate Change Strategy 2021-2030<sup>20</sup> (Braintree District Council, 2021)

<sup>11</sup> Essex County Council (2021) *Everyone's Essex: Draft Plan for Essex 2021-2025* Available at: <https://assets.ctfassets.net/knkzaf64jx5x/2HZhJsmJh37nxqT6e9In2e/d488238b25cb263c699ac78316030755/ECC-Everyones-Essex-our-draft-plan-for-2021-to-2025.pdf>

<sup>12</sup> Essex County Council (2021) *Net Zero: Making Essex Carbon Neutral* (pdf) Available at: <https://assets.ctfassets.net/knkzaf64jx5x/1fzMJKNmIfz8WHx4mzdy2h/e7c57523466f347fd6cdccb3286c113c/Net-Zero-Report-Making-Essex-Carbon-Neutral.pdf>

<sup>13</sup> Essex County Council Place Services (2020) *Essex Coast Recreational disturbance Avoidance & Mitigation Strategy Supplementary Planning Document* Available at: [https://consultations.essex.gov.uk/place-services/the-essex-coast-rams-spd/supporting\\_documents/Essex%20Coast%20RAMS%20SPD\\_January%202020.pdf](https://consultations.essex.gov.uk/place-services/the-essex-coast-rams-spd/supporting_documents/Essex%20Coast%20RAMS%20SPD_January%202020.pdf)

<sup>14</sup> Essex County Council and Place Services (2018) *Local Flood Risk Management Strategy* Available at: <https://flood.essex.gov.uk/media/1293/essex-local-flood-risk-management-strategy.pdf>

<sup>15</sup> Essex Highways (2017) *North Essex Rapid Transit Study* Available at: <https://cbccrmdata.blob.core.windows.net/noteattachment/EB066%20North%20Essex%20Rapid%20Transit%20Study%20final%20December%202017.pdf>

<sup>16</sup> Essex County Council (2017) *Economic Plan for Essex 2017-2021* Available at: <https://www.essex.gov.uk/plans-and-strategies>

<sup>17</sup> DEFRA and Environment Agency (2015) *Anglian river basin district: River basin management plan* (pdf) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718327/Anglian\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf)

<sup>18</sup> Essex County Council (2009) *Essex Public Rights of Way Improvement Plan* Available at: <https://www.essexhighways.org/uploads/files/final-rowip.pdf>

<sup>19</sup> Chris Blandford Associates (2003) *Essex Landscape Character Assessment* Available at: [https://www.rochford.gov.uk/sites/default/files/evibase\\_EB6\\_essex\\_laandscape\\_character\\_asssess2003pt1.pdf](https://www.rochford.gov.uk/sites/default/files/evibase_EB6_essex_laandscape_character_asssess2003pt1.pdf)

<sup>20</sup> Braintree District Council (2021) *Climate Change Strategy 2021-2030* (online) Available at:

- Braintree District Infrastructure Delivery Plan Update Report (Troy Planning + Design, Navigus Planning, 2021)<sup>21</sup>
- Braintree District Retail Study Update 2018 (Lichfields, 2018)<sup>22</sup>
- Braintree District Economic Viability Study (Three Dragons and Troy Planning + Design, 2017)<sup>23</sup>
- Braintree District Council Level 2 Strategic Flood Risk Assessment (Aecom, 2017)<sup>24</sup>
- Braintree District Gypsy and Traveller Accommodation Assessment (Opinion Research Services, 2017)<sup>25</sup>
- Braintree District Council Water Cycle Study (Aecom, 2017)<sup>26</sup>
- Braintree, Chelmsford, Colchester and Tendring Objectively Assessed Housing Need Study Update (Peter Brett Associates, 2016)<sup>27</sup>
- Braintree District Council Strategic Land Availability Assessment (Braintree District Council, 2016)<sup>28</sup>
- Braintree District Council Level 1 Strategic Flood Risk Assessment Update (Aecom, 2016)<sup>29</sup>
- Braintree and Witham Surface Water Management Plan (Aecom, 2016)<sup>30</sup>
- Braintree District Open Space Study (Braintree District Council, 2016)<sup>31</sup>
- Braintree District Employment Land Needs Assessment (Aecom, 2015)<sup>32</sup>
- Braintree District Council Affordable Housing Viability Assessment (Andrew Golland Associates, 2015)<sup>33</sup>
- Braintree District Council Strategic Housing Market Assessment (DCA, 2014)<sup>34</sup>
- Braintree District Economic Development Prospectus 2013/2026 (Braintree District Council, 2013)<sup>35</sup>
- Braintree District Historic Environment Characterisation Project (EssexWorks, 2010)<sup>36</sup>
- Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (Chris Blandford Associates, 2006)<sup>37</sup>

<https://www.braintree.gov.uk/homepage/212/climate-change-strategy-2021---march-2023>

<sup>21</sup> Braintree District Council (2021) Braintree Infrastructure Delivery Plan Update Report (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3260/bdc058-infrastructure-delivery-plan-update-june-2021>

<sup>22</sup> Braintree District Council (2018) Braintree Retail Study Update 2018 (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3093/bdc032a-braintree-retail-study-update-2018>

<sup>23</sup> Braintree District Council (2017) Braintree Economic Viability Study (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2075/bdc008-economic-viability-study-june-2017>

<sup>24</sup> Braintree District Council (2017) Braintree District Council Level 2 Strategic Flood Risk Assessment (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2196/bdc049-5-5-strategic-flood-risk-assessment-level-2-january-2017>

<sup>25</sup> Braintree District Council (2017) Braintree Gypsy and Traveller Accommodation Assessment (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2080/bdc007-gypsy-and-traveller-accommodation-assessment-may-2017>

<sup>26</sup> Braintree District Council (2017) Water Cycle Study (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2197/bdc050-bdc-water-cycle-study-update-march-2017>

<sup>27</sup> Braintree District Council, Chelmsford City Council, Colchester Borough Council and Tendring District Council (2016) Braintree, Chelmsford, Colchester and Tendring Objectively Assessed Housing Need Study Update (online) Available at:

<https://www.braintree.gov.uk/downloads/file/347/eb018-objectively-assessed-housing-need-study-update-2016>

<sup>28</sup> Braintree District Council (2016) Strategic Land Availability Assessment (online) Available at:

<https://www.braintree.gov.uk/directory-record/6765/shlaa-2016>

<sup>29</sup> Braintree District Council (2016) Level 1 Strategic Flood Risk Assessment Update (online) Available at:

<https://www.braintree.gov.uk/directory-record/7465/bdc049-1-5-strategic-flood-risk-assessment-update-level-1-november-2016>

<sup>30</sup> Braintree District Council (2016) Braintree and Witham Surface Water Management Plan (online) Available at:

<https://www.braintree.gov.uk/downloads/file/1614/bdc051-braintree-witham-surface-water-management-plan-with-appendices-dec-2016>

<sup>31</sup> Braintree District Council (2016) Open Space Study (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3115/bdc040-open-spaces-study-combined-reports>

<sup>32</sup> Braintree District Council (2015) Braintree District Employment Land Needs Assessment (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2076/bdc010-employment-land-needs-assessment-aug-2015>

<sup>33</sup> Braintree District Council (2015) Braintree District Council Affordable Housing Viability Assessment (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2078/bdc029-affordable-housing-viability-assessment-july-2015>

<sup>34</sup> Braintree District Council (2014) Strategic Housing Market Assessment (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3120/bdc011-strategic-housing-market-assessment-shma-2014>

<sup>35</sup> Braintree District Council (2013) Braintree District Economic Development Prospectus 2013/2026 (online) Available at:

<https://www.braintree.gov.uk/downloads/file/2074/bdc009-economic-development-prospectus-2013-2026>

<sup>36</sup> Braintree District Council (2010) Braintree District Historic Environment Characterisation Project (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3114/bdc017-historic-environment-characterisation-study-2010>

<sup>37</sup> Braintree District Council, Brentwood Borough Council, Chelmsford City Council, Maldon District Council, Uttlesford District Council (2006) Landscape Character Assessment (online) Available at:

<https://www.chelmsford.gov.uk/resources/assets/attachment/full/0/46395.pdf>

**1.24** In addition, Essex County Council has responsibility for waste and minerals planning in the area, as well as preparing Local Transport Plans. The Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan, together with the emerging Local Plan, will form the Development Plan for Braintree:

- **Essex Minerals Local Plan**<sup>38</sup> - Essex County Council is the minerals planning authority for the District, and is responsible for preparing planning policies, and also for assessing applications for minerals development. There are active quarry sites in the Borough as well as currently unworked sand and gravel and brick clay deposits which are subject to a Minerals Safeguarding policy within the Minerals Local Plan. The safeguarding policy requires the minerals planning authority – Essex County Council - to be consulted on development proposals covering five hectares or more within the sand and gravel minerals safeguarding area, and for all developments greater than one dwelling for the brick clay safeguarded area. The Minerals Safeguarding Areas within Braintree District are shown on the Policies Map in the Section 2 Local Plan.
- **Essex and Southend-on-Sea Waste Local Plan**<sup>39</sup> - Essex County Council is the waste planning authority for the District, and is responsible for preparing planning policies, and also for assessing applications for waste management development. Cordons Farm is identified as a main Local Authority Collected Waste Site. The Plan proposes new waste development at Rivenhall for biological waste and residual, non-hazardous waste management. It also identifies seven Areas of Search to meet the need for additional small scale waste management facilities. These Areas of Search are existing industrial estates within the Borough and are located away from residential and other uses sensitive to amenity impacts such as schools, retail, leisure and office development (i.e., Bluebridge Industrial Estate; Earls Colne Airfield; Eastways-Crittall Road, Waterside Park; Freebournes Industrial Estate; Skyline 120;

Springwood Industrial Estate; and Sturmer Industrial Estate Area 1).

- **Essex Local Transport Plan**<sup>40</sup> - The Essex Local Transport Plan sets out the 15-year vision to improve travel in the county and underlines the importance of the transport network in achieving sustainable, long term economic growth and enriching the life of residents. It is supplemented by delivery strategies for public transport, highways, cycling and public rights of way.

## Neighbouring Local Plans

**1.25** Throughout the preparation of the Section 2 Local Plan and the SA process, consideration has been given to the local plans being prepared by the authorities around Braintree District. As explained above, Section 1 of the Local Plan was prepared jointly by the North Essex Authorities (i.e., BDC, Tendring District Council, and Colchester Borough Council) and forms the first part of each authorities' respective Local Plans.

**1.26** The development proposed in the neighbouring authorities Local Plans could give rise to in-combination effects with the effects of the Section 2 Local Plan, and the effects of the various plans may travel across local authority boundaries. The authorities that border Braintree District include:

- Colchester Borough Council – Examination hearings on the **Publication Draft Colchester Section 2 Local Plan 2017-2033**<sup>41</sup> took place in April 2021. The Council are currently preparing the Main Modifications to the Colchester Section 2 Local Plan. Section 1 of the Colchester Borough Local Plan 2017-2033 was formally adopted on 1<sup>st</sup> February 2021<sup>42</sup>.
- Maldon District Council – The **Maldon District Local Development Plan**<sup>43</sup> was adopted on 27<sup>th</sup> July 2017.
- Babergh District Council – The **Publication Draft Babergh and Mid Suffolk Joint Local Plan**<sup>44</sup> was submitted to the Secretary of State for examination on

<sup>38</sup> Essex County Council (2014) Essex Minerals Local Plan (pdf) Available at: <https://www.braintree.gov.uk/downloads/file/3115/bdc040-open-spaces-study-combined-reports>  
<https://assets.ctfassets.net/knkzaf64jx5x/5UZuVtnjZbJ81olvZoZKvX/90acfc65df6fa8ee8ab20df3f0cda1c8/essex-minerals-local-plan-adopted-july-2014.pdf>

<sup>39</sup> Essex County Council and Southend-on-Sea Council (2017) Essex and Southend-on-Sea Waste Local Plan (pdf) Available at: [https://www.southend.gov.uk/downloads/file/5194/adopted\\_waste\\_local\\_plan](https://www.southend.gov.uk/downloads/file/5194/adopted_waste_local_plan)

<sup>40</sup> Essex County Council (2011) Essex Transport Strategy: The Local Transport Plan for Essex (pdf) Available at: [https://www.essexhighways.org/uploads/downloads/essex\\_ltp.pdf](https://www.essexhighways.org/uploads/downloads/essex_ltp.pdf)

<sup>41</sup> Colchester Borough Council (2017) Publication Draft Colchester Borough Local Plan 2017-2033 [online] Available at: <https://www.colchester.gov.uk/local-plan/evidence-base-emerging-local-plan-2017-33/>

<sup>42</sup> Tendring District Council, Colchester Borough Council, and Braintree District Council (2021) North Essex Authorities' Shared Strategic Section 1 Local Plan [online] Available at: <https://www.colchester.gov.uk/local-plan/section-1/>

<sup>43</sup> Maldon District Council (2017) Approved Maldon District Local Development Plan (online) Available at: [https://www.maldon.gov.uk/homepage/7031/emerging\\_local\\_plan](https://www.maldon.gov.uk/homepage/7031/emerging_local_plan)

<sup>44</sup> Babergh District Council and Mid Suffolk District Council (2020) Babergh and Mid Suffolk Joint Local Plan Pre-Submission (Regulation 19) Document (online) Available at: <https://www.midsuffolk.gov.uk/assets/Strategic->

31<sup>st</sup> March 2021. Examination hearings are currently taking place on the Joint Local Plan.

- Chelmsford City Council – **The Chelmsford Local Plan**<sup>45</sup> was adopted in May 2020 and covers the period 2013-2036.
- **Uttlesford District Council** is currently preparing a new Local Plan. A replacement plan for the 2005 Local Plan<sup>46</sup> was submitted to the Secretary of State for examination but subsequently withdrawn in May 2020 in light of the examining Inspectors' comments on the soundness of the plan. The Inspectors' stated that there was insufficient evidence to justify its garden communities proposals, noting that the Draft Plan had not provided enough detail on the locations of the proposed settlements. They were also concerned about housing delivery numbers and the cost of necessary transport infrastructure. The Council has stated that they are committed to having an up-to-date Local Plan in place by the Government deadline of December 2023.
- South Cambridgeshire District Council – The **South Cambridgeshire Local Plan**<sup>47</sup> was adopted on 27<sup>th</sup> September 2018 and covers the period up to 2031.
- **West Suffolk Council** - Consultation on the **West Suffolk Local Plan Issues and Options** documents took place between 13<sup>th</sup> October 2020 to the 22<sup>nd</sup> December 2020<sup>48</sup>. The Council is currently considering the comments received during the Issues and Options consultation in advance of preparing the West Suffolk Local Plan Preferred Options document which is expected for consultation in March 2022.

## Neighbourhood Plans

**1.27** Throughout the preparation of the Section 2 Local Plan and the SA process, consideration has been given to the

Neighbourhood Plans (NPs) within Braintree District. NPs have been adopted for the following areas and these now form part of the Development Plan for Braintree:

- Cressing<sup>49</sup>;
- Coggeshall<sup>50</sup>;
- Hatfield Peverel<sup>51</sup>;
- Salings<sup>52</sup>; and
- Bradwell with Pattiswick<sup>53</sup>

**1.28** The Neighbourhood Areas of Great Yeldham, Stisted, Great Bardfield and Toppesfield Neighbourhood Areas are currently working on their draft Neighbourhood Plans. Consultation on the Bures Hamlet and Bures Mary Neighbourhood Plan closed on 15<sup>th</sup> October 2021. The Feering Neighbourhood Plan was submitted under Regulation 15 to BDC in July 2021. In August 2021, BDC appointed an independent examiner to examine the Kelvedon Neighbourhood Plan.

## Sustainability Appraisal and Strategic Environmental Assessment.

**1.29** Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

**1.30** Strategic Environmental Assessment (SEA) is also a statutory assessment process, required by the SEA Regulations<sup>54</sup>. The SEA Regulations require the formal assessment of plans and programmes which are likely to have

[Planning/JLPExamination/CoreDocLibrary/JLP-Core-Document-Library-live.pdf](#)

<sup>45</sup> Chelmsford City Council (2020) Local Plan [online] Available at: <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/new-local-plan/adopted-local-plan/>

<sup>46</sup> Uttlesford District Council (2005) 2005 Local Plan [online] Available at: <https://www.uttlesford.gov.uk/local-plan-2005>

<sup>47</sup> South Cambridgeshire Council (2018) South Cambridgeshire Local Plan [online] Available at: <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/the-adopted-development-plan/south-cambridgeshire-local-plan-2018/>

<sup>48</sup> The West Suffolk Local Plan Issues and Options comprises three parts – Part One: Developing a Spatial Strategy, Part Two – Local Issues, and Part Three – Settlements. Available at: [https://westsuffolk.inconsult.uk/WSLP\\_Issues\\_and\\_Options/consultationHome](https://westsuffolk.inconsult.uk/WSLP_Issues_and_Options/consultationHome)

<sup>49</sup> DAC Planning (2020) Cressing Parish Neighbourhood Plan 2017-2033 (online) Available at: <https://www.braintree.gov.uk/directory-record/7245/cressing-adopted-version-february-2020>

<sup>50</sup> Coggeshall Parish Council (2021) Coggeshall Parish Neighbourhood Plan (online) Available at:

<https://www.braintree.gov.uk/directory-record/1059603/coggeshall-neighbourhood-plan-adopted-july-2021>

<sup>51</sup> Hatfield Peverel Parish Council (2019) Hatfield Peverel Neighbourhood Development Plan 2015-2033 (online) Available at: <https://www.braintree.gov.uk/directory-record/7277/hatfield-peverel-neighbourhood-plan-document>

<sup>52</sup> Salings Parish Council (2021) Salings Neighbourhood Plan (online) Available at: <https://www.braintree.gov.uk/downloads/file/3405/the-salings-neighbourhood-plan-october-2021>

<sup>53</sup> Bradwell with Pattiswick Parish Council (2019) Bradwell with Pattiswick Parish Neighbourhood Plan 2017-2033 (online) Available at: <https://www.braintree.gov.uk/directory-record/7164/bradwell-with-pattiswick-np-document-adopted-22nd-july-2019>

<sup>54</sup> Statutory Instrument 2004, No 1633, as amended by Statutory Instrument 2018 No 1232 and by Statutory Instrument 2020 No 1531

significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

**1.31** The UK left the EU in January 2020, with the transition period ending at the end of 2020. Following the end of the transition period, most EU law continues to apply as set out in the European Union (Withdrawal) Act 2018 (EUWA) and the 'EU Exit' amendments to English legislation.

**1.32** SEA and SA are separate processes but have similar aims and objectives. SEA focuses on the likely environmental effects of a plan while SA includes a wider range of considerations, such as social and economic impacts. The Government's Planning Practice Guidance<sup>55</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Braintree District Section 2 Local Plan is being undertaken using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

## SA of the Section 2 Local Plan

**1.33 Table 1.1** summarises the stages of the Braintree District Local Plan preparation and the accompanying SA Reports that have been prepared and consulted on. Please note that for the initial stages in the plan-making process, i.e., for the Scoping stage and Issues and Options stage, the concept of preparing a joint Local Plan between the North Essex Authorities was not yet identified. Therefore, the three authorities prepared separate Scoping Reports and Issues and Options documents (and accompanying Issues and Options SA Reports).

**1.34** There have been four key stages in the SA of the Section 2 Local Plan to date (see **Table 1.1**). As previously explained, this SA Addendum should be read in conjunction with the Section 2 2017 SA Report.

**1.35** Following each stage of consultation, all representations relating to the SA process were reviewed. Appendix 8 of the 2017 SA Report contains a summary of the representations received during the consultations on the Scoping Report, Issues and Options SA Report, and the Draft Local Plan SA Report. SA-related representations that were received during the consultation on the Publication Draft Section 2 Local Plan were considered through the Examination process.

**Table 1.1: Section 1 and Section 2 Local Plan and SA Stages and consultation documents**

Local Plan consultation stage and documents	SA consultation stage and documents
<b>Scoping stage / Issues and Options stage</b>	
Issues & Options documents prepared by each individual NEA. <u>BDC Issues and Scoping Document</u> (January 2015) Consultation: 26 <sup>th</sup> January - 6 <sup>th</sup> March 2015.	SA Scoping Reports prepared by each individual NEA. BDC Scoping Report (December 2014) Consultation: 26 <sup>th</sup> January - 6 <sup>th</sup> March 2015.
<b>Draft Local Plan stage</b>	
<u>BDC Draft Local Plan</u> (June 2016) Consultation: 9 <sup>th</sup> July - 16 September 2016	<u>SA Report on North Essex Authorities Section 1 Preferred Options Local Plan</u> (June 2016) <u>SA Report on Section 2 Draft Local Plan</u> (June 2016) Consultation on Section 1 SA Report and Section 2 SA Report: 27 <sup>th</sup> June – 19 <sup>th</sup> August 2016.
<b>Publication Draft stage</b>	
<u>BDC Publication Draft Section 1 and 2 Local Plan</u> (June 2017) Consultation: 16 <sup>th</sup> June – 28 <sup>th</sup> July 2017	<u>SA Report on North Essex Authorities Section 1 Publication Draft Local Plan</u> (June 2017) <u>SA Report on Section 2 Publication Draft Local Plan</u> (June 2017)

<sup>55</sup> See <https://www.gov.uk/government/collections/planning-practice-guidance>

Local Plan consultation stage and documents	SA consultation stage and documents
	<p><u>Non-Technical Summary of the SA Report on Section 2 Publication Draft Local Plan</u></p> <p>Consultation: 16<sup>th</sup> June – 28<sup>th</sup> July 2017</p>
Submission to the Secretary of State	
<p>Submission of the BDC Publication Draft Section 1 and 2 Local Plan to the Secretary of State for Examination took place on 9<sup>th</sup> October 2017. Other North Essex Authorities also submitted their respective Section 1 and Section 2 Local Plans at this time.</p>	
Section 1 Examination	
<p>Initial hearings 16<sup>th</sup> to 25<sup>th</sup> January 2018 and extra day for Matter 1 on 9<sup>th</sup> May 2018. Additional evidence base documents prepared including the Additional SA Report.</p> <p>Additional hearing sessions 14<sup>th</sup> - 30<sup>th</sup> January 2020</p> <p>Proposed Main Modifications to the Publication Draft Section 1 Local Plan</p> <p>Consultation: 27<sup>th</sup> August – 9<sup>th</sup> October 2020</p> <p><u>Examiner's Schedule of Main Modifications to the Publication Draft Section 1 Local Plan (December 2020)</u></p>	<p><u>Additional SA Report on the North Essex Authorities Section 1 Local Plan (July 2019)</u></p> <p>Consultation: 19<sup>th</sup> August to 30<sup>th</sup> September 2019</p> <p><u>SA Addendum Report on North Essex Authorities Section 1 Main Modifications (August 2020)</u></p> <p>Consultation: 19<sup>th</sup> August – 30<sup>th</sup> September 2020</p>
Section 1 Adoption	
<p><u>Braintree District Local Plan 2013-2033: North Essex Authorities Shared Strategic Section 1 Plan</u> was formally adopted on 22<sup>nd</sup> February 2021.</p>	
Section 2 Examination	
<p><b>Ongoing</b></p> <p><u>Draft Schedule of Recommended Modifications to the Section 2 Local Plan (May 2021)</u></p> <p>Hearing sessions 6<sup>th</sup> July – 15<sup>th</sup> July 2021.</p> <p>Schedule of Proposed Main Modifications to the Publication Draft Section 2 Local Plan (October 2021)</p>	<p>SA Addendum Report for the Main Modifications to Section 2 of the Local Plan (this report).</p> <p>Non-Technical Summary of the SA Addendum Report for the Main Modifications to Section 2 of the Local Plan (October 2021)</p>

## Habitats Regulations Assessment

**1.36** BDC is also required to undertake a Habitats Regulations Assessment (HRA) of the Section 2 Local Plan. The aim of the HRA is to assess the potential for the Local Plan to have adverse effects on the integrity of European designated nature conservation sites. The initial screening stage of the HRA considers whether the Local Plan is likely to have significant effect on these sites either alone or in combination with other plans and projects. If likely significant effects cannot be ruled out at the screening stage, then an Appropriate Assessment (AA) must be carried out.

**1.37** The HRA process has its own legislative drivers and requirements and, while the HRA findings may inform the SA, it is important that the HRA remains distinguishable from the

wider SA process. The HRA has been undertaken in parallel with the SA and the detailed methodology and findings are reported separately.

### HRA of the Section One Local Plan

**1.38** A HRA Screening of the North Essex Authorities Shared Section 1 Local Plan was undertaken by LUC in 2016<sup>56</sup>. The HRA Screening identified the following likely significant effects (LSEs) on European sites, either alone or in-combination with other plans and projects, which could not be rule out and therefore required further consideration at the AA stage:

- **Loss of offsite habitat** – Abberton Reservoir Special Protection Area (SPA)/Ramsar; Blackwater Estuary SPA/Ramsar; Hamford Water Special Area of Conservation (SAC); Hamford Water SPA/Ramsar;

<sup>56</sup> LUC (2016) HRA Screening for North Essex Authorities Strategic Section 1 Local Plans (pdf) Available at:

<https://www.braintree.gov.uk/downloads/file/1159/8-eb002-hra-screening-north-essex-authorites-strategic-part-1-local-plans>

Stour and Orwell Estuaries SPA/Ramsar; and Colne Estuaries SPA/Ramsar.

- **Recreational impacts** – Essex Estuaries SAC; Hamford Water SAC; Hamford Water SPA/Ramsar; Stour and Orwell Estuaries SPA/Ramsar; Colne Estuary SPA/Ramsar; and Blackwater Estuary SPA/Ramsar.
- **Water quality** – Essex Estuaries SAC; Stour and Orwell Estuaries SPA/Ramsar; and Colne Estuary SPA/Ramsar.

**1.39** The AA of the North Essex Authorities Shared Section 1 Local Plan was undertaken in May 2017<sup>57</sup>. The AA Report identified whether the above LSE's will, in light of mitigation and avoidance measures, result in adverse effects on the integrity (AEol) of the European sites either alone or in-combination with other plans and projects.

**1.40** The AA of the North Essex Authorities Shared Section 1 Local Plan was undertaken in May 2017<sup>58</sup>. The HRA Report identified whether the above LSE's will, in light of mitigation and avoidance measures, result in adverse effects on the integrity (AEol) of the European sites either alone or in-combination with other plans and projects.

The 2017 HRA Report concluded that, providing the mitigation safeguards identified in the AA Report are adopted and implemented, the **Section 1 Local Plan will not result in AEol of European sites either alone or in-combination with other plans and projects.**

**1.41** An update to the HRA Report was prepared in July 2019<sup>59</sup> to address the advice provided by the Planning Inspector relating to the HRA taking into account recent case law judgements including the People Over Wind, Peter Sweetman v Coillte Teoranta (CJEU Case C-323/17) (April 2018) and Holohan v An Bord Pleanala (November 2018).

The 2019 HRA Report concluded that, in light of the People Over Wind and Holohan rulings, the findings of the HRA rely on avoidance and mitigation measures only at the AA stage and that the complex relationships between qualifying and non-qualifying habitats and

species for each site have been taken into account. In conclusion, providing that key recommendations and mitigation requirements are adopted and implemented, the **Section 1 Local Plan will not result in adverse effects on the integrity of European sites either alone or in-combination with other plans and projects.**

**1.42** Further HRA work was carried out in August 2020 to consider the proposed Main Modifications to the Section 1 Local Plan.

The 2020 HRA Addendum Report<sup>60</sup> concluded that the Section 1 Local Plan, incorporating the proposed Main Modifications, **will not result in adverse effects on the integrity of European sites either alone or in-combination with other plans and projects.**

## HRA of the Section Two Local Plan

**1.43** LUC undertook HRA Screening of the Section 2 Local Plan<sup>61</sup> in August 2016 and identified LSEs on the following European sites, either alone or in-combination with other plans and projects, which could not be rule out and therefore required further consideration at the AA stage:

- **Recreational disturbance** - Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.
- **Built development** – Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.
- **Changes in species distribution** – Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.
- **Air pollution** – Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach

<sup>57</sup> LUC (2017) HRA Report for North Essex Authorities Strategic Section 1 Local Plans (pdf) Available at: <https://www.braintree.gov.uk/downloads/file/1150/9-eb003-habitats-regulation-assessment-screening-report-section-1-may-2017>

<sup>58</sup> LUC (2017) HRA Report for North Essex Authorities Strategic Section 1 for Local Plans [pdf]. Available at: <https://cbccrmdata.blob.core.windows.net/noteattachment/EB003%20Habitats%20Regulation%20Assessment%20Report%20North%20Essex%20Authorities%20Local%20Plan%20%20Section%201%20May%202017.pdf>

<sup>59</sup> LUC (2019) HRA Report for North Essex Authorities Shared Strategic Section 1 Local Plan (pdf) Available at:

<https://www.braintree.gov.uk/downloads/file/1155/eb083-hra-north-essex-authorities-shared-strategic-section-1-local-plan-july-2019>

<sup>60</sup> LUC (2020) HRA Addendum Report for North Essex Authorities Shared Strategic Section 1 Local Plan Proposed Main Modifications (pdf) Available at: <https://www.braintree.gov.uk/downloads/file/2576/eb083a-hra-north-essex-authorities-shared-strategic-section-1-local-plan-update-following-proposed-main-mods-aug-2020>

<sup>61</sup> LUC (2016) HRA Screening Report for Braintree District Local Plan Section 2 (online) Available at: <https://www.braintree.gov.uk/downloads/file/3103/bdc026-habitats-regulation-assessment-screening-report-section-2-aug-2016>

Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.

- **Coastal squeeze** - Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.
- **Invasive species** - Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.
- **Fishing and fisheries** - Blackwater Estuary SPA/Ramsar site; Colne Estuary SPA/Ramsar site; Crouch and Roach Estuaries SPA/Ramsar site; Dengie SPA/Ramsar site; Essex Estuaries SAC site.

**1.44** A HRA Report<sup>62</sup>, containing the AA, was prepared to accompany the Publication Draft Section 2 Local Plan.

The AA concluded that, providing the mitigation safeguards identified in the HRA Report are adopted and implemented, including the preparation of a Recreation Avoidance and Mitigation Strategy (RAMS), the **Section 2 Local Plan will not result in AEol of European sites either alone or in-combination with other plans or projects.**

**1.45** The HRA work has now been updated, including to consider the proposed modifications to the Section 2 Local Plan and the implications of changes in case law. The HRA Report of the Main Modifications to the Section 2 Local Plan as proposed to be modified (November 2021) also concluded **that no AEol will occur subject to the provision of safeguarding and mitigation measures identified in the HRA Report.**

## Structure of this SA Addendum

**1.46** This chapter has introduced the Braintree District Local Plan and its relationship to other plans and programmes and has summarised the stages in the SA undertaken to date. The rest of this SA Addendum is structured as follows:

- **Chapter 2** sets out the methodology used for the assessments in this SA Addendum.
- **Chapter 3** presents an update to the review of other relevant plans and baseline information.
- **Chapter 4** summarises the SA findings for additional proposed site allocations and reasonable alternatives.

- **Chapter 5** summarises the appraisal findings for the Main Modifications.
- **Chapter 6** details the cumulative and synergistic effects of the Braintree District Section 2 Local Plan as proposed to be modified.
- **Chapter 7** summarises the key findings from the SA of the Main Modifications and describes the next steps to be undertaken.

**1.47** This SA Addendum is supported by the following appendices:

- **Appendix A** presents the **updated policy context and baseline information** for Braintree District.
- **Appendix B** presents the detailed **SA findings** for additional proposed site allocations and reasonable alternatives.
- **Appendix C** sets out the detailed assessment criteria used to guide the SA of additional sites.
- **Appendix D** reproduces the **Schedule of Main Modifications**, with commentary on the SA implications of each proposed modification.
- **Appendix E** presents the Council's reasons for selecting or rejecting **reasonable alternatives**.

<sup>62</sup> LUC (2017) HRA Report for Section 2 of the Braintree Publication Draft Local Plan (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3106/bdc027-habitats-regulation-assessment-screening-report-section-2-may-2017>

## Chapter 2

### Methodology

This chapter describes the approach that has been taken to the SA of the Main Modifications to the Section 2 Local Plan.

#### Introduction

**2.1** The approach to assessing the SA implications of the proposed Main Modifications firstly involved considering each proposed modification as set out in the Schedule of Main Modifications. A column was added to the Schedule of Main Modifications to consider and record whether the proposed modification would be likely to change the SA findings presented in the 2017 SA Report for the relevant part of the Braintree District Local Plan that the modification relates to. The Schedule of Main Modifications with the additional 'SA implications' column is presented in **Appendix C** of this SA Addendum, and the findings are summarised in **Chapter 5**.

**2.2** New site allocations as well as reasonable alternatives to these are appraised in **Appendix C** and their likely sustainability effects are summarised in **Chapter 4** of this SA Addendum. As explained in **Chapter 4**, certain other sites were also appraised, for example those whose development boundary has changed significantly relative to that allocated in the Submission Draft Local Plan.

#### Sustainability context for development in Braintree

**2.3** Chapter 3 of the 2017 SA Report sets out the sustainability context for the Section 2 Local Plan. It provides a review of relevant plans and programmes; a description of the current state (at that time) of the environment; key sustainability issues facing the District; and their likely future evolution in the absence of the Section 2 Local Plan. **Chapter 3** and **Appendix A** of this SA Addendum present an update to those sections to reflect the most recent situation and up-to-date sources of data, in order to inform the assessment of the proposed Main Modifications.

#### SA framework

**2.4** This SA Addendum Report is prepared within the context of the previous SA that was undertaken for the Section 2 Local

Plan in 2017. Having updated the policy review, baseline information and key sustainability issues facing Braintree, it was concluded that the framework of sustainability objectives used to guide the previous stages of SA work (as set out in Chapter 2 of the 2017 SA Report) remains valid.

**2.5** The assessment reported in this document therefore continues to use this same 'SA framework' (see **Table 2.2** overleaf). The final column of the table identifies which of the topics specified in the SEA Regulations is addressed by each objective. The policy assessment criteria outlined in **Table 2.2** are not intended to be exhaustive but helped to guide identification of the likely sustainability effects of the Braintree District Local Plan policies. Appendix 3 of the 2017 SA Report outlines the criteria used to guide assessment of the proposed site allocations by sustainability objective.

**2.6** The proposed Main Modifications were appraised in relation to their likely effects in relation to the sustainability objectives set out in this SA framework, compared to the present baseline situation and likely evolution of key issues in the absence of the plan.

## Appraisal symbology

**2.7** The SA uses colour-coded symbols attributed to each policy and site allocation to indicate its likely sustainability effects and performance against each SA objective. **Table 2.1** shows how these symbols are applied during the appraisal. Note that the colours used have been updated since the 2017 SA Report in order to comply with the Government's accessibility guidelines.

**Table 2.1: Key to symbols and colour coding used in the SA of the Main Modifications**

Symbol and Colour Coding	Description
++	The policy/site allocation is likely to have a significant positive impact on the SA objective(s).
+	The policy/site allocation is likely to have a minor positive impact on the SA objective(s).
0	The policy/site allocation is likely to have a negligible or no impact on the SA objective(s).
+/- or +/-	The policy/site allocation is likely to have a mixture of both positive and negative impacts on the SA objective(s).
-	The policy/site allocation is likely to have a minor negative impact on the SA objective(s).

Symbol and Colour Coding	Description
--	The policy/site allocation is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect the policy/site allocation will have on the SA objective(s).
++/-	The policy/site allocation is likely to have a mixture of both significant positive and minor negative impacts on the SA objective(s).
--/+	The policy/site allocation is likely to have a mixture of both significant negative and minor positive impacts on the SA objective(s).

## Reasonable alternatives

**2.8** The SEA Regulations require the consideration of reasonable alternatives to the Section 2 Local Plan. Most of the proposed Main Modifications to the Local Plan provide clarification or and correction and are not considered to have reasonable alternatives.

**2.9** The 2017 SA Report which accompanied the Publication Draft Section 2 Local Plan sets out how reasonable alternatives were considered and selected as part of the SA and plan-making processes up until Submission, as required by the SEA Regulations. Reasonable alternatives to the proposed Main Modifications, which have not previously been subject to SA, have been identified by BDC and LUC in relation to the spatial strategy. A number of new reasonable alternatives were also identified to the new or amended site allocations provided by the Main Modifications and these are identified and appraised in **Chapter 4**.

**2.10** No further reasonable alternatives to the proposed Main Modifications have been identified, taking into account the reasonable alternatives that were already appraised up to the submission of the Section 2 Local Plan, and the nature of the proposed Main Modifications (i.e., non-spatial and/or simply text clarifications/corrections).

## Additional site appraisals

**2.11** Since the Publication Draft Local Plan was submitted for Examination, Braintree District Council has identified a number of new development site allocations. These sites and any new reasonable alternatives to them have been subject to SA. The SA at this Main Modifications stage has also given consideration to the need to appraise other development sites,

for example where the boundary of the previously assessed site has changed. The findings of the additional site appraisals are set out in **Chapter 4** of this report.

**2.12** The assessment framework for the additional sites is set out in **Appendix B** and the detailed site assessment forms can be found in **Appendix C**. Note that the site appraisals presented in this report may not be fully consistent with those presented at earlier stages of SA, for example due to changes in the spatial extent of environmental assets on which site options could have an effect.

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**Table 2.2: Sustainability Appraisal framework**

Sustainability objective(s)		Policy assessment criteria	SEA topic(s)
<b>SA1: Community safety &amp; cohesion</b>	Create safe environments which improve quality of life and community cohesion.	<p>Does it seek to improve / supply community facilities for young people?</p> <p>Does it seek to increase cultural activities or suitable development to stimulate them?</p> <p>Does it seek to reduce inequalities between areas and support cultural identity and social inclusion?</p> <p>Will there be measures to increase the safety and security of new development and public realm?</p>	<p>Population and human health</p> <p>Material assets</p>
<b>SA2: Housing</b>	Provide everyone with the opportunity to live in a decent home.	<p>Will it increase the range and affordability of housing for all social groups?</p> <p>Does it respond to the needs of an ageing population?</p> <p>Does the site respond to a housing type shortage as identified in the SHMA and responding to demographics in population growth?</p> <p>Does it seek to provide appropriate rural affordable housing?</p> <p>Does it seek to provide additional capacity in or of care homes?</p> <p>Will it promote an increase in social housing?</p> <p>Will it support development of homes that are adapted to a changing climate?</p>	<p>Population and human health</p> <p>Material assets</p>
<b>SA3: Health</b>	Improve the health of the District's residents and mitigate/reduce potential health inequalities.	<p>Will it improve access to high quality health facilities?</p> <p>Will it increase access to sport and recreation facilities, open space and/or SANG?</p> <p>Will it encourage access by walking or cycling, and will it increase the overall rates of walking and cycling?</p>	<p>Population and human health</p>
<b>SA4: Service centre vitality</b>	Promote the vitality and viability of all service centres throughout the District.	<p>Does it prevent further loss of retail and other services in rural areas?</p> <p>Does it promote and enhance the viability of existing centres by focusing development in such centres?</p> <p>Will retailing in town centres be enhanced in areas of identified need?</p> <p>Does it seek to increase the proportion of retail and non-commercial office floorspace (as a proportion of total commercial and industrial floorspace) in the District?</p>	<p>Material assets</p>

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Sustainability objective(s)		Policy assessment criteria	SEA topic(s)
<b>SA5: Economy</b>	Achieve sustainable levels of prosperity and economic growth.	<p>Will new housing be supported by adequate local employment opportunities?</p> <p>Does it support small businesses to grow and encourage business innovation?</p> <p>Will it make land and property available for business development?</p> <p>Will it provide a range of suitable employment sites to meet the needs of varying sizes and types of businesses?</p> <p>Will it enhance the District's potential for tourism?</p> <p>Will it encourage the rural economy and diversification of it, while minimising impacts on the rural environment?</p> <p>Will it lead to development having an adverse impact on employment for existing facilities?</p> <p>Does it seek to increase broadband coverage / bandwidth, especially in rural area?</p> <p>Does it avoid sterilising minerals extraction sites identified by the Essex Minerals Plan?</p>	<p>Population and human health</p> <p>Material assets</p>
<b>SA6: Biodiversity &amp; geodiversity</b>	Conserve and enhance the biological and geological diversity of the environment.	<p>Will it conserve and enhance natural/semi natural habitats?</p> <p>Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species?</p> <p>Will it maintain and enhance sites designated for their nature conservation interest?</p> <p>Will it maintain and enhance the connectivity of habitats, their ability to deliver ecosystem services or their resilience to climate change?</p>	Biodiversity, flora and fauna
<b>SA7: Sustainable travel</b>	Promote more sustainable transport choices and uptake.	<p>Will it increase and/or improve the availability and usability of sustainable transport modes?</p> <p>Will it seek to encourage people to use alternative modes of transportation other than private vehicle?</p> <p>Will it lead to the integration of transport modes?</p> <p>Will it improve rural public transport?</p> <p>Does it seek to increase the uptake of public transport through parking standards at destinations?</p> <p>Does it seek to increase the uptake or viability of walking and cycling as methods of transportation, through new infrastructure or integration?</p>	<p>Air</p> <p>Climatic factors</p>
<b>SA8: Accessibility</b>	Promote accessibility and ensure the	<p>Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all?</p> <p>Does it seek to concentrate development and facilities in town centres or where access via sustainable travel is greatest?</p>	Population and human health

# DRAFT

Sustainability objective(s)		Policy assessment criteria	SEA topic(s)
	necessary transport infrastructure to support new development.	<p>Will it assist in reducing the number of road casualties and ensure ease of pedestrian movement especially for the disabled?</p> <p>Will it improve parking conditions at destinations, particularly for commuters?</p> <p>Does it seek to minimise congestion on key routes and at key destinations / areas that witness a large amount of vehicle movements at peak times?</p> <p>Would the scale of development require significant supporting transport infrastructure in an area of identified need?</p> <p>Will planning controls seek to retain garages to reduce conversion to living space to reduce on-street parking?</p>	<p>Material assets</p> <p>Air</p> <p>Climatic factors</p>
<b>SA9: Education and skills</b>	Improve the education and skills of the population.	<p>Does it seek to improve existing educational facilities and/or create more educational facilities?</p> <p>Does it seek to improve existing training and learning facilities and/or create more facilities?</p> <p>Will the employment opportunities available be mixed to suit a varied employment skills base?</p> <p>Will new housing be supported by school expansion or other educational facilities where necessary?</p>	Population and human health
<b>SA10: Historic environment</b>	Conserve and enhance the historic environment, heritage assets and their settings.	<p>Will it protect and enhance heritage assets and their settings?</p> <p>Does it seek to enhance the range and quality of the public realm and open spaces?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p> <p>Does it encourage the use of high-quality design principles to respect local character?</p> <p>Will any adverse impacts be reduced through adequate mitigation?</p>	Cultural heritage including architectural and archaeological heritage
<b>SA11: Climate change mitigation</b>	Reduce contributions to climate change.	<p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it lead to an increased generation of energy from renewable sources?</p> <p>Does it ensure more sustainable modes of travel are provided?</p> <p>Will it encourage greater energy efficiency?</p> <p>Will it improve the efficient use of natural resources, minimising waste and promoting recycling?</p> <p>Will it seek to adhere to the Code for Sustainable Homes?</p>	<p>Climatic factors</p> <p>Population and human health</p>
<b>SA12: Water environment</b>	Improve water quality and address water	Will it lead to no deterioration on the quality of water bodies?	Water

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Sustainability objective(s)		Policy assessment criteria	SEA topic(s)
	scarcity and sewerage capacity.	<p>Will water resources and sewerage capacity be able to accommodate growth?</p> <p>Does it ensure the reinforcement of wastewater treatment works or the provision of alternatives (where required) to support growth?</p>	
<b>SA13: Flood risk</b>	Reduce the risk of flooding.	<p>Does it promote the inclusion of Sustainable Drainage Systems (SuDS) in new developments?</p> <p>Does it seek to avoid development in areas at risk of flooding (fluvial, surface water, groundwater)?</p> <p>Does it seek to avoid increasing flood risk (fluvial, surface water, groundwater) in areas away from initial development?</p> <p>Will developer contributions be utilised for the provision and maintenance of flood defences?</p>	<p>Water</p> <p>Climatic factors</p>
<b>SA14: Air quality</b>	Improve air quality.	<p>Will it improve, or not detrimentally affect air quality along the A12 or A120?</p> <p>Does it ensure that National Air Quality Standards are met at relevant points?</p> <p>Does it seek to improve or avoid increasing traffic flows generally and in particular through potentially significant junctions?</p>	Air
<b>SA15: Landscapes &amp; townscapes</b>	Maintain and enhance the quality of landscapes and townscapes.	<p>Will homes be designed to enhance the existing street scene creating a better cultural heritage &amp; public realm?</p> <p>Will areas of special landscape character be protected?</p> <p>Does it prioritise development on previously developed land over greenfield land?</p> <p>Does it support the positive use and visual enhancement of degraded land or derelict buildings?</p> <p>Will development see a disruption in current field boundaries?</p> <p>Will it lead to rural expansion or development outside development boundaries/limits that increases coalescence with neighbouring settlements?</p> <p>Is the scale / density of development in keeping with the local townscape / landscape?</p> <p>Will it limit light pollution or help to conserve or enhance dark skies?</p>	<p>Landscape</p> <p>Material assets</p>
<b>SA16: Soil</b>	Safeguard and enhance the quality of soil.	<p>Will it avoid the loss of high-quality agricultural land?</p> <p>Will it prevent soil pollution?</p> <p>Will it ensure effective soil protection during construction and development?</p> <p>Will it support the remediation of contaminated land, avoiding environmental pollution or exposure of occupiers or neighbouring land uses to unacceptable health risk?</p>	Soil

## Cumulative and synergistic effects

**2.13** The assessment described above considers each proposed Main Modification to the Section 2 Local Plan in isolation. However, the SEA Regulations require consideration of secondary, cumulative and synergistic effects.

**2.14** Chapter 11 of the 2017 SA Report describes the cumulative and synergistic effects of the Section 2 Local Plan policies and the overall cumulative effects of the Local Plan as a whole (Section 1 and Section 2). **Chapter 6** of this SA Addendum presents an update to those chapters and considers whether the Main Modifications have any implications for the cumulative and synergistic effects of the Section 2 Local Plan that were reported previously.

## Mitigation

**2.15** Schedule 2(7) of the SEA Regulations require the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme to be described in the Environmental Report (i.e., the SA Report). These are usually termed 'mitigation' measures.

**2.16** The SA of the proposed Main Modifications identified the potential for adverse effects to arise from certain individual policies. These effects are often mitigated by safeguards provided in other policies in the Section 2 Local Plan, for example in Policy ENV1: Environment, PP1: Generic Infrastructure and Mitigation Requirements, or Policy SG7: Infrastructure Delivery and Impact Mitigation. In addition, some policies that could give rise to significant effects themselves, such as Policy WC2: Stanway or Policy SC2 Middlewick Ranges, have mitigation built into the policy wording, and this was taken into account in coming to judgements of the likely effects of implementing such policies.

**2.17** The overall effects of the policies in the Main Modifications as a whole, taking into account the mitigation provided in the Section 1 and Section 2 Local Plan, are described in **Chapter 6** of this SA Addendum.

## Difficulties encountered

**2.18** It is a requirement of the SEA Regulations that the SA Report describes any data limitations or other difficulties that are encountered during the assessment process. Chapter 2 of the 2017 SA Report outlines the difficulties that were encountered during the SA of the Publication Draft Section 2 Local Plan. Additional difficulties encountered during the SA process are recorded in the subsequent paragraphs.

**2.19** One of the difficulties in coming to judgements about the effects of the Main Modifications is comparing the policy intent, as worded in policy, and the actual effects of implementation of policy through the delivery of development. Our judgments of the effects are based on what we consider to be the likely effects, taking into account policy wording. For example, there may be safeguards in a policy that aim to prevent negative effects arising, but in practice it may not be possible to mitigate in full such effects, despite the policy safeguards. Where we think this is the case, we have used the precautionary principle to identify such effects, particularly in relation to environmental topics. This means that where it is uncertain that a negative effect will occur, we have assumed that it is more likely to happen than not, in order to avoid painting an overly optimistic picture of the likely outcomes.

**2.20** New and amended site allocations provided for by the Main Modifications and new reasonable alternatives to these were appraised against the criteria set out in Appendix 3 of the 2017 SA Report. These appraisal criteria are based on a variety of digital datasets that provide spatial information on the locations of key services and facilities and on environmental assets in relation to development sites. These datasets were updated for the current round of site appraisals, as presented in the SA of Main Modifications. This approach ensured that the sustainability of newly allocated sites could be compared with that of newly identified reasonable alternatives on an up to date and consistent basis. However, these new site appraisals may not be fully comparable with those presented at earlier stages of SA, for example due to changes in the spatial extent of environmental assets on which site allocations could have an effect.

**2.21** The HRA of the Main Modifications was undertaken in parallel with the SA and it was necessary to revise the assessment of policies to incorporate the findings of the HRA.

## Chapter 3

### Sustainability context for development in Braintree

Chapter 3 of the 2017 SA Report sets out the sustainability context for the Section 2 Local Plan. It provides a review of relevant plans and programmes; a description of the current state (at that time) of the environment; key sustainability issues facing the District; and their likely future evolution in the absence of the Section 2 Local Plan. This chapter presents an update to those sections to reflect the most recent situation and up-to-date sources of data.

**3.1 Appendix A** of this SA Addendum updates the information presented in Chapter 3 of the 2017 SA Report and provides a detailed review of relevant international and national plans, policies and programmes, and presents an update to the baseline information. The updated review is structured around the following key themes:

- Population, Health and Wellbeing;
- Economy and Employment;
- Transport and Accessibility;
- Air, Land and Water Quality;
- Climate Change Mitigation and Adaptation;
- Biodiversity;
- Historic Environment; and
- Landscape.

**3.2** The following paragraphs present a synopsis of the key changes to the policy context since the 2017 SA Report was prepared.

## Policy context

**3.3 Appendix A** of this SA Addendum updates the information in **Appendix 1** of the 2017 SA Report and provides a detailed review of relevant international and national plans and programmes, in line with the SEA Regulations. A summary of key changes in the policy context is provided below.

**3.4** It should be noted that the policy context within which the Section 2 Local Plan and its SA are being prepared is inherently uncertain given the following key factors:

- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors, notably the success of the ongoing vaccination programme to combat the virus. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development; changes to permitted development rights; increased remote working and reduced commuting and related congestion and air pollution; increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.
- **Brexit** - Following the United Kingdom's (UK) departure from the European Union (EU) on 31<sup>st</sup> January 2020, it entered a transition period which ended on 31<sup>st</sup> December 2020. From 1<sup>st</sup> January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. For completeness relevant EU legislation has still been referred to in this report where UK legislation has yet to be amended.
- **The Planning for the Future White Paper August 2020**<sup>63</sup> set out proposals for the reform of the planning system in England, covering plan-making, development management, development contributions, and other related policy proposals. Potential implications include reducing the period of a Local Plan period to 10 years; a

move towards a zonal planning system with areas of England allocated as either Growth Areas; Renewal Areas or Protected Areas; and the abolition of Community Infrastructure Levy (CIL) and Section 106. It remains unclear which of these proposed reforms will be carried forward into the Planning Bill.

## National Planning Policy Framework

**3.5** Since the preparation of the Publication Draft Section 2 Local Plan, several international and national plans, policies and programmes have been updated/published that are relevant to the Section 2 Local Plan.

**3.6** Most notable is the publication of the revised **National Planning Policy Framework**<sup>64</sup> in July 2021, replacing the previous version of the NPPF published in March 2012, and revised in July 2018. The Publication Draft SA Report was published in 2017 and therefore referred to the 2012 version of the NPPF that was extant at that time. Since the Section 2 Local Plan was submitted before 24<sup>th</sup> January 2019, it is also being examined against the 2012 NPPF, in terms of whether it meets the tests of soundness. Notable changes that have been made to the NPPF since the publication of the original 2012 version include:

- Changes to calculating housing need over the plan period and agreeing a housing five-year land supply.
- Design policies are considered instrumental in delivering new homes, and local planning authorities (LPAs) must make sure that the quality of approved developments does not materially diminish between permission and completion.
- Planning policies and decisions should seek to achieve "appropriate densities", with the use of minimum density standards for city and town centres and other areas well-served by public transport, as this is key to their long-term vitality and viability. They should clarify the range of uses permitted in such locations.
- Planning policies and decisions should support opportunities to use the airspace above existing buildings, by allowing upward extensions. There is also support for local authorities to take a positive approach to applications for alternative uses on land which is currently developed but not allocated.

<sup>63</sup> Ministry of Housing, Communities & Local Government (2020) Planning for the Future White Paper August 2020 (pdf) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/958420/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/958420/MHCLG-Planning-Consultation.pdf)

<sup>64</sup> Ministry of Housing, Communities & Local Government (2021) *National Planning Policy Framework* [online]. Available at: <https://www.gov.uk/guidance/national-planning-policy-framework>

- Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. There is also additional recognition of the role that planning can play in promoting social interaction and healthy lifestyles.
- Clarity on the ways in which transport should be considered as part of the planning process from the earliest stages of plan-making and development proposals.
- Plans are to have regard to the cumulative impacts of flood risk, rather than just to or from individual development sites.
- Updates also align with the 25 Year Environment Plan, including taking air quality into account in planning policies and decisions.

**3.7** The 2021 revisions to the NPPF reflect the Government's commitment to making beauty and place making a strategic theme in national planning policy. The changes make clear that development that is not well designed should be refused and that 'good design and beautiful places' should be at the centre of plan making and decision making.

**3.8** Both the Section 2 Local Plan and SA are being prepared in line with the NPPF. The SA framework contains sustainability objectives relating to good design (SA objective 1), the vitality of town centres (SA objective 4), sustainable land use (SA objective 2), sustainable transport (SA objectives 7 and 8), flood risk management (SA objective 13), climate mitigation and adaptation (SA objectives 11 and 13) and the conservation and enhancement of the natural environment (SA objectives 6, 10, 12, 14, 15 and 16).

### National Planning Practice Guidance

**3.9 National Planning Practice Guidance<sup>65</sup>** (NPPG) provides guidance on the interpretation and implementation of the NPPF. The NPPG is an online resource that is continuously being updated and the following updates have been made since the 2017 SA Report:

- 28<sup>th</sup> July 2017 – updated guidance on 'Brownfield land registers'.

- 15<sup>th</sup> March 2019 – updated guidance on 'Climate change'.
- 09<sup>th</sup> May 2019 – updated guidance on 'Neighbourhood planning' and 'Viability'.
- 26<sup>th</sup> June 2019 – new information on 'Housing for older and disabled people'.
- 22<sup>nd</sup> July 2019 – new information on 'Appropriate assessment', 'Effective use of land', 'Green Belt', 'Historic environment', 'Natural environment', 'Noise', 'Water supply, wastewater and water quality', 'Housing needs of different groups' and 'Housing supply and delivery'.
- 1<sup>st</sup> October 2019 – updated guidance on 'Design: process and tools'.
- 1<sup>st</sup> November 2019 – updated guidance on 'Air quality', 'Light pollution' and 'Healthy and safe communities'.
- 18<sup>th</sup> September 2020 – updated guidance on 'Town centres and retail'.
- 25<sup>th</sup> September 2020 – updated guidance on 'Neighbourhood planning'.
- 15<sup>th</sup> and 31<sup>st</sup> December 2020 – updated guidance on 'Housing and economic needs assessment' and 'Strategic environmental assessment and sustainability appraisal'.
- 24<sup>th</sup> May 2021 – updated guidance on 'Housing needs of different groups'.
- 20<sup>th</sup> August 2021 – updated guidance on 'Flood risk and coastal change'.

**3.10** Both the Section 2 Local Plan and the SA are being prepared in line with the guidance outlined in the NPPG.

### Other relevant international and national plans and programmes

**3.11** Other relevant plans and programmes that have been published/updated of relevance to the Section 2 Local Plan and SA include:

- National Design Guide (2021)<sup>66</sup>
- Build Back Better: Our Plan for Growth (2021)<sup>67</sup>

<sup>65</sup> Ministry of Housing, Communities & Local Government (2021) Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>66</sup> Ministry of Housing, Communities and Local Government (2021) *National Design Guide* [online] Available at: <https://www.gov.uk/government/publications/national-design-guide>

<sup>67</sup> HM Treasury (2021) Build Back Better: Our Plan for Growth [online] available at: <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>

- The Energy Performance of Buildings Regulations (2021)<sup>68</sup>
- Planning for the Future White Paper (2020)<sup>69</sup>
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020)<sup>70</sup>
- The Waste (Circular Economy) (Amendment) Regulations (2020)<sup>71</sup>
- Clean Air Strategy 2019 (2019)
- Public Health England Strategy 2020-25 (2019)<sup>72</sup>
- The Flood and Water Regulations (2019)<sup>73</sup>
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)<sup>74</sup>
- The Road to Zero (2018)<sup>75</sup>
- Homes England Strategic Plan 2018 to 2023 (2018)<sup>76</sup>
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)<sup>77</sup>
- Our Waste, Our Resources: A strategy for England<sup>78</sup> (2018)
- The Environmental Noise Regulations (2018)<sup>79</sup>
- Transport Investment Strategy (2017)<sup>80</sup>
- The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)<sup>81</sup>
- UK Climate Change Risk Assessment 2017 (2017)<sup>82</sup>
- The Heritage Statement (2017)<sup>83</sup>
- Highways England Sustainable Development Strategy and Action Plan<sup>84</sup> (2017)
- UK Industrial Strategy: Building a Britain fit for the future<sup>85</sup> (2017)

## Baseline information

**3.12 Appendix A** of this SA Addendum describes the changes to the baseline since the preparation of the 2017 SA Report. The key changes are outlined below:

- Updated employment land provision over the plan period – the requirement was previously identified as 51.1ha however, this is revised to 42.1ha to reflect the removal of two garden communities.
- Updated housing provision over the plan period to reflect the removal of two garden communities and permissions granted since submission of the Section 2 Local Plan for examination – 15,772 dwellings will be delivered

<sup>68</sup> HM Government (2021) *The Energy Performance of Buildings Regulations*

<sup>69</sup> Department for Housing, Communities and Local Government (2020) [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

<sup>70</sup> Department for Transport (2020) *Decarbonising Transport Setting the Challenge* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

<sup>71</sup> HM Government (2020) *The Waste (Circular Economy) Regulations*

<sup>72</sup> Public Health England (2019) *PHE Strategy 2020-25* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/831562/PHE\\_Strategy\\_2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

<sup>73</sup> HM Government (2019) *The Flood and Water Regulations*

<sup>74</sup> HM Government, 2018. *A Green Future: Our 25 Year Plan to Improve the Environment* [pdf]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>75</sup> HM Government (2018) *The Road to Zero*

<sup>76</sup> Homes England (2018) *Strategic Plan 2018 to 2023* [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752686/Homes\\_England\\_Strategic\\_Plan\\_AW\\_REV\\_150dpi\\_REV.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf)

<sup>77</sup> HM Government (2018) *The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate*

<sup>78</sup> HM Government (2018) *Our Waste, Our Resources: A strategy for England* Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

<sup>79</sup> HM Government (2018) *The Environmental Noise (England) Regulations*

<sup>80</sup> Department for Transport (2017) *Transport Investment Strategy* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/918490/Transport\\_investment\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf)

<sup>81</sup> Department for Environment Food and Rural Affairs and Department for Transport (2017) *UK plan for tackling roadside nitrogen dioxide concentrations*

<sup>82</sup> HM Government (2017) *UK Climate Change Risk Assessment 2017* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assessment-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assessment-2017.pdf)

<sup>83</sup> Department for Digital, Culture Media and Sport (2017) *Heritage Statement 2017*

<sup>84</sup> Highways England (2017) *Highways England Sustainable Development Strategy and Action Plan* Available at: <https://www.gov.uk/government/publications/highways-england-sustainable-development-strategy>

<sup>85</sup> HM Government (2017) *UK Industrial Strategy: Building a Britain fit for the future* Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf)

exceeding the supply requirement of 14,320 dwellings (716 dwellings per annum) identified in the Section 1 Local Plan.

- The population projections for Braintree District predict that the population will increase to 159,198 by 2043, a percentage change of 6.3% compared to 2018 (below the England average of 10%, and Essex average of 12.6%)<sup>86</sup>. The projected number of households in the authority is forecast to grow by 13.4% between 2018 and 2043 which is also below the England average (16.2%) and Essex average (17.6%)<sup>87</sup>.
- Braintree District ranked 194<sup>th</sup> in 2015 and 203<sup>rd</sup> in 2019 out of the 317 districts on the Index of Multiple Deprivation<sup>88</sup>. Braintree District ranks 7<sup>th</sup> in comparison to 12 other Essex authorities in terms of average score, with Tendring, Basildon, Harlow, Colchester, Castle Point and Epping Forest the more deprived Essex authorities. Two Lower layer Super Output Areas ('LSOAs' – a small geographic area used for statistical reporting) are in the 20% most deprived in the wards of Bocking North and Halstead Trinity
- Life expectancy for men in Braintree District is 80.1 years which is above the England average (79.8), while life expectancy for women is 83.0 years which is lower than the England average (83.4)<sup>89</sup>. Life expectancy is 6.9 years lower for men and 3.6 years lower for women in the most deprived areas of Braintree District than in the least deprived areas. According to the Health Deprivation and Disability domain in the Indices of Multiple Deprivation<sup>90</sup>, only one LSOA in Braintree District is within the 20% most deprived under this domain (Braintree Central & Beckers Green).
- According to the Sport England's Active Lives Adult Survey<sup>91</sup> (2021), Braintree District has the third highest

rate of inactivity out of the 12 local authorities in Essex (inactive <30 minutes a week) at 31%, after Basildon (34.8%) and Tendring (32%). There is a 'significant decrease' of -8.6% in the percentage of people who consider themselves 'fairly active' (i.e., 30-149 minutes of exercise a week) from the baseline.

- 78% of the population of Braintree District is economically active, which is lower than the regional average (80.5%) and the national average (78.7%)<sup>92</sup>. In July 2021, 6,130 people (5.3%) in Braintree District claimed out of work benefits, which represents a drastic increase from 3,375 (2.9%) in May 2019. This increase in claimants reflects the economic implications of COVID-19 pandemic. Braintree's claimant rate is higher than the regional average (4.4%) and national average (5.3%).
- According to the Braintree District Retail Study<sup>93</sup>, there are 55 vacant shop units within the three main town centres in the District which equates to an overall vacancy rate of 9.9%. This is below the Experian Goad national average of (11.2%)<sup>94</sup>. However, retail capacity is anticipated to decline in Braintree District from structural changes in the retail sector and the economic implications of the COVID-19 pandemic.
- All waterbodies in Braintree District are failing in terms of achieving a 'good' chemical status. Just one water body has achieved a 'good' ecological status (Domesy Brook), with the remainder of moderate or poor ecological status. Improvements to water quality are needed to meet The Water Environment (Water Framework

<sup>86</sup> Office for National Statistics (2020) *Population projections for local authorities: Table 2* [online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>87</sup> Office for National Statistics (2020) *Household projections for England* [online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

<sup>88</sup> Ministry of Housing, Communities & Local Government (2019) *English Indices of Deprivation 2019 Explorer* (online) Available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)

<sup>89</sup> Public Health England (2020) *Local Authority Health Profile 2019: Braintree* [online]. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000067.html?area-name=Braintree>

<sup>90</sup> Ministry of Housing, Communities & Local Government (2019) *English Indices of Deprivation 2019 Explorer* (online) Available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)

<sup>91</sup> Sport England (2019) *Active Lives Adult November 19-20 Tables* <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-04/Active%20Lives%20Adult%20November%2019-20%20Tables%201-4%20Levels%20of%20activity.xlsx?VersionId=NtDU9.uVjwnhHCnCXpnGSQyr175SJ6t4>

<sup>92</sup> NOMIS (2021) *Labour Market Profile: Braintree* [online]. Available at:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157211/report.aspx>

<sup>93</sup> Lichfields (2018) *Braintree Retail Study 2018 Update* [online] Available at: <https://www.braintree.gov.uk/downloads/file/3093/bdc032a-braintree-retail-study-update-2018>

<sup>94</sup> Experian's Goad Plan Data is a comprehensive dataset that covers retail areas within urban areas across the whole of the UK. The 2018 Retail Study used Goad Plan Data to identify vacancy rates in Braintree District.

Directive) Regulations (2017)<sup>95</sup> target of 'good ecological status' and 'good chemical status' by 2027.

- Commuting patterns result in a daily 16,525 population decrease in Braintree<sup>96</sup>. Around 31,765 people commute out of Braintree District to other local authorities each day, most notably to Tendring, Colchester and the City of London. However, these commuting patterns are expected to have significantly changed due to the increase in working from home as a response to the COVID-19 pandemic.
- There is a significant demand for school places in Essex. The total number of pupils by 2030/31 will reach 131,635 primary pupils and 99,693 secondary school pupils (including sixth form)<sup>97</sup>. The District is anticipated to experience significant capacity issues in its primary schools from 2025 onwards, particularly in Witham/Rivenhall, Kelvedon/Feering, Braintree Town & Surrounds, Earls Colne/Colne Engaine, Cressing/Silver End, and Hatfield Peverel/Terling.
- Braintree District Council declared a climate emergency in 2019 and subsequently prepared a Climate Change Strategy<sup>98</sup> for the period 2021 to 2030. The UK Climate Projections (UKCP18) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present<sup>99</sup>.
- The latest DECC<sup>100</sup> figures show generally decreasing trends for CO<sub>2</sub> emissions (kilotonnes) in Braintree District from 2005-2019. Domestic emissions have seen the greatest reduction, falling by 138.2 kt to 209. In addition, the latest DECC figures for energy consumption<sup>101</sup> (in thousand tonnes of oil equivalent (ktoe)) show there has been a general decreasing trend in energy consumption as well as CO<sub>2</sub> emissions.
- Historic England's Heritage at Risk Register contains six entries for the District.

- There are currently no Air Quality Management Areas (AQMAs) declared in Braintree District. The main air quality issues in the District relate to nitrogen dioxide (NO<sub>2</sub>) and particulate emissions from vehicles travelling on the A12, A131 and A120.
- In 2020, there were 36 sites on the Brownfield Register totalling 20.77ha of previously developed land in the District<sup>102</sup>.
- The condition of the SSSIs at Belcher's and Broadfield Woods, and Glemsford Pits is assessed as unfavourable but recovering. Chalkney Wood and Bovingdon Hall Woods are generally in favourable condition.

## Key sustainability issues

**3.13** Chapter 3 of 2017 SA Report describes the key sustainability issues facing the District. Following the latest review of other relevant plans and updates to the baseline, the following additional key sustainability issues are identified:

- **Health and Wellbeing:** Life expectancy is 6.9 years lower for men and 3.6 years lower for women in the most deprived areas of Braintree District than in the least deprived areas.
- **COVID-19 impacts:** The COVID-19 pandemic has had a dramatic effect on the number of people claiming out-of-work benefits and commuting/working patterns, as well as increasing pressure on recreation and open spaces and the supply of housing.

**3.14** The following key sustainability issues identified in the 2017 SA Report are updated as follows:

- **Biodiversity and geodiversity:** Braintree District contains areas of ecological and geological value, some of which are in unfavourable condition.
- **Climate change and energy:** Although the District is showing decreasing trends in CO<sub>2</sub> emissions and energy consumption, significant progress will need to be made

<sup>95</sup> HM Government (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations.

<sup>96</sup> Nomis (online) Location of usual residence and place of work (online) Available at:

<https://www.nomisweb.co.uk/census/2011/wu01uk/chart>

<sup>97</sup> Essex School Organisation Service (2021) *10 Year Plan: Meeting the demand for school places in Essex 2021-2030* [pdf]. Available at: [https://assets.ctfassets.net/knkzaf64jx5x/1sTwHeX9pKGl7ebfWZQ8yS/96075a2a1c4da12ea2af8b873ee76900/ECC\\_10\\_year\\_plan\\_school\\_places\\_2021\\_2030.pdf](https://assets.ctfassets.net/knkzaf64jx5x/1sTwHeX9pKGl7ebfWZQ8yS/96075a2a1c4da12ea2af8b873ee76900/ECC_10_year_plan_school_places_2021_2030.pdf)

<sup>98</sup> Braintree District Council (2021) Climate Change Strategy [online] Available at: <https://www.braintree.gov.uk/advice-environment/climate-change>

<sup>99</sup> Met Office (2018) *Land Projections Maps: Probabilistic Projections* [online]. Available at:

<https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>

<sup>100</sup> Department for Business, Energy & Industrial Strategy (2021) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 [online]. Available at:

<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019>

<sup>101</sup> Department for Business, Energy & Industrial Strategy (2013, updated 2019) *Total final energy consumption at regional and local authority level 2005 to 2017* [online]. Available at:

<https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>

<sup>102</sup> Braintree District Council (2020) *Brownfield Land Register* [Excel]. Available at: <https://www.braintree.gov.uk/directory-record/5933/brownfield-land-register>

to achieve the Government's target of net-zero emissions by 2050.

- **Water quality and water resources:** All waterbodies in Braintree District are failing in terms of achieving a 'good' chemical status. Just one water body has achieved a 'good' ecological status (Domesy Brook), with the remainder of moderate or poor ecological status. Improvements to water quality are needed to meet The Water Environment (Water Framework Directive) Regulations (2017)<sup>103</sup> target of 'good ecological status' and 'good chemical status' by 2027.
- **Health:** Braintree District has the third highest rate of inactivity out of the 12 local authorities in Essex (inactive <30 minutes a week) at 31%, after Basildon (34.8%) and Tendring (32%)<sup>104</sup>, which could be contributing to a higher incidence of excess weight in adults in Braintree District.
- **Population and society:**
  - Braintree District ranked 194<sup>th</sup> in 2015 and 203<sup>rd</sup> in 2019 out of the 317 districts on the Index of Multiple Deprivation<sup>105</sup>. Braintree District ranks 7<sup>th</sup> in comparison to 12 other Essex authorities in terms of average score.
  - Educational attainment is particularly poor in four LSOAs which are classified as being within the 10% most deprived under the Education, Skills and Training domain in the English Indices of Multiple Deprivation (Halstead Trinity, Bocking North, Braintree Central and Beckes Green and Bocking South). There are also an additional eight LSOAs within the 20% most deprived under the education deprivation domain<sup>106</sup>.
- **Economy:** Although Braintree District has a lower overall vacancy rate (9.9%)<sup>107</sup> than the Experian Goad national average (11.2%)<sup>108</sup>, retail capacity is anticipated to decline in Braintree District from structural changes in

the retail sector and the economic implications of the COVID-19 pandemic.

- **Housing:** According to the English Indices of Multiple Deprivation 2019<sup>109</sup>, three LSOAs are within the within the 20% most deprived under the Barriers to Housing and Services domain, compared to 11 LSOAs in 2015.
- **Transport:** Commuting patterns result in a daily 16,525 population decrease in Braintree<sup>110</sup>. However, these commuting patterns are expected to significantly change due to the increase in working from home as a response to the COVID-19 pandemic.

<sup>103</sup> HM Government (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations.

<sup>104</sup> Sport England (2019) Active Lives Adult November 19-20 Tables <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-04/Active%20Lives%20Adult%20November%2019-20%20Tables%201-4%20Levels%20of%20activity.xlsx?VersionId=NtDU9.uVjwnhHCnCXPnGSQyr175SJ6t4>

<sup>105</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/ioid\\_index.html](http://dclgapps.communities.gov.uk/imd/ioid_index.html)

<sup>106</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/ioid\\_index.html](http://dclgapps.communities.gov.uk/imd/ioid_index.html)

<sup>107</sup> Lichfields (2018) Braintree Retail Study 2018 Update [online] Available at:

<https://www.braintree.gov.uk/downloads/file/3093/bdc032a-braintree-retail-study-update-2018>

<sup>108</sup> Experian's Goad Plan Data is a comprehensive dataset that covers retail areas within urban areas across the whole of the UK. The 2018 Retail Study used Goad Plan Data to identify vacancy rates in Braintree District.

<sup>109</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/ioid\\_index.html](http://dclgapps.communities.gov.uk/imd/ioid_index.html)

<sup>110</sup> Nomis (online) Location of usual residence and place of work (online) Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>

## Chapter 4

### Additional site appraisals

**This chapter summarises the SA findings for additional site appraisals at Main Modifications stage.**

**4.1** Since the Publication Draft Local Plan was submitted for Examination, Braintree District Council has identified a number of new development site allocations. These sites and any new reasonable alternatives to them have now been subject to SA and the findings are set out in this chapter. The SA at Main Modifications stage has also given consideration to the need to appraise other development sites, for example where the boundary of the previously assessed site has changed. The categories of sites considered for SA and the sites identified for appraisal within each category are set out below. Where sites are allocated for both residential and employment use, the site is listed twice with the use indicated in brackets after the site name as it was appraised separately for each use. Any sites identified by the Council as already under construction were not appraised as the Plan cannot affect them and they have effectively become part of the baseline for the purposes of the SA.

**4.2** The site appraisals presented in the SA of Main Mods may not be fully consistent with those presented at earlier stages of SA, for example due to changes in the spatial extent of environmental assets on which site options could have an effect.

### Categories of sites subject to SA at Main Modifications stage

#### New site allocations

**4.3** The Council's modifications to the Publication Draft Local Plan propose the following new site allocations that have now been appraised:

- **BCBG 147A – Unit 1 The Mazes East Street Braintree 20/01118/COUPA 20/01119/COUPA (Residential)**
- **BOCN 750 – Foley House 115 High Garrett Bocking (Residential)**

- **BRAW 751 – 263 Rayne Road Braintree (Residential)**
- **HATR 752 – Former Courtauld Boiler Building Factory Lane West Halstead (Residential)**
- **HATR 752 – Former Courtauld Boiler Building Factory Lane West Halstead (Employment)**
- **WITN 755 – The Old Pool Club 49 Braintree Road (Residential)**

## Uplift in development capacity or change in development boundary

**4.4** A check was made for previously allocated sites for which the Plan as proposed to be modified provides for a significant uplift in allocated development capacity within the same development boundary or for an altered development boundary relative to the Publication Draft Plan. A significant uplift was defined as an uplift of 10 or more dwellings, given that this was the Council's cut-off for considering allocation of a site option that came forward through the call for sites process. The following such sites were identified and have now been re-appraised based on the modified development capacity or boundary:

- **BOS 6H – Branoc Park, Land West of Panfield Lane NW Braintree (Residential):** Uplift of 225 dwellings. Note that this site was omitted in error from the list of sites identified for appraisal in the SA of the Publication Local Plan.
- **Group L – FEER 230, 232 and 233B - Land south of Feering/west of A12, Feering Strategic Growth Location (Residential):** The SA of the Publication Draft Local Plan appraised Group L comprising sites FEER 230, FEER 232 and FEER 233. FEER 233 has since been split into FEER 233A and FEER 233B, with FEER 233B now forming part of the group of sites being allocated and FEER 232A being excluded. This group of sites has now been reappraised as comprising FEER 230, 232 and 233B. In line with the methodology, FEER 233 A has not been appraised as a standalone allocation as it is already under construction.
- **Group L – FEER 230, 232 and 233B - Land south of Feering/west of A12, Feering Strategic Growth Location (Employment):** See previous bullet point.
- **Group J – BOCN 132 – Land at Straits Mill off Broad Road Bocking (Residential):** The SA of the Publication Draft Local Plan appraised Group J comprising sites BOCN 123 and 132. BOCN 123 has since been removed and only BOCN 132 now forms this site. This group of sites has now been reappraised as comprising BOCN 132 only.

- **Group J – BOCN 132 – Land at Straits Mill off Broad Road Bocking (Employment):** See previous bullet point.

## New reasonable alternatives

**4.5** Where Plan modifications have provided for additional development on new site allocations or by significant uplift of the capacity of existing allocations, the Council considered whether this additional development could be provided on reasonable alternative sites. The following reasonable alternative sites had not previously been subject to SA and were therefore appraised at the Main Modifications stage:

- **GGHR 801 – Land West of Blamsters (Residential)**
- **HASA 802 – Land Adj Moys allotment, Halstead (Residential)**
- **KELV 805 – Land SE of London Road, Kelvedon (Residential)**
- **KELV 805 – Land SE of London Road, Kelvedon (Employment)**
- **SILV 809 – Land at Egypts Farm (Residential)**

## Permitted sites

**4.6** Site allocations with planning permission were not previously appraised on the basis that the Plan cannot affect the decision on whether to develop them. The following permitted sites that remain allocated in the Plan as proposed to be modified have now been subject to SA for completeness, provided that development has not commenced.

- **BOS 35 – The Rose and Crown PH site Masefield Road Braintree (Residential)**
- **EARC 225 – Land rear of Halstead Road Earls Colne (Residential)**

## Correction of error

**4.7** The following sites have been reappraised to correct an error in the previous SA:

- **Group A - BLAN 110, 114 and 116 – Land east of Great Notley (Residential):** The SA of the Publication Draft Local Plan appraised Group A comprising sites BLAN 110, 114, 116 and 633, which is an error. This allocation actually comprises sites BLAN 110, 114 and 116 and has therefore been subject to reappraisal so as to correct this error.
- **Group A - BLAN 110, 114 and 116 – Land east of Great Notley (Employment):** See previous bullet point.

## SA findings

**4.8** **Table 4.1** lists the sites subject to SA at Main Modifications stage and their likely effects against the sustainability objectives in the site assessment framework (**Appendix B**). A summary of the effects is provided below the table and a detailed assessment form for each site is provided in **Appendix C**.

Table 4.1: Summary of SA findings for the allocated sites and reasonable alternative sites appraised at Main Modifications stage

Site ID	Proposed use	Area (ha)	No. of dwellings	Q1a Community facilities	Q1c AD and Waste sites	Q2a Affordable housing	Q3a Primary healthcare	Q3c ANG	Q3e Open space	Q4a Retail provision	Q4c Shops & services	Q5a Mineral reserves	Q5c Employment areas	Q5e Broadband availability	Q6a Designated wildlife	Q7a Public transport	Q8a Service centres	Q8c Public transport	Q8e Highway access	Q9a Primary schools	Q9c Secondary schools	Q10a Historic environment	Q11a Climate change	Q12a Groundwater SPZ	Q12c Sewage capacity	Q13a Flood risk	Q14a Air quality	Q15a Landscape sensitivity	Q15c AONB extension	Q15e Greenfield / brownfield	Q15g VIS	Q15i Country parks	Q16a Agricultural land	Q16c Contaminated land			
Allocated sites																																					
BCBG 147A	Residential	0.03	11	0	0	0	+	-?	?	0	+	0	-	++	0	+	++	++	+	-	++	?	N/A	?	?	0	0	0	0	+	0	0	0	0	0		
BOCN 750	Residential	0.29	18	0	0	++	-	-?	+	0	+	0	-	++	0	+	0	++	+	-	-	-	N/A	?	?	0	0	--	0	+	0	0	0	0			
BRAW 751	Residential	0.21	12	0	0	0	+	-?	+	?	+	0	+	++	0	+	++	++	+	++	++	?	N/A	?	-	0	0	0	0	+	0	0	0	0	0		
HATR 752	Residential	0.20	22	0	0	++	+	-?	?	0	+	0	+	++	0	+	++	++	+	++	++	+	N/A	-	-	--	0	0	0	+	0	0	0	0	-		
HATR 752	Employment	0.20	N/A	0	0	N/A	N/A	N/A	?	0	N/A	0	N/A	++	0	+	++	++	+	N/A	N/A	+	N/A	-	N/A	--	0	0	0	+	0	0	0	0	-		
WITN 755	Residential	0.09	10	0	0	0	+	-?	?	0	+	0	+	++	0	+	++	++	+	++	++	+	N/A	0	-	0	0	0	0	+	0	0	0	0	0		
BOS 6H	Residential	43.44	825	0	0	++	+	-?	?	0	+	--	+	++	--?	++	++	++	+	++	++	?	N/A	-	--	0	0	-	0	-	0	0	-	0	0		
Group L - FEER 230, 232B and 233	Residential	56.94	835	+	0	++	-	-?	+	0	+	--	+	++	--?	++	+	++	+	++	+	?	N/A	?	--	-?	--?	-	0	-	0	0	--	?			
Group L - FEER 230, 232B and 233	Employment	56.94	N/A	0	0	N/A	N/A	N/A	+	0	N/A	--	N/A	++	-	++?	++?	++?	+	N/A	N/A	?	N/A	?	N/A	-?	--?	-?	0	-	0	0	?	?			
BOS 35	Residential	0.09	11	0	0	0	-	-?	?	0	-	0	+	++	0	+	++	++	+	+	++	?	N/A	?	?	0	0	0	0	+	0	0	0	0	0		
EARC 225	Residential	2.25	80	0	0	++	+	-?	+	0	+	--	-	++	0	+	+	++	+	+	+	?	N/A	?	-	0	0	-	0	-	0	0	-	0			
Group A - BLAN 110, 114, 116 and 117	Residential	117.25	1,750	+	0	++	+	-?	+	0	+	--	+	++	--?	++	++	++	+	++	++	?	N/A	?	--	0	0	-	0	-	0	0	--	0			
Group A - BLAN 110, 114, 116 and 117	Employment	117.25	N/A	0	0	N/A	N/A	N/A	+	0	N/A	--	N/A	++	0	++?	++?	++?	+	N/A	N/A	?	N/A	?	N/A	0	?	-?	0	-	0	0	--	0			
Group J - BOCN 132	Residential	65.86	1,000	+	0	++	-	-?	?	0	-	--	-	++	--?	++	++	++	+	++	++	?	N/A	?	--	0	0	-	0	-	0	0	--	?			
Group J - BOCN 132	Employment	65.86	N/A	0	0	N/A	N/A	N/A	?	0	N/A	--	N/A	++	-	++?	++?	++?	+	N/A	N/A	?	N/A	?	N/A	0	0	-?	0	-	0	0	--	?			
Reasonable alternatives																																					
GGHR 801	Residential	5.35	156	0	0	++	-	-?	?	0	+	--	-	++	--?	+	++	++	+	+	++	-	N/A	?	?	0	0	-	0	-	0	0	-	0			
HASA 802	Residential	1.21	36	0	0	++	+	-?	?	0	+	0	+	++	-	+	++	++	-	+	++	?	N/A	?	?	-	0	-	0	-	0	0	-	0			
KELV 805	Residential	3.10	75	0	0	++	+	-?	?	0	+	--	+	++	-	+	+	++	+	+	-	-	N/A	0	?	-	0	-	0	-	0	0	-	0			
KELV 805	Employment	3.10	N/A	0	0	N/A	N/A	N/A	?	0	N/A	--	N/A	++	-	+	+	++	+	N/A	N/A	-	N/A	0	N/A	-	0	-	0	-	0	0	-	0			
SILV 809	Residential	37.55	1,125	+	0	++	+	-?	?	0	+	--	-	++	--?	++	+	++	+	++	+	-	N/A	?	-	-	0	+	0	-	0	0	--	0			

**4.9** The narrative below summarises the main types of effects identified for the allocated sites and reasonable alternative sites, with particular consideration given to those effects which are likely to be significant, in line with the SEA Regulations.

**4.10** Development at any of the allocated sites and reasonable alternative sites shown in **Table 4.1** would give rise to a mixture of positive and negative effects in relation to the SA objectives. Significant positive effects (++ or ++?) were identified in relation to five SA objectives:

- SA objective 2: To provide everyone with the opportunity to live in a decent home
- SA objective 5: To achieve sustainable levels of prosperity and economic growth
- SA objective 7: To promote more sustainable transport choices and uptake
- SA objective 8: Promote accessibility and ensure the necessary transport infrastructure to support new development
- SA objective 9: To improve the education and skills of the population

**4.11** Significant negative effects (-- or --?) were identified in relation to seven SA objectives:

- SA objective 5: To achieve sustainable levels of prosperity and economic growth
- SA objective 6: To conserve and enhance the biological and geological diversity of the environment
- SA objective 12: To improve water quality and address water scarcity and sewerage capacity
- SA objective 13: To reduce the risk of flooding
- SA objective 14: To improve air quality
- SA objective 15: To maintain and enhance the quality of landscapes and townscapes
- SA objective 16: To safeguard and enhance the quality of soil

**4.12** Uncertain effects (?) were identified for a large proportion of site options in relation to ten SA objectives:

- SA objective 3: To improve the health of the District's residents and mitigate/reduce potential health inequalities
- SA objective 4: To promote the vitality and viability of all service centres throughout the District

- SA objective 10: To conserve and enhance the historic environment, heritage assets and their settings
- SA objective 12: To improve water quality and address water scarcity and sewerage capacity
- SA objective 14: To improve air quality
- SA objective 15: To maintain and enhance the quality of landscapes and townscapes
- SA objective 16: To safeguard and enhance the quality of soil

**4.13** The effects of the allocated sites and reasonable alternative sites are discussed further below.

### SA objective 1: Create safe environments which improve quality of life and community cohesion

#### Allocated sites

**4.14** No significant effects were identified in relation to this SA objective.

**4.15** A large number of negligible (0) effects were identified, where there was no evidence that development would either enhance or lead to a loss of community facilities. Minor positive (+) effects were identified for the Group A, Group J and Group L residential sites, indicating that they would be suitable for new facilities where none exist currently or would be likely to enhance existing facilities.

#### Reasonable alternative sites

**4.16** No significant effects were identified in relation to this SA objective.

**4.17** Negligible (0) effects were identified for all but one of the reasonable alternative residential and employment sites because there was no evidence that they would either enhance or lead to a loss of community facilities. SILV 809 is expected to have a minor positive (+) effect because due to the scale of development proposed, it is assumed to incorporate new facilities where none exist currently or would be likely to enhance existing facilities.

### SA objective 2: To provide everyone with the opportunity to live in a decent home

#### Allocated sites

**4.18** A number of significant positive (++) effects were identified in relation to this objective, reflecting the fact that the allocated residential sites would deliver at least 15 new dwellings and therefore contribute significantly to the delivery of affordable housing. Negligible (0) effects were identified for

the remaining allocated residential sites. The allocated employment sites were not assessed in relation to this objective.

#### Reasonable alternative sites

**4.19** Significant positive (++) effects were identified for the reasonable alternative residential sites in relation to this objective, reflecting the fact that they would deliver at least 15 new dwellings and therefore contribute significantly to the delivery of affordable housing. The reasonable alternative employment site was not assessed in relation to this objective.

#### SA objective 3: To improve the health of the District's residents and mitigate/reduce potential health inequalities

##### Allocated sites

**4.20** No significant effects were identified in relation to this SA objective.

**4.21** Minor positive (+) effects were identified in relation to this objective for more than half of the allocated residential sites, indicating they are within 800m of the nearest NHS GP surgery or hospital. The remaining allocated residential sites were assessed as having minor negative (-) effects, reflecting the absence of nearby health facilities. The allocated employment sites were not assessed in relation to proximity to NHS GP surgeries or hospitals.

**4.22** All allocated residential sites scored minor negative (-) effects because they fulfilled no more than one of four criteria for accessibility to natural greenspace. The effects are recorded as uncertain (-?) because spatial data is only available within Braintree District and there is a possibility that there are additional accessible natural greenspaces within 10km of the District in neighbouring districts. The allocated employment sites were not assessed in relation to accessibility to natural greenspace.

**4.23** Uncertain (?) effects were identified for more than half of allocated residential and employment sites as the BDC site assessment form did not identify whether there would be a loss of open space. The remaining allocated sites scored minor positive (+) effects as they would not lead to a loss of publicly accessible open space.

##### Reasonable alternative sites

**4.24** No significant effects were identified in relation to this SA objective.

**4.25** Minor positive (+) effects were identified in relation to this objective for all but one of the reasonable alternative residential sites, indicating they are within 800m of the nearest

NHS GP surgery or hospital. The remaining reasonable alternative residential site scored a minor negative (-) effect, reflecting the absence of nearby health facilities. The reasonable alternative employment site was not assessed in relation to proximity to NHS GP surgeries or hospitals.

**4.26** All reasonable alternative residential sites scored minor negative (-) effects because they fulfilled no more than one of four criteria for accessibility to natural greenspace. The effects are recorded as uncertain (-?) because spatial data is only available within Braintree District and there is a possibility that there are additional accessible natural greenspaces within 10km of the District in neighbouring districts. The reasonable alternative employment site was not assessed in relation to accessibility to natural greenspace.

**4.27** All of the reasonable alternative residential and employment sites scored uncertain (?) effects in relation to publicly accessible open space because loss or provision of open space was not assessed by the BDC site visit form.

#### SA objective 4: To promote the vitality and viability of all service centres throughout the District

##### Allocated sites

**4.28** No significant effects were identified in relation to this SA objective.

**4.29** No effects (0) were identified in relation to retail provision for the majority of allocated residential and employment sites as they generally would lead to no increase or loss of retail. BRAW 751 is identified as having an uncertain (?) effect because it is not clear whether existing retail provision would be lost or not.

**4.30** Considering proximity to existing shops and services, mainly minor positive (+) effects were identified, reflecting the fact that allocated residential sites within or directly adjacent to the Main Towns (Braintree, Bocking and Great Notley; Witham; Halstead) were generally within 800m (walking distance) of a primary shopping area or Local Centre with site options elsewhere generally within 8km (driving distance) of a Local Centre boundary. Minor negative effects (-) are identified for BOS 35 and Group J (Residential), reflecting longer travel distances to shops and services. The allocated employment sites were not assessed in relation to proximity to existing shops and services.

##### Reasonable alternative sites

**4.31** No significant effects were identified in relation to this SA objective.

**4.32** No effects (0) were identified in relation to retail provision for the reasonable alternative residential and employment sites as they generally would lead to no increase or loss of retail.

**4.33** Considering proximity to existing shops and services, minor positive (+) effects were identified, reflecting the fact that reasonable alternative residential sites within or directly adjacent to the Main Towns (Braintree, Bocking and Great Notley; Witham; Halstead) were generally within 800m (walking distance) of a primary shopping area or Local Centre with reasonable alternative site options elsewhere generally within 8 km (driving distance) of a Local Centre boundary. The reasonable alternative employment site was not assessed in relation to proximity to existing shops and services.

### SA objective 5: To achieve sustainable levels of prosperity and economic growth

#### Allocated sites

**4.34** For the first criterion assessed under this SA objective, potential sterilisation of mineral reserves, significant negative (--) effects were identified in relation to this objective for more than half of the allocated residential and employment sites, reflecting the fact more than 25% of the area of these allocated sites fall within a minerals safeguarding area. No (0) effects were identified for the remaining allocated sites.

**4.35** The SA also examined the proximity of residential site options to main employment areas. Against this criterion, minor positive (+) effects were identified for the majority of allocated residential sites with the remainder scoring minor negative (-) effects. The allocated employment sites were not assessed in relation to proximity to employment areas.

**4.36** The third criterion examined the current or planned availability of a fast broadband internet connection at the site location and for this, significant positive (++) effects were identified for all allocated residential and employment sites, reflecting the fact that a fast (optic fibre) connection was already available or planned.

#### Reasonable alternative sites

**4.37** For the first criterion assessed under this SA objective, potential sterilisation of mineral reserves, significant negative effects (--) were identified for almost all of the reasonable alternative residential and employment sites, reflecting the fact more than 25% of the area of these sites falls within a minerals safeguarding area. The remaining reasonable alternative site was scored as having no effects (0).

**4.38** The SA also examined the proximity of site options to main employment areas and against this criterion a minor

positive (+) was identified for half of the reasonable alternative residential sites and a minor negative (-) effect for the other half. The reasonable alternative employment site was not assessed in relation to proximity to employment areas.

**4.39** The third criterion examined was the current or planned availability of a fast broadband internet connection at the site location and for this, significant positive (++) effects were identified for all reasonable alternative residential and employment sites, reflecting the fact that a fast (optic fibre) connection was already available or planned.

### SA objective 6: To conserve and enhance the biological and geological diversity of the environment

#### Allocated sites

**4.40** Mainly negligible effects (0) were identified in relation to this objective for most allocated residential and employment sites. Significant negative effects with uncertainty (--?) were identified for three allocated sites: BOS 6H; Group L (Residential); and Group A (Residential). This is because they fall within a SSSI Impact Risk Zone for the type and scale of development proposed. Group L (Residential) and Group J (Residential) are also located within 100m of a designated wildlife site. Group L (Employment) and Group J (Employment) were identified as having minor negative (-) effects because although the SSSI Impact Risk Zone they fall within is not relevant to the employment development proposed, they are within 100m of a designated site. These sites also fall on greenfield land.

#### Reasonable alternative sites

**4.41** Mainly minor negative (-) effects were identified in relation to this objective for most reasonable alternative residential and employment sites, mainly reflecting the fact that they are greenfield sites where development could lead to the loss or fragmentation of undesignated wildlife habitats. Significant negative effects with uncertainty (--?) were identified for GGHR 801 and SILV 809 because they fall within a SSSI Impact Risk Zone for the type and scale of development proposed. They also fall on greenfield land.

### SA objective 7: To promote more sustainable transport choices and uptake

#### Allocated sites

**4.42** Effects on this SA objective were assessed by considering the proximity of a site to existing public transport facilities and whether the site was large enough to be likely to support provision of a new bus stop. Mainly minor positive (+) effects were identified, generally reflecting the fact that the

residential and employment sites are within 400m of an existing bus stop and in some cases also within 800m of a railway station. Significant positive (++) effects were identified for four residential sites, reflecting the fact that they have capacity for at least 700 new dwellings and were therefore assumed to incorporate a new bus stop. The three large employment allocations are also allocated for at least 700 dwellings and therefore significant positive (++) effects were identified for these due to the assumed provision of a new bus stop. The effects are recorded as uncertain (++) because the actual effects will depend on where employment development is located within these sites.

### Reasonable alternative sites

**4.43** Minor positive (+) effects were identified for all but one of the reasonable alternative residential and employment sites, generally reflecting the fact that they are within 400m of an existing bus stop. SILV 809 is expected to have a significant positive (++) effect because due to its large size, is expected to incorporate a bus stop.

### SA objective 8: Promote accessibility and ensure the necessary transport infrastructure to support new development

#### Allocated sites

**4.44** The first criterion assessed under this SA objective was whether the site option was within or directly adjacent to a settlement with a high level of provision of services and facilities. The majority of allocated residential and employment sites were identified as having significant positive (++) effects, whilst three were identified as having minor positive (+) effects, reflecting the location of sites at settlements classed as Main Towns or Villages with Services, respectively, in the settlement hierarchy. A significant positive effect with uncertainty (++) was identified for two of the three large employment allocations (Group A and Group J) because they are adjacent to a Main Town but their actual effect will depend on where employment-related development is located within both sites. The other large employment allocation (Group L) is expected to have a minor positive effect with uncertainty (+?) because it is adjacent to a Village With Services but its actual effect will depend on where employment-related development is located within the site. One of the sites, BOCN 750, is expected to have a negligible (0) effect because it is adjacent to an Other Village.

**4.45** The assessment against this SA objective also considered the distance of the site options to public transport services and the regularity of those services. Significant positive (++) effects were identified for all of the allocated

residential and employment sites, reflecting the fact that they are within 400m of a bus stop with a frequent service (either existing stops or the new stops with frequent services assumed for larger sites) or within 800m of a railway station with a frequent service. The three large employment sites are also allocated for at least 700 dwellings and therefore significant positive effects with uncertainty (++) were identified for these. This is because the actual effects will depend on where employment development is located within these sites.

**4.46** Finally, the SA considered whether any highway access issues had been identified for the site options; this revealed minor positive (+) effects, reflecting no issues.

### Reasonable alternative sites

**4.47** Significant positive (++) effects were identified for two of the reasonable alternative sites, with the rest identified as minor positive (+). This reflects the location of reasonable alternative sites at settlements classed as Villages with Services or Main Towns, respectively, in the settlement hierarchy.

**4.48** Significant positive (++) effects were identified for all of the reasonable alternative sites, reflecting the fact that they are within 400m of a bus stop with a frequent service (either existing stops or the new stops with frequent services assumed for larger sites).

**4.49** Finally, the SA considered whether any highway access issues had been identified for the site options; this revealed mostly minor positive (+) effects, reflecting no issues, with a minor negative (-) effect identified for HASA 802.

### SA objective 9: To improve the education and skills of the population

#### Allocated sites

**4.50** The SA considered the proximity of residential sites to primary and secondary schools, taking into account the potential for larger housing developments to provide new schools. In relation to access to primary schools, many significant positive (++) effects were identified, reflecting the fact that the allocated residential sites either have capacity to develop at least 700 dwellings and are therefore assumed to provide a new primary school, or are within 400m of an existing primary school. Minor positive (+) or minor negative (-) effects were identified for the remaining allocated residential sites because they were further away from existing primary schools and not large enough to provide a new school. The allocated employment sites were not assessed in relation to proximity to primary schools.

**4.51** A similar picture also existed in terms of access to secondary schools, with most allocated sites scoring significant positive (++) effects, indicating they fall within 2.4km of a secondary school. Minor positive (+) or minor negative (-) effects were identified for the remaining allocated residential sites. The allocated employment sites were not assessed in relation to proximity to secondary schools.

#### Reasonable alternative sites

**4.52** In relation to primary schools, minor positive (+) effects were identified for over half of the reasonable alternative residential sites, reflecting the fact that sites are more than 400m, but less than 800m, from the nearest primary school. SILV 809 is expected to have a significant positive (++) effect as it is assumed to incorporate a new primary school due to its large housing provision. The reasonable alternative employment site was not assessed in relation to proximity to primary schools.

**4.53** For secondary schools, half of the reasonable alternative residential sites were identified as having significant positive (++) effects, indicating that they fall within 2.4km of a secondary school. SILV 809 is expected to have a minor positive (+) effect because it is within 4.8km of a secondary school. KELV 805 was identified as having a minor negative (-) effect, as the nearest secondary school was more than 4.8km away. The reasonable alternative employment site was not assessed in relation to proximity to secondary schools.

#### SA objective 10: To conserve and enhance the historic environment, heritage assets and their settings

##### Allocated sites

**4.54** No significant effects were identified in relation to this SA objective.

**4.55** The SA resulted in uncertain effects being identified for the majority of allocated residential and employment sites, reflecting the fact that heritage assets exist close to (or in a few cases within) the sites. This was based on GIS mapping which sought to identify designated historic assets up to 1km distance from the sites subject to SA. However, the Council's site visits did not identify any potential significant effects on the historic environment in relation to these sites, and therefore they were not recorded in the site assessment forms. The Council is of the view that, as the site visits did not reveal significant effects, it is appropriate to carry out detailed assessment of the effects on the historic environment and requirements for mitigation at the planning application stage.

**4.56** Minor positive (+) effects were identified for a small number of allocated sites, reflecting the potential for

enhancement. One of the sites is expected to have a minor negative (-) effect because the Council's site visit identified a potential negative effect where mitigation was deemed likely to be feasible.

##### Reasonable alternative sites

**4.57** No significant effects were identified in relation to this SA objective.

**4.58** Minor negative (-) effects were identified for the majority of reasonable alternative residential and employment sites where the Council's site visit identified a potential negative effect where mitigation was deemed likely to be feasible. An uncertain (?) effect was identified for HASA 802 because the Council's site visit did not identify any potential significant effects on the historic environment in relation to this site, and therefore they were not recorded in the site assessment form.

#### SA objective 11: To reduce contributions to climate change

**4.59** Effects of the site options on this SA objective were judged to be more appropriately assessed on the basis of the features and designs of individual development proposals and the development management policies that govern these. Site allocations and reasonable alternatives were not, therefore, assessed against this SA objective.

#### SA objective 12: To improve water quality and address water scarcity and sewerage capacity

##### Allocated sites

**4.60** The first criterion assessed under this SA objective was whether the site option was within a groundwater Source Protection Zone (SPZ). Uncertain effects (?) were identified for the majority of allocated residential and employment sites, reflecting the fact that more than 25% of the area of these sites fall within Source Protection Zone 3. One site was identified as having no effect (0) as it does not fall in any Source Protection Zone. Three sites were identified as having minor negative (-) effects, reflecting the fact that 25% or more of these sites are within Source Protection Zone 1 or 2.

**4.61** Significant negative (--) effects were identified for some allocated sites in relation to the second criterion, the capacity of sewerage infrastructure to accommodate allocations at different locations, reflecting limited capacity in the network. Minor negative (-) effects and uncertain (?) effects were identified for the remainder of the allocated sites. This uncertainty is due to the capacity of wastewater networks to accommodate development having not been assessed by the

Water Cycle Study at these sites. The employment site allocations were not assessed in relation to sewage capacity.

## Reasonable alternative sites

**4.62** No significant effects were identified in relation to this SA objective.

**4.63** Uncertain effects (?) were identified for the majority of reasonable alternative sites, reflecting the fact that more than 25% of the area of the sites fall within Source Protection Zone 3. KELV 805 (employment and residential) was identified as having no effects (0) as it does not fall in any Source Protection Zones.

**4.64** For the second criterion, uncertain effects (?) were identified for all but one of the reasonable alternative residential sites. This uncertainty is due to the capacity of wastewater networks to accommodate development having not been assessed by the Water Cycle Study at these sites. SILV 809 is expected to have a minor negative effect (-) because its capacity issues may restrict growth. The reasonable alternative employment site was not assessed in relation to sewage capacity.

## SA objective 13: To reduce the risk of flooding

### Allocated sites

**4.65** Effects on this SA objective were assessed by determining whether the site option was located within an area of high flood risk. No effect (0) was identified for most of the allocated sites, reflecting the fact that less than 5% of the sites are within Flood Zone 3 or less than 25% of the sites are within Flood Zone 2. Significant negative (--) effects were identified for HATR 752 (residential and employment) because a significant proportion of this site is within Flood Zone 3. A minor negative (-) effect was identified for Group L (residential and employment) as a small proportion of the site is within Flood Zone 3. The effect for Group L (employment) is recorded as uncertain (-?) because the actual effect is dependent on the exact location of employment development within the site.

### Reasonable alternative sites

**4.66** No significant effects were identified in relation to this SA objective.

**4.67** Minor negative effects (-) were identified for all but one of the reasonable alternative sites, reflecting the fact that more than 25% of the sites are within Flood Zone 2 or 5% to 25% of the sites are within Flood Zone 3. No effect (0) was identified for the remaining reasonable alternative site because it does not fall within Flood Zones 2 or 3.

## SA objective 14: To improve air quality

### Allocated sites

**4.68** No effects (0) were identified for the majority of allocated residential and employment sites in relation to this SA objective, reflecting the fact that they are not within 200m of the A12 or A120 and no AQMAs are present in the District. Significant negative effects with uncertainty (--?) were identified for Group L (residential and employment) as a significant proportion of the site is located within 200m of the A12. For Group L (employment), the effect is also recorded as uncertain because the actual effect will depend on the exact location of employment development within the site. An uncertain (?) effect was identified for Group A (Employment) because a small proportion of the site is located within 200m of the A12, so effects would depend on the exact location of employment development within the site.

### Reasonable alternative sites

**4.69** No significant effects were identified in relation to this SA objective.

**4.70** No effects (0) were identified for all reasonable alternative residential and employment sites in relation to this SA objective, reflecting the fact that they are not within 200m of the A12 or A120.

## SA objective 15: To maintain and enhance the quality of landscapes and townscapes

### Allocated sites

**4.71** Effects in relation to this SA objective were assessed via a number of criteria, with results as follows.

**4.72** Firstly, it was determined whether any of the sites fall within an area with high sensitivity to change, as determined by the Council's Landscape Character Assessment studies. A variety of effects were identified, the only significant one being a significant negative (--) effect for BOCN 750 where at least 25% of the allocated site falls within a landscape character area with high sensitivity to change. Minor negative (-) effects were identified for a small number of the allocated sites because at least 25% of them fall within a landscape area with moderate sensitivity to change. Minor negative effects with uncertainty (-?) were identified against the three large employment allocations because a significant proportion of these sites fall within a landscape character area with moderate sensitivity to change but the actual effects will depend on the exact location of employment development within these three sites.

**4.73** Secondly, a check was made whether any of the sites fall within the proposed extension to the Dedham Vale AONB. No effects (0) were identified for all of the allocated residential and employment sites as they do not fall within this designation.

**4.74** Thirdly, it was determined whether the sites comprise greenfield or previously developed land and whether the potential existed for remediation of any degraded landscape or derelict buildings. Minor negative (-) effects were identified for over half of the allocated residential and employment sites, reflecting the fact they are located on greenfield land. Minor positive (+) effects were identified for the remaining allocations, reflecting the fact that less than 25% of these sites comprise greenfield land.

**4.75** Finally, it was determined whether the site options were located in any locally designated Visually Important Spaces or within a Country Park. No effects (0) were identified for all allocated residential and employment sites.

#### Reasonable alternative sites

**4.76** No significant effects were identified in relation to this SA objective.

**4.77** Effects in relation to this SA objective were assessed via a number of criteria, with results as follows.

**4.78** Firstly, with regard to landscape sensitivity, minor negative (-) effects were identified for the majority of reasonable alternative residential and employment sites, reflecting the fact that more than 25% of these sites are within a landscape area with moderate sensitivity to change. A minor positive (+) effect was identified for one of the reasonable alternative sites because a significant proportion of the site falls within a landscape area with low sensitivity to change.

**4.79** Secondly, for the Dedham Vale AONB proposed extension, no effects (0) were identified for all of the reasonable alternative residential and employment sites as they did not fall within its boundaries.

**4.80** Thirdly, in terms of greenfield and brownfield development, minor negative (-) effects were identified for all of the reasonable alternative residential and employment sites, reflecting the fact that at least 25% of each site comprised greenfield land.

**4.81** Finally, for assessing intersection with Visually Important Spaces or Country Parks, no effects (0) were identified for all reasonable alternative sites.

#### SA objective 16: To safeguard and enhance the quality of soil

##### Allocated sites

**4.82** Effects in relation to this SA objective were firstly assessed by considering whether development would lead to loss of high quality agricultural land. No effects (0) were identified for just under half of the allocated sites, reflecting no loss of good quality agricultural land. Significant negative (-) effects were identified for a small number of the allocated residential and employment sites, reflecting the fact that at least 25% of these sites comprise grade 1 (excellent) or grade 2 (very good) agricultural land. The remaining allocated sites scored minor negative (-) or uncertain (?) effects.

**4.83** Secondly, the SA considered the potential for development of site options to remediate known areas of contaminated land. No effect (0) was identified for most of the allocated residential and employment site options, reflecting the fact that no known contaminated land was present. The remaining allocated sites scored minor negative (-) or uncertain (?) effects.

##### Reasonable alternative sites

**4.84** Regarding agricultural land, minor negative (-) effects were identified for the majority of reasonable alternative residential and employment sites, reflecting the fact that more than 25% of the area of each site comprises grade 3 agricultural land. The remaining reasonable alternative site scored a significant negative (-) effect because it comprises grade 2 agricultural land.

**4.85** For contaminated land, no effect (0) was identified for all reasonable alternative site options, reflecting the fact that no known contaminated land is present.

## Chapter 5

# Appraisal of the Schedule of Main Modifications

This chapter summarises the findings of the SA of the Main Modifications to Section 2 of the Local Plan.

### Introduction

**5.1 Appendix D** presents the Schedule of Main Modifications and the Council's reasons for proposing each change, with a final column added to record the implications of each Main Modification for the SA conclusions reported previously.

The SA implications have been considered based on whether each Main Modification changes the conclusion of the 2017 SA Report for the Publication Draft Section 2 Local Plan. Therefore, this chapter should be read in conjunction with chapters 4-8 of the 2017 SA Report. Only changes to previously reported SA findings or new sustainability effects are summarised in this chapter.

**5.2 Table 5.1** shows how the policies in the Publication Draft Section 2 Local Plan relate to those in the Section 2 Local Plan as proposed to be modified. The final column sets out where the most up-to-date policy assessment can be found. For some policies this is the SA of the Publication Draft Section 2 Local Plan because the policy has either not changed or has changed in a very minor way. The assessments presented in this SA Addendum supersede any previous assessment. Where the policy number and name have changed, this document refers to the new number and name unless stated otherwise.

# DRAFT

**Table 5.1: Relationship between policies in the Publication Draft Section 2 Local Plan and the Section 2 Local Plan as proposed to be modified**

Policy number and name in Publication Draft Section 2 Local Plan	Policy number and name in the Main Modifications Section 2 Local Plan	Most up to date policy assessment
Vision	Vision	Publication Draft SA Report (June 2017)
Key Objectives	Key Objectives	Publication Draft SA Report (June 2017)
Spatial Strategy	Spatial Strategy	Main Modifications SA Report (this report)
Policy LPP 1 Development Boundaries	Policy LPP 1 Development Boundaries	Main Modifications SA Report (this report)
Policy LPP 2 Location of Employment Land	Policy LPP 2 Location of Employment Land	Main Modifications SA Report (this report)
Policy LPP 3 Employment Policy Areas	Policy LPP 3 Employment Policy Areas	Publication Draft SA Report (June 2017)
Policy LPP 4 Kelvedon Park	Policy LPP 4 Kelvedon Park	Publication Draft SA Report (June 2017)
Policy LPP 5 Allshot's Farm, Rivenhall	Policy LPP 5 Allshot's Farm, Rivenhall	Publication Draft SA Report (June 2017)
Policy LPP 6 Business Parks	Policy LPP 6 Business Parks	Publication Draft SA Report (June 2017)
Policy LPP 7 Design and Layout of Employment Policy Areas and Business Uses	N/A – Policy deleted from Section 2 Local Plan as proposed to be modified	-
Policy LPP 8 Rural Enterprise	Policy LPP 8 Rural Enterprise	Main Modifications SA Report (this report)
Policy LPP 9 Tourist Development within the Countryside	Policy LPP 9 Tourist Development within the Countryside	Main Modifications SA Report (this report)
Policy LPP 10 Retailing and Regeneration	Policy LPP 10 Retailing and Regeneration	Publication Draft SA Report (June 2017)
Policy LPP 11 Primary Shopping Areas	Policy LPP 11 Primary Shopping Areas	Publication Draft SA Report (June 2017)
Policy LPP 12 District Centre	Policy LPP 12 District Centre	Publication Draft SA Report (June 2017)
Policy LPP 13 Freeport Outlet Centre	Policy LPP 13 Freeport Outlet Centre	Publication Draft SA Report (June 2017)
Policy LPP 14 Leisure and Entertainment	Policy LPP 14 Leisure and Entertainment	Publication Draft SA Report (June 2017)

# DRAFT

Policy number and name in Publication Draft Section 2 Local Plan	Policy number and name in the Main Modifications Section 2 Local Plan	Most up to date policy assessment
Policy LPP 15 Retail Warehouse Development	Policy LPP 15 Retail Warehouse Development	Publication Draft SA Report (June 2017)
Policy LPP 16 Retail Site Allocations	Policy LPP 16 Retail Site Allocations	Main Modifications SA Report (this report)
Policy LPP 17 Housing Provision and Delivery	Policy LPP 17 Housing Provision and Delivery	Main Modifications SA Report (this report)
Policy LPP 18 Strategic Growth Location - Land East of Great Notley, south of Braintree	Policy LPP 18 Strategic Growth Location - Land East of Great Notley, south of Braintree	Main Modifications SA Report (this report)
Policy LPP 19 Strategic Growth Location - Land East of Broad Road, Braintree	Policy LPP 19 Strategic Growth Location - Land East of Broad Road, Braintree	Main Modifications SA Report (this report)
Policy LPP 20 Strategic Growth Location - Former Towerlands Park Site	Policy LPP 20 Strategic Growth Location - Former Towerlands Park Site	Main Modifications SA Report (this report)
Policy LPP 21 Strategic Growth Location - North West Braintree	Policy LPP 21 Strategic Growth Location - North West Braintree	Publication Draft SA Report (June 2017)
Policy LPP 22 Strategic Growth Location - Land at Feering	Policy LPP 22 Strategic Growth Location - Land at Feering	Main Modifications SA Report (this report)
Policy LPP 23 Strategic Growth Location - Wood End Farm, Witham	Policy LPP 23 Strategic Growth Location - Wood End Farm, Witham	Publication Draft SA Report (June 2017)
Policy LPP 24 Comprehensive Redevelopment Area - Land East of Halstead High Street	Policy LPP 24 Comprehensive Redevelopment Area - Land East of Halstead High Street	Main Modifications SA Report (this report)
Policy LPP 25 Specialist Housing - Mount Hill, Halstead	Policy LPP 25 Specialist Housing - Mount Hill, Halstead	Main Modifications SA Report (this report)
Policy LPP 26 Comprehensive Redevelopment Area - Factory Lane West/Kings Road	Policy LPP 26 Comprehensive Redevelopment Area - Factory Lane West/Kings Road	Main Modifications SA Report (this report)
Policy LPP 27 Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall	N/A – Policy deleted from Section 2 Local Plan as proposed to be modified	-
Policy LPP 28 Comprehensive Redevelopment Area - Kings Chase, Witham	Policy LPP 28 Comprehensive Redevelopment Area - Kings Chase, Witham	Publication Draft SA Report (June 2017)
Policy LPP 29 Comprehensive Redevelopment Area - Newlands Precinct, Witham	Policy LPP 29 Comprehensive Redevelopment Area - Newlands Precinct, Witham	Publication Draft SA Report (June 2017)
Policy LPP 30 – Comprehensive Redevelopment Area – Rickstones Neighbourhood Centre, Witham	Policy LPP 30 – Comprehensive Redevelopment Area – Rickstones Neighbourhood Centre, Witham	Publication Draft SA Report (June 2017)

# DRAFT

Policy number and name in Publication Draft Section 2 Local Plan	Policy number and name in the Main Modifications Section 2 Local Plan	Most up to date policy assessment
Policy LPP 31 - Comprehensive Redevelopment Area – Land between A12 and GEML, Hatfield Peverel	Policy LPP 31 - Comprehensive Redevelopment Area – Land between A12 and GEML, Hatfield Peverel	Publication Draft SA Report (June 2017)
Policy LPP 32 Residential Allocation Area - Gimsons, Witham	Policy LPP 32 Residential Allocation Area - Gimsons, Witham	Publication Draft SA Report (June 2017)
Policy LPP 33 Affordable Housing	Policy LPP 33 Affordable Housing	Publication Draft SA Report (June 2017)
Policy LPP 34 Affordable Housing in the Countryside	Policy LPP 34 Affordable Housing in the Countryside	Publication Draft SA Report (June 2017)
Policy LPP 35 Specialist Housing	Policy LPP 35 Specialist Housing	Publication Draft SA Report (June 2017)
Policy LPP 36 Gypsy and Traveller and Travelling Showpersons' Accommodation	Policy LPP 36 Gypsy and Traveller and Travelling Showpersons' Accommodation	Publication Draft SA Report (June 2017)
Policy LPP 37 Housing and Density	Policy LPP 37 Housing, Density and Accessibility	Publication Draft SA Report (June 2017)
Policy LPP 38 Residential Alterations, Extensions and Outbuildings	Policy LPP 38 Residential Alterations, Extensions and Outbuildings	Publication Draft SA Report (June 2017)
Policy LPP 39 Replacement Dwellings in the Countryside	Policy LPP 39 Replacement Dwellings in the Countryside	Publication Draft SA Report (June 2017)
Policy LPP 40 Rural Workers Dwellings in the Countryside	Policy LPP 40 Rural Workers Dwellings in the Countryside	Publication Draft SA Report (June 2017)
Policy LPP 41 Infill Developments in Hamlets	Policy LPP 41 Infill Developments in Hamlets	Publication Draft SA Report (June 2017)
Policy LPP 42 Residential Conversion of Buildings in the Countryside	Policy LPP 42 Residential Conversion of Buildings in the Countryside	Main Modifications SA Report (this report)
Policy LPP 43 Garden Extensions	Policy LPP 43 Garden Extensions	Publication Draft SA Report (June 2017)
Policy LPP 44 Sustainable Transport	Policy LPP 44 Sustainable Transport	Publication Draft SA Report (June 2017)
Policy LPP 45 Parking Provision	Policy LPP 45 Parking Provision	Publication Draft SA Report (June 2017)
Policy LPP 46 Protected Lanes	Policy LPP 46 Protected Lanes	Publication Draft SA Report (June 2017)
Policy LPP 47 Transport Related Policy Areas	Policy LPP 47 Transport Related Policy Areas	Publication Draft SA Report (June 2017)
Policy LPP 48 New Road Infrastructure	Policy LPP 48 New Road Infrastructure	Publication Draft SA Report (June 2017)

# DRAFT

Policy number and name in Publication Draft Section 2 Local Plan	Policy number and name in the Main Modifications Section 2 Local Plan	Most up to date policy assessment
Policy LPP 49 Broadband	Policy LPP 49 Broadband	Publication Draft SA Report (June 2017)
Policy LPP 50 Built and Historic Environment	Policy LPP 50 Built and Historic Environment	Publication Draft SA Report (June 2017)
Policy LPP 51 An Inclusive Environment	Policy LPP 51 An Inclusive Environment	Publication Draft SA Report (June 2017)
Policy LPP 52 Health and Wellbeing Impact Assessment	Policy LPP 52 Health and Wellbeing Impact Assessment	Publication Draft SA Report (June 2017)
Policy LPP 53 Provision for Open Space, Sport and Recreation	Policy LPP 53 Provision for Open Space, Sport and Recreation	Main Modifications SA Report (this report)
Policy LPP 54 Equestrian Facilities	Policy LPP 54 Equestrian Facilities	Main Modifications SA Report (this report)
Policy LPP 55 Layout and Design of Development	Policy LPP 55 Layout and Design of Development	Publication Draft SA Report (June 2017)
Policy LPP 56 Conservation Areas	Policy LPP 56 Conservation Areas	Publication Draft SA Report (June 2017)
Policy LPP 57 Demolition In Conservation Areas	Policy LPP 57 Demolition In Conservation Areas	Publication Draft SA Report (June 2017)
Policy LPP 58 Shop Fronts, Fascias and Signs in Conservation Areas	Policy LPP 58 Shop Fronts, Fascias and Signs in Conservation Areas	Publication Draft SA Report (June 2017)
Policy LPP 59 Illuminated Signs in Conservation Areas	Policy LPP 59 Illuminated Signs in Conservation Areas	Publication Draft SA Report (June 2017)
Policy LPP 60 Heritage Assets and their settings	Policy LPP 60 Heritage Assets and their settings	Publication Draft SA Report (June 2017)
Policy LPP 61 Demolition of Listed Buildings or Structures	Policy LPP 61 Demolition of Listed Buildings or Structures	Main Modifications SA Report (this report)
Policy LPP 62 Enabling Development	N/A – Policy deleted from Section 2 Local Plan as proposed to be modified	-
Policy LPP 63 Archaeological Evaluation, Excavation and Recording	Policy LPP 63 Archaeological Evaluation, Excavation and Recording	Publication Draft SA Report (June 2017)
Policy LPP 64 Educational Establishments	Policy LPP 64 Educational Establishments	Main Modifications SA Report (this report)
Policy LPP 65 Local Community Services and Facilities	Policy LPP 65 Local Community Services and Facilities	Publication Draft SA Report (June 2017)
Policy LPP 66 Cemeteries and Churchyards	Policy LPP 66 Cemeteries and Churchyards	Publication Draft SA Report (June 2017)
Policy LPP 67 Natural Environment and Green Infrastructure	Policy LPP 67 Natural Environment and Green Infrastructure	Main Modifications SA Report (this report)

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Policy number and name in Publication Draft Section 2 Local Plan	Policy number and name in the Main Modifications Section 2 Local Plan	Most up to date policy assessment
Policy LPP 68 Protected Species, Priority Spaces and Priority Habitat	Policy LPP 68 Protected Species, Priority Spaces and Priority Habitat	Publication Draft SA Report (June 2017)
Policy LPP 69 Tree Protection	Policy LPP 69 Tree Protection	Publication Draft SA Report (June 2017)
Policy LPP 70 Protection, Enhancement, Management and Monitoring of Biodiversity	Policy LPP 70 Protection, Enhancement, Management and Monitoring of Biodiversity	Publication Draft SA Report (June 2017)
Policy LPP 71 Landscape Character and Features	Policy LPP 71 Landscape Character and Features	Publication Draft SA Report (June 2017)
Policy LPP 72 Green Buffers	Policy LPP 72 Green Buffers	Publication Draft SA Report (June 2017)
Policy LPP 73 Protecting and Enhancing Natural Resources, Minimising Pollution and 138 Safeguarding from Hazards	Policy LPP 73 Protecting and Enhancing Natural Resources, Minimising Pollution and 138 Safeguarding from Hazards	Main Modifications SA Report (this report)
Policy LPP 74 Climate Change	Policy LPP 74 Climate Change	Publication Draft SA Report (June 2017)
Policy LPP 75 Energy Efficiency	Policy LPP X Resource Efficiency, Energy Generation and Energy Efficiency (Combined Publication Draft policies LPP75 and LPP77)	Main Modifications SA Report (this report)
Policy LPP 76 Renewable Energy Schemes	Policy LPP 76 Renewable Energy Schemes	Publication Draft SA Report (June 2017)
Policy LPP 77 Renewable Energy Within New Developments	Policy LPP X Resource Efficiency, Energy Generation and Energy Efficiency (Combined Publication Draft policies LPP75 and LPP77)	Main Modifications SA Report (this report)
Policy LPP 78 Flooding Risk and Surface Water Drainage	Policy LPP 78 Flooding Risk and Surface Water Drainage	Main Modifications SA Report (this report)
Policy LPP 79 Surface Water Management Plan	Policy LPP 79 Surface Water Management Plan	Publication Draft SA Report (June 2017)
Policy LPP 80 Sustainable Urban Drainage Systems	Policy LPP 80 Sustainable Urban Drainage Systems	Publication Draft SA Report (June 2017)
Policy LPP 81 External Lighting	Policy LPP 81 External Lighting	Publication Draft SA Report (June 2017)
Policy LPP 82 Infrastructure Delivery and Impact Mitigation	Policy LPP 82 Infrastructure Delivery and Impact Mitigation	Publication Draft SA Report (June 2017)

## Summary of changes to SA findings

**5.3** This section summarises changes to the SA findings reported in the 2017 SA Report as a result of the Main Modifications to the Section 2 Local Plan. Where sustainability effects identified by the SA findings have changed as a result of the proposed modifications, most of them are more positive than previously reported.

**5.4** In line with the policy groupings presented in the 2017 SA Report, the SA findings are presented in the following sections:

- Spatial Strategy
- Prosperous District Policies (LPP 2 – LPP 49)
- Creating Better Places Policies (LPP 50 – LPP 66)
- District's Natural Environment Policies (LPP 67 – LPP 81)

## Spatial strategy

### Previous SA and identification of reasonable alternatives

**5.5** Chapter 5 of the 2017 SA Report presented the appraisal of the proposed Spatial Strategy for Braintree District and five reasonable alternatives:

- Main Towns, A12/GEML Corridor and Garden Communities (proposed spatial strategy)
- Excluding Large Sites
- Large Developments Only
- Sites with high sustainable transport
- Centred around Braintree
- Rural Distribution

**5.6** Subsequently, a wide range of reasonable alternative spatial strategies and strategic sites were also appraised for North Essex in the 2019 Additional SA for the Section 1 Plan. These included (see chapters 3 & 4 of Additional SA):

- 23 strategic sites, each at a range of housing capacities (see Table 2.8 pp 63-65 of Additional SA).
- 17 spatial strategies, including 11 for the part of North Essex west of Colchester (and therefore including Braintree District). These spatial strategy alternatives west of Colchester included ones with no garden communities west of Colchester, that instead comprised various strategic sites and proportionate growth at existing settlements (see Table 2.9, p71 of Additional SA).

**5.7** The additional SA for the Section 1 Plan found that spatial strategy options that rely solely on proportionate growth are the least sustainable but for others, the differences are much more finely balanced such that it was not possible to come to a definitive conclusion that any one strategy option was the most sustainable option. Therefore, it was for the Councils to choose their preferred strategy taking into account a broader range of considerations.

**5.8** Garden communities were part of the submitted strategy for North Essex and were allocated within the shared Section 1 Plan. Two of the three garden communities in the submitted North Essex spatial strategy (those within Braintree District) were removed during the Examination of the shared Section 1 Plan. Accordingly, their removal has already been appraised by the SA of Main Modifications to the Section 1 Plan. That SA also considered the impacts of the proposed modifications on the reasonable alternatives already assessed and whether any new reasonable alternatives to the Section 1 spatial strategy or other Section 1 strategic policies required assessment. This resulted in the appraisal of alternative housing provision figures for Braintree District compared to those specified by policy SP4: Meeting Housing Needs but no additional spatial alternatives were identified as requiring appraisal.

**5.9** In line with the adopted Section 1 Plan, the spatial strategy proposed for Braintree District by the Section 2 Plan has now been modified to remove reference to the garden communities. Other than deletion of the reference to the two garden communities, no other changes have been made to the submitted Section 2 spatial strategy. Similarly, other than deletion of the two garden communities, the proposed Main Modifications do not propose any significant changes to the submitted settlement hierarchy that supports the spatial strategy (the addition of two lower tier villages that were previously omitted in error is not considered significant in relation to the SA).

**5.10** At the same time as amending its proposed spatial strategy, the Council has considered whether any additional reasonable alternative Section 2 Spatial Strategies exist that have not previously been subject to SA as part of the Section 1 or Section 2 SA process and whether the five previously appraised Section 2 reasonable alternatives remain valid or they require updating and re-appraisal.

**5.11** The following modifications are proposed for the six Spatial Strategy options presented in the 2017 SA Report (no change to Spatial Strategy option **A: Excluding large sites** (AS1)):

- **Spatial Strategy as proposed to be modified: Main towns and A12/GEML corridor (AS6) – Reference to**

development of the Colchester / Braintree Garden Community is removed.

- **B: Large developments only (AS2)** – Large development sites would be promoted in Silver End in addition to the other previously identified existing settlements of Braintree, Witham, Halstead, Ferring, Kelvedon and Coggeshall.
- **C: Sites with high sustainable transport (AS3)** – A smaller amount of development, in addition to development in the highly accessible areas of Braintree, Witham and Kelvedon/Feering, would be allocated at Tye Green and Silver End. Reference to the Hatfield Peverel train station is removed.
- **D: Centred around Braintree (AS4)** – Reference to the specific number of dwellings required to be delivered is removed. The modification to the text clarifies that land

between Braintree and Rayne is also considered part of this Spatial Strategy option.

- **E: Rural distribution (AS5)** – The amount of housing distributed to Braintree, Witham, Halstead, the five key service villages, the seven secondary villages, and the remaining 43 tertiary villages is reduced from 5,045 to 2,525 dwellings.

**5.12 Table 5.2** presents a summary of the Spatial Strategy options and their assessment findings. The SA of the Spatial Strategy options focuses on the broad distribution of development that would be provided by the spatial options. Assessments of individual site options are presented in **Chapter 4** of this SA Addendum and Chapter 10 of the 2017 SA Report.

**Table 5.2: Proposed spatial strategy and reasonable alternatives at Main Modifications stage and changes vs. Proposed Submission stage**

Strategy name	Strategy description	Summary of changes vs. option considered in 2017 SA of Proposed Submission Section 2 Local Plan
<b>Spatial strategy as proposed to be modified: Main towns and A12/GEMPL corridor (AS6)</b>	A hybrid option that mixes the spatial strategy of concentrating development around Braintree with the strategy of focusing on sites with good access to sustainable transport. This includes some limited distribution to other population centres at Witham and Halstead, and a strategic allocation at Feering. There is limited development along the Braintree branch line outside of main towns due to the limited level of service provision in existing villages immediately adjacent to stations.	Amended proposed strategy: reference to development of the Colchester / Braintree Borders and West of Braintree garden communities removed in line with adopted Section 1 spatial strategy for North Essex.
<b>A: Excluding large sites (AS1)</b>	In this spatial strategy, the maximum sized site was set at 100-200 dwellings. This spatial strategy would achieve diversity and improve deliverability; however, a large quantum of sites would have to be identified. Many of the possible development sites near towns have a capacity of greater than 200 dwellings, whereas many of the smaller possible development sites are more rural. As such, this option is expected to rely heavily on development in rural areas.	No change to previously considered reasonable alternative.
<b>B: Large development s only (AS2)</b>	A series of large developments would bring a higher level of planning gain and large sites have the viability to support more infrastructure. Large sites are being promoted by landowners around the existing settlements of Braintree, Witham, Halstead, Silver End, Feering, Kelvedon and Coggeshall and sustainable urban extensions would be allocated to these as they have some infrastructure to support early phases.	Amended reasonable alternative: Large development sites would be promoted in Silver End in addition to the other previously identified existing settlements of Braintree, Witham, Halstead, Feering, Kelvedon and Coggeshall.

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Strategy name	Strategy description	Summary of changes vs. option considered in 2017 SA of Proposed Submission Section 2 Local Plan
<b>C: Sites with high sustainable transport (AS3)</b>	Stations along the Great Eastern Main Line (GEML) corridor and Braintree branch line were considered to have the highest levels of sustainable transport capacity. This would be underpinned by being near town centres with good bus services or being near railway stations. GEML stations (Witham and Kelvedon/Feering) would be the focus of significant allocations, along with Braintree. A smaller amount would be allocated at Cressing / Tye Green and Silver End.	Amended reasonable alternative: A smaller amount of development, in addition to development in the highly accessible areas of Braintree, Witham and Kelvedon/Feering, would be allocated at Cressing / Tye Green and Silver End. Reference to the Hatfield Peverel train station is removed.
<b>D: Centred around Braintree (AS4)</b>	With the retention of strategic allocations around Braintree, capacity for further dwellings would need to be found. There is an abundance of land submitted to the SHLAA around Braintree, Bocking and Great Notley. Sites illustrated in this spatial strategy option were land to the south east of Braintree at Cressing and Ford End and land between Braintree and Rayne, although many other options were available.	Amended reasonable alternative: Reference to the specific number of dwellings required to be delivered is removed. The modification to the text clarifies that land between Braintree and Rayne is also considered part of this spatial strategy option.
<b>E: Rural distribution (AS5)</b>	<p>A high-level distribution of housing was made in accordance with the village hierarchy. The main towns would be allocated development where permission is already granted and the remaining quantum of housing distributed formulaically to the 3 tiers of villages.</p> <ul style="list-style-type: none"> <li>– 1,300 dwellings to Braintree;</li> <li>– 675 dwellings to Witham;</li> <li>– 250 dwellings to Halstead;</li> <li>– 150 dwellings to each of the 5 key service villages;</li> <li>– 100 dwellings in each of the 7 secondary villages; and</li> <li>– 50 dwellings for each of the remaining 43 tertiary villages.</li> </ul>	Amended reasonable alternative: The amount of housing distributed to Braintree, Witham, Halstead, the five key service villages, the seven secondary villages, and the remaining 43 tertiary villages is reduced from 5,045 to 2,525 dwellings to reflect the amount of development that has come forward since the option was originally considered.
<b>F: Sites along the A120 corridor (AS7)</b>	Strategic allocations in and around Braintree will be retained and a linear development corridor will be created to include a mix of small and large sites at Rayne, Cressing, Silver End, Bradwell and Coggeshall. Some services at Coggeshall and Braintree would need to be accessed by bus services running along the A120 corridor. The spatial strategy would not require but would benefit greatly from a future A120 to A12 link road NSIP which would greatly increase capacity on this corridor.	New reasonable alternative: Includes a focus in the east of the District in place of the deleted Colchester / Braintree Borders Garden Community, albeit at a smaller scale.

**Table 5.3: Summary of SA findings for modified spatial strategy and reasonable alternatives**

SA Objective	Spatial strategy as proposed to be modified	A	B	C	D	E	F
SA1: Community safety & cohesion	0	0	0	0	0	0	0
SA2: Housing	++	++	++	++	++	++	++
SA3: Health	+?	-?	+?	+?	+?	-?	+/-
SA4: Service centre vitality	+	+/-	+/-	+/-	+/-	+/-	+/-
SA5: Economy	+?	-?	+	+/-	+	-?	+/-
SA6: Biodiversity and geodiversity	-?	+/-	-?	-?	-?	?	-?
SA7: Sustainable travel	++	--?	+?	++	+?	-?	--/+
SA8: Accessibility	+++?	-?	+/-	+?	+/-	+/-	--/+
SA9: Education and skills	+?	-?	+?	+?	+?	-?	+/-
SA10: Historic environment	-?	0	-?	-?	-?	?	-?
SA11: Climate change mitigation	+?	-?	+/-	++	+/-	-?	--/+
SA12: Water environment	-?	?	-?	-?	-?	?	-?
SA13: Flood risk	-?	?	-?	-?	-?	?	-?
SA14: Air quality	+/-	?	--?	+/-	--?	?	--/+
SA15: Landscapes and townscapes	?	-?	-?	+/-	-?	?	+/-
SA16: Soil	--	-?	-?	--	-?	-?	--

**Changes to the SA findings for the spatial strategy as proposed to be modified: Main towns and A12/GEML corridor (AS6)**

**5.13** The deletion of the West of Braintree and Colchester / Braintree Borders Garden Communities from the proposed spatial strategy removes two strategic scale developments, each of which would have resulted in significant sustainability effects. The policies allocating these garden communities were contained in the Submission Draft Section 1 Local Plan (policies SP 9 and SP 10) and the effects of their allocation

and subsequent removal were appraised through the SA and Additional SA for the Submission Draft Plan as well as the SA of the Main Modifications to that Plan. The 2017 SA of the Section 2 submitted strategy highlighted some effects relating to the inclusion of the garden communities, notably positive effects in relation to SA objective 7: Sustainable travel and SA objective 8: Accessibility as garden communities are expected to follow a model that promotes such effects. However, similar effects were identified from other elements of the Section 2 spatial strategy that remain unchanged, for example focussing development on the main towns and other locations with good

access to sustainable transport. Given the high level nature of the appraisal of the spatial strategy, the deletion of the garden communities **does not, therefore, alter the previously identified SA effects for this spatial strategy**. This is explained in more detail below in relation to each of the types of effect previously identified for the Submission Draft spatial strategy.

**5.14** Development would still be focused to the main towns of Braintree, Witham and Halstead which contain services and facilities, including healthcare and education facilities, sustainable transport links and employment opportunities, resulting in positive effects for SA objectives **3: 'Health'**, **5: 'Economy'**, **7: 'Sustainable travel'**, **8: 'Accessibility'**, **9: 'Education and skills'**, **11: 'Climate change mitigation'** and **14: 'Air quality'**. A minor negative effect for **14: 'Air quality'** (as part of an overall mixed effect) is also identified as development along the A12/GEML corridor could lead to increased road traffic and associated emissions. The potential negative effect for SA objective **6: 'Biodiversity and geodiversity'** remains valid as there is still potential for adverse effects particularly on the Local Nature Reserves, Local Wildlife Sites and Ancient Woodland near Braintree, Witham and Feering. The spatial strategy focuses development to the main towns where generally heritage assets are more concentrated, reinforcing the previously identified uncertain minor negative effect for **10: 'Historic environment'**. Areas at risk of flooding (Flood Zone 3) are present in the main towns and along the A12/GEML corridor associated with the River Blackwater and River Brain, reinforcing the previously identified uncertain minor negative effect identified for **13: 'Flood risk'**. The significant positive effect for SA objective **16: 'Soil'** remains valid as the land along the A12/GEMEL corridor predominately comprises Grade 2 and 3 Best and Most Versatile (BMV) agricultural land.

#### Changes to the SA findings for spatial strategy option A: Excluding large sites (AS1)

**5.15** No changes were necessary to this reasonable alternative spatial strategy therefore the previously reported SA effects remain valid.

#### Changes to the SA findings for spatial strategy option B: Large developments only (AS2)

**5.16** The addition of Silver End to the list of existing settlements where large development sites would be located **does not alter the previously identified SA effects for this reasonable alternative spatial strategy**. The minor positive effects previously identified for SA objectives **3: 'Health'**, **7: 'Sustainable travel'**, **8: 'Accessibility'** (as part of a mixed effect), **9: 'Education and skills'**, and **11: 'Climate change**

**mitigation'** (as part of a mixed effect) remain valid as Silver End is moderately accessible by public transport links (bus services to Braintree, Witham and Colchester) and contains a range of services and facilities including a primary school and primary healthcare facilities. In addition, the development of large sites in Silver End would be required to deliver new community facilities and sustainable transport links. Minor negative effects (as part of mixed effects) are identified for **8: 'Accessibility'** and **11: 'Climate change mitigation'** as it is likely that the development of large sites in this area could also lead to increase traffic congestion and associated GHG emissions.

**5.17** The potential for adverse effects on the Silver End Conservation Area and its assets reinforces the minor negative effect previously identified for SA objective **10: 'Historic Environment'**. The area to the south and west of Silver End is at risk from flooding (Flood Zone 3) which reinforces the uncertain minor negative effect previously identified for SA objective **13: 'Flood risk'**. Silver End is of moderate landscape sensitivity, however the development of large areas of greenfield land is likely to result in adverse effects on the landscape reinforcing the previously identified uncertain minor negative effect for SA objective **15: 'Landscapes and townscapes'**. The uncertain significant negative effect for **14: 'Air quality'** relates to the development proposed at other settlements in this spatial strategy including Braintree, as well as Witham, Kelvedon and Coggeshall, all of which are adjacent to the A120 or A12 and are identified as having poor air quality due to emissions. Although the area around Silver End contains Grade 2 Best and Most Versatile (BMV) agricultural land, the minor negative effect for SA objective **16: 'Soil'** remains valid as it reflects the overall effect from development at all settlements identified in this spatial strategy.

#### Changes to the SA findings for spatial strategy option C: Sites with high sustainable transport (AS3)

**5.18** A smaller amount of development, in addition to development in the highly accessible areas of Braintree, Witham and Kelvedon/Feering, allocated at Cressing / Tye Green and Silver End **does not alter the previously identified SA effects for this reasonable alternative spatial strategy**. The significant positive effects previously identified for SA objectives **7: 'Sustainable travel'** and **11: 'Climate change mitigation'** remain valid as Cressing and Tye Green either contain or are close to the train stations at Cressing and White Notley on the Braintree town branch line. Although Silver End is only served by bus services, this settlement would receive a relatively small proportion of the total development under this strategy so the overall significant positive effect is judged to remain valid. This could also

increase accessibility to jobs, schools, services, and healthcare facilities reinforcing the minor positive effects previously identified for **3: 'Health'**, **5: 'Economy'**, **8: 'Accessibility'**, and **9: 'Education and skills'**, and the minor positive effect previously identified for SA objective **14: 'Air quality'** (as part of an overall mixed effect due to other settlements in this spatial strategy being in close proximity to the A12, which may increase road traffic and air pollutants).

**5.19** The development of Silver End and Cressing / Tye Green, second tier and third tier villages respectively in the Settlement Hierarchy, could increase pressure on local services. However, it is also possible that new development may contribute to supporting existing services and therefore, the previously identified mixed effects (minor positive / minor negative) for SA objective **4: 'Service centre vitality'** remain valid. The potential for adverse effects on the Silver End Conservation Area and its assets reinforces the minor negative effect previously identified for SA objective **10: 'Historic Environment'**. The area to the south and west of Silver End is at risk from flooding (Flood Zone 3) which reinforces the uncertain minor negative effect previously identified for SA objective **13: 'Flood risk'**. Both Silver End and Cressing / Tye Green are of moderate landscape sensitivity reinforcing the uncertain minor negative effects (as part of an overall mixed effect) previously identified for SA objective **15: 'Landscapes and townscapes'**. Cressing / Tye Green and Silver End contain Grade 2 Best and Most Versatile (BMV) agricultural land reinforcing the significant negative effect previously identified for SA objective **16: 'Soil'**.

#### Changes to the SA findings for spatial strategy option D: Centred around Braintree (AS4)

**5.20** The modification to the text to clarify that land between Braintree and Rayne is also considered part of this spatial strategy option **does not alter the previously identified SA effects for this spatial strategy**. The land between Braintree and Rayne is predominately of low landscape sensitivity, however, the development of this land could result in the coalescence of the two settlements which reinforces the minor negative effect previously identified for SA objective **15: 'Landscapes and townscapes'**. Similarly, the minor negative effect (as part of an overall mixed effect) for SA objective **4: 'Service centre vitality'** remains valid as the development of Braintree could have a negative effect on the vitality of Rayne as a second-tier village.

**5.21** The close proximity to Braintree ensures that there would be access to employment opportunities, services and facilities, including healthcare and education facilities, and sustainable transport links which reinforces the minor positive effects previously identified for **3: 'Health'**, **5: 'Economy'**, **7:**

**'Sustainable travel'**, **8: 'Accessibility'**, **9: 'Education and skills'**, and **11: 'Climate change mitigation'**. However, the development of land between Braintree and Rayne is likely to have an adverse impact on traffic congestion along the Rayne Road reinforcing the negative effects previously identified for **8: 'Accessibility'** and **11: 'Climate change mitigation'** (as part of overall mixed effects) and contributing to the significant negative effect for SA objective **14: 'Air quality'** (due to the close proximity to the A120 corridor which is identified as having poor air quality).

**5.22** The land between Braintree and Rayne is at risk from flooding (Flood Zone 3) which reinforces the uncertain minor negative effect previously identified for SA objective **13: 'Flood risk'**. Although the land between Braintree and Rayne contains Grade 3 Best and Most Versatile (BMV) agricultural land, the minor negative effect for SA objective **16: 'Soil'** remains valid as it reflects the overall effect for this spatial strategy.

#### Changes to the SA findings for spatial strategy option E: Rural distribution (AS5)

**5.23** The change in the distribution of housing in Braintree, Witham, Halstead, the five key service villages, the seven secondary villages, and the remaining 43 tertiary villages, **does not alter the previously identified SA effects for this spatial strategy**. Although the larger towns and key service villages would receive a greater quantum of housing, the uncertain minor negative effects previously identified for the SA objectives remain valid as development in smaller settlements is less likely to be in close proximity to services and facilities, including schools and health care facilities, employment opportunities, and sustainable transport links.

#### SA findings for spatial strategy option F: Sites along the A120 corridor (AS7)

**5.24** This newly identified spatial strategy option would meet the identified housing need (including affordable housing) and is therefore expected to have significant positive effects on SA objective **2: 'Housing'**.

**5.25** Mixed effects (significant negative / minor positive) are identified for SA objectives **7: 'Sustainable travel'**, **8: 'Accessibility'**, **11: 'Climate change mitigation'** and **14: 'Air quality'** as the A120 corridor currently experiences traffic congestion and poor air quality due to vehicle emissions. Development along the A120 corridor is likely to exacerbate these issues by increasing road traffic and their associated GHG emissions. With the exception of Cressing, this corridor is not served by rail links, which could reduce accessibility to jobs, services and facilities for those without private cars. However, the main town of Coggeshall, in particular, is well

served by bus links which may encourage sustainable travel, helping to improve air quality, and accessibility to jobs, services and facilities.

**5.26** Mixed effects (minor positive / minor negative) are expected for SA objectives **3: 'Health'**, **4: 'Service centre vitality'**, **5: 'Economy'** and **9: 'Education and skills'** as development at Coggeshall ensures that there would be access to employment opportunities, services and facilities, including healthcare and education facilities, however, such services are more limited in the other settlements targeted by this spatial strategy along the A120 corridor.

**5.27** An uncertain minor negative effect is identified for SA objective **6: 'Biodiversity and geodiversity'** as there is potential for adverse effects on biodiversity sites, particularly on the Local Wildlife Sites beside the River Blackwater near the A120 corridor, for instance from recreational disturbance or loss of habitat.

**5.28** While there are few heritage assets along the A120 corridor, with the exception of a number of Listed Buildings, there is a concentration of heritage assets in Coggeshall including Coggeshall Abbey Scheduled Monument, the Coggeshall Conservation Area, and numerous Listed Buildings. Focusing development to this area may therefore result in adverse effects on heritage assets and their settings. An uncertain minor negative effect is identified for SA objective **10: 'Historic Environment'**, however the extent of the effect will depend on the exact location and design of developments.

**5.29** The Water Cycle Study<sup>111</sup> indicates that the Water Recycling Centres (WRCs) at Bocking and Braintree do not have sufficient capacity to serve proposed future development across the District. Without further action, increased wastewater resulting from new development could exceed environmental permits and have adverse impacts on the quality of watercourses. However, the Water Cycle Study concludes that it would be feasible to upgrade these WRCs to ensure that watercourses are not significantly harmed. The A120 corridor also lies within a Ground Source Protection Zone (SPZ3). Overall, an uncertain minor negative effect is identified for SA objective **12: 'Water environment'**.

**5.30** While the District lies largely within Flood Zone 1, which is at low risk of flooding, there are areas of Flood Zone 3 along the A120 corridor, primarily associated with the River Blackwater, resulting in a minor negative effect for SA objective **13: 'Flood risk'**. The effect is uncertain as this depends on the location of the developments.

**5.31** Most of the land along the A120 corridor is of low or moderate landscape sensitivity, however, there are areas of high sensitivity around Coggeshall, Pattiswick, and Bradwell. Therefore, mixed effects (minor positive / minor negative) are identified for SA objective **15: 'Landscapes and townscapes'**. A significant negative effect identified for SA objective **16: 'Soil'** as the land along the A120 corridor, including Coggeshall, comprises Grade 2 and Grade 3 agricultural land.

### Rationale for choosing the reasonable alternative spatial strategy options and the reasons for selecting the preferred spatial strategy

**5.32** The Section 2 Local Plan, as proposed to be modified, states that the spatial strategy for the Local Plan concentrates development on the towns of Braintree, Witham and the A12/Great Eastern Mainline corridor and Halstead (AS6). This is a hybrid of six preceding alternatives which were explored before arriving at the preferred spatial strategy (AS1-AS5 and AS7).

**5.33** The largest sites are concentrated around existing towns and villages or as standalone new settlements, and generally along the A12 or A120 corridors. This formed the basis for spatial strategy options 'B: Large developments only' (AS2), and 'D: Centred around Braintree' (AS4). The inverse of this formed spatial strategy option 'A: Excluding large sites' (AS1). Option 'E: Rural distribution' (AS5) was developed to explore a spatial strategy requiring the development of hundreds of small sites, land availability notwithstanding, where implementation would be delegated to neighbourhood plans. Option 'C: Sites with high sustainable transport' (AS3) was based on developing areas which have the greatest choice of sustainable travel to explore the effect of varying the level of accessibility to services and high-quality transport.

**5.34** In light of the deletion of the Colchester / Braintree Garden Community from the Section 1 Local Plan, BDC identified a new spatial strategy, option 'F: Sites along the A120 corridor (AS7)' focussing development along the A120 corridor which seeks to allocate development in the east of the District where the Colchester / Braintree Garden Community was proposed, although at a much smaller scale.

**5.35** All of the spatial strategy options are considered to be reasonable alternatives that explore different approaches to allocating the residual development in the Section 2 Local Plan. They are also consistent with the key features of the Section 1 policy SP3: spatial strategy for North Essex:

<sup>111</sup> AECOM (2017) Braintree District Council Water Cycle Study

- Existing settlements will be the principal focus for additional growth.
- Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role.
- Future growth will seek to avoid coalescence between and conserve the setting of existing settlements.
- The objective of development on previously developed land within settlements will be balanced against ensuring that development locations are accessible by a choice of means of travel.

**5.36 Table 5.4** presents BDC's reasons for selecting the spatial strategy as proposed to be modified, and the reasons for discounting the reasonable alternatives to the spatial strategy. This table updates **Table 5.1** presented in Chapter 5 of the 2017 SA Report.

**Table 5.4: Braintree District Council's reasons for selecting and discounting the spatial strategy options**

Spatial strategy option	Reasons for selecting / discounting the spatial strategy option
<b>Spatial strategy as proposed to be modified: Main towns and A12/GEML corridor (AS6)</b>	<p>A distribution of small sites at accessible locations early in the plan period would help establish a five-year housing land supply. The availability of public transport links, infrastructure and access employment at Braintree and Witham would be supplemented by new infrastructure, particularly on the larger sites around Braintree. Even though this scenario allocates units less at Braintree, it is likely that local highways will be strained. Sustainable transport at Kelvedon and Feering will help focus growth away from Braintree halfway through the plan period.</p> <p>BDC recommend this spatial strategy as a balance between constraints and opportunities. All sites are deliverable within the plan period, a housing land supply could realistically be established, and key infrastructure will be provided viably.</p>
<b>A: Excluding large sites (AS1)</b>	<p>More than 74 different rural sites would be required to undertake this spatial strategy. The spatial strategy has the benefit of ensuring earlier delivery subject to capacity of the Council to process planning applications and landowners to resolve any infrastructure capacity issues. Some villages would struggle to reach critical mass to support new schools, shops, sewerage, superfast broadband and road infrastructure mitigation. Delivery of key infrastructure items could be delayed or prevented because of s.106 complexity, including limits to pooling arrangements.</p> <p>BDC discounts this spatial strategy due to the environmental strain from landscape and heritage impacts, and the uncertainty regarding infrastructure provision.</p>
<b>B: Large developments only (AS2)</b>	<p>Due to the complexity of large sites, this spatial strategy would struggle to deliver enough units within the first five years. Key new infrastructure could be supported within the new developments. There are unknown but likely negative strategic highways impacts resulting from development at Halstead and at Coggeshall. Some of the largest sites in the District are not in the most sustainable areas, near public transport hubs, key retail centres or employment opportunities. Highways links to Colchester, Braintree, Chelmsford, Stanstead Airport and London would be strained.</p> <p>Kelvedon and Feering would have local highways constraints relating to the A12. BDC discounts this spatial strategy due the strategic highways constraints which are not likely to be mitigated to an effective degree within the plan period.</p>
<b>C: Sites with high sustainable transport (AS3)</b>	<p>There is a good variety of sites however this distribution is unlikely to deliver a robust five-year housing land supply. Existing infrastructure would be supplemented by new infrastructure provision on large sites. Witham and Braintree are sustainable transport hubs with rail and bus provision, however developments on the fringes of these towns are exceeding reasonable walking distance to transport hubs. Development at Witham north of the railway line would strain the local road network.</p> <p>Kelvedon/Feering could support new secondary schools and key road infrastructure. However, development at Kelvedon would have local highways constraints relating to the A12 and the</p>

Spatial strategy option	Reasons for selecting / discounting the spatial strategy option
	<p>removal of junction 23. Capacity on the GEML may be strained by largely dormitory settlements heading for employment centres at London, Chelmsford and Colchester.</p> <p>BDC discounts this spatial strategy due to highways constraints leading to uncertainties about deliverability within the plan period.</p>
<b>D: Centred around Braintree (AS4)</b>	<p>Smaller sites within Braintree could be brought forward in advance of larger sites. However, there may be problems with the five-year housing land supply within the first five years.</p> <p>Existing infrastructure would be supplemented by new infrastructure provision on large sites, however there may be issues around pooling arrangements. There also would be uncertainty over how to retrofit existing infrastructure to support higher levels of sustainable transport. Braintree branch line is not expected to be upgraded within the plan period. This spatial strategy would have a severe impact on local and strategic highways within Braintree Town Centre and on the A120.</p> <p>BDC discounts this spatial strategy as it is not likely that the impact of these proposals could be readily addressed by sustainable transport improvements and the overall outcome is likely to be severe congestion.</p>
<b>E: Rural distribution (AS5)</b>	<p>While developments in unparished Braintree and Bocking could be granted permission, there would be a delay in establishing neighbourhood plans with allocations across the District. Firstly, there would be no obligation for a parish to become a neighbourhood area and produce a neighbourhood plan. Secondly, smaller parishes may struggle to find human resources and political will for the undertaking, and thirdly, there may also be a resource issue for BDC to support so many neighbourhood plans.</p> <p>BDC discounts this spatial strategy as the level of service provision in most rural villages would not be able to support the proposed level of development and no significant new infrastructure could be provided viably.</p>
<b>F: Sites along the A120 corridor (AS7)</b>	xxx

### Policy LPP 1: Development Boundaries

**5.37** The Spatial Strategy section of the Plan as proposed to be modified contains a single policy, LPP 1 (Development Boundaries). **Table 5.5** outlines the changes to the SA findings for Policy LPP 1 (Development Boundaries) as a result of the Main Modifications to the Section 2 Local Plan.

**5.38** The proposed Main Modification to Policy LPP 1 supports development outside development boundaries provided it protects and enhances landscapes, biodiversity, geodiversity and soils. Therefore, the negligible effects previously identified for SA objective objectives **6: 'Biodiversity & geodiversity'** and **16: 'Soil'** are revised to minor positive effects and the previously identified significant positive effect for SA objective **15: 'Landscapes & townscapes'** is reinforced.

**Table 5.5: Changes to Spatial Strategy policy**

Policy	SA objective and assessment criteria	Previous effect	Revised effect
'Prosperous District' policies			
Policy LPP 1 Development Boundaries	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	0	+
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	0	+

## 'Prosperous District' policies

**5.39** Table 5.6 outlines the changes to the SA findings for the Prosperous Growth Policies (LPP 2 – LPP 49) as a result of the Main Modifications to the Section 2 Local Plan.

**5.40** The deletion of Policy LPP 7 (Design and Layout of Employment Policy Areas and Business Parks) as design principles are also addressed in Policy LPP 55 'Layout and Design of Development', means that the effects previously identified in the SA will no longer occur as part of the Section 2 Local Plan. Thus, all effects are revised to negligible effects.

**5.41** The proposed Main Modification to Policy LPP 8 (Rural Enterprise) removes criteria relating to sites for rural enterprise being accessible and having no unacceptable impact on protected species, the historic environment, and local landscape character. Therefore, the previously identified minor positive effects for SA objectives **6: 'Biodiversity and geodiversity'**, and **10: 'Historic environment'** are revised to negligible effects. The minor positive effect for SA objective **15: 'Landscape & townscape'** remains as another criterion in the policy requires no unacceptable impact on the character of the site or the surrounding countryside and its landscape value. Similarly, the minor positive effect previously identified for Policy LPP 9 (Tourist Development within the Countryside) for **16: 'Soil'** is revised to a negligible effect due to the deletion of the criterion relating to avoiding best and most versatile agricultural land.

**5.42** The removal of site allocation BRE31RW (Land North of Freeport) from Policy LPP 16 means that the sustainability effects for this site allocation no longer apply. However, the SA findings for Policy LPP 16 remain unchanged as the remaining sites will still positively contribute to the viability and vitality of existing service centres (minor positive effect for **4: 'Service centre vitality'**) which will strengthen the local economy and provide employment opportunities in the retail sector (minor positive effect for **5: 'Economy'**).

**5.43** Policy LPP 18 (Strategic Growth Location - Land East of Great Notley, south of Braintree) as proposed to be modified includes the reassessment of site allocations BLAN 110, 114 and 116 (Group A) while Policy LPP 22 (Strategic Growth Location - Land at Feering) as proposed to be modified includes the reassessment of sites FEER 230, 232 & 233B (Group L). The removal of site BLAN 117 from Group A does not alter the SA findings previously reported for Group A. However, the modifications to the sites in Group L has resulted in a minor negative effect being identified for Q13a: 'Flood risk'. Therefore, an uncertain minor negative effect is identified for SA objective 13: 'Flood risk' for Policy LPP 22. The modification to both policies in relation to the provision of community facilities, new primary school and stand-alone

early years and childcare nurseries reinforce the positive effects previously identified for SA objectives **1: 'Community safety & cohesion'** (minor positive) and **9: 'Education and skills'** (significant positive). The delivery of up to 1750 homes in Land East of Great Notley, 835 homes in Feering, and the provision of or contribution towards Gypsy and Traveller sites will also strengthen the previously identified significant positive effects for SA objective **2: Housing**. The minor negative effect identified as part of an overall mixed effect (minor positive / minor negative) previously identified for SA objective **3: 'Health'** (Policy LPP 18), due to a lack of access to natural greenspace, and the minor positive effect for Policy LPP 22 are revised to significant positive effects as proposals are required to deliver healthcare facilities; and to incorporate public open spaces and informal and formal recreation areas into the design of the developments. The proposed Main Modification requires proposals for the development of Land East of Great Notley to contribute towards the strategic road network which reinforces the previously identified significant positive effect for SA objective **8: 'Accessibility'**. Similarly, Policy LPP 22 requires proposals to provide a new connection between Inworth Road and London Road; safe cycle and pedestrian access; and contributions towards highway and transport infrastructure reinforcing the significant positive effects for SA objectives **7: 'Sustainable travel'** and **8: 'Accessibility'**. Policy LPP 22 also requires proposals to conserve and enhance the conservation areas and their settings, preserve listed buildings and scheduled monuments and their settings, reinforcing the minor positive effect previously identified for SA objective **10: 'Historic environment'**.

**5.44** Policy LPP 19 (Strategic Growth Location - Land East of Broad Road, Braintree) as proposed to be modified includes the reassessment of site allocations in Group J (BOCN 132). The previously identified uncertain minor negative effect for site assessment criteria Q6a: 'Designated wildlife' is revised to an uncertain significant negative effect as the site is within 100m of the Bocking Blackwater Local Nature Reserve and within the SSSI Impact Risk Zone. Therefore, the previously identified minor negative effect for SA objective **6: 'Biodiversity and geodiversity'** for Policy LPP 19 is revised to an uncertain significant negative effect. The modification of the policy wording to reflect the recent changes to the Use Class Orders will not alter the significant positive effect previously identified for SA objective **9: 'Education and skills'** for Policy LPP19. The provision of up to 1000 homes and the provision of or contribution towards a Gypsy and Traveller site will strengthen the previously identified significant positive effect for SA objective **2: Housing**. The modification to the policy in relation to compliance with the Open Space Study and Playing Pitch Strategy, and access to the site will not alter

the previously identified minor positive effect for SA objective **3: 'Health'**, or the significant positive effects for SA objective **7: 'Sustainable travel'** and SA objective **8: 'Accessibility'**.

**5.45** The proposed Main Modification to Policy LPP 24 (Comprehensive Redevelopment Area - Land East of Halstead High Street) requires the protection of the setting of listed buildings and enhancement of the Halstead Conservation Area including the retention and refurbishment of the air raid shelters, revising the previously identified negligible effect to a minor positive effect for SA objective **10: 'Historic environment'**. Similarly, the proposed Main Modification to Policy LPP 25 (Specialist Housing - Mount Hill, Halstead) seeks to protect the nearby listed buildings and their settings, also revising the previously identified negligible effect to a minor positive effect for SA objective **10: 'Historic environment'**.

**5.46** Policy LPP 26 (Comprehensive Redevelopment Area – Factory Lane West / Kings Road) as proposed to be modified includes a new site allocation, HATR 752, which has been assessed for the delivery of housing and employment in Chapter 4. This policy now relates to site allocations HATR 752 and HATR 299. The Main Modification to the policy removes reference to the retention of the boiler house (not in this area) and updates the terminology relating to the Use Class Orders. The revision to the terminology to reflect the recent changes to the Use Class Orders will not alter the SA findings previously identified. The negligible effect previously identified for SA objective **2: 'Housing'** is revised to a

significant positive effect as the allocation of site HATR 752, which is expected to deliver 22 new dwellings, which will contribute to the delivery of affordable housing in Halstead.

**5.47** The previously identified uncertain effect for SA objective **10: 'Historic environment'** is revised to an uncertain minor positive effect as the existing building on site HATR 752 does not positively contribute to the adjacent conservation area and therefore its redevelopment has the potential to positively enhance the setting of nearby heritage assets. The effect remains uncertain to reflect the assessment of site HATR 299. The uncertain effect previously identified for SA objective **16: 'Soil'** is revised to an uncertain minor negative effect as site HATR 752 is potentially contaminated.

**5.48** The deletion of Publication Draft Policy LPP 27 (Comprehensive Redevelopment Area - Former Dutch Nursery, West Street Coggeshall) as site allocation COGG 506 is under construction means that the effects previously identified in the SA will no longer occur as part of the Section 2 Local Plan. Thus, all effects are revised to negligible effects.

**5.49** Policy LPP 42 (Residential Conversion of Buildings in the Countryside) clarifies that buildings in the countryside must be no longer suitable for commercial uses before being considered for conversion to residential uses. Therefore, the previously identified minor negative effects in relation to SA objectives **3: 'Economy'**, and **8: 'Accessibility'** are revised to negligible effects.

**Table 5.6: Changes to 'Prosperous District' policies**

Policy	SA objective and assessment criteria	Previous effect	Revised effect
'Prosperous District' policies			
LPP 7 Design and Layout of Employment Policy Areas and Business Parks <i>(policy deleted in Section 2 Local Plan as proposed to be modified)</i>	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	0
	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	+	0
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	+/-	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	++	0

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	<b>SA11: Climate change mitigation</b> Reduce contributions to climate change.	+/-	0
	<b>SA14: Air quality</b> Improve air quality.	+/-	0
	<b>SA15: Landscapes &amp; townscapes</b> Maintain and enhance the quality of landscapes and townscapes.	+	0
LPP 8 Rural Enterprise	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	+	0
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	+	0
LPP 9 Tourist Development within the Countryside	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	+	0
LPP16 Retail Site Allocations  <i>(relating to site BRE31RW no longer being allocated)</i>	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	?	0
	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	++	0
	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	-	0
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	+	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	++?	0
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	?	0
	<b>SA11: Climate change mitigation</b> Reduce contributions to climate change.	+	0
	<b>SA15: Landscapes &amp; townscapes</b>	-	0

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	Maintain and enhance the quality of landscapes and townscapes.		
LPP 18 (Strategic Growth Location - Land East of Great Notley, south of Braintree)	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	++
LPP 19 (Strategic Growth Location - Land East of Broad Road, Braintree) <i>(relating to reappraisal of Group J sites)</i>	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	-?	--?
LPP 20 (Strategic Growth Location - Former Towerlands Park Site)	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
LPP 22 (Strategic Growth Location - Land at Feering)	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
LPP 22 (Strategic Growth Location - Land at Feering) <i>(relating to reappraisal of Group L sites)</i>	<b>SA13: Flood risk</b> Reduce the risk of flooding	0	-?
LPP 24 (Comprehensive Redevelopment Area - Land East of Halstead High Street)	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	0	+
LPP 25 (Comprehensive Redevelopment Area - Land East of Halstead High Street)	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	0	+
LPP 26: Comprehensive Redevelopment Area – Factory Lane West / Kings Road	<b>SA2: 'Housing'</b> Provide everyone with the opportunity to live in a decent home.	0	++
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	?	+?
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	?	-?
LPP 27 Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall	<b>SA1: 'Community safety &amp; cohesion'</b> Create safe environments which improve quality of life and community cohesion.	+	0
	<b>SA2: 'Housing'</b>	++	0

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
<b><i>(policy deleted in Section 2 Local Plan as proposed to be modified)</i></b>	Provide everyone with the opportunity to live in a decent home.		
	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	0
	<b>SA4: Service centre vitality</b> Promote the vitality and viability of all service centres throughout the District.	+	0
	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	-	0
	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	--?	0
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	+	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	++/--	0
	<b>SA9: Education and skills</b> Improve the education and skills of the population.	++/-	0
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	?	0
	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage capacity.	-	0
	<b>SA13: Flood risk</b> Reduce the risk of flooding.	-	0
	<b>SA15: Landscapes &amp; townscapes</b> Maintain and enhance the quality of landscapes and townscapes.	-	0
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	-?	0
	<b>SA5: Economy</b>	-	0

Policy	SA objective and assessment criteria	Previous effect	Revised effect
LPP 42 (Residential Conversion of Buildings in the Countryside)	Achieve sustainable levels of prosperity and economic growth.		
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	-	0

### 'Creating Better Places' policies

**5.50** Table 5.7 outlines the changes to the SA findings for the 'Creating Better Places' policies (LPP 50 – LPP 66) as a result of the Main Modifications to the Section 2 Local Plan.

**5.51** The deletion of Publication Draft Policy LLP 62 (Enabling Development) means that the effects previously identified in the SA will no longer occur as part of the Section 2 Local Plan. Thus, the significant positive effect identified for SA objective **10: 'Historic environment'** is revised to a negligible effect.

**5.52** The proposed modification to Policy LPP 53 (Provision for Open Space, Sport and Recreation) sets out that all developments will be expected to provide new open spaces and that any replacement provision should be equivalent or better in terms of quality and quantity and be in a suitable location. This strengthens the previously identified minor positive effect to a significant positive effect for SA **objective 3: 'Health'**.

**5.53** The proposed modification to Policy LPP 54 (Equestrian Facilities) removes the criterion relating to equestrian workers accommodation and therefore the minor positive effect identified for SA objective **2: 'Housing'** is revised to a negligible effect.

**5.54** The proposed modification to Policy LPP 61 (Demolition of Listed Buildings or Structures) allows for the demolition of listed buildings or structures where the redevelopment of the site would provide substantial public benefits that outweigh the loss resulting from demolition. Therefore, a minor positive effect, rather than a negligible effect, is identified for SA objective **1: 'Community safety & cohesion'**.

**5.55** For Policy LPP 64 (Educational Establishments), the removal of Lodge Farm, Witham as an allocation will result in the previously identified significant negative effect for SA objective **16: 'Soil'** being revised to a negligible effect, as the remaining site allocation, GGHR 284A, does not include any Grade 1, 2 or 3 Best & Most Versatile (BMV) agricultural land.

**Table 5.7: Changes to 'Creating Better Places' policies**

Policy	SA objective and assessment criteria	Previous effect	Revised effect
'Creating Better Places' policies			
Policy LPP 53 Provision for Open Space, Sport and Recreation	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
Policy LPP 54 Equestrian Facilities	<b>SA2: 'Housing'</b> Provide everyone with the opportunity to live in a decent home.	+	0
Policy LPP 61 Demolition of Listed Buildings or Structures	<b>SA1: 'Community safety &amp; cohesion'</b> Create safe environments which improve quality of life and community cohesion.	0	+

Policy	SA objective and assessment criteria	Previous effect	Revised effect
Publication Draft Policy LPP 62 Enabling Development <i>(policy deleted in Section 2 Local Plan as proposed to be modified)</i>	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	++	0
Policy LPP 64 Educational Establishments	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	--	0

### 'District's Natural Environment' policies

**5.56** Table 5.7 outlines the changes to the SA findings for the 'District's Natural Environment' policies (LPP 67 – LPP 81) as a result of the Main Modifications to the Section 2 Local Plan.

**5.57** The proposed Main Modification to Policy LPP 67 (Natural Environment and Green Infrastructure) to support the creation and enhancement of GI revises the negligible effects previously identified for SA objectives **7: 'Sustainable travel'**, **12: 'Water environment'**, **13: Flood risk'**, **14: Air quality'**, and **16: 'Soil'** to minor positive effects.

**5.58** The minor positive effect previously identified for SA objective **3: 'Health'** is revised to a significant positive effect for Policy LPP 73 (Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards) as the policy states that developments which negatively impacts on the health and safety of the public, including from noise and odour pollution, will not be permitted, thereby protecting the health, safety and amenity of Braintree's population. The minor positive effect previously

identified for SA objective **16: 'Soil'** is also revised to a significant positive effect as Policy LPP 73 requires soil quality to be protected during development.

**5.59** The proposed Main Modification to LPP 78 (Flooding Risk and Surface Water Drainage) requires proposals to demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development. Therefore, the negligible effect previously identified for SA objective **12: 'Water environment'** is revised to a significant positive effect.

**5.60** The Main Modification to the Publication Draft policies LPP 75 and LPP 77 amalgamates both policies to form a new policy 'Resource Efficiency, Energy Generation and Energy Efficiency'. However, the previously identified SA effects for policies LPP 75 and LPP77 have been subsumed in the combined policy and the significant positive effects identified for SA objectives **11: 'Climate change mitigation'**, **14: 'Air quality'** and **12: 'Water environment'**, and the minor positive effect for SA objective **2: 'Housing'**, remain valid and unchanged.

**Table 5.8: Changes to 'District's Natural Environment' policies**

Policy	SA objective and assessment criteria	Previous effect	Revised effect
'District's Natural Environment' policies			
Policy LPP 67 Natural Environment and Green Infrastructure	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	0	+
	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage	0	+
	<b>SA13: Flood risk</b> Reduce the risk of flooding	0	+
	<b>SA14: Air quality</b>	0	+

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	Improve air quality.		
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	0	+
Policy LPP 73 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	+	++
LPP 78 Flooding Risk and Surface Water Drainage	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage capacity.	0	++

## Overall summary of SA findings

**5.61 Table 5.9** summarises all of the above changes to the SA findings previously reported as a result of the Main Modifications to the Section 2 Local Plan.

**Table 5.9: Summary of changes to SA findings as a result of the proposed Main Modifications**

Policy	SA objective and assessment criteria	Previous effect	Revised effect
Spatial Strategy			
Spatial Strategy Reasonable Alternative F	<b>SA1: 'Community safety &amp; cohesion'</b> Create safe environments which improve quality of life and community cohesion.	0	0
	<b>SA2: 'Housing'</b> Provide everyone with the opportunity to live in a decent home.	0	++
	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	0	+/-
	<b>SA4: Service centre vitality</b> Promote the vitality and viability of all service centres throughout the District.	0	+/-
	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	0	+/-
	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	0	-?

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	0	--/+
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	0	--/+
	<b>SA9: Education and skills</b> Improve the education and skills of the population.	0	+/-
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	0	-?
	<b>SA11: Climate change mitigation</b> Reduce contributions to climate change.	0	--/+
	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage capacity.	0	-?
	<b>SA13: Flood risk</b> Reduce the risk of flooding.	0	-?
	<b>SA14: Air quality</b> Improve air quality.	0	--/+
	<b>SA15: Landscapes &amp; townscapes</b> Maintain and enhance the quality of landscapes and townscapes.	0	+/-
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	0	--
LPP 1 Development Boundaries	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	0	+
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	0	+
'Prosperous District' policies			
LPP 7 Design and Layout of Employment Policy Areas and Business Parks	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	0
	<b>SA5: Economy</b>	+	0

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
<b><i>(policy deleted in Section 2 Local Plan as proposed to be modified)</i></b>	Achieve sustainable levels of prosperity and economic growth.		
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	+/-	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	++	0
	<b>SA11: Climate change mitigation</b> Reduce contributions to climate change.	+/-	0
	<b>SA14: Air quality</b> Improve air quality.	+/-	0
	<b>SA15: Landscapes &amp; townscapes</b> Maintain and enhance the quality of landscapes and townscapes.	+	0
LPP 8 Rural Enterprise	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	+	0
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	+	0
LPP 9 Tourist Development within the Countryside	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	+	0
LPP16 Retail Site Allocations <b><i>(relating to site BRE31RW no longer being allocated)</i></b>	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	?	0
	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	++	0
	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	-	0
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	+	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	++?	0

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	?	0
	<b>SA11: Climate change mitigation</b> Reduce contributions to climate change.	+	0
	<b>SA15: Landscapes &amp; townscapes</b> Maintain and enhance the quality of landscapes and townscapes.	-	0
LPP 18 (Strategic Growth Location - Land East of Great Notley, south of Braintree)	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	++
LPP 19 (Strategic Growth Location - Land East of Broad Road, Braintree) <i>(relating to reappraisal of Group J sites)</i>	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	-?	--?
LPP 20 (Strategic Growth Location - Former Towerlands Park Site)	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
LPP 22 (Strategic Growth Location - Land at Feering)	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
LPP 22 (Strategic Growth Location - Land at Feering) <i>(relating to reappraisal of Group L sites)</i>	<b>SA13: Flood risk</b> Reduce the risk of flooding	0	-?
LPP 24 (Comprehensive Redevelopment Area - Land East of Halstead High Street)	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	0	+
LPP 25 (Comprehensive Redevelopment Area - Land East of Halstead High Street)	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	0	+
LPP 26: Comprehensive Redevelopment Area – Factory Lane West / Kings Road	<b>SA2: 'Housing'</b> Provide everyone with the opportunity to live in a decent home.	0	++
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	?	+?

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	?	-?
LPP 27 Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall  <i>(policy deleted in Section  2 Local Plan as proposed  to be modified)</i>	<b>SA1: 'Community safety &amp; cohesion'</b> Create safe environments which improve quality of life and community cohesion.	+	0
	<b>SA2: 'Housing'</b> Provide everyone with the opportunity to live in a decent home.	++	0
	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	0
	<b>SA4: Service centre vitality</b> Promote the vitality and viability of all service centres throughout the District.	+	0
	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	-	0
	<b>SA6: Biodiversity &amp; geodiversity</b> Conserve and enhance the biological and geological diversity of the environment.	--?	0
	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	+	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	++/--	0
	<b>SA9: Education and skills</b> Improve the education and skills of the population.	++/-	0
	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	?	0
	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage capacity.	-	0
	<b>SA13: Flood risk</b> Reduce the risk of flooding.	-	0
	<b>SA15: Landscapes &amp; townscapes</b>	-	0

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	Maintain and enhance the quality of landscapes and townscapes.		
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	-?	0
LPP 42 (Residential Conversion of Buildings in the Countryside)	<b>SA5: Economy</b> Achieve sustainable levels of prosperity and economic growth.	-	0
	<b>SA8: Accessibility</b> Promote accessibility and ensure the necessary transport infrastructure to support new development	-	0
'Creating Better Places' policies			
Policy LPP 53 Provision for Open Space, Sport and Recreation	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
Policy LPP 54 Equestrian Facilities	<b>SA2: 'Housing'</b> Provide everyone with the opportunity to live in a decent home.	+	0
Policy LPP 61 Demolition of Listed Buildings or Structures	<b>SA1: 'Community safety &amp; cohesion'</b> Create safe environments which improve quality of life and community cohesion.	0	+
Publication Draft Policy LPP 62 Enabling Development <i>(policy deleted in Section 2 Local Plan as proposed to be modified)</i>	<b>SA10: Historic environment</b> Conserve and enhance the historic environment, heritage assets and their settings.	++	0
Policy LPP 64 Educational Establishments	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	--	0
'District's Natural Environment' policies			
Policy LPP 67 Natural Environment and Green Infrastructure	<b>SA7: Sustainable travel</b> Promote more sustainable transport choices and uptake.	0	+
	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage	0	+
	<b>SA13: Flood risk</b> Reduce the risk of flooding	0	+
	<b>SA14: Air quality</b>	0	+

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Policy	SA objective and assessment criteria	Previous effect	Revised effect
	Improve air quality.		
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	0	+
Policy LPP 73 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	<b>SA3: 'Health'</b> Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
	<b>SA16: Soil</b> Safeguard and enhance the quality of soil.	+	++
LPP 78 Flooding Risk and Surface Water Drainage	<b>SA12: Water environment</b> Improve water quality and address water scarcity and sewerage capacity.	0	++

## Chapter 6

### Cumulative and synergistic effects

This chapter appraises the cumulative and synergistic effects of the Main Modifications Section 2 Local Plan as whole.

**6.1** The SA objectives and assessment criteria used to appraise the Main Modifications to the Section 2 Local Plan and the SA objectives used to appraise the Section 1 Local Plan generally correspond, with the exception of SA objective **9: 'Education and skills'** which is not a SA objective in the Section 1 SA framework.

#### Cumulative effects of Section 1 and Section 2 of the Local Plan

**6.2** **Table 6.1** describes the cumulative effects of the various provisions of the Section 1 Local Plan and of the Section 2 Local Plan individually and cumulatively with each other. This table updates the cumulative effects assessment presented in Chapter 11 of the 2017 SA Report and takes into account the changes to the effects of the Section 2 Local Plan in light of the Main Modifications (as reported in the preceding chapters of this SA Addendum), as well as the cumulative effects presented in Chapter 4 of the Section 1 Main Modifications SA Addendum Report<sup>112</sup>.

**Table 6.1: Cumulative effects of Section 1 and Section 2 of the Braintree District Local Plan**

Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
<b>SA1: Community safety &amp; cohesion</b>	Create safe environments which improve quality of life and community cohesion.	++/-	++/-	++/-
<p>Section 1 Policy SP6 (Infrastructure and Connectivity) and Policy SP7 (Place-shaping Principles) seek to ensure that all new development is guided by a policy framework that strengthens community identity, services and facilities and provides the infrastructure to make them function in positive way.</p> <p>A number of Section 2 policies are likely to give rise to significant positive effects due to their contribution to community services (LPP 51 [An Inclusive Environment], LPP 64 [Educational Establishments], LPP 65 [Local Community Services and Facilities]), or to creating safe environments [LPP 81 (External Lighting)]. Minor positive effects are identified for a number of</p>				

<sup>112</sup> LUC (2020) SA Addendum Report on the North Essex Authorities Section 1 Main Modifications (pdf) Available at:

<https://www.braintree.gov.uk/downloads/file/2903/sd001c-north-essex-section-1-local-plan-sa-proposed-main-modifications-august-2020>

Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
<p>other policies. No significant negative effects on SA objective 1 are identified, however, there are potential minor negative effects expected for a small number of policies (LPP 32 [Residential Allocation Area – Gimsons, Witham], LPP 42 [Residential Conversion of Buildings in the Countryside]) and for four non-strategic site allocations (HASA 295, COLE 188, CRESS 202 and WITN 427). The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective 1.</p> <p>It is inevitable that the scale of development proposed in the Main Modifications Plan will impact on some communities, particularly those where there is considerable growth. In some instances, this may be seen as a positive outcome, as new development will help to support existing and new services and jobs and provide new homes for people who want to live locally. In some areas, though it may be to change the character of settlements over time. Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative mixed effect (significant positive and minor negative) for SA objective 1: 'Community safety &amp; cohesion'</b>.</p>				
<b>SA2: Housing</b>	Provide everyone with the opportunity to live in a decent home.	++	++	++
<p>Section 1 Policy SP4 (Meeting Housing Needs) requires a variety of homes to be delivered including affordable homes and homes for an ageing population. Most of the homes will be directed to existing communities, in line with the settlement hierarchy as set out in Policy SP3 (Spatial Strategy for North Essex).</p> <p>Section 2 site-specific policies (X, X and X) and the other housing policies (LPP 33 [Affordable Housing], LPP 34 [Affordable Housing in Rural Areas], LPP 35 [Specialist Housing], LPP 36 [Gypsy and Traveller and Travelling Showpersons' Accommodation], LPP 37 [Housing Type and Density], LPP 40 [Rural Workers Dwellings in the Countryside], LPP 41 [Infill Development in Hamlets], LPP 42 [Residential Conversion of Buildings in the Countryside]) were found to be likely to give rise to significant positive effects as they provide for a range of needs to meet all sectors of Braintree's population. The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Delivering the objectively assessed housing need is a key principle of both the Section 1 and Section 2 Local Plan and together they provide for a substantial increase in the housing stock in Braintree District. This should allow for a variety of homes to be delivered, including affordable homes and homes for an ageing population. Most of the homes will be delivered in accordance with the settlement hierarchy. Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative significant positive effect for SA objective 2: 'Housing'</b>.</p>				
<b>SA3: Health</b>	Improve the health of the District's residents and mitigate/reduce potential health inequalities.		++	
<p>Section 1 Policy SP6 (Infrastructure and Connectivity) and Policy SP7 (Place-shaping Principles) are likely to lead to positive effects on health as they are designed to create and provide healthy environments, services and infrastructure, including active modes of transport.</p> <p>Section 2 Policy LPP 52 (Health and Wellbeing Impact Assessment) is likely to result in a significant positive effect because it requires development proposals to assess their impact upon health and well-being, upon the capacity of existing health services and facilities, and the environmental impact and the promotion of health improvement activities. Policy LPP 65 (Local Community Services and Facilities) will also have a significant positive effect due to the protection it gives to existing health facilities and support for enhanced provision. A significant positive effect (with uncertainty) is identified for Policy LPP 4 (Kelvedon Park) as it supports the expansion of the Essex County Fire and Rescue Headquarters. The requirement in Policy LPP 21 for provision of open space in the North West Braintree Strategic Growth Location also gives rise to a significant positive effect for this SA objective.</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 3: 'Health'</b>.</p>				
<b>SA4: Service centre vitality</b>	Promote the vitality and viability of all service centres throughout the District.		++	

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Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
<p>The Spatial Strategies of both Section 1 and Section 2 of the Local Plan focus on delivering development close to existing settlements, in accordance with the settlement hierarchy, which will support the vitality of town and village centres in the District.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 4: 'Service centre vitality'</b>.</p>				
<b>SA5: Economy</b>	Achieve sustainable levels of prosperity and economic growth.		++	
<p>The Spatial Strategies of both Section 1 and Section 2 of the Local Plan seek to strengthen and diversify local economies to provide more employment opportunities.</p> <p>Section 1 Policy SP5 (Providing for Employment and Retail) supports strong, sustainable and diverse local economies in North Essex and requires the Section 2 Local Plan to deliver between 20.9-43.3ha of employment land over the plan period. Policy SP6 (Infrastructure and Connectivity) places emphasis on improving both public transport and road connections as well as digital connectivity, which will all be good for the economy. In addition, the construction of at least 14,320 homes over the plan period is likely to generate jobs not only in the construction sector, but also supply trades and materials. The occupants of these homes will also generate demand for shops and services, in both the private and public sector.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 5: 'Economy'</b>.</p>				
<b>SA6: Biodiversity &amp; geodiversity</b>	Conserve and enhance the biological and geological diversity of the environment.		-?	
<p>The scale of growth, and associated human activity, including traffic, water supply and treatment, noise and air pollution, and disturbance from recreation will undoubtedly put pressure on the ecological network of habitats and species in Braintree District during the plan period.</p> <p>Section 1 Policy SP7 (Place-shaping Principles) aims to protect and enhance the biodiversity in the NEA area. Policy SP2 (Recreational disturbance Avoidance and Mitigation Strategy) of the Section 1 Local Plan seeks to ensure that there will be no adverse effects on the integrity of the internationally designated nature conservation sites along the coast.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 6: 'Biodiversity &amp; geodiversity'</b>.</p>				
<b>SA7: Sustainable travel</b>	Promote more sustainable transport choices and uptake.		++/-	
<p>Sustainable travel is a key principle of both Spatial Strategies of the Section 1 and Section 2 Local Plan. The Braintree District Local Plan seeks to focus development at existing settlements, principally Braintree town, where jobs, services and facilities are concentrated, meaning shorter journeys and greater opportunities to walk, cycle or use public transport.</p>				

Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
<p>Section 1 Policy SP6 (Infrastructure and Connectivity) and Policy SP7 (Place-shaping Principles), aim to create pedestrian, cycling and public transport friendly developments, with these modes of transport given priority over the car.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 7: 'Sustainable travel'</b>.</p>				
<b>SA8: Accessibility</b>	Promote accessibility and ensure the necessary transport infrastructure to support new development.		++	
<p>Section 1 Policy SP6 (Infrastructure and Connectivity) places great emphasis on the need to provide for the services and facilities, and the infrastructure, to support new development. This includes community infrastructure, such as healthcare and education, utilities infrastructure, such as water supply and treatment, green infrastructure, and transport infrastructure. This will be of benefit not only to occupants of the new developments, but also residents in existing development.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 8: 'Accessibility'</b>.</p>				
<b>SA9: Education &amp; skills</b>	Improve the education and skills of the population.		+	
<p>Section 1 of the Local Plan was not appraised against this SA objective. However, Section 1 Policy SP6 (Infrastructure and Connectivity) emphasises the need to provide for educational infrastructure to support new development. Therefore, the Section 1 Local Plan is expected to have a minor positive effect on this SA objective.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 9: 'Education &amp; skills'</b>.</p>				
<b>SA10: Historic environment</b>	Conserve and enhance the historic environment, heritage assets and their settings.		--/+?	
<p>Braintree District is very rich in historical assets, both designated and non-designated, and in the towns and villages, as well as the wider countryside. In addition, it is not only the heritage assets that are important for cultural heritage, but also their setting. In undeveloped locations, but also in key urban views, these settings can extend considerable distances. In addition, not all the heritage interest is known about, and the very act of development can lead to new finds. It is therefore going to be very difficult for growth to be delivered in Braintree District without having an impact on the historic environment.</p> <p>Section 1 Policy SP7 (Place-shaping Principles) seeks to protect and enhance assets of historical value. This policy also requires new development to respond positively to local character; to preserve and enhance the quality of existing places; and to exhibit individual architectural quality, all of which will conserve and enhance the setting of heritage assets.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p>				

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Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 10: 'Historic environment'</b> .				
<b>SA11: Climate change mitigation</b>	Reduce contributions to climate change.		+/-	
<p>The Spatial Strategies of both Section 1 and Section 2 of the Local Plan focus on delivering development close to existing settlements, in accordance with the settlement hierarchy, which means that people will be able to access jobs, services and facilities locally, rather than travelling long distances.</p> <p>Section 1 Policy SP6 (Infrastructure and Connectivity) emphasises the need to prioritise walking, cycling and public transport over the car, investing in digital technology (which may obviate the need for some journeys), and electric car charging points. Policy SP7 (Place-shaping Principles) advises that energy efficiency in development should be pursued.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 11: 'Climate change mitigation'</b>.</p>				
<b>SA12: Water environment</b>	Improve water quality and address water scarcity and sewerage capacity.		0	
<p>Section 1 Policy SP6 (Infrastructure and Connectivity) provides strong safeguards that water supply, wastewater treatment and water efficiency measures are all addressed before development is delivered. This is supported by Policy SP2 (Recreational disturbance Avoidance and Mitigation Strategy (RAMS)), which specifically ensures that there will be no damage to the integrity of internationally designated nature conservation sites as a result of deteriorating water quality.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>The Braintree District Local Plan also references the Appropriate Assessments which recommend ....</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 12: 'Water environment'</b>.</p>				
<b>SA13: Flood risk</b>	Reduce the risk of flooding.		0	
<p>Section 1 Policy SP7 (Place-Shaping Principles) requires development to incorporate flood mitigation measures including the use of open space to provide flora and fauna rich sustainable drainage solutions.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 13: 'Flood risk'</b>.</p>				
<b>SA14: Air quality</b>	Improve air quality.		-	
<p>The Spatial Strategies of both Section 1 and Section 2 of the Local Plan focus on delivering development close to existing settlements, in accordance with the settlement hierarchy, which means that people will be able to access jobs, services and facilities locally, rather than travelling long distances, which will benefit air quality in the District.</p> <p>Section 1 Policy SP6 (Infrastructure and Connectivity) emphasises the need to prioritise walking, cycling and public transport over the car, investing in digital technology (which may obviate the need for some journeys), and electric car charging points.</p>				

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Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
<p>Policy SP7 (Place-shaping Principles), aims to create pedestrian, cycling and public transport friendly developments, with these modes of transport given priority over the car.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 14: 'Air quality'</b>.</p>				
<b>SA15: Landscapes &amp; townscapes</b>	Maintain and enhance the quality of landscapes and townscapes.		-?	
<p>The Spatial Strategies of both Section 1 and Section 2 of the Local Plan focus on delivering development close to existing settlements, in accordance with the settlement hierarchy, which will be required to maintain the distinctive character and role of the existing settlements, preventing coalescences between them and conserving their settings. Section 1 Policy SP3 (Spatial Strategy for North Essex) supports the reuse of previously developed land within settlements. However, the scale of growth proposed will inevitably mean that a considerable amount of the development as a result of the Local Plan will take place on greenfield sites, albeit close to existing settlements.</p> <p>Section 1 Policy SP7 (Place-Shaping Principles) requires new developments to respond positively to their local character, and to preserve and enhance the quality of existing places. The policy also supports the enhancement of public realm and the creation of green and blue infrastructure networks.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 15: 'Landscapes &amp; townscapes'</b>.</p>				
<b>SA16: Soil</b>	Safeguard and enhance the quality of soil.		--	
<p>Braintree District contains significant mineral resources and Best and Most Versatile agricultural land. There are also considerable tracts of these resources close to the main settlements, which is where the Spatial Strategies of both Section 1 and Section 2 of the Local Plan, require the focus of development to be located. The scale of growth proposed will inevitably mean that a considerable amount of the BMV agricultural land will be lost to development.</p> <p>Section 1 Policy SP3 (Spatial Strategy for North Essex) supports the reuse of previously developed land within settlements which will protect some BMV agricultural land from development.</p> <p>Section 2 policies</p> <p>The positive effects identified for policies X and X as proposed to be modified contribute towards the cumulative positive effect for SA objective X</p> <p>Overall, it is considered that the Braintree District Local Plan will result in a <b>cumulative X effect for SA objective 16: 'Soil'</b>.</p>				

## Chapter 7

### Conclusion and next steps

**This chapter presents the overall conclusions of the SA of the Main Modifications and describes the next steps to enable adoption of the Section 2 Local Plan.**

#### Conclusion

**7.1** [Click here to enter text.](#)

#### Next steps

**7.2** In LUC's professional judgement, the work carried out and presented in this SA Addendum is appropriate to meet the requirements of the SEA Regulations in relation to the proposed Main Modifications to the Section 2 Local Plan.

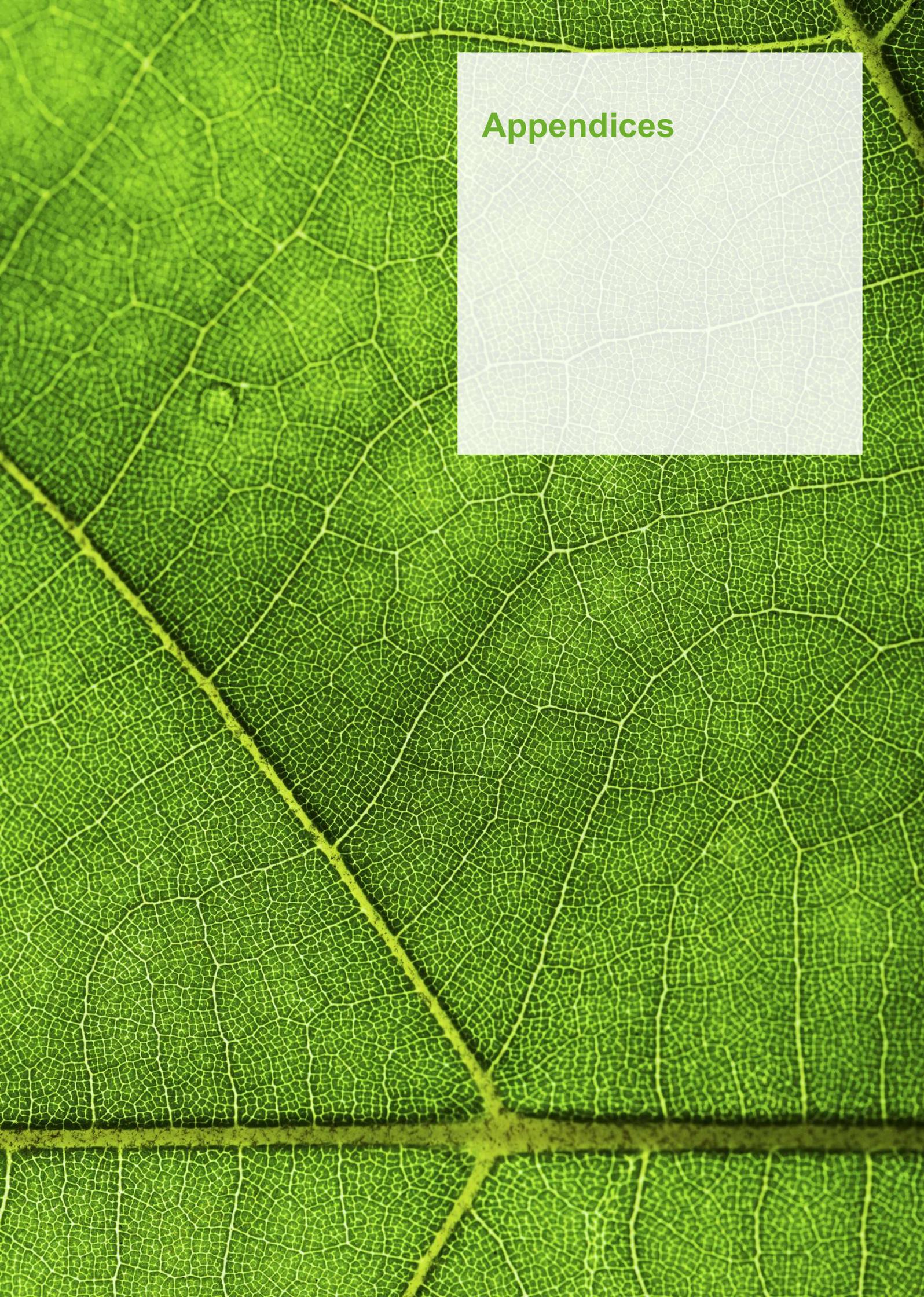
**7.3** This SA Addendum will be published alongside the proposed Main Modifications to the Section 2 Local Plan Review during a six-week consultation period from X X to X X 2021.

**7.4** Following the consultation, the Inspector will consider the representations raised in respect of the proposed Main Modifications and will report on the modified Section 2 Local Plan's soundness.

**7.5** If the Section 2 Local Plan is found to be 'sound', it can be formally adopted by Braintree District Council. Once the Section 2 Local Plan has been adopted, a SA Adoption Statement will be published to report the full plan-making and SA process and the framework for monitoring future effects.

LUC

November 2021

A close-up photograph of a green leaf, showing a dense network of veins. The veins are a lighter green color, contrasting with the darker green of the leaf's surface. The veins form a complex, branching pattern across the entire leaf. In the upper right corner, there is a white rectangular box containing the text 'Appendices'.

# Appendices

# Appendix A

## Policy review and baseline information

### Population, health and wellbeing

#### Policy context

##### International

**A.1 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002)** sets the broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

**A.2 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998):** Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

##### National

**A.3 The NPPF (2021)** includes as part of its social objective the promotion of “*strong, vibrant and healthy communities*” by:

- *“ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and*
- *by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.”*

**A.4** Ultimately planning policies and planning decision making should “*aim to achieve healthy, inclusive and safe places*”.

**A.5** The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for “*housing (including affordable housing) ... [as well as] community facilities (such as health, education and cultural infrastructure)*.” Policies should reflect “*the size, type and tenure of housing needed*”. This policy approach is to

include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. Major developments that involve the provision of new housing planning policies and decisions should expect at least 10% of the total number of homes to be delivered for affordable home ownership subject to conditions and exemptions.

**A.6** To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authority's plan should be half a hectare or smaller.

**A.7** Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.

**A.8** The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which *"promote social interaction (and) enable and support healthy lifestyles."*

**A.9** As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- *"plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;*
- *support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community;*
- *help prevent unnecessary loss of valued facilities and services."*

**A.10** Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and

physical activity has in terms of health and wellbeing of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a *"proactive, positive and collaborative approach to meeting this requirement"*.

**A.11** The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book** (2018)<sup>113</sup> provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation.

**A.12 National Design Guide** (2021)<sup>114</sup>: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**A.13 Fair Society, Healthy Lives** (2011)<sup>115</sup> investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is *"overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities"*.

**A.14 Select Committee on Public Service and Demographic Change report Ready for Ageing?** (2013)<sup>116</sup>: warns that society is underprepared for the ageing population. The report states *"longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises"*. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

**A.15 Laying the foundations: a housing strategy for England** (2011)<sup>117</sup>: Aims to provide support to deliver new homes and improve social mobility.

<sup>113</sup> Ministry of Housing, Communities and Local Government (July 2018) *Housing Delivery Test Measurement Rule Book*

<sup>114</sup> Ministry of Housing, Communities and Local Government (2021) *National Design Guide* [online] Available at:

<https://www.gov.uk/government/publications/national-design-guide>

<sup>115</sup> The Marmot Review (2011) *Fair Society, Healthy Lives*

<sup>116</sup> Select Committee on Public Service and Demographic Change (2013) *Ready for Ageing?* [online] Available at:

<https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>

<sup>117</sup> HM Government (2011) *Laying the Foundations: A Housing Strategy for England* [online] Available at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7532/2033676.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf)

## A.16 Homes England Strategic Plan 2018 to 2023

(2018)<sup>118</sup>: Sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

**A.17 Planning Policy for Traveller Sites** (2015)<sup>119</sup> sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

**A.18 Planning for the Future White Paper** (2020)<sup>120</sup>: Sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:

- Simplifying the role of Local Plans and the process of producing them.
- Digitising plan-making and development management processes.
- Focus on design, sustainability and infrastructure delivery.
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

**A.19 The Housing White Paper 2017 (Fixing our broken housing market)**<sup>121</sup> sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.

- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

## A.20 Public Health England, PHE Strategy 2020-25

(2019)<sup>122</sup>: identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

**A.21 Healthy Lives, Healthy People: Our strategy for public health in England** (2010)<sup>123</sup>: Sets out how our approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make

<sup>118</sup> Homes England (2018) *Strategic Plan 2018 to 2023* [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752686/Homes\\_England\\_Strategic\\_Plan\\_AW\\_REV\\_150dpi\\_REV.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf)

<sup>119</sup> Department for Communities and Local Government (2015) *Planning policy for traveller sites* (pdf) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

<sup>120</sup> Department for Housing, Communities and Local Government (2020) *Planning for the Future White Paper* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

<sup>121</sup> Department for Communities and Local Government (2017) *Fixing our broken housing market* (pdf) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/590464/Fixing\\_our\\_broken\\_housing\\_market\\_-\\_print\\_ready\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf)

<sup>122</sup> Public Health England (2019) *PHE Strategy 2020-25* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/831562/PHE\\_Strategy\\_2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

<sup>123</sup> HM Government (2010) *Healthy Lives, Healthy People: Our strategy for public health in England* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216096/dh\\_127424.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf)

voluntary approaches work before resorting to regulation.

## A.22 Using the planning system to promote healthy weight environments<sup>124</sup> (2020), Addendum (2021)<sup>125</sup>

provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

**A.23 The 25 Year Environment Plan<sup>126</sup>** (2018) sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The document identifies six key areas upon which action will be focused. Those of relevance to the topics of population growth, health and wellbeing are using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. These two key areas are of relevance to the Colchester Borough Local Plan as follows:

- Using and managing land sustainably:
  - Embed an ‘environmental net gain’ principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
  - Help people improve their health and wellbeing by using green spaces including through mental health services.

- Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
- ‘Green’ our towns and cities by creating green infrastructure and planting one million urban trees.

## Baseline information

### Population and society

**A.24** In mid-2020, the population of Braintree District was estimated to be approximately 153,091<sup>127</sup>. This is an increase of 0.3% (152,604 people) from the figure recorded in mid-2019, making it the fourth largest local authority area in Essex in terms of population size. Of the 153,091 people, 29,323 are aged 0 to 15, 92,272 are aged 16 to 64, and 31,496 are aged 65 years and over.

**A.25** The population projections for Braintree District predict that the population will increase to 159,198 by 2043, a percentage change of 6.3% compared to 2018 (below the England average of 10%, and Essex average of 12.6%)<sup>128</sup>. The projected number of households in the authority is forecast to grow by 13.4% between 2018 and 2043 which is also below the England average (16.2%) and Essex average (17.6%)<sup>129</sup>.

**A.26** Braintree District has an Old Age Dependency Ratio of 330 people age 65 years and over to every 1,000 of working age. This is equivalent to 3 working age people to every one person aged 65 and over, which is below the average for Essex as a whole (335.6) but higher than the average for England (286.8)<sup>130</sup>. By 2034, 24.1% of the population of Braintree District will be aged over 65 years (this is above the Essex average of 22.6%). This will have implications for the economy, service provision, accommodation and health. Under 18s will account for a very similar proportion of the population in 2034 at 17.1%.

<sup>124</sup> Public Health England (2020) Guidance and supplementary planning document template for local authority public health and planning teams (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3307/bdc065-using-the-planning-system-to-promote-healthy-weight-environments-feb-2020>

<sup>125</sup> Public Health England (2021) Addendum: Hot food takeaways use in the new Use Class Order (online) Available at:

<https://www.braintree.gov.uk/downloads/file/3323/bdc065a-using-the-planning-system-to-promote-healthy-weight-environments-addendum-feb-2021>

<sup>126</sup> HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment [pdf]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>127</sup> Office for National Statistics (2021) Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2020 (online) Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2020>

<sup>128</sup> Office for National Statistics (2020) Population projections for local authorities: Table 2 [online]. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>129</sup> Office for National Statistics (2020) Household projections for England [online]. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

<sup>130</sup> Essex County Council (2019) Essex Joint Strategic Needs Assessment 2019: Braintree Local Authority Profile [online]. Available at: <https://data.essex.gov.uk/dataset/exwyd/essex-jsna-and-district-profile-reports-2019> [Accessed 18/08/2021]

**A.27** With an estimated 249 residents per square kilometre, Braintree District has the third lowest population density of the Essex authorities, and is nearly half the county average (431 people per sq. km).

**A.28** In 2020, there were 1,530 births and 1,619 deaths in Braintree, resulting in a natural change (the balance between births and deaths) -89 (compared to a natural change of 70 in 2019). The increase in deaths can be largely attributed to the effects of the Coronavirus (COVID-19) and in the year to mid-2020, there were a higher number of deaths in 366 of the 374 local authorities in the UK.

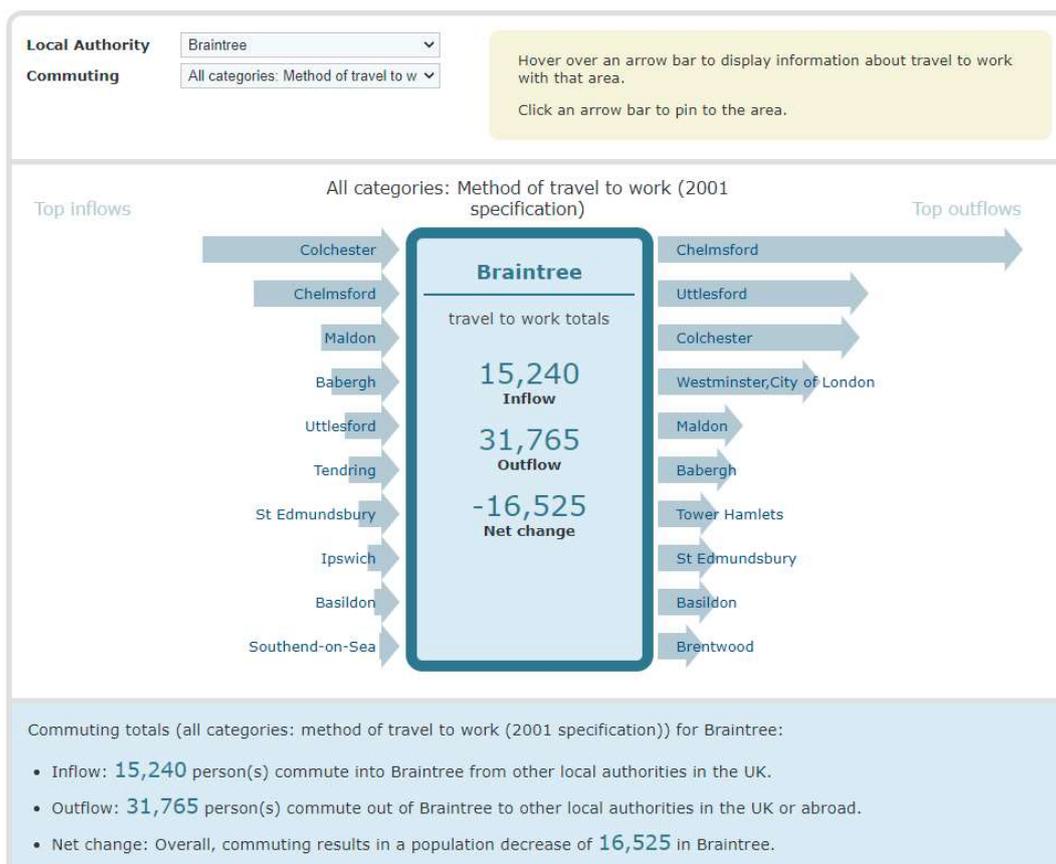
**A.29** At the time of the 2011 Census<sup>131</sup> the population of Braintree District was majority White British (93.2%) with the

remainder (6.8%) of residents coming from Black and Minority Ethnic (BAME) ethnic groups including white non-British residents. The percentage of BAME residents was slightly lower than the average for Essex in 2011 (9.2%) and significantly lower than the average for England (20.3%).

**A.30** In the year to mid-2020, there were 7,010 internal in-migrants and 6,573 internal out-migrants in Braintree. This makes net internal migration of 437<sup>132</sup>. In terms of migration patterns from the 2001 Census, the main in and out migration to and from the District was in Chelmsford, Colchester, Uttlesford and City of London<sup>133</sup>, resulting in a net change of -16,525 people in the District.

Figure A.1: Nomis Census 2001 Commuting Patterns in Braintree District

## Location of usual residence and place of work by method of travel to work



<sup>131</sup> Office for National Statistics (2011) 2011 Census (online) Available at: <https://www.ons.gov.uk/census/2011census>

<sup>132</sup> Office for National Statistics (2021) Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2020 (online) Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationand>

[dmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2020](https://www.nomisweb.co.uk/census/2011/wu01uk/chart)

<sup>133</sup> Nomis (online) Location of usual residence and place of work (online) Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>

## Deprivation

**A.31** Braintree District ranked 194<sup>th</sup> in 2015 and 203<sup>rd</sup> in 2019 out of the 317 districts on the Index of Multiple Deprivation (rank 1 being the most deprived). Braintree District ranks 7<sup>th</sup> in comparison to 12 other Essex authorities in terms of average score, with Tendring, Basildon, Harlow, Colchester, Castle Point and Epping Forest the more deprived Essex authorities.

**A.32** According to the English Indices of Multiple Deprivation 2019<sup>134</sup>, out of the 87 Lower-Layer Super Output Areas (LSOAs)<sup>135</sup> in the District, two LSOAs are in the 20% most deprived in the wards of Bocking North and Halstead Trinity (none are in the 10% most deprived) while seven additional LSOAs are within the 40% most deprived in the country. These LSOAs are largely concentrated in the wards of Witham West, Braintree Central and Beckers Green and Witham Central. Since the 2015 Indices of Multiple Deprivation, the number of LSOAs in the 40% category has remained the same.

## Health

**A.33** The health of people in Braintree District is varied compared with the England average. According to the most recent Local Authority Health Profile for Braintree<sup>136</sup>, life expectancy for men is 80.1 years which is above the England average (79.8), while life expectancy for women is 83.0 years which is lower than the England average (83.4).

**A.34** As outlined above, Braintree District experiences pockets of deprivation. As a result, life expectancy is 6.9 years lower for men and 3.6 years lower for women in the most deprived areas of Braintree District than in the least deprived areas. According to the Health Deprivation and Disability domain in the Indices of Multiple Deprivation<sup>137</sup>, only one LSOA in Braintree District is within the 20% most deprived under this domain (Braintree Central & Beckers Green).

**A.35** The health of the population in Braintree District is generally better than the England average. The only indicators that are significantly worse than the Essex or England average are 'killed and seriously injured rate on roads', 'emergency hospital admission rates for hip fractures', 'percentage of breastfeeding initiatives', 'smoking prevalence in adults',

'percentage of physically active adults' and 'excess winter deaths'. In Year 6, 17.3% (287) of children are classified as obese, better than the average for England. The rates of statutory homelessness, violent crime (hospital admissions for violence), under 75 mortality rate from cardiovascular diseases and employment (aged 16-64) are better than the England average.

**A.36** Sport England's Active Lives Adult Survey<sup>138</sup> (2021) estimates that:

- 58.2% of adults (16+) in Braintree District reported undertaking 150 minutes of moderate intensity physical activity (fifth lowest out of 12 local authorities in Essex).
- Braintree District has the third highest rate of inactivity out of the 12 local authorities in Essex (inactive <30 minutes a week) at 31%, after Basildon (34.8%) and Tendring (32%).
- There is a 'significant decrease' of -8.6% in the percentage of people who consider themselves 'fairly active' (i.e., 30-149 minutes of exercise a week) from the baseline.

### Impact of COVID-19

Between March 2020 and April 2021 there were 1,031 deaths registered in Braintree<sup>139</sup>. Of the deaths, 402 had COVID-19 listed as the main cause.

The Middle Layer Super Output Area of Halstead East and Colnes saw the highest number of excess deaths during the pandemic followed by Bocking Churchstreet and Blackwater and Westlands. There were 198 deaths in total in Halstead East between March 2020 and April 2021, where 54 of these had COVID listed as the main cause. This was followed by Bocking Churchstreet and Blackwater End which reported 44 deaths from COVID out of 186 total deaths in the same period.

West Witham saw the lowest number percentage of excess deaths which saw 46 deaths, with 12 deaths attributed to COVID-19. Bures Hamlet, Maplestead and Belchamp and Panfield, Finchinfield and Bardfield had

<sup>134</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)

<sup>135</sup> LSOAs are small areas designed to be of a similar population size, with an average of approximately 1,500 residents or 650 households.

<sup>136</sup> Public Health England (2020) *Local Authority Health Profile 2019: Braintree* [online]. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000067.html?area-name=Braintree>

<sup>137</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)

<sup>138</sup> Sport England (2019) Active Lives Adult November 19-20 Tables <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-04/Active%20Lives%20Adult%20November%2019-20%20Tables%201-4%20Levels%20of%20activity.xlsx?VersionId=NtDU9.uVjwnhHCnCXpnGSQyr175SJ6t4>

<sup>139</sup> Office for National Statistics (2021) *Deaths due to COVID-19 by local area and deprivation* [online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/datasets/deathsduetocovid19bylocalareaanddeprivation>

the lowest percentage of COVID related deaths at six deaths each.

## Housing

**A.37** According to the Braintree District Infrastructure Delivery Plan Update Report<sup>140</sup> (2021), 716 dwellings per year (totalling 14,320 dwellings) are expected to be delivered in the District over the plan period of 2013-2033. As of 31<sup>st</sup> March 2020, 11,373 dwellings had either been completed, were under construction or were in the planning pipeline. This leaves a residual requirement to deliver 2,947 dwellings. The remaining sites allocation in the emerging Local Plan have a capacity to deliver 3,809 dwellings. Of these sites, 1,054 dwellings were the subject of a planning condition as at 31<sup>st</sup> March 2020.

**A.38** The most recent Housing Land Supply Statement for the period 2021-2026 shows that there is a housing land supply of 5.34 years.

**A.39** According to the English Indices of Multiple Deprivation 2019<sup>141</sup>, three LSOAs are within the within the 20% most deprived under the Barriers to Housing and Services domain, compared to 11 LSOAs in 2015.

**A.40** In July 2021, the average household price in Braintree District was £310,419<sup>142</sup>. This illustrates an 9.6% increase from £283,299 in July 2020. This is higher than the national average (£270,973) but is lower than the Essex average (£338,373).

**A.41** The 2016 Objectively Assessed Housing Need Study Update concluded that the objectively assessed need for Braintree District was an average of 716 new homes from 2013.

**A.42** According to the 2011 Census, in March 2011 there were 132 people in the District who defined their ethnic group as White, Gypsy or Irish Traveller. The Council's evidence base on Gypsy and Traveller and Travelling Showperson's has identified a need of 26 pitches to meet the needs of Gypsy and Travellers between 2016 and 2033. An additional need of 6 plots has been identified for Travelling Showpeople for the same period.

## Crime

**A.43** The overall crime rate in Braintree District in 2020 was 97 crimes per 1,000 people. This compares poorly to Essex's overall crime rate of 78 crimes per 1,000 people. Violence and sexual offences, criminal damage and arson, anti-social behaviour and public order offences made up the highest proportion of recorded offences<sup>143</sup>.

**A.44** There are two LSOAs within the 20% most deprived under the Crime domain in the English Indices of Multiple Deprivation, which is an increase compared to 2015 when just one LSOA was in the 20% most deprived under the crime domain<sup>144</sup>. There are no LSOAs within the 10% most deprived domain for Crime.

## Education and skills

**A.45** There are 52 primary schools, eight secondary schools and two special schools (The Edith Borthwick School and Southview School) in Braintree. The Colchester Institute Braintree Campus is the Institute's second largest campus, making the District a major educational base with visiting students significantly adding to the diversity of the population. The provision of day care, nursery education and out-of-school care remains an issue for the District, with there being more demand than formal supply.

**A.46** There is a significant demand for school places in Essex. The total number of pupils by 2030/31 will reach 131,635 primary pupils and 99,693 secondary school pupils (including sixth form)<sup>145</sup>. The District is anticipated to experience significant capacity issues in its primary schools from 2025 onwards, particularly in Witham/Rivenhall, Kelvedon/Feering, Braintree Town & Surrounds, Earls Colne/Colne Engine, Crossing/Silver End, and Hatfield Peverel/Terling. To manage demand, expansion projects are in the pipeline and new primary schools will be built on the Lodge Farm development and Panfield Lane development through S106 agreements.

**A.47** 45.1% of pupils in Braintree District achieved GCSEs which is lower the national average of 46.9% and the East of England average of 47%<sup>146</sup>. According to the latest labour

<sup>140</sup> Braintree District Council (2021) Infrastructure Delivery Plan Update Plan (online) Available at: <https://www.braintree.gov.uk/downloads/file/3260/bdc058-infrastructure-delivery-plan-update-june-2021>

<sup>141</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/ioid\\_index.html](http://dclgapps.communities.gov.uk/imd/ioid_index.html)

<sup>142</sup> UK House Price Index (2021) *UK house Price Index* [online]. Available at: <http://landregistry.data.gov.uk/app/ukhpi>

<sup>143</sup> <https://crimedata.co.uk/essex/braintree>

<sup>144</sup> Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: [http://dclgapps.communities.gov.uk/imd/ioid\\_index.html](http://dclgapps.communities.gov.uk/imd/ioid_index.html)

<sup>145</sup> Essex School Organisation Service (2021) *10 Year Plan: Meeting the demand for school places in Essex 2021-2030* [pdf]. Available at: [https://assets.ctfassets.net/44242af8b873ee76900/ECC\\_10\\_year\\_plan\\_school\\_places\\_2021\\_2030.pdf](https://assets.ctfassets.net/44242af8b873ee76900/ECC_10_year_plan_school_places_2021_2030.pdf)

<sup>146</sup> Public Health England (2020) *Local Authority Health Profile 2019: Braintree* [online]. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000067.html?area-name=Braintree>

market statistics (from January 2020 to December 2020)<sup>147</sup>, Braintree District has a higher-than-average proportion of people with NVQ1 qualifications but a lower proportion of people with NVQ2, NVQ3 and NVQ4 qualifications compared to the regional and national averages. Braintree District has more people with no qualifications (6.9%) compared to the regional (5.7%) and national averages (6.4%). Educational attainment is particularly poor in four LSOAs which are classified as being within the 10% most deprived under the Education, Skills and Training domain in the English Indices of Multiple Deprivation (Halstead Trinity, Bocking North, Braintree Central and Beckes Green and Bocking South). There are also an additional eight LSOAs within the 20% most deprived under the education deprivation domain<sup>148</sup>.

## Community Facilities

**A.48** The community has access to a wide range of Council-run services and facilities. Facilities include the Braintree Sport & Health Club, Halstead Leisure Centre, Witham Leisure Centre, Great Notley County Park, Halstead Public Gardens, street markets in Braintree and Witham, and Braintree Museum.

## Economy and employment

### Policy context

#### International and national

**A.49** There are no specific international economic policy agreements relevant to the preparation of the Colchester Borough Local Plan and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade within the European Union (subject to changes post-Brexit) and with other nations.

**A.50** The **NPPF** (2021) contains an economic objective to “*help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.*”

**A.51** It also requires that planning seeks to “*create the conditions in which businesses can invest, expand and adapt*” with policies required to “*set out a clear economic vision and strategy which positively and proactively encourages*

*sustainable economic growth*”. Policies addressing the economy should also seek “*to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.*”

**A.52** Of particular relevance to Colchester is the requirement for planning policies to “*recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.*”

**A.53** Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

**A.54** The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a “*positive approach to [town centres] growth, management and adaptation.*” Included within this support is a requirement to “*allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead.*”

**A.55 The Local Growth White Paper** (2010)<sup>149</sup> highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

**A.56 Build Back Better: Our Plan for Growth** (2021)<sup>150</sup>: Sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

**A.57 The Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)** (2000)<sup>151</sup> sets out the Government’s Rural Policy Objectives:

<sup>147</sup> NOMIS (2021) *Labour Market Profile: Braintree* [online]. Available at:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157211/report.aspx>

<sup>148</sup> Ministry of Housing, Communities & Local Government (2019)

English Indices of Deprivation 2019 Explorer (online) Available at:

[http://dclgapps.communities.gov.uk/imd/ioid\\_index.html](http://dclgapps.communities.gov.uk/imd/ioid_index.html)

<sup>149</sup> Department for Business, Innovation and Skills (2010) *Local Growth: Realising Every Place’s Potential*

<sup>150</sup> HM Treasury (2021) *Build Back Better: Our Plan for Growth* [online] Available at: <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>

<sup>151</sup> HM Government (2000) *Rural White Paper (Our Countryside: the future – A fair deal for rural England)*

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).
- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

#### **A.58 National Infrastructure Delivery Plan 2016-2021<sup>152</sup>**

(2016) sets out the government's plans for economic infrastructure over a five-year period with those to support delivery of housing and social infrastructure.

**A.59 UK Industrial Strategy: Building a Britain fit for the future** (2018) lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four 'Grand Challenges' of the future.

### Baseline information

**A.60** 78.0% of the population of Braintree District is economically active, which is lower than the regional average (80.5%) and the national average (78.7%)<sup>153</sup>.

**A.61** In July 2021, 6,130 people (5.3%) in Braintree District claimed out of work benefits, which represents a drastic increase from 3,375 (2.9%) in May 2019<sup>154</sup>. This increase in claimants reflects the economic implications of COVID-19 pandemic. Braintree's claimant rate is higher than the regional average (4.4%) and national average (5.3%).

**A.62** In July 2021, there were the same level of available jobs per single person in the District at 0.86 with the regional average of 0.86. This is lower than the national average (0.87).

**A.63** According to the 2011 Census data, the largest proportion of people work in the 'Wholesale and retail trade; repair of motor vehicles and motor cycles'. Braintree District also has a higher than average proportion of residents working in manufacturing and in construction. The proportion working in manufacturing is 10%, compared to 8.7% in the East of England and 8.8% in England.

**A.64** Commuting patterns result in a daily 16,525 population decrease in Braintree<sup>155</sup>. Around 31,765 people commute out of Braintree District to other local authorities each day, most notably to Tendring, Colchester and the City of London. However, these commuting patterns are expected to have significantly changed due to the increase in working from home as a response to the COVID-19 pandemic.

**A.65** The general proportion of full-time to part time jobs, at approximately 2:1, is in line with regional and national averages.

**A.66** There were 690 business 'births' in the District in 2012, the 4<sup>th</sup> highest amongst the Essex districts. The business formation rate in Braintree District is consistently above the Essex average.

**A.67** Factories and warehouses accounted for the majority of industrial and commercial floorspace. Factory floorspace accounted for a higher proportion in the District than the average for the region and for England, whereas retail and offices accounted for a lower proportion in Braintree District than the regional and national averages.

### Employment land

**A.68** The Council's 2015 Employment Land Needs Assessment calculated the additional need for employment space in the District over the Local Plan period 2015-2033 and made a number of detailed recommendations to help support the local economy. Key points included the following:

- There will be a net additional requirement for 60,000 sq. m of office floorspace. Provision of should be promoted in the town centres of Braintree, Witham and Halstead and other named, accessible locations. New office space should support a range of business sizes and should include affordable, flexible business space suitable for small businesses.

<sup>152</sup> HM Treasury (2016) *National Infrastructure Delivery Plan 2016–2021* [PDF] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/520086/2904569\\_nidp\\_deliveryplan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/520086/2904569_nidp_deliveryplan.pdf)

<sup>153</sup> Basildon Borough Council (2021) Authority Monitoring Report [pdf]. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157210/report.aspx#abempunemp>

<sup>154</sup> Basildon Borough Council (2021) Authority Monitoring Report [pdf]. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157210/report.aspx#abempunemp>

<sup>155</sup> NOMIS (n.d.) Location of usual residence and place of work by method of travel to work [online]. Available at: <https://www.nomisweb.co.uk/census/2011/wu03uk/chart>

- The Council should re-designate location C10, Halstead Town Centre South, as a mixed-use cluster to allow redevelopment for industrial, office, retail, leisure and residential uses.
- There will be a net additional requirement for 9.2 ha (medium scenario) of industrial land (manufacturing and warehousing). The Council should support development of named clusters which are currently functioning well as employment locations which have vacant land, land with derelict buildings or have underutilised land and premises. In addition, the Council should promote development at new sites which display good strategic characteristics and potential for industrial use. The study also identifies poorly performing industrial locations which could be re-designated.

**A.69** According to the Braintree District Retail Study<sup>156</sup>, there are 55 vacant shop units within the three main town centres in the District which equates to an overall vacancy rate of 9.9%. This is below the Experian Goad national average of (11.2%)<sup>157</sup>. Retail capacity is anticipated to decline in Braintree District from structural changes in the retail sector and the economic implications of the COVID-19 pandemic.

## Minerals

**A.70** Seven sites within Braintree District have been identified as preferred or reserved sites for primary mineral extraction of sand and gravel in the Essex Minerals Plan, which was adopted in July 2014<sup>158</sup>. These include five sites at Bradwell Quarry, Rivenhall Airfield; one site at Broadfield Farm, Rayne; and one site on land at Colemans Farm. The volume of sand and gravel extracted from these sites will need to meet the minerals demand for the whole of Essex created by major development and new infrastructure projects within the County.

**A.71** The provision of other forms of development in the District may be constrained by the need to safeguard mineral resources for extraction.

## Transport and accessibility

### Policy context

#### International

**A.72 The Trans-European Networks (TEN)** was created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

#### National

**A.73 The NPPF (2021)** requires that “*transport issues should be considered from the earliest stages of plan-making*”. The scale, location and density of development should reflect “*opportunities from existing or proposed transport infrastructure*”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “*on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*.” The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

**A.74** While the framework promotes the use and development of sustainable transport networks it also requires that “*where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development*” should be identified and protected.

**A.75 The Road to Zero (2018)**<sup>159</sup> sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

**A.76 Transport Investment Strategy (2017)**<sup>160</sup>: Sets out four objectives that the strategy aims to achieve:

<sup>156</sup> Lichfields (2018) Braintree Retail Study 2018 Update [online] Available at: <https://www.braintree.gov.uk/downloads/file/3093/bdc032a-braintree-retail-study-update-2018>

<sup>157</sup> Experian's Goad Plan Data is a comprehensive dataset that covers retail areas within urban areas across the whole of the UK. The 2018 Retail Study used Goad Plan Data to identify vacancy rates in Braintree District.

<sup>158</sup> Essex County Council (2014) Essex Minerals Local Plan [online] Available at: <https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

<sup>159</sup> HM Government (2018) *The Road to Zero*

<sup>160</sup> Department for Transport (2017) *Transport Investment Strategy* [online] Available at: <https://assets.publishing.service.gov.uk/government/uploads/system/u>

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

**A.77 Door to Door: A strategy for improving sustainable transport integration** (2013)<sup>161</sup>: Focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

**A.78** The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

**A.79 Decarbonising Transport: Setting the Challenge** (2020)<sup>162</sup> sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies<sup>163</sup> to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a

coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

**A.80 Decarbonising Transport: A Better, Greener Britain** (2021)<sup>164</sup> The Decarbonisation Transport Plan (DTP) sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DTP also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

**A.81 Highways England Sustainable Development Strategy and Action Plan**<sup>165</sup> (2017): This strategy is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

## Baseline information

**A.82** Accessibility by public transport or walking to key services and educational facilities is improved considerably within and in close proximity to the three main towns of Braintree, Halstead and Witham. Just over half of residents live in these three main urban areas, leaving a substantial proportion living in rural areas where the private car is often the main means of transport. As such, the private car is the

[ploads/attachment\\_data/file/918490/Transport\\_investment\\_strategy.pdf](#)

<sup>161</sup> Department for Transport (2013) *Door to Door: A strategy for improving sustainable transport integration* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/142539/door-to-door-strategy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf)

<sup>162</sup> Department for Transport (2020) *Decarbonising Transport Setting the Challenge* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

<sup>163</sup> These have not been summarised, since the upcoming TDP will supersede them to some extent: the Road to Zero strategy, Maritime 2050 and the Clean Maritime Plan, the Aviation 2050 Green Paper and forthcoming net zero aviation consultation and Aviation Strategy,

the Cycling and Walking Investment Strategy, Future of Mobility: Urban Strategy, the 2018 amendments to the Renewable Transport Fuel Obligation, Freight Carbon Review, the Rail Industry Decarbonisation Taskforce and the Carbon Offsetting for Transport Call for Evidence.

<sup>164</sup> Department for Transport (2021) *Decarbonising Transport: A Better, Greener Britain* (pdf) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)

<sup>165</sup> Highways England (2017) *Highways England Sustainable Development Strategy and Action Plan* Available at: <https://www.gov.uk/government/publications/highways-england-sustainable-development-strategy>

most common means of getting to work and levels of private vehicle ownership are high.

**A.83** Public transport networks in the towns are greater during the day on weekdays but during the evening and in rural areas, the availability of public transport is reduced. This can make it difficult for those without access to a car to access key services and facilities, including the less well-off and the District's growing elderly population. Cycle networks are fragmented and mainly available in Witham and Braintree towns. Around one fifth of those who use employment centres in the district are unable to access them by public transport or walking. This may present barriers to future employment opportunities for those without access to a car.

**A.84** More than 80% of the population of Braintree District lives within 30 minutes travel time by public transport or walking to of each of five key services: primary school, secondary school, employment site, retail centre, GP surgery. The proportion of residents living within 15 minutes travel time of these services is primary school 79%, GP surgery 64%, retail centre 62%, employment site 59% and secondary school 41%. At 19 minutes, Braintree District has the joint third highest average travel time by public transport or walking to reach key services. In 2014, the Essex County Council Tracker survey found that 55% of residents in Braintree District are satisfied with their local bus service and less than half, 44% were satisfied with their local transport information.

**A.85** The proportion of residents of Braintree District who work mainly at or from home is higher than the regional and national figures.

**A.86** The major road routes in the District are the A120 and A12. Rail services between Braintree town and London are infrequent, being constrained by its location on a single track branch line.

**A.87** Stansted Airport is located within Uttlesford District but it is a major employer of Braintree District residents and it is therefore a major cause of out-commuting, with potential negative effects on road congestion and road traffic-related air pollution and greenhouse gas emissions. The airport plans to address these issues by improving the attractiveness of public transport to the airport for both staff and passengers, for example offering discounted travel opportunities and working with bus, coach and rail operators to provide scheduled services that match working patterns where possible.

## Air, land and water quality

### Policy context

#### National

**A.88** The **NPPF** (2021) states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from “*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.*”

**A.89** The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously developed or 'brownfield' land. Furthermore, policies should “*support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*”.

**A.90 Environmental Protection Act 1990**<sup>166</sup>: makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

**A.91 Building Regulations** (2010)<sup>167</sup>: requires that reasonable precautions are taken to avoid risks to health and safety cause by contaminants in ground to be covered by building and associated ground.

**A.92 National Planning Policy for Waste (NPPW)** (2014)<sup>168</sup>: Key planning objectives are identified within the NPPW, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns.
- Provide a framework in which communities take more responsibility for their own waste.
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.

<sup>166</sup> HM Government (1990) *Environmental Protection Act 1990* [online] Available at: <https://www.legislation.gov.uk/ukpga/1990/43/contents>

<sup>167</sup> HM Government (2010) *Building Regulations* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/431943/BR\\_PDF\\_AD\\_C\\_2013.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431943/BR_PDF_AD_C_2013.pdf)

<sup>168</sup> Department for Communities and Local Government (2014) *National Planning Policy for Waste* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

- Ensure the design and layout of new development supports sustainable waste management.

**A.93 The Nitrate Pollution Prevention Regulations (2016)**<sup>169</sup> provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

**A.94 The Urban Waste Water Treatment Regulations (2003)**<sup>170</sup> protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

**A.95 The Water Environment (Water Framework Directive) Regulations (2017)**<sup>171</sup> protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process

**A.96 The Water Supply (Water Quality) Regulations (2016)**<sup>172</sup> focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

**A.97 The Environmental Permitting Regulations (2016)**<sup>173</sup> streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

**A.98 The Air Quality Standards Regulations (2016)**<sup>174</sup> set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the

procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

**A.99 The Environmental Noise Regulations (2018)**<sup>175</sup> apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

**A.100 The Waste (Circular Economy) (Amendment) Regulations (2020)**<sup>176</sup> amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

**A.101 Safeguarding our Soils – A Strategy for England (2009)**<sup>177</sup> sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

**A.102 The Water White Paper (2012)**<sup>178</sup> provides the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle

<sup>169</sup> HM Government (2016) *The Nitrate Pollution Prevention Regulations*

<sup>170</sup> HM Government (2003) *The Urban Waste Water Treatment Regulations*

<sup>171</sup> HM Government (2017) *The Water Environment (Water Framework Directive) (England and Wales) Regulations*

<sup>172</sup> HM Government (2016) *The Water Supply (Water Quality) Regulations*

<sup>173</sup> HM Government (2016) *The Environmental Permitting Regulations*

<sup>174</sup> HM Government (2016) *The Air Quality Standards Regulations*

<sup>175</sup> HM Government (2018) *The Environmental Noise (England) Regulations*

<sup>176</sup> HM Government (2020) *The Waste (Circular Economy) Regulations*

<sup>177</sup> Department for Environment, Food and Rural Affairs (2009) *Safeguarding our Soils: A Strategy for England*

<sup>178</sup> Department for Environment, Food and Rural Affairs (2012) *The Water White Paper*

issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

**A.103 National Policy Statement for Waste Water** (2012)<sup>179</sup>: sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

**A.104 Future Water: The Government's Water Strategy for England** (2008)<sup>180</sup>: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, while discharge from sewers will be reduced.

**A.105 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland** (2007)<sup>181</sup> sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

**A.106 The Road to Zero** (2018)<sup>182</sup> sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

**A.107 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations** (2017)<sup>183</sup> provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULESVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

**A.108** Of the key areas in the **25 Year Environment Plan**<sup>184</sup> around which action will be focused, those of relevance to the Colchester Borough Local Plan in terms of the protection of air, land and water quality are:

- Using and managing land sustainably:
  - Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
  - Protect best agricultural land.
  - Improve soil health, and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
  - Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
  - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

**A.109 Our Waste, Our Resources: A strategy for England**<sup>185</sup> (2018) aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030,

<sup>179</sup> HM Government (2012) *National Policy Statement for Waste Water* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69505/pb13709-waste-water-nps.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

<sup>180</sup> HM Government (2008) *Future Water: The Government's water strategy for England* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69346/pb13562-future-water-080204.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)

<sup>181</sup> Department for Environment Food and Rural Affairs (2007) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland*

<sup>182</sup> HM Government (2018) *The Road to Zero*

<sup>183</sup> Department for Environment Food and Rural Affairs and Department for Transport (2017) *UK plan for tackling roadside nitrogen dioxide concentrations*

<sup>184</sup> HM Government, 2018. *A Green Future: Our 25 Year Plan to Improve the Environment* [pdf]. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>185</sup> HM Government (2018) *Our Waste, Our Resources: A strategy for England* [PDF] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

**A.110 Clean Air Strategy 2019 (2019)<sup>186</sup>:** This strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030. The goal is to reduce the harm to human health from air pollution by half.

## Baseline information

### Air

**A.111** There are currently no Air Quality Management Areas (AQMAs) declared in Braintree District. The main air quality issues in the District relate to nitrogen dioxide (NO<sub>2</sub>) and particulate emissions from vehicles travelling on the A12, A131 and A120. The three main towns are Braintree, Halstead and Witham and there are increasing traffic flows in the town centres due to both commercial and residential development. Within the towns and larger villages there is the potential for elevated NO<sub>2</sub> levels close to road junctions and air pollutant monitoring is focussed on these locations.

**A.112** According to the latest Air Quality Annual Status Report for Braintree<sup>187</sup>, there are 18 NO<sub>2</sub> diffusion tubes monitoring air quality including at seven new locations (two in Witham and five in Halstead). There are high concentrations of NO<sub>2</sub> to the north of Halstead High Street where Colchester Road and Head Street converge at a mini roundabout.

### Soil and geology

**A.113** The Agricultural Land Classification (ALC) system<sup>188</sup> provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought

and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land.

**A.114** The majority of agricultural land in Braintree District is classified as Grade 2 or 3, with 65.8% (40,243 hectares) of agricultural land classified as Grade 2 and 29.9% (18,304 hectares) as Grade 3.

**A.115** The existence of large historical manufacturing industries in the Braintree District, has led to some degree of contamination of sites through associated industrial processes, or activities that are now defunct. Contamination of land can have adverse impacts on health and well-being as well as damaging wildlife and contributing to pollution of water bodies. Currently, there are no entries on Braintree District Council's contaminated land register<sup>189</sup>. In 2020, there were 36 sites on the Brownfield Register totalling 20.77ha of previously developed land in the District<sup>190</sup>.

**A.116** There are no geological SSSIs or Local Geological Sites in Braintree. However, Geo Essex identify 20 other sites noted for their geological importance, including: Bulmer Brickworks (manufacture of traditional, hand-made bricks for historic buildings); Bures Pit (disused sand and grave pit); Site of Witham Spa (spa in 18th century).<sup>191</sup>

### Water

**A.117** The main water courses running through Braintree District are the Rivers Blackwater, Colne, Brain, Pant, Stour and Ter. Braintree District contains Source Protection Zones and major aquifers within the northern half of the District, together with scattered minor aquifers in the south of the District.

**A.118** Catchment Abstraction Management Strategies (CAMS) set out how the Environment Agency will manage the water resources of a catchment and contribute to implementing the Water Framework Directive (WFD). Overall,

<sup>186</sup> DEFRA, *Clean Air Strategy 2019* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

<sup>187</sup> Braintree Council (2020) 2020 Air Quality Annual Status Report (online) Available at: <https://www.braintree.gov.uk/downloads/file/3138/air-quality-report-2020>

<sup>188</sup> Natural England (2013) *Agricultural Land Classification (ALC) system*.

<sup>189</sup> Braintree District Council (20??) Contaminated Land Register

<sup>190</sup> Braintree District Council (2020) *Brownfield Land Register* [Excel]. Available at: <https://www.braintree.gov.uk/directory-record/5933/brownfield-land-register>

<sup>191</sup> GeoEssex (2021) Sites – Braintree (online) Available at: <http://www.geoessex.org.uk/braintree/>

Essex CAMS area is heavily abstracted with further licensing most likely only available at high flows. Looking in more detail at the CAMS river catchments within the District, the resource

availability during the lowest flow times of the year (Q95 flows) is detailed in **Table A.1**<sup>192</sup>.

**Table A.1: Water resource availability in CAMS catchments intersecting Braintree District**

CAMS catchment intersecting Braintree District	Water resource availability
Stour	'water not available' in almost all of catchment
Colner & Tendring	'water not available' in all of catchment upstream of Colchester
Blackwater	'water not available' in all of catchment except for small portion at the Essex coast
Chelmer	'water not available' in almost all of catchment

**A.119** The water not available' CAMS status across the District indicates that recent actual river flows are below the Environmental Flow Indicator (EFI), the flow required to support a healthy ecology. In these areas, no further consumptive licences will be granted although unused capacity may exist within abstraction licences that have already been granted.

**A.120** Essex falls within the Anglian River Basin District. The Anglian River Basin District is subdivided into catchment areas and the Combined Essex catchment area lies within the counties of Essex and Suffolk, as well as a small part of

Cambridgeshire. Current water quality in Essex is described in the Anglian River Basin Management Plan<sup>193</sup>.

**A.121** The Water Environment (Water Framework Directive) Regulations (2017)<sup>194</sup> looks at the ecological and chemical health of both groundwater and surface water with the aim of achieving 'good ecological status' and 'good chemical status' by 2027, and to ensure that there is no deterioration from existing statuses. The current overall, ecological and chemical WFD status or potential of each of the water bodies within the Combined Essex catchment associated with Braintree District is shown in **Table A.2**.

**Table A.2: Water quality in Braintree District's water bodies**

Waterbody ID and name	Current overall status	Current ecological status	Current chemical status
GB105037033870 Domsey Brook	Moderate	Good	Fail
GB105037033940 Ter	Moderate	Moderate	Fail
GB105037033530 River Chelmer	Poor	Poor	Fail
GB105037033860 Blackwater Pant	Moderate	Moderate	Fail
GB105037041140 Brain	Poor	Poor	Fail

<sup>192</sup> Environment Agency (2017) Essex Abstraction Licensing Strategy (pdf) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/636594/ALS\\_2017\\_Essex.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/636594/ALS_2017_Essex.pdf)

<sup>193</sup> Environment Agency (2015) River Basin Management Plan: Anglian River Basin District (pdf) Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718327/Anglian\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf)

<sup>194</sup> HM Government (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations.

Waterbody ID and name	Current overall status	Current ecological status	Current chemical status
GB105037033910 Boreham Tributary	Moderate	Moderate	Fail
GB105037041160 River Blackwater	Poor	Poor	Fail

**A.122** This shows that, in 2019, sections of the Rivers Chelmer, Brain and Blackwater are of poor water quality. All rivers within Braintree District are failing in terms of achieving good chemical status.

**A.123** Braintree District Council's Water Cycle Study<sup>195</sup> (WCS) assesses planned future development of the District with regards to water supply capacity, wastewater capacity and environmental capacity. The WCS identifies that in total, 14 Water Recycling Centres (WRCs) will serve the proposed future development across the District. The WRCs that are likely to require changes to permits that control discharge and potential infrastructure upgrades include:

- Bocking
- Braintree
- Coggeshall
- White Notley

**A.124** The WCS shows that improvements to Bocking, Coggeshall and White Notley WRCs are possible using wastewater treatment technologies (conventional). However, Braintree WRC will require more advanced treatment technologies (non-conventional) to ensure future development can be accepted without significantly compromising water quality targets in the River Basin.

**A.125** The WCS also concludes that, allowing for the planned resource management of Anglian Water's and Essex & Suffolk Water's supply areas, the water supply companies would have adequate water supply to cater for growth over the plan period. However, it is important to note that significant water stress was identified in the District, as well as limitations on water available in local water resources. Hence there are key drivers requiring that water demand is managed in the District for all new development in order to achieve long-term sustainability in terms of water resources.

**A.126** Overall, the WCS concludes there are no constraints with respect to water service infrastructure and the water environment to deliver the Local Plan development, on the

basis that strategic water resource options and wastewater solutions are developed in advance of development coming forward.

## Climate change mitigation and adaptation

### Policy context

#### International

**A.127** **United Nations Paris Climate Change Agreement** (2015) is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

#### National

**A.128** The **Climate Change Act 2008**<sup>196</sup> sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO<sub>2</sub> emission reductions of at least 26% by 2015, against a 1990 baseline.

**A.129** **Planning and Energy Act** (2008)<sup>197</sup>: enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

**A.130** The **NPPF** (2021) contains as part of its environmental objective a requirement to mitigate and adapt to climate change, "*including moving to a low carbon economy*". The document also states that the "*planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.*" To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed,

<sup>195</sup> Braintree District Council (2017) Water Cycle Study Braintree District Council [online] Available at: <https://www.braintree.gov.uk/directory-record/6754/water-cycle-study-braintree-district-council>

<sup>196</sup> HM Government (2008) *Climate Change Act 2008*

<sup>197</sup> HM Government (2008) *Climate Change Act 2008*:

[https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga\\_20080027\\_en.pdf](https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf)

located and orientated as to help to reduce greenhouse gas emissions.

**A.131** The revised framework also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the *“development should be made safe for its lifetime without increasing flood risk elsewhere.”*

**A.132** In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should *“reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast”*.

**A.133 The Energy Performance of Buildings Regulations (2021)**<sup>198</sup> seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**A.134 The UK Renewable Energy Strategy (2009)**<sup>199</sup> describes out the ways in which we will tackle climate change by reducing our CO<sub>2</sub> emissions through the generation of a renewable electricity, heat and transport technologies.

**A.135 The Energy Efficiency Strategy (2012)**<sup>200</sup> aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21<sup>st</sup> century energy management initiatives on 19<sup>th</sup> century homes.

**A.136 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)**<sup>201</sup>: sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

**A.137 UK Climate Change Risk Assessment 2017 (2017)**<sup>202</sup>: sets out six priority areas needing urgent further action over the next five years. These include:

- flooding and coastal change risks to communities, businesses and infrastructure,
- health, well-being and productivity from high temperatures,
- shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology,
- natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity,
- domestic and international food production and trade and
- new and emerging pests and diseases and invasive non-native species affecting people, plants and animals.

**A.138 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)**<sup>203</sup> sets out visions for the following sectors:

- People and the Built Environment – *“to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”*
- Infrastructure – *“an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”*.
- Natural Environment – *“the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”*
- Business and Industry – *“UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”*
- Local Government – *“Local government plays a central in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”*

<sup>198</sup> HM Government (2021) *The Energy Performance of Buildings Regulations*

<sup>199</sup> HM Government (2009) *The UK Renewable Energy Strategy*

<sup>200</sup> Department of Energy & Climate Change (2012) *The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK*

<sup>201</sup> HM Government (2009) *The UK Low Carbon Transition Plan* [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228752/9780108508394.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf)

<sup>202</sup> HM Government (2017) *UK Climate Change Risk Assessment 2017* [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)

<sup>203</sup> HM Government (2018) *The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate*

**A.139** The **Flood and Water Management Act 2010**<sup>204</sup> and **The Flood and Water Regulations (2019)**<sup>205</sup> sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**A.140** **Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)**<sup>206</sup>: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

**A.141** The **25 Year Environment Plan**<sup>207</sup> sets out policy priorities with respect to responding to climate change, are using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

<sup>204</sup> HM Government (2010) *Flood and Water Management Act*

<sup>205</sup> HM Government (2019) *The Flood and Water Regulations*

<sup>206</sup> HM Government (2011) *Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

<sup>207</sup> HM Government, 2018. *A Green Future: Our 25 Year Plan to Improve the Environment* [pdf]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

## Baseline information

### Climate change and energy

**A.142** Braintree District Council declared a climate emergency in 2019 and subsequently prepared a Climate Change Strategy<sup>208</sup> for the period 2021 to 2030, with the following aims:

- To make the Council activities carbon neutral as far as practical by 2030.
- Support partners, residents and local businesses to achieve carbon neutrality by 2030.
- Build resilient communities that adapt to the impacts of climate change.

**A.143** Changes to the climate will bring new challenges to the District's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP18) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present<sup>209</sup>. Specifically:

- Under medium emissions, the increase in winter mean temperature is estimated to be 2.2°C; it is unlikely to be less than 1.1°C and is very unlikely to be more than 3.4°C.
- Under medium emissions, the increase in summer mean temperature is estimated to be 2.8°C; it is unlikely to be less than 1.3°C and is very unlikely to be more than 4.6°C.

The latest IPCC Report (2021)<sup>210</sup> identifies that global warming of 1.5°C and 2°C will be exceeded during the 21<sup>st</sup> century unless deep reductions in carbon dioxide and other greenhouse gas emissions occur in the coming decades. The report shows that, under all scenarios examined, Earth is likely to reach the crucial 1.5°C warning limit in the early 2030s. Beyond 1.5°C, the situation is likely to rapidly deteriorate.

<sup>208</sup> Braintree District Council (2021) *Climate Change Strategy* [online] Available at: <https://www.braintree.gov.uk/advice-environment/climate-change>

<sup>209</sup> Met Office (2018) *Land Projections Maps: Probabilistic Projections* [online]. Available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>

<sup>210</sup> IPCC (2021) *Climate Change 2021: The Physical Science Basis. Sixth Assessment Report* (online) Available at: [https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf)

**A.144** A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Although the precise nature of environmental changes is not fully understood, changes to precipitation patterns (and river flow) and flooding have implications for the location, longevity and viability of waste developments. Conversely, predicted dry, hot summers will cause problems of low flows for some of the rivers in the area which will increase demand for water. Extreme weather events may also increase disruption to supply chains, infrastructure and transport of waste.

**A.145** The latest DECC<sup>211</sup> figures show generally decreasing trends for CO<sub>2</sub> emissions (kilotonnes) in Braintree District from 2005-2019. Domestic emissions have seen the greatest reduction, falling by 138.2 kt to 209.1 kt. Industrial emissions have also reduced from 234.4 kt in 2005 to 118.3 in 2019, while commercial emissions have reduced from 89.1 kt in 2015 to 39.8 kt in 2019. The decreasing trend in emissions reflects the decrease in overall emissions for the UK during this period driven mainly by reductions in emissions from power stations, industrial combustion and passenger cars. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a reduction in the amount of coal, which is a carbon intensive fuel. Emissions for many Local Authorities are heavily influenced by activities at industrial sites, and changes at a single site can have a big impact on emissions trends.

**A.146** Up until December 2014, Braintree District had issued 1,338 certificates related to the Code for Sustainable Homes, the sixth highest amongst local authorities in Essex and above the local authority average of 1,017. Of these, 813 certificates were issued at the design stage and 525 post construction.

## Flooding

**A.147** The risk of flooding posed to properties within the District arises from a number of different sources including river flooding, sewer and surface water flooding.

**A.148** The dominant fluvial systems within the District are the River Blackwater, the River Brain and the River Colne. These rivers run close to a number of settlements. The River Brain flows through the towns of Braintree and Witham. The River Blackwater flows through Braintree, Coggeshall,

Kelvedon and to the south of Witham. The confluence of the Rivers Brain and Blackwater is situated to the south east of Witham town centre. The River Colne flows through Great Yeldham, Sible Hedingham and Halstead.

**A.149** The large majority of the District is defined as Flood Zone 1, low probability of flooding from fluvial sources. However, due to the lowland nature of the landscape, floodplains associated with principal watercourses are broad. There are large extents of Flood Zone 2 and 3 around Sible Hedingham, Halstead, Earls Colne, Braintree, Coggeshall, and Witham<sup>212</sup>. The most significant flood events reported to have affected the District occurred in 2001 and 2009. The risk of flooding is likely to be intensified due to climate change.

**A.150** Surface water flooding can occur from sewers, drains, or groundwater and from runoff from land, small watercourses and ditches because of heavy rainfall. The effect of climate change on surface water flood risk is predicted to increase the intensity and likelihood of summer rainfall events, meaning surface water flooding may become more severe and more frequent in the future. An increase in rainfall intensity of 20% and 40% was applied in the Braintree and Witham Surface Water Management Plan to account for the projected impacts of climate change based on updated guidance provided by the Environment Agency, which takes account of the uncertainty in climate change projections<sup>213</sup>.

**A.151** Based on the Environment Agency's Flood Map for Surface Water (FMfSW), the PFRA identified clusters of areas where surface water poses a potential flood risk. Two of the clusters identified within the County of Essex were centred on Braintree and Witham, with over 2,000 and 1,000 people respectively predicted to be at risk of surface water flooding<sup>214</sup>.

**A.152** The Level 1 SFRA Update found no indication that groundwater flooding forms a significant risk within the District. A large proportion of the District is underlain by London Clay, including all of the main settlements. This forms an impenetrable barrier to groundwater at depth, limiting the risk from this source.

<sup>211</sup> Department for Business, Energy & Industrial Strategy (2021) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 [online]. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019>

<sup>212</sup> Braintree District Council (2016) Level 1 Strategic Flood Risk Assessment Update [online] Available at: <https://www.braintree.gov.uk/downloads/file/1616/bdc-level-1-sfra-final>

<sup>213</sup> Essex County Council (2016) Braintree and Witham Surface Water Management Plan [online] Available at: <https://www.braintree.gov.uk/downloads/file/1614/bdc051-braintree-witham-surface-water-management-plan-with-appendices-dec-2016>

<sup>214</sup> Essex County Council (2016) Braintree and Witham Surface Water Management Plan [online] Available at: <https://www.braintree.gov.uk/downloads/file/1614/bdc051-braintree-witham-surface-water-management-plan-with-appendices-dec-2016>

## Biodiversity

### Policy context

#### International

**A.153 International Convention on Wetlands (Ramsar Convention)** (1976) is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

**A.154 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)** (1979) aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

**A.155 International Convention on Biological Diversity** (1992) is an international commitment to biodiversity conservation through national strategies and action plans.

**A.156 United Nations Declaration on Forests (New York Declaration)** (2014) sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

#### National

**A.157** A requirement of the **NPPF's** (2021) environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity, and using natural resources prudently. In support of this aim the framework states that Local Plans should “*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks*” and should also “*promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*”

**A.158** The framework requires that plans should take a strategic approach in terms of “*maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*”.

**A.159 The Conservation of Habitats and Species Regulations**<sup>215</sup> protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

**A.160 The Natural Environment and Rural Communities Act 2006**<sup>216</sup> places a duty on public bodies to conserve biodiversity.

**A.161 England Biodiversity Strategy Climate Change Adaptation Principles** (2008)<sup>217</sup>: sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these.

**A.162 Biodiversity 2020: A strategy for England's wildlife and ecosystem services** (2011)<sup>218</sup> guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

**A.163 Biodiversity Offsetting in England Green Paper** (2013)<sup>219</sup> sets out a framework for offsetting. Biodiversity offsets are conservation activities designed to compensate for residual losses.

**A.164** The key areas of the **25 Year Environment Plan**<sup>220</sup> of relevance in terms of the protection and promotion of biodiversity are recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
  - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-

<sup>215</sup> HM Government (2019) The Conservation of Habitats and Species Regulations

<sup>216</sup> HM Government (2006) *Natural Environment and Rural Communities Act 2006*

<sup>217</sup> Department for Environment, Food and Rural Affairs (2008) *The England Biodiversity Strategy Climate Change Adaptation Principles* [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69270/pb13168-eps-ccap-081203.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-eps-ccap-081203.pdf)

<sup>218</sup> Department for Environment, Food and Rural Affairs (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*

<sup>219</sup> Department for Environment, Food and Rural Affairs (2013) *Biodiversity offsetting in England Green Paper*

<sup>220</sup> HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment [pdf]. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

introduce species that have been lost from the countryside.

- Securing clean, healthy, productive and biologically diverse seas and oceans:
  - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
  - Support and protect international forests and sustainable agriculture.

## Baseline information

**A.165** There are no international biodiversity designations (Special Areas of Conservation, Special Protection Areas or Ramsar sites) or Nature Improvement Areas (NIAs) in Braintree District.

**A.166** There are four Sites of Special Scientific Interest (SSSIs) in Braintree District at:

- Belcher's and Broadfield Woods
- Bovingdon Hall Woods
- Chalkney Wood
- Glemsford Pits

**A.167** The condition of the SSSIs at Belcher's and Broadfield Woods, and Glemsford Pits is assessed as unfavourable but recovering (100%). Chalkney Wood and Bovingdon Hall Woods are generally in favourable condition (100% and 93% respectively). The 7% of Bovingdon Hall Woods assessed as being in 'unfavourable – no change' condition is due to inappropriate deer grazing/browsing rather than development pressure. There are no SSSIs designated for their geological diversity or Local Geological Sites in the District.

**A.168** There are no National Nature Reserves (NNRs) located in Braintree, however there are nine Local Nature Reserves (LNRs):

- Bocking Blackwater LNR;
- Gosfield Sandpits LNR;

- Cuckoo Wood LNR;
- Colne Valley LNR (dismantled Railway);
- Brickfield and Long Meadow LNR;
- Brockwell Meadows LNR;
- Whetmead LNR;
- Hoppit Mead LNR; and,
- The Railway Walks LNR (on the border with Babergh)

**A.169** There are 253 Local Wildlife Sites (LWSs) scattered throughout Braintree District, with many concentrated in the centre of the District<sup>221</sup>. These non-statutory nature conservation sites which along with the statutory sites play a key role in helping conserve the District's biodiversity in both urban and rural locations.

**A.170** Roadside verges, if sensitively managed, can benefit the biodiversity not only of the verges themselves but also the wider countryside by acting as corridors interlinking fragmented or isolated habitats. With this in mind, in the 1970s, Essex County Council Highways Agency, Nature Conservancy Council and Essex Wildlife Trust identified a number of important verges, which were subsequently designated as Special Roadside Nature Reserves. Once designated, wooden posts are erected on the verges with warning plaques and arrows. There are over 100 special verges designated in Essex and these are reviewed annually.

## Historic environment

### Policy context

#### International

**A.171 United Nations (UNESCO) World Heritage Convention** (1972) promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

**A.172 European Convention for the Protection of the Architectural Heritage of Europe** (1985): defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

<sup>221</sup>Essex Wildlife Trust Biological Records Centre (2021) Find a Local Wildlife Site (online) Available at: <http://www.essexwtrecords.org.uk/lowsfinder>

**A.173 Valletta Treaty, formerly the European Convention on the Protection of Archaeological Heritage (1992):** agreed that the conservation and enhancement of an archaeological heritage is one of the goals of urban and regional planning policy. It is concerned in particular with the need for co-operation between archaeologists and planners to ensure optimum conservation of archaeological heritage.

## National

**A.174** Of relevance to the approach of the planning system to the historic environment the **NPPF (2021)** contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek “*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats.*” Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

**A.175** It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up-to-date evidence.

**A.176 Ancient Monuments & Archaeological Areas Act 1979<sup>222</sup>:** a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**A.177 Planning (Listed Buildings & Conservation Areas) Act 1990<sup>223</sup>:** An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

**A.178 Historic Buildings and Ancient Monuments Act 1953<sup>224</sup>:** An Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

**A.179 The Government’s Statement on the Historic Environment for England (2010)<sup>225</sup>** sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. It includes reference to promoting the role of the historic environment within the Government’s response to climate change and the wider sustainable development agenda.

**A.180 The Heritage Statement (2017)<sup>226</sup>** describes out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**A.181 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016)<sup>227</sup>:** Sets out Historic England’s guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

## Baseline information

**A.182** Braintree District is an area of undulating countryside, bordered by the River Stour valley to the north. The area is also drained by the upper reaches of the River Colne and the River Pant/Blackwater, as well as many smaller streams and tributaries creating a landscape of gentle slopes and small valleys<sup>228</sup>. The historic features of this landscape and of the urban areas described below are potentially sensitive to development.

**A.183** The main towns of the District comprise Braintree, Witham, and Halstead, all of which were medieval market towns, some having their origins in Roman times. The rural

<sup>222</sup> HM Government (1979) *Ancient Monuments & Archaeological Areas Act*: <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>

<sup>223</sup> HM Government (2002) *Planning (Listed Buildings & Conservation Areas) Act (1990)*: [http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\\_19900009\\_en.pdf](http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf)

<sup>224</sup> HM Government (1953) *Historic Buildings and Ancient Monuments Act 1953* [online] Available at: <https://www.legislation.gov.uk/ukpga/EIiz2/1-2/49/contents>

<sup>225</sup> HM Government (2010) *The Government’s Statement on the Historic Environment for England 2010*

<sup>226</sup> Department for Digital, Culture Media and Sport (2017) *Heritage Statement 2017*

<sup>227</sup> Historic England (2016) *Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8* [online] Available at: <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/hea036-sustainability-appraisal-strategic-environmental-assessment.pdf/>

<sup>228</sup> Essex County Council and English Heritage (2013) *Essex Historic Landscape Characterisation Project* (online) Available at: [https://archaeologydataservice.ac.uk/archives/view/essex\\_hlc\\_2013/](https://archaeologydataservice.ac.uk/archives/view/essex_hlc_2013/)

settlement pattern was historically very dispersed, comprising church/hall complexes, manors, farms, moated sites and small hamlets strung out along extensive network of linear and triangular greens, the latter located at road junctions. Post-1950s boundary loss varies widely<sup>229</sup>.

**A.184** The River Stour and River Colne valley bottoms are characterised by extensive meadows or meadow pasture. The higher ground between them is characterised by a complex mix of pre-18th century irregular fields of probable of medieval origin or older and common arable field enclosed by agreement largely before the mid-19th century. The Upper Pant/Blackwater valley, and the area to the southwest of Braintree town, are characterised by pre-18th century irregular fields. The Coggeshall area is complex, comprising a mix of pre-18th century irregular fields and pre-18th century co-axial fields. The southern part of the District has a more complex fieldscape with a mixture of irregular and regular fields, including some coaxial fields, and enclosed heathlands and commons. The area around Gosfield is notable for its Ancient Woodland and a number of large landscaped parks, some of

which are medieval in origin, including Gosfield Hall, Gosfield Place and Marks Hall Park<sup>230</sup>.

**A.185** According to Historic England's most recent Local Authority Profile for Braintree<sup>231</sup>, Braintree District has 40 Scheduled Monuments, eight Registered Parks and Gardens, and 3,189 Listed Buildings, the majority of which are Grade II. Listed buildings within the District are fairly widely spread.

**A.186** There are 37 Conservation Areas within the District and of these, 12 of which have management plans in place, which set out desired actions to deal with detracting elements. Action plans have been put in place for Silver End, Bulmer, Cressing, Finchingfield, Sible Hedingham, Witham Town Centre Newland Street and Pebmarsh<sup>232</sup>.

**A.187** The Essex Historic Environment Record (EHER)<sup>233</sup> contains approximately 7,138 archaeological records relating to Braintree District out of a total of 46,572 for the County. According to the national Heritage at Risk Register maintained by Historic England in 2021 there are six sites on the Heritage at Risk Register<sup>234</sup>. The site names, designations and locations are presented in the table below.

**Table A.3: Braintree District Heritage at Risk**

Site Name	Designation	Location
Parish Church of St Mary Magdalene	Listed Building, Grade I	High Street, Wethersfield
Circular crop mark at Ferriers Farm	Scheduled Monument	Ferriers Farm, 190m south west of Hill Farm, Bures Hamlet
Codham Mill and Mill House	Listed Building, Grade II*	Codham's Lane, Wethersfield
Roman villa	Scheduled Monument	480m south east of Hill Farm, Gestingthorpe / Wickham St. Paul
Sible Hedingham South	Conservation Area including 46 Listed Buildings	Swan Street, Sible Hedingham
Silver End	Conservation Area, including 22 Listed Buildings	Between Braintree and Witham

<sup>229</sup> Ibid.

<sup>230</sup> Ibid.

<sup>231</sup> Historic England (2020) Local Authority Profile (Excel) Available at: <https://historicengland.org.uk/content/heritage-counts/pub/2020/local-authority-profiles-2020/>

<sup>232</sup> Braintree District Council (2015) Conservation Area Appraisals

<sup>233</sup> Heritage Gateway (n.d) Historic Environment Records [online] Available at:

<https://www.heritagegateway.org.uk/gateway/chr/herdetail.aspx?crit=&ctid=95&id=4761>

<sup>234</sup> Historic England (2021) Heritage at Risk Register (online) Available at:

## Landscape

### Policy context

#### International

**A.188 The European Landscape Convention (2002)** promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

#### National

**A.189 The NPPF (2021)** includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB).

**A.190** As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments “*are sympathetic to local character and history, including the surrounding built environment and landscape setting.*”

**A.191 National Parks and Access to the Countryside Act 1949<sup>235</sup>:** An Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

**A.192 Countryside and Rights of Way Act 2010<sup>236</sup>:** An Act of Parliament to make new provision for public access to the countryside.

**A.193** The key area in the **25 Year Environment Plan<sup>237</sup>** of relevance in terms of the conservation and enhancement of

landscape character is recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

### Baseline information

**A.194** There is no Area of Outstanding Natural Beauty (AONB) in the District, but proposals are under consideration to extend Dedham Vale AONB westwards towards Sudbury, crossing over into the north east part of Braintree District. In 2014, the Partnership submitted additional information to Natural England, the body with the power to designate AONBs, and Braintree District has since offered written support for the proposal to extend the current AONB boundary. The Dedham Vale AONB and Stour Valley Management Plan was published in 2016 and covers the period up until 2021<sup>238</sup>. The plan expresses an aspiration to extend the AONB boundary into Braintree.

**7.6** Braintree District lies within the South Suffolk and North Essex Clayland National Character Area (NCA)<sup>239</sup>. The Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment<sup>240</sup> identified three Landscape Character Types in the District: River Valley Landscapes, Farmland Plateau Landscapes, and Wooded Farmland Landscapes.

**A.195** The Landscape Partnership completed an updated Landscape Character Assessment: Capacity Analysis for Braintree District<sup>241</sup>. It assesses the capacity of the landscape to accommodate new development around nine settlements, namely Braintree (together with the various satellite settlements and surrounding smaller villages), Coggeshall, Earls Colne, Halstead, Hatfield Peverel, Kelvedon and Feering, Sible Hedingham, Silver End and Witham. The Overall Capacity Profile score identifies each 'parcel's' capacity based on five ranges 'Low' (27 - 33.5 homes),

<sup>235</sup> HM Government (1949) *National Parks and Access to the Countryside Act 1949* [online] Available at:

<https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>

<sup>236</sup> HM Government (2010) *Countryside and Rights of Way Act 2010* [online] Available at:

<https://www.legislation.gov.uk/ukpga/2000/37/section/85>

<sup>237</sup> HM Government, 2018. *A Green Future: Our 25 Year Plan to Improve the Environment* [pdf]. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>238</sup> Dedham Vale AONB and Stour Valley Joint Advisory Committee and Partnership (2016) *Dedham Vale Management Plan 2016-2021* [online] Available at:

<https://www.dedhamvalestourvalley.org/wp-content/uploads/2020/12/AONB-DV-Management-Plan-2016-21.pdf>

<sup>239</sup> Natural England (2014) *National Character Area profiles* [online]. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

<sup>240</sup> Chris Blandford Associates (2006) *The Braintree, Brentwood, Chelmsford, Maldon and Uttlesford landscape Character Assessment* (pdf) Available at: <https://www.maldon.gov.uk/publications/LDP/pre-submission/2%20Design%20and%20Climate%20Change/EB009a%20Landscape%20Character%20Assessment.pdf>

<sup>241</sup> Braintree District Council (2015) *Landscape Character Assessment: Capacity Analysis for Braintree District*

'Medium-Low' (34 - 40.5 homes), 'Medium' (41 - 47.5 homes), 'Medium-High' (48 - 54.5 homes) and High (55 - 61.5 homes).

**A.196** Provision of open space varies across wards and typologies (allotments, amenity green space, park and recreation ground, play space, accessible natural green space) with some meeting standards and some falling below<sup>242</sup>. There is insufficient youth provision across the majority of Braintree wards (with the exception of Witham West Ward and Yeldham Ward), whereas natural green space is in sufficient supply across all wards. Park and Recreation Grounds (Public and Private Combined) are in sufficient supply across over half of the wards, whereas all other typologies (with the exception of natural green space) are insufficient across the majority of wards.

**A.197** The number of Protected Lanes in Braintree District has decreased since they were originally designated mostly due to changes in agricultural practice but also because of road improvements. The open character, nature conservation importance and recreational importance of the floodplains of the River Stour, Colne, Brain, Pent, Blackwater, Ter Valley and their tributaries and the Chelmer and Blackwater Navigation are potentially sensitive to inappropriate development close to these watercourses.

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<sup>242</sup> Braintree District Council (2016) Braintree Open Space Study [online] Available at:

<https://www.braintree.gov.uk/downloads/file/1557/open-spaces-study-combined-reports>

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## **Appendix B**

### **Assessment framework for SA of additional sites**

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<b>SA objective 1: Create safe environments which improve quality of life and community cohesion</b>						
<u>ALL ALLOCATIONS</u>  Provision or enhancement of dedicated community facilities such as village halls and community centres.  Source: BDC site assessment (suitability for, requirements for, relocation of, enhancement to existing).  <i>N.B. See methodology chapter for assumed new community facility provision in large new housing developments.</i>	N/A	Removal of community facilities with no relocation	Suitability for new community facilities where none exist currently; or  Enhancement of existing community facilities.	N/A	Existing community facilities remain.	Uncertainty surrounding impacts.
<u>ALL ALLOCATIONS</u>  Minimisation of exposure to noise and odour emissions, dust and pests.  Source: Environment Agency	N/A	500m from AD or 250m from Waste Plant	N/A	N/A	Not 500m from AD or 250m from Waste Plant	N/A
<b>SA objective 2: Provide everyone with the opportunity to live in a decent home</b>						
<u>HOUSING ALLOCATIONS</u>  Delivery of affordable housing.  Source: BDC site assessment (site potential housing yield); BDC mapping of 'designated rural areas'; applicable	N/A	N/A	REST OF DISTRICT OUTSIDE OF URBAN WARDS OF BRAINTREE AND BOCKING, WITHAM, AND HALSTEAD  Allocation of 5-14 dwellings makes minor contribution to	WHOLE DISTRICT  Allocation of >=15 dwellings contributes significantly to the delivery of affordable housing.	URBAN WARDS OF BRAINTREE AND BOCKING, WITHAM, AND HALSTEAD  Allocation of 0-14 dwellings makes no contribution to the delivery of affordable housing.	Uncertainty surrounding delivery

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
affordable housing requirements in Local Plan policy.			the delivery of affordable housing in rural areas.		REST OF DISTRICT Allocation of 0-4 dwellings makes no contribution to the delivery of affordable housing.	
<b>SA objective 3: Improve the health of the District's residents and mitigate/reduce potential health inequalities</b>						
<u>HOUSING ALLOCATIONS</u> Distance to nearest NHS GP surgery or hospital. Source: GP surgeries - BDC to supply or obtain from OS AddressBase Premium digital dataset showing GP surgeries Hospitals: BDC to provide list of names and addresses.	N/A	Distance > 800 m	Distance <= 800 m	N/A	N/A	N/A
<u>HOUSING ALLOCATIONS</u> Distances to publicly accessible natural greenspace (ANG), including country park, woodland, grassland, river or canal bank, as per Natural England ANG Standards (ANGSt): <= 300m from ANG of at least 2 ha in size <= 2 km from ANG of at least 20 ha <= 5 km from ANG of at least 100 ha	N/A	None or one of ANGSt criteria met  N.B. Spatial data only available for ANG within Braintree District so score '-?' rather than '-' to reflect possibility that additional ANG within 10 km may be present in neighbouring districts.	Three or more of ANGSt criteria met	N/A	Two of ANGSt criteria met  N.B. Spatial data only available for ANG within Braintree District so score '0?' rather than '0' to reflect possibility that additional ANG within 10 km may be present in neighbouring districts.	Uncertainty

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<p>&lt;= 10 km from ANG of at least 500 ha</p> <p>Source: digital data showing publicly accessible open spaces (BDC)</p>						
<p><u>ALL ALLOCATIONS</u></p> <p>Net increase or loss of publicly accessible open space (including recreation space and allotments).</p> <p>Source: BDC site assessment</p>	N/A	Loss	No loss	Provision of new	N/A	Uncertain impacts
<b>SA objective 4: Promote the vitality and viability of all service centres throughout the District</b>						
<p><u>ALL ALLOCATIONS</u></p> <p>Net increase or loss of retail provision on the site.</p> <p>Source: BDC site assessment</p>	N/A	Loss	Increase	N/A	No change	N/A
<p><u>HOUSING ALLOCATIONS</u></p> <p>Distances to local shops and services</p> <p>Source: digital data showing primary shopping area and Local Centre boundaries (BDC)</p>	N/A	<p><u>Allocations within or directly adjacent to Main Towns (Braintree, Bocking and Great Notley; Witham; Halstead)</u></p> <p>&gt; 800 m from a primary shopping area or Local Centre boundary (represents 10 mins walking distance)</p> <p><u>Allocations elsewhere</u></p> <p>&gt; 8 km from a Local Centre boundary (represents 10 mins driving distance)</p>	<p><u>Allocations within or directly adjacent to Main Towns (Braintree, Bocking and Great Notley; Witham; Halstead)</u></p> <p>&lt;= 800 m from a primary shopping area or Local Centre boundary (represents 10 mins walking distance)</p> <p><u>Allocations elsewhere</u></p> <p>&lt;= 8 km from a Local Centre boundary (represents 10 mins driving distance)</p>	Extension of primary shopping areas/ Local Centres or identified regeneration	N/A	N/A

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
		N.B. Spatial data only available for local shops and services within Braintree District so site allocations within 8 km of Braintree District boundary score '-?' rather than '-' to reflect possibility that local shops and services within 8 km may be present in neighbouring districts.				
<b>SA objective 5: Achieve sustainable levels of prosperity and economic growth</b>						
<u>ALL ALLOCATIONS</u> Sterilisation of mineral reserves Source: digital data showing minerals safeguarding areas (BDC)	Significant proportion of allocated land (>= 25%) on site preferred and reserved for mineral extraction	N/A	N/A	N/A	All other sites	N/A
<u>HOUSING ALLOCATIONS</u> Distances to main employment areas (B1, B2, B8) Source: digital data showing main employment areas (BDC)	N/A	> 800 m from existing employment area  N.B. Spatial data only available for employment areas within Braintree District so site allocations within 800 m of Braintree District boundary score '-?' rather than '-' to reflect possibility that local shops and services within 800 m may be present in neighbouring districts.  <u>Or</u> Loss of employment site	<= 800 m from existing employment area  <u>Or</u> Addition of employment site	N/A	N/A	N/A

# DRAFT

Site assessment criteria	Significant negative effect (--)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<p><u>ALL ALLOCATIONS</u></p> <p>Broadband availability</p> <p>Source:  <a href="https://www.superfastessex.org/interactive-maps/rollout-map/">https://www.superfastessex.org/interactive-maps/rollout-map/</a></p>	N/A	N/A	Fibre or wireless broadband available or planned by 2019 in 25-50% of surrounding properties	Fibre or wireless broadband available or planned by 2019 in over 50% of surrounding properties	No work currently planned but download speeds of 2 Mbps available in surrounding properties OR  Fibre or wireless broadband available or planned in less than 25% of surrounding properties	N/A
<b>SA objective 6: Conserve and enhance the biological and geological diversity of the environment</b>						
<p><u>ALL ALLOCATIONS</u></p> <p>Distances (impacts on) to: internationally (SAC, SPA, Ramsar), nationally (SSSI, NNR) or locally (LWS, LNR) designated wildlife site or Ancient Woodland.</p> <p>Source: digital data showing internationally (LUC), nationally (LUC), and locally (BDC) designated wildlife sites.</p>	<p>Significant negative effect (--) if significant proportion of allocated land (&gt;= 25%) lies within designated site.</p> <p>Or</p> <p>Significant effect with uncertainty (--?) if significant proportion of allocated land (&gt;= 25%) lies within a SSSI's Impact Risk Zone for the relevant type of development. Effects will be assumed to apply to both the SSSI and any internationally designated site overlaying it. Uncertainty relates to whether potentially significant negative effects can be mitigated.</p> <p>Or</p> <p>Significant effect with uncertainty (--?) if smaller part of allocated land (&lt; 25%) lies within designated site. Uncertainty relates to whether significant adverse effects can be avoided by</p>	<p>Significant proportion of allocated land (&gt;= 25%) is on undesignated greenfield land.</p> <p>Or</p> <p>Allocated site is &lt;= 100 m from a designated site (other than internationally designated or SSSI which will be assessed on basis of Impact Risk Zones – see significant negative effects column).</p>	N/A	N/A	All other allocations.	N/A

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
	layout of development within the site boundary.					
<b>SA objective 7: Promote more sustainable transport choices and uptake</b>						
<u>HOUSING AND EMPLOYMENT ALLOCATIONS</u>  Distance to public transport.  Source: digital data showing bus stops and railway stations (BDC to supply or obtain from bus company)  <i>N.B. See methodology chapter for assumed new bus service provision in large new housing developments.</i>	N/A	> 400 m from a bus stop  And  > 800 m from a railway station	<= 400 m from a bus stop or <= 800 m from a railway station	Provision of a new bus stop or public transport hub	N/A	N/A
<b>SA objective 8: Promote accessibility and ensure the necessary transport infrastructure to support new development</b>						
<u>HOUSING AND EMPLOYMENT ALLOCATIONS</u>  Is the allocation within or directly adjacent to a settlement that has a high level of provision of services and facilities, as identified by the Local Plan settlement hierarchy?  Source: Local Plan.	Allocation to THE COUNTRYSIDE  N.B. Data on level of provision of services and facilities only available for settlements within Braintree District. For site allocations that are within 100 m of a settlement beyond the Braintree District boundary and which would otherwise score '- -', score as '?' to reflect uncertainty.		Allocation to VILLAGE WITH SERVICES  N.B. Data on level of provision of services and facilities only available for settlements within Braintree District. For site allocations that are within 100 m of a settlement beyond the Braintree District boundary and which would otherwise score '- -', score as '?' to reflect uncertainty.	Allocation to MAIN TOWNS Braintree, Bocking and Great Notley; Witham; Halstead.	Allocation to OTHER VILLAGE  N.B. Data on level of provision of services and facilities only available for settlements within Braintree District. For site allocations that are within 100 m of a settlement beyond the Braintree District boundary and which would otherwise score '0', score as '?' to reflect uncertainty	Site allocations that are within 100 m of a settlement beyond the Braintree District boundary.

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<p><u>HOUSING AND EMPLOYMENT ALLOCATIONS</u></p> <p>Distance to and regularity of public transport.</p> <p>Source: digital data showing bus stops + BDC schedule of bus service frequency by settlement; all national rail services in district are "frequent"; ignore Castle Hedingham station of Colne Valley Railway</p> <p><i>N.B. See methodology chapter for assumed new bus service provision in large new housing developments.</i></p>	N/A	<p>&gt; 400 m from a bus stop</p> <p>And</p> <p>&gt; 800 m from a railway station</p>	<p>&lt;= 400 m from a bus stop or &lt;= 800 m from a railway station providing an "infrequent" service (seven day per week service but not "frequent")</p>	<p>&lt;= 400 m from a bus stop or &lt;= 800 m from a railway station providing a "frequent" service (&gt;=1 per hour, at least 5 days per week)</p>	N/A	<p>&lt;= 400 m from a bus stop or &lt;= 800 m from a railway station with unknown service frequency</p>
<p><u>HOUSING AND EMPLOYMENT ALLOCATIONS</u></p> <p>Highways access information.</p> <p>Source: BDC site assessment.</p>	N/A	Highway access issues identified.	No highway access issues identified.	N/A	N/A	Possible highway access issues identified.
<b>SA objective 9: Improve the education and skills of the population</b>						
<p><u>HOUSING ALLOCATIONS</u></p> <p>Distance to a primary school.</p> <p>Source: digital data showing primary schools (BDC).</p>	N/A	> 800 m	<= 800m , > 400m	<= 400 m	N/A	N/A

# DRAFT

Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<i>N.B. See methodology chapter for assumed new school provision in large new housing developments.</i>						
<p><b>HOUSING ALLOCATIONS</b> Distance to a secondary school.</p> <p>Source: digital data showing secondary schools (BDC).</p> <p><i>N.B. See methodology chapter for assumed new school provision in large new housing developments.</i></p>	N/A	<p>&gt; 4.8 km</p> <p>N.B. Spatial data only available for secondary schools within Braintree District and 2 km beyond the boundary. For site allocations within 2.8 km of Braintree District boundary score '-' rather than '-' to reflect possibility that closer secondary schools may be present in neighbouring districts.</p>	<p>&lt;= 4.8km, &gt; 2.4km</p> <p>N.B. Spatial data only available for secondary schools within Braintree District and 2 km beyond the boundary. For site allocations within 2.8 km of Braintree District boundary score '+' rather than '+' to reflect possibility that closer secondary schools may be present in neighbouring districts.</p>	<= 2.4 km	N/A	N/A
<b>SA objective 10: Conserve and enhance the historic environment, heritage assets and their settings</b>						
<p><b>HOUSING AND EMPLOYMENT ALLOCATIONS</b> BDC to:</p> <ul style="list-style-type: none"> <li>- Identify heritage assets on or close to the site</li> <li>- Assess the contribution of the site to the significance of the heritage assets</li> <li>- Identify the potential impacts of development on the significance of heritage assets</li> <li>- Consider how any harm might be removed or reduced, including reasonable alternatives sites</li> </ul>	Loss of or considerable harm to significance of designated heritage asset or its setting, where mitigation is unlikely to be feasible.	Harm to significance of designated heritage asset or its setting where mitigation is likely to be feasible, for example via design and layout of the new development.	Development likely to enhance historic asset, for example by bringing an 'at risk' structure into appropriate use or improving a degraded setting.	N/A	No effect (assume in all cases where there is no designated historic asset within 1 km of allocation).	Uncertainty

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Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<p>- Consider how any enhancements could be achieved and maximised</p> <p>- Consider and set out the public benefits where harm cannot be removed or reduced</p> <p>Source: BDC officer judgement based on site visit, reference to digital mapping of designated heritage assets, and Essex Heritage At Risk Register.</p>						
<b>SA objective 11: Reduce contributions to climate change</b>						
More appropriately assessed on basis of the features and designs of individual development proposals.	N/A	N/A	N/A	N/A	N/A	N/A
<b>SA objective 12: Improve water quality and address water scarcity and sewerage capacity</b>						
<p><u>ALL ALLOCATIONS</u></p> <p>Groundwater Source Protection Zone (SPZ).</p> <p>Source: SPZs (BDC).</p>	N/A	Significant proportion of allocation (>=25%) falls within SPZ1 or SPZ2	N/A	N/A	Allocation does not fall in any SPZs or insignificant proportion (<25%) lies within SPZ1, 2 or 3	Significant proportion of allocation (>=25%) falls within SPZ3
<p><u>HOUSING ALLOCATIONS</u></p> <p>Capacities in sewage network.</p> <p>Source: BDC Water Cycle Study (2017)</p>	Limited capacity in the network, hence solution required to prevent further Combined Sewer Overflow (CSO) discharges or sewer flooding	Pumping station or sewer pipe size may restrict growth, or non-sewered areas, where there is a lack of infrastructure	N/A	N/A	Development is likely to be possible without upgrades to wastewater network	Capacity of wastewater network to accommodate development at this site not assessed by WCS, hence effects uncertain
<b>SA objective 13: Reduce the risk of flooding</b>						
<p><u>ALL ALLOCATIONS</u></p> <p>Sites within an area of high flood risk.</p>	Significant proportion of allocation (>=25%) is within Flood Zone 3a or 3b.	Significant proportion of allocation (>=25%) is within Flood Zone 2 or smaller	N/A	N/A	< 5% of allocation within Flood Zone 3, or < 25% within Flood Zone 2, or	Uncertainty

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Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
<p>Source: digital data showing high flood risk locations (BDC).</p> <p><i>N.B. Criteria shown to be reviewed once Addendum to Mid Essex SFRA and Essex CC Surface Water Management Plan become available.</i></p>		area (5% to < 25%) is within Flood Zone 3.			proposed use is classified as 'water compatible development' by Technical Guidance to the NPPF.	
<b>SA objective 14: Improve air quality</b>						
<p><u>ALLOCATIONS FOR HOUSING OR OTHER SENSITIVE USES (e.g. hospital, school, childcare)</u> Location within an area likely to have poor air quality.</p> <p>Source: digital data showing AQMAs (currently none in District but BDC to provide boundaries if any are designated in the future) and road corridors (LUC).</p>	<p>Significant negative effect with uncertainty (--?) assumed where significant proportion of allocation (&gt;= 25%) is:</p> <p>a) within an AQMA (if any are designated in the future), or</p> <p>b) &lt;= 200 m from the A12 or A120.</p> <p>Uncertainty relates to whether mitigation will; be possible through layout of development.</p>	N/A	N/A	N/A	All other allocations.	N/A
<b>SA objective 15: Maintain and enhance the quality of landscapes and townscapes</b>						
<p><u>ALL ALLOCATIONS</u> High sensitivity to change per the Landscape Character Assessment (LCA).</p> <p>Source: Landscape Character Assessment</p>	<p>Significant proportion of allocation (&gt;=25%) is in landscape area with high sensitivity to change.</p>	<p>Significant proportion of allocation (&gt;=25%) is in landscape area with moderate sensitivity to change.</p>	<p>More than 75% of allocation is in landscape area with low sensitivity to change.</p>	N/A	<p>More than 75% of allocation is in urban area</p>	<p>Unknown sensitivity to change.</p>

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Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
report (BDC).  <i>N.B. LCA 2015 update used where available (main town fringes), otherwise LCA 2006 used.</i>						
<b>ALL ALLOCATIONS</b> Proposed extension to Dedham Vale AONB.  Source: boundary traced from BDC document: <a href="http://www.braintree.gov.uk/downloads/file/3199/map_dedham_vale_aonb_and_proposed_extent">http://www.braintree.gov.uk/downloads/file/3199/map_dedham_vale_aonb_and_proposed_extent</a>	Significant effect with uncertainty (--?) where significant proportion of allocation (>=25%) is within proposed extension to Dedham Vale AONB. Uncertainty relates to whether all of the proposed extension area meets the criteria for AONB designation.	N/A	N/A	N/A	<25% of allocation is within proposed extension to Dedham Vale AONB.	N/A
<b>ALL ALLOCATIONS</b> Greenfield site or Previously Developed Land (PDL).  Source: BDC site assessment.	N/A	Significant proportion of allocation (>=25%) is located on greenfield land.	<25% of allocation is on greenfield land.	Degraded landscape or derelict buildings and BDC confirm that remediation will be a condition of development.	N/A	Unknown whether greenfield or PDL.
<b>ALL ALLOCATIONS</b> Visually Important Spaces.  Source: digital data showing Visually Important Spaces (BDC).	N/A	Significant proportion of allocation (>=25%) is located in Visually Important Space, as identified by BDC and Parish Councils.	N/A	N/A	<25% of allocation is located on identified Visually Important Space.	Unknown whether Visually Important Space.
<b>ALL ALLOCATIONS</b> Country parks.  Source: digital data showing country parks (LUC).	N/A	Significant proportion of development allocation (>=25) is located in a country park.	Enhancement of an existing country park	Provision of a new country park	<25% of development allocation is located on a country park.	N/A
<b>SA objective 16: Safeguard and enhance the quality of soil</b>						
<b>ALL ALLOCATIONS</b> Loss of good quality agricultural land	Significant proportion of allocated land (>= 25%) on grade 1 or 2 agricultural land	Significant proportion of allocated land (>= 25%) on grade 3 agricultural land	N/A	N/A	All other sites	N/A

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Site assessment criteria	Significant negative effect (-)	Negative effect (-)	Positive effect (+)	Significant positive effect (++)	No / negligible effect (0)	Uncertain effect (?)
Source: digital data showing agricultural land classification (LUC)						
<u>ALL ALLOCATIONS</u> Remediation of contaminated land Source: digital data showing past contaminative land use (BDC)	N/A	Land is contaminated but remediation will not be a condition of development.	N/A	Land is contaminated and BDC confirm that remediation will be a condition of development.	Land is not contaminated	Unknown whether land is contaminated or if remediation will be required.

## **Appendix C**

### **Detailed assessment forms for additional sites**

## **Appendix D**

### **Schedule of Main Modifications with SA implications**

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Ref Number	Paragraph or Policy	Modifications: Bold = New Text Strikethrough = Deleted Text	Reason	Implications for SA Findings Previously Reported
MM1	Throughout the document	All references to 'Braintree Freeport' or 'Freeport' to be replaced with <b>'Braintree Village'</b>	Company and centre name has been changed.	<b>No change to SA findings:</b> This proposed Main Modification will not alter the findings of the SA as it is a minor wording change that amends references to Braintree Freeport to Braintree Village.
MM2	Vision for Braintree District	...access to the highest quality community facilities including health and education provision <b>and green infrastructure</b> . Outstanding...	As requested by consultee to reflect national policy	<b>No change to SA findings:</b> The proposed Main Modification seeks to ensure that all residents in the District will have access to green infrastructure networks which reinforces the minor positive effects identified in relation to access to open spaces ( <b>3: 'Health'</b> ); conserving and enhancing biodiversity, the historic environment, and landscapes/townscapes (SA objectives <b>6: 'Biodiversity &amp; geodiversity'</b> , <b>'10: Historic environment'</b> , <b>15: 'Landscape &amp; townscape'</b> ); improving sustainable transport infrastructure ( <b>7: 'Sustainable travel'</b> ), and improving air quality and the effects of climate change ( <b>11: 'Climate change mitigation'</b> , <b>13: 'Flooding'</b> , and <b>14: 'Air'</b> ).
MM3	Vision for Braintree District	<del>Two new garden communities are being built within the District at West of Braintree and Colchester/Braintree borders providing new communities within a high quality environment</del>	To remove reference to garden communities	<b>No change to SA findings:</b> Removing reference to the West of Braintree and Colchester/Braintree Borders Garden Communities will not

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				alter the SA findings for the Vision. The removal of the Garden Communities will be assessed in other parts of the Local Plan.
MM4	Key Objectives Housing Need	To provide a range of housing sizes, types and tenures which meet local need, including affordable homes, <del>starter homes</del> , and homes for those residents with...	Starter homes as a category of homes were never implemented.	<b>No change to SA findings:</b> Removing reference to starter homes will not alter the SA findings previously identified for this objective. Specifically, the significant positive effect identified for SA objective 2: <b>Housing</b> remains valid as the Key Objective is still to deliver a range of housing sizes, types and tenures to meet the needs of the District's population.
MM5	Key Objectives Transport Infrastructure	New developments must contribute towards the improvement of the transport network in the District. <del>including schemes to ensure safety and reduce congestion.</del> <b>Developments will make appropriate provision to ensure safety and reduce congestion on the road network.</b> Developments will make appropriate provision for public transport, walking and cycling, both within developments and connections to the wider network.	As requested by consultees to reflect national policy.	<b>No change to SA findings:</b> The proposed Main Modification requires developments to make appropriate provisions to ensure safety and reduce congestion on the road network, which reinforces the significant positive effects identified for SA objective 7: <b>'Sustainable travel'</b> and SA objective 8: <b>'Accessibility'</b> .
MM6	Paragraph 5.8	Delete paragraph and title	To remove reference to the position of Garden Communities within the spatial hierarchy	<b>No change to SA findings.</b>
MM7	Spatial Hierarchy	Add Crossing Tye to the list of second tier villages To add High Garrett to the list of third tier villages <del>West of Braintree Garden Community</del>	The villages were omitted from the original spatial hierarchy  To remove reference to Garden Communities	<b>No change to SA findings:</b> The implications for removing the Garden Communities is appraised throughout the SA Addendum. The previous omission of Crossing Tye and High

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		<del>Colchester Braintree Borders Garden Community</del>		Garrett from the Spatial Hierarchy list does not affect the SA findings previously reported as these settlements were still considered in the previous SA.
MM8	Spatial Strategy	That the broad spatial strategy for Braintree District should concentrate development on the town of Braintree, <del>planned new garden communities</del> , Witham and the A12/Great Eastern Mainline corridor and Halstead	To remove reference to Garden Communities	<b>Changes to SA findings:</b> A new reasonable alternative Spatial Strategy has been identified by BDC and appraised in Chapter 5 of the SA Addendum. Similarly, the Spatial Strategy as proposed to be modified is also reappraised in Chapter 5.
MM9	LPP1	Development outside development boundaries will be <del>strictly controlled</del> <b>confined</b> to uses appropriate to the countryside <b>whilst also protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils</b>	To aid clarity and ensure purpose of the policy is clear following a High Court decision at Gulls Meadow, Stisted.	<b>Changes to SA findings:</b> The proposed Main Modification supports development outside development boundaries provided it protects and enhances landscapes, biodiversity, geodiversity and soils. Therefore, the negligible effects identified for SA objective objectives <b>6: 'Biodiversity &amp; geodiversity'</b> and <b>16: 'Soil'</b> are revised to minor positive effects and the previously identified significant positive effect for SA objective <b>15: 'Landscapes &amp; townscapes'</b> is reinforced.
MM10	Picture 5.1 Key Diagram	Remove the 'Garden Community area of search' from the key diagram.	To remove references to Garden Communities	This Main Modification relates to part of the plan which was not previously appraised in its own right in the SA (the key diagram) and so it does not need to be appraised as part of this SA process.

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<p>MM11</p>	<p>LPP2</p>	<p><del>The Council and its partners will be driving forward the growth of the economy in the District and provide for the 32.4ha of industrial land and 19.5ha of office land in the District to support this.</del></p> <p>New strategic employment sites <b>to meet the needs set out within policy SP5</b>, and the proposed uses for those sites, are set out in the table below.</p> <p>Extension to Springwood Drive Industrial area in Braintree 19ha employment policy area 10</p> <p><del>Eastlink Horizon 120 18.5ha Innovation and Enterprise Business park for uses in the B4 E(g), B2, B8 use class.</del></p> <p><b>The Council has an approved LDO for the site.</b></p> <p><del>Part of the site may be developed for a hotel use (C1)</del></p> <p><del>B8 uses should be restricted to no more than 40% of the total floor area and no single unit should be larger than 7,500sqm</del></p> <p>The site also includes 7ha of structural landscaping.</p> <p><del>Major Business Park on the West Braintree Garden Community To be determined through a Strategic Growth DPD</del></p> <p><del>Major Business Park on the Marks Toy Garden Community To be determined through a Strategic Growth DPD</del></p> <p>Total identified new employment land allocations for B1, B2 and B8 51.1 <b>42.1</b></p>	<p>To aid clarity as the overall employment need is set out in policy SP5 of the section 1</p> <p>To aid clarity</p> <p>To reflect the current planning permission</p> <p>To aid clarity and to reflect use class changes</p> <p>To reflect the current planning position</p> <p>To remove reference to Garden Communities</p> <p>To aid clarity and to reflect the current planning permission for Springwood Drive Industrial Estate</p>	<p><b>No change to SA findings:</b> The proposed Main Modification has revised the policy to update the amount of employment land to be delivered over the plan period, and the removal of employment land proposed at two Garden Communities. Overall, there has been a reduction in the amount of employment land to be delivered over the plan period since the Publication Draft Section 2 Local Plan. However, the effects identified in the previous SA remain valid, including the significant positive effect identified for SA objective 5: 'Economy'.</p> <p><b>The assessment of this policy includes the newly appraised/modified site allocations for HATR 752, BOS 6H, Group L and Group E (see Chapter 4 of this SA Addendum) and the site-specific policies (see Chapter 5 of this SA Addendum).</b></p>
<p>MM12</p>	<p>LPP3</p>	<p>Employment policy areas are identified on the Proposals Map, where the following uses will be considered appropriate and will be permitted and retained:</p> <p><b>A. Office use, research and development, and industrial processes (other than industrial processes falling within Use Class B2). Business (use class B1) (use class E(g))</b></p> <p>B. General industrial (use class B2) and storage and distribution (use class B8)</p>	<p>To reflect changes to use classes</p> <p>To aid clarity</p>	<p><b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.</p>

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		<p>C. Repair of vehicle and vehicle parts</p> <p>D. Waste management facilities as appropriate taking into account neighbouring uses</p> <p>E. services specifically provided for the benefit of businesses or workers based on the employment area</p> <p><b>Changes from B2 or B8 to E will not be permitted.</b></p>		
MM13	LPP6	<p>Employment locations for <del>Use class B1 Business Parks</del> <b>business uses</b> are identified on the Proposals Map. To maintain the character of these sites <del>only uses falling within Use Class B1 business will be permitted.</del> <b>and to meet identified needs, they are allocated for office use, research and development, and industrial processes (other than industrial processes falling within Use Class B2).</b></p>	To reflect use class changes	<b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.
MM14	Paragraph 6.23, 6.24 and 6.25 LPP7	Delete policy and supporting text	Design appropriately covered in general design policies	<b>Changes to SA findings:</b> The proposed deletion of Policy LPP 7 'Design and Layout of Employment Policy Areas and Business Parks', as design principles are also addressed in Policy LPP 55 'Layout and Design of Development', means that the effects previously identified for Policy LPP 7 in the SA will no longer occur as part of the Section 2 Local Plan.
MM15	LPP8	<p><del>A the Location of the site being accessible, and sustainable in terms of the Framework</del></p> <p><del>B There is no unacceptable impact on protected species or the historic environment</del></p> <p><del>Where it has been evidenced that the conversion of existing buildings on the site is not practical or where there are no existing buildings on the site and where a need has been demonstrated, new buildings shall be well designed, and appropriately sited. New buildings shall be of a form, bulk and design that should not offend local landscape character, and protect and enhance heritage assets and their</del></p>	<p>To avoid repeating national policy</p> <p>To avoid repeating other policies in the Plan</p>	<b>Changes to SA findings:</b> The proposed Main Modification to Policy LPP 8 'Rural Enterprise' removes criteria relating to sites being accessible and having no unacceptable impact on protected species, the historic environment, and local landscape character. Therefore, the previously identified minor positive effects for SA objectives <b>6: 'Biodiversity and geodiversity'</b> , and <b>10: 'Historic</b>

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		<p><del>settings. All such new development shall also be considered against the criteria above.</del></p>		<p><b>environment'</b> are revised to negligible effects.</p> <p>However, the minor positive effect for SA objective <b>8: 'Accessibility'</b> remains as the policy will still improve access to rural employment and facilities. Similarly, the minor positive effect for SA objective <b>15: 'Landscape &amp; townscape'</b> remains as another criterion in the policy requires no unacceptable impact on the character of the site or the surrounding countryside and its landscape value.</p>
MM16	LPP9	<p>Proposals for new tourist accommodation and facilities, <b>including extensions to existing tourist accommodation and facilities</b>, within the countryside, will be permitted provided that all the following criteria are met;</p> <p>b. <b>Large scale</b> proposals are connected to and associated with existing facilities or located at a site that relates well to defined settlements in the area and are accessible to adequate public transport, cycling and walking links.</p> <p><del>e They would not use the best and most versatile agricultural land</del></p>	<p>To provide clarity</p> <p>To provide clarity</p> <p>To avoid repeat of other policies in the Plan</p>	<p><b>Changes to SA findings:</b> The proposed Main Modification has revised the policy text to include reference to extensions to existing tourist accommodation and facilities which will enhance the District's potential for tourism and therefore strengthen the significant positive effect previously identified for SA objective <b>5: 'Economy'</b>. The minor positive effect previously identified for SA objective <b>16: 'Soil'</b> is revised to a negligible effect due to the deletion of the criterion relating to avoiding best and most versatile agricultural land.</p>
MM17	LPP10	<p>Convenience (Food) retailing across the District is expected to grow. <del>Evidence suggests,</del> <b>with evidence suggesting</b> that across the District <del>8,966sq.m</del> <b>2927sq.m</b> (gross) of new floorspace will be required. For comparison goods (Non-food retailing) <del>15,869 sqm</del> <b>10,315 sq.m</b> (gross) will be required and for food and beverage provision <del>8,304 sqm</del> <b>4506 sq.m</b> (gross) is needed.</p>	<p>To reflect updated evidence base</p> <p>To correct typographical error</p>	<p><b>No change to SA findings:</b> The proposed Main Modification has revised the policy to update the amount of floorspace required for convenience and comparison retailing reflecting the updated evidence base. Overall, there is a</p>

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		1,000sqm (Gross) Great Notley District Centre <del>and</del>		reduction in the amount of convenience and comparison retailing floorspace to be delivered over the plan period since the Publication Draft Local Plan, however, the significant positive effects identified in relation to SA objective 4: <b>'Service centre vitality'</b> and SA objective 5: <b>'Economy'</b> remain valid, as the policy will still enhance the proportion of retail space in the District which will strengthen the local economy and provide employment opportunities in the retail sector.
MM18	LPP11	<p>Within the Primary Shopping Areas, as defined on the Proposals Maps, primary and secondary frontages have been identified. A balance between A4 retail shops and non-retail town centre uses has to be maintained in order to secure the vitality and viability of the primary shopping area.</p> <p>The following uses will be permitted within primary frontages:</p> <p>a. <b>Commercial Retail development (Use Class A4 E)</b></p> <p>b. <b>Local Community uses (Use class F.2)</b> <del>Proposals for use classes A2- A5 and D1- D2 provided that:</del></p> <p><del>It would not result in 3 or more non A1) Use class units in adjoining premises within the primary shopping area</del></p> <p><del>It would not break a continuous A1 primary retail frontage</del></p> <p>The following <b>additional</b> uses will be permitted within Secondary Frontages:</p> <p><del>Use Classes A1 to A5, B1 and D1 to D2</del><b>Pubs and drinking establishments</b></p> <ul style="list-style-type: none"> <li>• <b>Hot food takeaways</b></li> </ul>	To reflect use class changes	<b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.

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		• <b>Cinemas, concert halls, music venues and similar</b>		
MM19	LPP12	<p><b>District Centre – Great Notley</b></p> <p>Within the District centre as defined on the Proposals Map, the following uses will be permitted:</p> <p>a. <del>Retail development (Use Class A1)</del> <b>Commercial E use</b></p> <p>b. <b>Use Classes F1, F2, pubs and drinking establishments, hot food takeaways and cinemas, concert halls, music venues and similar providing this does not lead to an over proliferation of these uses to the detriment of the amenity of the surrounding area or viability of the centre.</b> <del>Proposals for use classes A2 – A5 and D1 – D2, provided that it does not result in the loss of an existing A1 retail use, or where a A1 unit has become vacant, it can be demonstrated through a marketing and viability assessment that an A1 user cannot be found.</del></p>	<p>To aid clarity as to where the policy applies.</p> <p>To reflect changes to use classes</p>	<p><b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.</p>
MM20	LPP13	<p>The area defined on the Proposals Map as a <del>Factory</del> <b>Designer Outlet Centre</b> shall be maintained for the purpose of a discount shopping outlet centre, <b>and current associated uses.</b></p>	<p>To better reflect the uses on the site</p>	<p><b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.</p>
MM21	LPP14	<p>The areas identified on the Proposals Map for Leisure and Entertainment shall be retained for leisure and entertainment-related uses. <b>This includes use for indoor sport, recreation or fitness; local community shops (Use Class F2); bingo halls, music venues and other similar uses; and expansion of the existing cinema will be acceptable.</b></p>	<p>To reflect new use class order</p>	<p><b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.</p>
MM22	LPP15	<p><b>Bulky retail P</b> proposals outside of town centres will be required to satisfy all the following criteria:</p> <p><del>e. A traffic transport impact assessment and travel plan demonstrating that the proposal would not cause any detriment to the local traffic network</del></p>	<p>To aid clarity</p> <p>For clarity and to avoid repetition</p>	<p><b>No change to SA findings:</b> The proposed Main Modification no longer requires bulky retail proposals outside of town centres to be accompanied by transport impact assessments and travel plans (as this is a requirement of Policy LPP 44). Therefore, the previously identified</p>

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				negligible effect for SA objective 8: <b>'Accessibility'</b> remains valid.
MM23	LPP16	<p><del>Former EMD Site, Kings Road</del></p> <p>New retail provision will also be provided at strategic growth locations, <del>new garden communities and a site allocations at land north of Freeport and</del> land off Millennium Way, Braintree.</p>	<p>To remove allocation at former EMD site which has now been built.</p> <p>To remove allocation at Freeport which is not being taken forward by landowner.</p> <p>To remove reference to Garden Communities</p>	<p><b>Changes to SA findings:</b></p> <p>The sites listed in the town centres for retailing and other main town centre uses were appraised together in Policy LPP 16 (including the Former EMD Site at Kings Road). However, individual site assessments were prepared for the two out of centre retail allocations. Therefore, the sustainability effects previously identified for site allocation BRE31RW (Land North of Freeport) no longer apply, i.e., the significant positive effects identified for SA objective 5: <b>'Economy'</b> and 8: <b>'Accessibility'</b>; the minor positive effects for 7: <b>'Sustainable travel'</b>, 11: <b>'Climate change mitigation'</b>; and the uncertain effects for 6: <b>'Biodiversity and geodiversity'</b> and 15: <b>'Landscapes and townscapes'</b>.</p> <p>Overall, the removal of the Former EMD, the two Garden Communities, and Land North of Freeport as potential retail allocations from Policy LPP 16 will not alter the SA findings previously identified as the remaining sites will still positively contribute to the viability and vitality of existing service centres (minor positive effect for 4: <b>'Service centre vitality'</b>) which will strengthen the local economy and provide employment opportunities in</p>

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					the retail sector (minor positive effect for <b>5: 'Economy'</b> ).
MM24	LPP17	Strategic Growth Location	Number of Homes (within the Plan period)	To remove reference to Garden Communities  To update to the current housing position	<p><b>No change to SA findings:</b> The proposed Main Modification has revised the policy to update the housing provision for Former Towerlands Park Site, Land at Feering, Wood End Farm, and North West Braintree, including the removal of the housing provision at the two Garden Communities. 15,772 dwellings will be delivered exceeding the supply requirement of 14,320 dwellings (716 dwellings per annum). The effects identified in the previous SA remain valid, including the significant positive effect identified for SA <b>objective 2: 'Housing'</b>, as the Local Plan will continue to deliver the objectively assessed need (OAN) for housing identified for the District.</p> <p><b>The assessment of this policy includes the removal of sites BCBG 150; BCBG 550, BRC 77, BOCN 123, SIB 2CH, WITC 424 and WITW 431, and the newly appraised/modified site allocations for BCBG 147A; BOCN 750; BRAW 751; WITN 755; EARC 225, HATR 752, BOS 6H, Group L and Group A (see Chapter 4 of this SA Addendum) and the site-specific policies (see Chapter 5 of this SA Addendum).</b></p>
		<del>West of Braintree Garden Community</del>	2,500		
		<del>New Colchester Braintree Borders Garden Community</del>	4,150		
		East of Great Notley (in Black Notley Parish)	1,750		
		Land East of Broad Road, Braintree	1,000		
		Former Towerlands Park Site, Braintree	<del>600</del> <b>575</b>		
		Land at Feering	<del>750</del> <b>795</b>		
		Wood End Farm, Witham	<del>450</del> <b>400</b>		
		North West Braintree – Panfield Lane	<del>600</del> <b>825</b>		
MM25	LPP18	<ul style="list-style-type: none"> <li><b>Up to</b> 1750 new homes of a mixed size and type appropriate to the area</li> </ul>		To reflect the wording of other strategic growth locations policy	<b>Changes to SA findings:</b> The assessment of LPP 18 has been

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		<ul style="list-style-type: none"> <li>• <b>Contributions to the strategic road network in the vicinity of the site which could include the A120 and A131 corridor</b></li> <li>• Provision of <b>or contribution towards</b> a Gypsy and Traveller Site</li> <li>• A new primary school with co-located 56 early years and childcare <b>nursery</b> (D1-use) on 2.7ha of <b>suitable</b> land <b>allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> <li>• Two new 56 place stand-alone early years and childcare <b>nurseries</b> (D1-use) each on 0.13ha of <b>suitable</b> land <b>allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> <li>• Community facilities including a contribution to or <b>location provision of infrastructure for new</b> NHS facilities</li> <li>• Public open space <b>in accordance with the Open Space Study</b>, and informal and formal recreation <b>in accordance with the playing pitch strategy</b></li> </ul> <p>The main access to the site will be from London Road and <b>local access from</b> Notley Road <del>with additional minor vehicle access from</del> <b>and Bakers Lane, the latter</b> only if it is an essential requirement of the development</p>	<p>For clarity</p> <p>For ensure the policy is effective</p> <p>To reflect use class orders</p> <p>To aid clarity</p> <p>To aid clarity</p> <p>To ensure the policy is effective</p> <p>To ensure the policy is effective</p>	<p>updated to include the reappraisal of site allocations in Group A. The assessment is presented in Chapter 5.</p>
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<p>MM26</p>	<p>LPP19</p>	<ul style="list-style-type: none"> <li>• <b>Up to 1000</b> homes of a mixed size and type appropriate to the area</li> <li>• A new primary school with co-located <del>56</del> early years and childcare <b>nursery (D4 use)</b> on 2.1ha of <b>suitable</b> land <b>allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> <li>• A new <del>56</del> place stand-alone early years and childcare nursery (<del>D4 use</del>) on 0.13 hectares of <b>suitable</b> land <b>allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> <li>• Provision for <b>or contributions towards</b> a Gypsy and Traveller site</li> <li>• Public open space <b>in accordance with the Open Space Study</b>, formal <b>recreation in accordance with the Playing Pitch strategy</b> and informal recreation, which would include improvements to the River Walk...</li> </ul> <p>The main <b>vehicular</b> access to the site will be from <b>a new roundabout on the A131</b> with an additional <b>local minor-vehicle</b> access from Broad Road.</p>	<p>To reflect wording of other strategic growth location policies</p> <p>To aid clarity</p> <p>To reflect use class order</p> <p>To ensure the policy is effective</p> <p>To ensure the policy is effective</p> <p>To ensure the policy is effective</p>	<p><b>Changes to SA findings:</b> The assessment of LPP 19 has been updated to include the reappraisal of site allocations in Group J. The assessment is presented in Chapter 5.</p>
<p>MM27</p>	<p>LPP20</p>	<ul style="list-style-type: none"> <li>• <b>Up to <del>600</del> 575</b> new homes of a mixed use and type appropriate to the area</li> <li>• A new 56 place stand-alone early years and childcare nursery (<del>D4 use</del>) on 0.13 hectares of <b>suitable</b> land <b>allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> </ul>	<p>To reflect wording of other strategic growth location policies</p> <p>To aid clarity and to reflect changes to use class</p>	<p><b>Changes to SA findings:</b></p> <p>Spatial effects for this policy relate to site allocation BOCN 137. The site appraisal of BOCN 137 identified the following effects (relevant to the proposed Main Modification): a negligible effect for SA objective Q1a: 'Community facilities'; a significant</p>

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		<ul style="list-style-type: none"> <li>• <b>All access points will have to be agreed to the satisfaction of Essex County Council, as Highways Authority.</b></li> <li>• Community facilities including a contribution to or <b>location provision of infrastructure for new</b> NHS facilities</li> <li>• Public open space <b>in accordance with the Open Space Study and formal recreation in accordance with the Playing Pitch Strategy</b> and informal recreation including landscaping to the rural edge</li> </ul>	<p>To ensure the policy is effective</p> <p>To ensure clarity</p> <p>To ensure the policy is effective</p>	<p>positive for Q2a: 'Affordable housing'; a minor negative effect for Q3a: 'Primary healthcare'; a minor positive effect for Q3e: 'Open space'; and a minor negative effect for Q9a: 'Primary schools'.</p> <p>The proposed Main Modification updates the housing provision for the Former Towerlands Park Site. Although there is a reduction in the amount of housing to be delivered on this site since the Publication Draft Section 2 Local Plan, the significant positive effect for SA objective 2: <b>'Housing'</b> remains valid.</p> <p>The modification of the policy wording to reflect the recent changes to the Use Class Orders will not alter the significant positive effect previously identified for SA objective 9: <b>'Education and skills'</b>.</p> <p>The modification to the policy to require all access points to be agreed by Essex County Council as Highways Authority, reinforces the significant positive effect identified for SA objective 8: <b>'Accessibility'</b>.</p> <p>The modification to the policy in relation to community facilities will not alter the previously identified minor positive effect for SA objective 1: <b>'Community safety &amp; cohesion'</b>.</p> <p>The previously identified minor positive effect for SA objective 3: <b>'Health'</b> is revised to a significant positive effect as the proposal is</p>
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				required to deliver healthcare facilities; and to incorporate public open spaces and informal and formal recreation areas into the design of the developments
MM28	LPP21	<ul style="list-style-type: none"> <li>Up to 825 <del>600</del> new homes of a mixed size and type appropriate to the area</li> <li>10ha of employment development</li> <li>A new primary school with co-located 56 early years and childcare <del>nursery (D1 use)</del> on 2ha of <b>suitable land allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> <li>Public open space <b>in accordance with the Open Space Study</b>, formal and informal recreation <b>in accordance with the Playing Pitch Strategy</b> and community sports facilities</li> <li><b>Community facilities including a contribution to or provision of infrastructure for new NHS facilities</b></li> </ul>	<p>To reflect wording of other strategic growth location policies and current planning permission</p> <p>To reflect current permission.</p> <p>To aid clarity and to reflect use classes</p> <p>To ensure the policy is effective</p> <p>To ensure the plan is positively prepared</p>	<p><b>No change to SA findings:</b></p> <p>Policy LPP 21 as proposed to be modified includes the reassessment of site allocation BOS 6H. The site appraisal of BOS 6H identified the following effects (relevant to the proposed Main Modification): a negligible effect for Q1a: 'Community facilities'; a significant positive for Q2a: 'Affordable housing'; a mixed effect for Q3a/b: 'Primary healthcare'/Accessible natural greenspace; a mixed effect for Q5a/b: 'Minerals/Employment', and a significant positive effect for Q9a/b: 'Primary/secondary schools'.</p> <p>The proposed Main Modification uplifts the housing capacity for North West Braintree to 825 homes, reinforcing the significant positive effect for SA objective <b>2: 'Housing'</b>. Although there is a reduction in the amount of employment land to be delivered on this site since the Publication Draft Section 2 Local Plan, the significant positive effect for SA objective <b>5: 'Economy'</b> remains valid.</p> <p>The modification of the policy wording to reflect the recent changes to the Use Class Orders will not alter the</p>

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				<p>significant positive effect previously identified for SA objective 9: <b>'Education and skills'</b>.</p> <p>The modification to the policy in relation to community facilities and compliance with the Open Space Study and Playing Pitch Strategy, will not alter the previously identified minor positive effect (as part of a mixed effect, due to the proximity to a waste facility) for SA objective 1: <b>'Community safety &amp; cohesion'</b> or the significant positive effect for SA objective 3: <b>'Health'</b>.</p>
MM29	LPP22	<p><b>Strategic Growth Location - Land at Feering</b></p> <p>A Strategic Growth Location has been identified at land south east of Feering and is shown on the Proposals Map. Development will be expected to provide;</p> <ul style="list-style-type: none"> <li>• Up to 750 <del>new</del> <b>Around 835</b> new homes of a mixed, size and type appropriate to the area</li> <li>• Affordable housing as per the Council's <b>policy</b> requirements</li> <li>• Appropriate employment <b>generating</b> uses to support the new community</li> <li>• Location for a new primary school or community centre <b>A new primary school with co-located early years and childcare nursery on 2.1 ha of suitable land allocated for education and childcare use or the expansion of Feering School</b></li> <li>• <del>Two</del> <b>A</b> new 56 place <b>stand-alone</b> early years and childcare facilities potentially collocated with any new primary school <b>nursery on 0.13 hectares of suitable land allocated for education and childcare use or potentially co-located with any new primary school site</b></li> <li>• <b>Provision of a community centre or a financial contribution towards off site provision of the same</b></li> </ul>	<p>To aid clarity and to reflect a current planning permission</p> <p>To aid clarity</p> <p>To aid clarity</p> <p>To respond to comments of consultees</p> <p>To respond to comments of consultees</p> <p>To respond to comments of consultees</p>	<p><b>Changes to SA findings:</b> The assessment of LPP 22 has been updated to include the reappraisal of site allocations in Group L. The assessment is presented in Chapter 5.</p>

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		<ul style="list-style-type: none"> <li>• <del>Financial contributions to primary and secondary education provision as required by the Local Education Authority through S106 Planning Obligations</del></li> <li>• Community facilities including a contribution to or location <b>provision of infrastructure</b> for new NHS facilities</li> <li>• Retail Provision</li> <li>• <b>Public open space in accordance with the Open Spaces Study, informal and formal recreation in accordance with the playing pitch strategy including a new Country Park to the south of the A12</b></li> <li>• Safe cycle and pedestrian access between all parts of the development and Kelvedon and Feering</li> <li>• Provision for <b>or contributions towards</b> a Gypsy and Traveller site</li> <li>• Contributions to an all directions A12 junction at Feering <b>highway and transport infrastructure as required by the Highway Authorities</b></li> <li>• <b>Provision of a new connection between Inworth Road and London Road</b></li> </ul> <p>Development must be designed to ensure that no substantial harm to <b>should conserve and where opportunities arise enhance</b> the conservation areas <b>and their settings, preserve listed buildings and</b> scheduled Ancient monuments and other heritage assets located in the vicinity of the site <b>their settings</b></p> <p>The delivery of each facility shall coincide with the completion of different phases of development to ensure that local services are in place when they are needed.</p> <p>Development proposals which would compromise the delivery of an identified <b>and coherent</b> Strategic Growth Location will be resisted.</p>	<p>To aid clarity</p> <p>To respond to comments of consultees</p> <p>To ensure the policy is effective</p> <p>To respond to comments of consultees</p> <p>To respond to comments of consultees and aid clarity</p> <p>To respond to the comments of consultees and ensure consistency with national policy</p> <p>To aid clarity</p>	
MM30	LPP23	<ul style="list-style-type: none"> <li>• Up to <del>450</del> <b>400</b> new homes of a mix size and type appropriate to the area</li> </ul>	To reflect current position	<p><b>No change to SA findings:</b></p> <p>Spatial effects for this policy relate to sites HATF 315 and HATF 316</p>

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		<ul style="list-style-type: none"> <li>• A new 30 place stand-alone early years and childcare nursery (<del>D1 use</del>) on 0.065 hectares of <b>suitable</b> land <b>allocated for education and childcare use</b> as required by the Local Education Authority through S106 Planning Obligations</li> <li>• <del>Formal and informal</del> <b>Public</b> open space <b>in accordance with the Open Space Study, informal and formal recreation in accordance with the Playing Pitch Strategy</b> <del>play space and allotments</del> including an appropriate countryside edge to the development and buffering to the railway line</li> <li>• <del>Contributions to other community facilities including health provision as required by the NHS</del></li> <li>• Community facilities including a contribution to or <del>location</del> <b>provision of infrastructure for new</b> NHS facilities</li> </ul>	<p>To reflect use class change</p> <p>To ensure the policy is effective</p> <p>To aid clarity</p>	<p>(Group M). The site appraisal for Group M identified the following effects (relevant to the proposed Main Modification): a negligible effect for SA objective Q1a: 'Community facilities'; a significant positive for Q2a: 'Affordable housing'; a minor negative effect for Q3a: 'Primary healthcare'; a minor positive effect for Q3e: 'Open space'; and a minor negative effect for Q9a: 'Primary schools'.</p> <p>The proposed Main Modification to Policy LPP 23 updates the housing provision for Wood End Farm, Witham. There is a reduction in the amount of housing to be delivered on these sites since the Publication Draft Section 2 Local Plan, however, the effects identified in the previous SA of Policy LPP 23 remain valid, including the significant positive effect for SA objective <b>2: 'Housing'</b>.</p> <p>The modification of the policy wording to reflect the recent changes to the Use Class Orders will not alter the significant positive effect previously identified for SA objective <b>9: 'Education and skills'</b>.</p> <p>The modification to the policy in relation to community facilities and compliance with the Open Space Study and Playing Pitch Strategy, will not alter the previously identified minor positive effects for SA objective <b>1: 'Community safety &amp; cohesion'</b> and SA objective <b>3: 'Health'</b>.</p>
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MM31	LPP24 bullet 3	<ul style="list-style-type: none"> <li>Protection of the setting of listing buildings and enhancement of the Conservation Area including the retention and refurbishment of <del>the at least one</del> air raid shelters</li> </ul>	To reflect appeal decision APP/Z1510/W/19/3224638 which set out that the loss of any of these features would be harmful	<p><b>Changes to SA findings:</b></p> <p>Spatial effects for this policy relate to HASA 287. The site appraisal for HASA 287 identified a minor negative effect for Q10a: 'Historic environment' due to the site being located within a Conservation Area with BDC's site assessment identifying the potential for development to lead to a more crowded appearance, with negative effects, recognising that mitigation may be possible through care with height and layout, and the retention of trees.</p> <p>The proposed Main Modification to Policy LPP 24 requires the protection of the setting of listed buildings and enhancement of the Halstead Conservation Area including the retention and refurbishment of the air raid shelters, revising the previously identified negligible effect to a minor positive effect for SA objective <b>10: 'Historic environment'</b>.</p>
MM32	LPP25	<ul style="list-style-type: none"> <li>Impact on the nearby listed buildings <b>and their settings</b></li> </ul>	To respond to comments of consultees	<p><b>Changes to SA findings:</b></p> <p>Spatial effects for this policy relate to HATR 309. The site appraisal for HATR 309 identified a minor negative effect for Q10a: 'Historic environment' as a Grade II Listed Building (Blamsters) lies to the north of the site. The BDC site assessment form states that the site provides the setting of this heritage asset, which could be harmed by development.</p>

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				<p>However, careful layout and design could mitigate these impacts.</p> <p>The proposed Main Modification to Policy LPP 25 seeks to protect the nearby listed buildings and their settings revising the previously identified negligible effect to a minor positive effect for SA objective <b>10: 'Historic environment'</b>.</p>
MM33	LPP26	<p>Employment <b>uses E B4 and B8</b></p> <p><del>Retention of the boiler house</del></p>	<p>To reflect use class changes</p> <p>Error – the boiler house is not within this area.</p>	<p><b>Changes to SA findings:</b> The assessment of LPP 26 has been updated to include the appraisal of a new allocation, HATR 752. The assessment is presented in Chapter 5.</p>
MM34	Paragraph 6.81 LPP27	Delete policy and support text as the site is now under construction.	To reflect current planning permission	<p><b>Changes to SA findings:</b> The proposed deletion of Policy LPP 27, as the site (COGG 506) is currently under construction, means that the effects previously identified in the SA will no longer occur as part of the Section 2 Local Plan.</p>
MM35	LPP28	<ul style="list-style-type: none"> <li>Retention of A-class retail uses along the secondary retail frontage</li> </ul>	To reflect use class changes	<p><b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.</p>
MM36	LPP29 2 <sup>nd</sup> paragraph  3 <sup>rd</sup> paragraph	<p>Any developments of extensions should address the drainage <del>impacts</del> infrastructure deficit in its immediate area.</p> <p>A development brief will be produced to guide the redevelopment, the brief and any proposals in advance of the brief. <b>An illustrative</b></p>	To ensure consistency with national policy	<p><b>No change to SA findings:</b></p> <p>Spatial effects for this policy relate to site allocation WCH 14CD. A minor negative effect is identified in relation</p>

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		<p><b>masterplan, design code and parameter plan should be produced which</b> should address all the following issues:</p>	To aid clarity	<p>to site appraisal SA objective 12c: 'Sewerage capacity'.</p> <p>The proposed Main Modification amends the policy to require any extension of Newlands Precinct to address the drainage impacts which reinforces the previously identified minor positive effect for Policy LPP 29 in relation to SA objective <b>13: 'Flooding'</b>.</p> <p>The minor wording change requiring a master plan, design code and parameter plan to be produced rather than a development brief will not alter the previously identified findings of the SA.</p>
MM37	LPP30	<p>Land at Rickstones Neighbourhood Centre, Dorothy Sayers Drive, Witham is allocated as a Comprehensive Redevelopment Area for a mixed use development <del>where</del> <b>which could include</b> a combination of retail, community uses, public house, pavilion, residential development and car parking will be supported.</p>	For clarity	<p><b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA of Policy LPP 30, including site allocation WITN 429.</p>
MM38	LPP31	<p>Comprehensive Redevelopment Area - Land between A12 and GEML, Hatfield Peverel</p> <p>The following <del>Development</del> is supported within the comprehensive redevelopment area at land between A12 and GEML.</p> <ul style="list-style-type: none"> <li>• <del>Mixed use development of up to 200 dwellings on former Arla Dairy site (3.8ha)</del></li> <li>• <del>Up to 45 dwellings on Sorrells Field (2ha)</del></li> <li>• <del>Up to 20 dwellings on Bury Farm (2.8ha)</del></li> <li>• <del>Up to 20 dwellings to the rear of Station Road, subject to a masterplan to be agreed with the LPA. Piecemeal development of gardens will be resisted</del></li> </ul>	To reflect current planning permissions	<p><b>No change to SA findings:</b></p> <p>Spatial effects for this policy relate to site allocations HATF 608, HATF 630 and HATF 313. The number of houses to be delivered on these sites has been updated since the Publication Draft Local Plan SA to reflect planning permissions. However, the removal of specific reference to these sites in Policy LPP 31 does not alter the SA findings previously reported as these sites still constitute the 'comprehensive redevelopment area' between the</p>

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		<ul style="list-style-type: none"> <li>• <del>Access and capacity improvements to Station Road car park</del></li> </ul> <p>Development of residential dwellings on these sites will be expected to provide;</p> <ul style="list-style-type: none"> <li>• <b>A main vehicular access from the site to be taken from Station Road</b></li> </ul>	<p>To respond to comments of consultees</p>	<p>A12 and GEML. The additional policy requirement for main vehicular access to be from Station Road reinforces the previously identified significant positive effect for SA objective <b>8: 'Accessibility'</b>.</p>
MM39	LPP32	<p><del>40 Up to 78 new homes</del></p> <p><del>Retention of the visual integrity of the character and setting of Gimsons and its access</del></p> <p><del>Enhancement of the parkland setting of Gimsons</del></p>	<p>To reflect the planning permission on the site</p>	<p><b>No change to SA findings:</b></p> <p>Spatial effects for this policy relate to site allocation WITC 421. A significant negative effect is identified in relation to site appraisal SA objective 15a: 'Landscape sensitivity' as the site lies within an area of high landscape sensitivity and a minor negative effect was identified for SA15g: 'VIS' as the site consists partially of a Visually Important Space. In addition, the site consists almost entirely of greenfield land (minor negative effect identified for SA15e: 'Greenfield/brownfield').</p> <p>The proposed Main Modification removes mitigation measures to protect and enhance the visual integrity, character and setting of Gimsons. Therefore, the uncertain significant negative effect previously identified for SA objective <b>15: 'Landscapes and townscapes'</b> for Policy LPP 32 remains valid. The</p>

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				effect remains uncertain, as the requirement of the policy to contribute to public realm improvements, may contribute to minimising and mitigating negative effects.
MM40	LPP33	<p>A <del>target requirement</del> of 30% of the total number of <del>residential units dwellings</del> on sites located...</p> <p>A <del>target requirement</del> of 40% of the total <del>dwellings</del> number of <del>residential units</del> in all other areas.</p> <p>A threshold of 104 dwellings or more <b>or where the site area is 0.5 hectares or more</b> with a maximum combined gross internal floor space of 1,000sqm will apply in all other areas of the District.</p> <p><del>10% of all homes on individual sites should be affordable home ownership products, including starter homes and shared ownership. The mix of ownership options will be subject to identified local needs.</del></p> <p><del>Standalone new settlements by virtue of their size will be subject to separate viability appraisals, including on affordable housing.</del></p>	<p>To aid clarity</p> <p>To aid clarity</p> <p>To aid clarity</p> <p>To ensure consistency with national policy.</p> <p>To remove reference to Garden Communities</p>	<p><b>No change to SA findings:</b> The previously identified significant positive effect in relation to SA objective 2: <b>'Housing'</b> remains, despite the removal of the requirement for 10% of all homes on individual sites to be affordable, as the Local Plan will continue to deliver the objectively assessed need for affordable housing in the District.</p>
MM	LPP 34	<p>b. the settlement within which the development is to take place should have a population of less than 3,000 in order to provide for affordable homes in perpetuity.</p> <p><b>b. The site is located within an area designated as a rural area by the Secretary of State under the Housing Act 1996 (or any successor legislation)</b></p>	To aid clarity	<p><b>No change to SA findings:</b> The previously identified significant positive effect for SA objective 2: <b>'Housing'</b> remains valid.</p>
MM41	LPP 35	<p>b. Health services should be available on site or in close proximity and have capacity to accommodate the additional services required from residents, <b>or proposals should provide appropriate mitigation</b></p>	To aid clarity	<p><b>No change to SA findings:</b></p> <p>The Reg. 19 Policy LPP 35 does not identify individual site allocations for</p>

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		<p>Minor extensions to, or the expansion of existing specialist housing in the countryside may be acceptable if, <b>in addition to the criteria a; b; c and d above</b>, all the following criteria are met;</p>				<p>To aid clarity</p>	<p>specialist housing. Specialist housing sites identified on the Proposal Map were instead appraised in Chapter 10 of the 2017 SA Report, as part of the policy-off appraisals of all proposed site allocations. The appraisal of Main Modifications to LPP 35 therefore is restricted to consideration of changes to the policy text.</p> <p>The specialist housing sites allocated in the Reg 19 Plan were KELV 332, HATR 309, SIB 2CH and BOCN 134. Chapter 4 of this SA Addendum contains the policy-off appraisals of all site allocations that are new or have been amended since the 2017 SA Report, including any specialist housing sites but excluding any sites where construction has started. KELV 332 and HATR 309 have not changed since the 2017 SA Report and construction has started on sites SIB 2CH and BOCN 134. Therefore, none of these four sites are being reassessed in Chapter 4.</p> <p>The proposed Main Modification requires health services to be available on or in close proximity to Specialist Housing sites or for proposals to provide appropriate mitigation which reinforces the previously identified minor positive effect in relation to SA objective 3: <b>'Health'</b>.</p>
MM42	LPP36	Gypsies and Travellers	GTAA	SHMA	Total	To correct error	<p><b>No change to SA findings:</b> The previously identified significant positive effect in relation to SA</p>

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		Meet planning definition	2	0	2		objective 2: <b>'Housing'</b> remains, despite the reduction in the number of pitches for Gypsy and Traveller (G&T) accommodation, as the Local Plan will continue to deliver the identified need for G&T accommodation in the District. The policy requires proposals for G&T accommodation to be designed to protect local amenity which will reinforce the minor positive effect identified for SA objective 1: <b>'Community safety &amp; cohesion'</b> .
		May meet planning definition	4	4	<del>8</del> 4 <sup>a</sup>		
		Not meeting planning definition	0	20	20		
		Total	6	24	<del>30</del> 26		
		Travelling Showpeople	GTAA	SHMA	Total		
		Meet planning definition	5	0	5		
		May meet planning definition	1	0	1		
		Not meeting planning definition	0	0	0		
		Total	6	0	6		
		1 <sup>st</sup> paragraph	<p><sup>a</sup>The GTAA and SHMA studies double counted pitch needs which fall under this definition.</p> <p>The Council will allocate <del>seek</del> up to <del>30</del> 26 pitches for Gypsy and Traveller Accommodation, at Strategic Growth Locations <del>and the garden communities</del>, or through the planning application process.</p>				

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	<p>3<sup>rd</sup> paragraph</p> <p>4<sup>th</sup> paragraph</p> <p>Final paragraph</p>	<p>6 travelling showpersons plots will be sought at the Strategic Growth locations <del>and garden communities</del>, through the planning application process, or through the expansion or intensification of existing sites.</p> <p><del>However if insufficient sites have been proposed or sites are no longer likely to come forward than any additional sites.</del> <b>Planning applications for Gypsy and Traveller or Travelling showpersons sites</b> must meet all the following criteria;</p> <p>c. Are located, designed and landscaped to minimise their impact on the environment <del>and to protect local amenity</del></p> <p>In addition, plots for travelling showpersons must be large enough for the safe storage and maintenance of rides and equipment, <b>and to protect local amenity.</b></p>	<p>To remove reference to Garden Communities</p> <p>For clarity</p> <p>To ensure consistency with national policy</p>	
MM43	<p>LPP37</p> <p>1<sup>st</sup> paragraph</p> <p>5<sup>th</sup> paragraph</p>	<p>Housing <del>Mix, Type and Density</del> <b>and Accessibility</b></p> <p>Development <del>should seek to</del> <b>shall</b> create sustainable, inclusive...</p> <p><del>‘10% of new market homes on sites of 10 or more dwellings must meet category 2 or 3 of part M of Buildings Regulations 2015 as appropriate.</del></p> <p><b>A minimum of 10% of new market homes on sites of 10 or more dwellings must meet Category M4(2) or Category M4(3)(2)(a)/(b) – Wheelchair Accessible’ dwellings of Building Regulations 2015, or as superseded, as appropriate.</b></p> <p><del>10% of new affordable homes on all sites must meet category 2 or 3 of part M of Buildings Regulations 2015 as appropriate.</del> <b>All new affordable homes on ground floor level must meet Category M4(2) or M4(3). For developments within or adjacent to the Main Towns</b></p>	<p>To better reflect contents of the policy</p> <p>For clarity</p> <p>For clarity and to reflect building regulations</p> <p>For clarity and to reflect building regulations.</p>	<p><b>No change to SA findings:</b> The proposed Main Modification provides clarity on the accessibility standards to be delivered in housing developments. Therefore, the significant positive effect previously identified in relation to increasing the range of housing to meet the specific needs of all social groups in the District (SA objective 2: <b>'Housing'</b>) is reinforced.</p>

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	6 <sup>th</sup> paragraph	<p><b>and Key Service Villages, 5% of all new affordable homes will be required to meet Category M4(3)(2)(a)/(b) – Wheelchair Accessible’ dwellings - of Building Regulations 2015, or as superseded, as appropriate.</b></p> <p>Within the main towns 5% of all affordable units will be required to meet Category 3 of Part M <del>M4(3)(2)(a) – ‘Wheelchair Accessible’ dwellings – of Building Regulations 2015, or as superseded, as appropriate.</del></p>		
	7 <sup>th</sup> paragraph	<p>On sites of 500 dwellings or more, <b>serviced plots equating to 2% of overall</b> homes will be required to be <b>made</b> available for self or custom builders.</p>	For clarity	
	8 <sup>th</sup> paragraph		For clarity	
MM44	LPP38	<p>e. There should be no <del>adverse material unacceptable</del> impact on the identity of the street scene and/or the appearance of the countryside</p> <p><b>h. Annexes shall not be self-contained and shall share a physical and functional relationship with the host dwelling</b></p>	<p>To ensure consistency with national policy</p> <p>For clarity</p>	<p><b>No change to SA findings:</b> The proposed Main Modification to require annexes to share a physical and functional relationship with the host building will not alter the previously reported SA findings for this policy.</p>
MM45	LPP39	<p>b. The replacement dwelling and any outbuildings would not have a more harmful impact, or be more intrusive on the landscape or countryside setting, or the setting of <del>any</del> heritage assets <b>and their settings</b>, than the original dwelling...</p>	<p>To ensure the policy is consistent with national guidance</p>	<p><b>No change to SA findings:</b> The proposed Main Modification provides greater support for the protection of heritage assets and their settings which reinforces the minor positive effect identified for SA objective <b>10: ‘Historic environment’</b>.</p>
MM46	LPP40	<p>a. There is a clearly-established functional need for a full-time worker to live on <del>this</del> <b>the</b> site in the countryside.</p>	<p>To aid clarity</p>	<p><b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.</p>

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		d. The new dwelling should be well-related to <b>any</b> existing buildings, whilst retaining the ability to meet the identified functional need		
MM47	LPP41	This policy will not apply to proposals for <del>isolated new dwellings</del> or the extension of ribbon development and will not apply to gaps which could accommodate more than one dwelling.	To aid clarity	<b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.
MM48	LPP42	<del>a. The location of the site is accessible and sustainable in the terms of the framework</del>  <b>a. The site is no longer suitable and has been marketed for commercial use</b>	To ensure consistency with national policy	<b>Change to SA findings:</b> The proposed Main Modification clarifies that buildings in the countryside must be no longer suitable for commercial uses before being considered for conversion to residential uses. Therefore, the previously identified minor negative effects in relation to <b>SA objectives 3: 'Economy'</b> , and <b>8: 'Accessibility'</b> are revised to negligible effects.
MM49	LPP43	<del>The extension of a garden within a defined settlement boundary or the countryside will only be permitted where all the following criteria are met;</del>  d. It does not enclose areas intended for amenity open space including, but not limited to those identified on the Proposals Map for visually important open space, allotments, <b>structural landscaping</b> , informal or formal recreation.  g. It would not interfere with any neighbouring use, including <del>farming</del> <b>agriculture</b>  <b>Appropriate boundary treatments for the area to be enclosed, including the planting of native species will be specified. The</b>	For clarity  For clarity  For clarity  To provide clarity	<b>No change to SA findings:</b> The proposed Main Modifications provide clarity on appropriate boundary treatments, including the planting of native species, and where extensions of gardens are permitted (provided it does not enclose areas intended for structural landscaping or it does not interfere with neighbouring agricultural uses). Therefore, the significant positive effects identified in relation to SA objective <b>6: 'Biodiversity &amp; geodiversity'</b> and SA objective <b>15: 'Landscape and townscape'</b> are reinforced.

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		<del>Council will impose conditions removing permitted development rights over the new area of the garden.</del>		
MM50	LPP44 1 <sup>st</sup> bullet  Last bullet  7 <sup>th</sup> paragraph	<p>...to offer multi user routes for walking, cycling and other recreational opportunities <b>such as horse riding</b></p> <p>Facilities for charging plug-in and other ultra-low emission vehicles <b>will be provided at all new residential properties</b></p> <p><del>Highway works(S278) and/or financial contributions(S106) from development proposals will be sought, where appropriate and viable, towards achieving the above objectives including the construction of new or improvement of the existing PROW network-off-site cycleway and footpaths,</del> and additional off-site car parking, if required.</p>	<p>For clarity</p> <p>To provide clarity</p> <p>For clarity to respond to the comments of consultees</p>	<p><b>No change to SA findings:</b> The proposed Main Modification requires facilities for charging plug-in and other ULEVs to be provided at all new residential properties which strengthens the significant positive effect previously identified for SA objective 11: '<b>Climate change mitigation</b>'.</p> <p>The minor wording changes relating to horse riding, the existing PROW network or Highway works (S278) do not alter the previously identified findings of the SA, including the significant positive effects for SA objectives 7: '<b>Sustainable travel</b>' and 8: '<b>Accessibility</b>'.</p>
MM51	LPP45	<p>Existing car parks serving the main town centres, retail, leisure facilities and train stations are allocated on the Proposals Maps <b>and set out below</b>, and will be protected for this use.</p> <p>Proposals for alternative uses <b>of the above sites</b> will only be acceptable where it can be shown to the satisfaction of the Local Planning Authority that these car parking spaces are being re-provided in an equal or better position to serve that main use.</p>	To aid clarity	<p><b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.</p>
MM52	LPP46	<p>...such as hedgerows, <b>hedgerow trees</b> and other structural elements contributing to the historic features of the lanes.</p>	<p>For clarity</p> <p><del>Move policy and supporting text to natural environment section and renumber accordingly</del></p>	<p><b>No change to SA findings:</b> The proposed Main Modification to conserve hedgerow trees along protected lanes strengthens the previously identified significant positive effects for SA objective 6: '<b>Biodiversity &amp; geodiversity</b>' and</p>

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				SA objective 15: 'Landscape and townscape'.
MM53	LPP47	<p>Strict control will be exercised over development in these areas <del>to, which will be restricted to the following Use Classes below:</del> transport related development comprising of either;</p> <p><del>C1</del> overnight accommodation</p> <p>Appropriate sui generis, such as petrol filling station, car showrooms, car wash, car rental or garden centres and ancillary <del>retail</del> uses, or</p> <p><del>D4</del> Nursery <b>and café/restaurants which fall within the E use class</b></p> <p><del>A3</del> café/restaurant.</p>	To reflect use class changes	<b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.
MM54	LPP48	<ul style="list-style-type: none"> <li><del>• A131 Sudbury Western Bypass as it passes through the District</del></li> <li><del>• A new link road between Inworth Road and the A12 Kelvedon North/Feering junction</del> <b>Provision of a new connection between Inworth Road and London Road</b></li> </ul>	<p>This road project is not being taken forward by SuffolkCC</p> <p>To reflect wording in site specific policy</p>	<b>No change to SA findings:</b> The proposed Main Modification removes reference to the A131 Sudbury Western Bypass in Braintree which is no longer being developed and updates the wording relating to the new connection between Inworth Road and London Road. Therefore, the minor positive effect identified for SA objective 8: ' <b>Accessibility</b> ' remains valid as the new road connection will improve access to services and facilities and will ease traffic congestion.
MM55	LPP49 2 <sup>nd</sup> paragraph	Connection should include the installation of appropriate cabling within the homes or business units as well as a fully enabled connection of the developed areas to the full main telecommunications network to provide <b>capability</b> for the fastest available broadband access.	To aid clarity	<b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.
MM56	LPP50	The Council will promote and secure <del>the highest possible</del> <b>a high</b> standards of design...	To ensure consistency with national policy	<b>No change to SA findings:</b> The proposed Main Modification provides greater support for the protection of

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		a. ...significance, conservation areas, registered parks and gardens, <b>scheduled monuments</b> and areas of high archaeological and landscape sensitivity <del>including designated heritage assets</del>		heritage assets requiring high standards of design in all new developments which reinforces the significant positive effect previously identified for SA objective <b>10: 'Historic environment'</b> .
MM57	LPP51	Developments shall achieve <del>a high the highest</del> standards of accessible and inclusive design to ensure that they;....	To ensure consistency with national policy	<b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.
MM58	LPP52	<p><b>To ensure new development is designed to promote good health all developments over 50 residential units and non-residential developments over 1,000sqm will be required to undertake a Health Impact Assessment having regard to the Essex Design Guide Supplementary Guidance on Health Impact Assessments. Negative health impacts identified in a Health Impact Assessment must be resolved in the development or mitigations secured through planning condition(s) and / or a Section 106 Agreement.</b></p> <p>2<sup>nd</sup> paragraph  <del>For all Use Class C2 developments comprising residential care homes and nursing homes, Use Class C3 residential developments in excess of 50 units and non-residential developments in excess of 1,000sqm, this will take the form of a Health and Wellbeing Impact Assessment. This will measure the wider impact upon healthy living and the demands placed upon the capacity of health services and facilities arising from the development.</del></p> <p>3<sup>rd</sup> paragraph  <del>For Use Class A5 developments (hot food takeaways), a health Impact Assessment will be required....</del>  <del>In addition, proposals for new hot food takeaways within 400m walking distance from the entrance points of primary or secondary schools will</del></p>	To provide clarity and ensure consistency with national policy	<p><b>No change to SA findings:</b> The proposed Main Modification requires developments of over 50 residential units and non-residential development over 1,000 sq. m to undertake a Health Impact Assessment, having regard to the Essex Design Guide SG on HIAs, and where negative health impacts are identified in the HIA, they must be resolved in the development or mitigations secured through planning conditions or a Section 106 Agreement. Therefore, the previously identified significant positive effect for SA objective <b>3: 'Health'</b> is reinforced.</p> <p>The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.</p>

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	<p>4<sup>th</sup> paragraph</p> <p>5<sup>th</sup> paragraph</p>	<p>be restricted in order to promote the health and wellbeing of school pupils. Hours of opening will be limited to after 5pm on school days and lunch time opening will only be permitted where schools within 400m do not allow pupils to freely leave school premises during lunch breaks.</p> <p>Where significant <b>adverse</b> health and wellbeing impacts are identified...</p> <p><del>The District Council will require Health and Wellbeing Impact Assessments to be prepared in accordance with the advice and best practise for such assessments as published by the Department of Health and other agencies such as NHS organisations across Essex. The impact of the development on health and wellbeing will need to be explained.</del></p>		
MM59	<p>LPP53</p> <p>New 1<sup>st</sup> paragraph</p> <p>3<sup>rd</sup> paragraph</p>	<p><b>All developments will be expected to provide new open spaces in line with the requirements set out in the Open Spaces Supplementary Planning Document 2009 or successor document.</b></p> <p>Where the Council has identified, <b>in an up-to-date and robust evidence base and strategy</b>, a surplus in one type of open space or sports and recreational facility but a deficit <b>or qualitative issues</b> in another type, planning conditions or obligations may be used to secure part of the development site for the type of open space or sports and recreational facility that is in deficit <b>or needs quality improvements to increase capacity</b>. The Council will also consider where development may also provide the opportunity to exchange the use of one site for another to substitute for any loss of open space, or sports or recreational facility. <b>Such replacement provision should be</b></p>	<p>Paragraphs reordered</p> <p>To aid clarity</p> <p><b>To ensure the policy is effective and positively prepared</b></p>	<p><b>Change to SA findings:</b> The proposed Main Modification specifically sets out that all developments will be expected to provide new open spaces which will strengthen the previously identified minor positive effect for SA objective <b>3: 'Health'</b> to a significant positive effect. To further reinforce the positive effect, the policy also specifies that any replacement provision should be equivalent or better in terms of quality and quantity and be in a suitable location.</p>

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		<p><b>equivalent or better in terms of quality and quantity and be in a suitable location.</b></p> <p>For small sites where on-site provision is impractical, consideration will be given to opportunities for off-site provision or improvements within the ward or an adjacent ward.</p> <p>Open space, <del>and sports and recreational</del> <b>land and buildings</b> facilities that <b>are identified as needed in the Council's Open Space Study</b> <del>and/or are of high quality, or of particular value to a local community,</del> will be recognised and given protected by the Council. Areas of particular quality may include;</p> <ul style="list-style-type: none"> <li>• Small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities</li> <li>• Areas of open space that provide a community resource and can be used for informal or formal events such as community religious and cultural festivals</li> <li>• Areas of open space that particularly benefit wildlife and biodiversity</li> <li>• Areas identified as visually important on the proposals map</li> <li>• Play areas, and sport and recreation grounds and associated facilities</li> </ul> <p>Existing open space, sports and recreational land and buildings <del>and land</del> shall not be lost or built on unless an a robust and up to date assessment has been undertaken which has clearly demonstrated that <del>the open space or the buildings and land to be</del> <b>they are</b> surplus to requirements <b>or the proposed development is otherwise compliant with this policy as a whole.</b> For open space, 'surplus to requirements' should include consideration of all the functions that open space can perform. Not all open space, sport and recreational land and buildings</p>	<p style="color: red;">For clarity</p>	
4 <sup>th</sup> paragraph				
1 <sup>st</sup> paragraph				
2 <sup>nd</sup> paragraph				



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				detriment to the character of the local area, which reinforces the minor positive effect identified for SA objective <b>15: 'Landscape and townscape'</b> .
<b>MM61</b>	LPP55	<p>2. Buildings and structures should be of the highest architectural quality</p> <p>5. Designs shall be sensitive to the need to conserve <b>and enhance</b> local features...</p> <p>9. Landscape proposals should <i>consist of</i> native plant species and their design shall promote and enhance local biodiversity and historic environmental assets. <b>Biodiversity net gain through the provision of new priority habitat where appropriate is encouraged.</b>  <b>Development layouts must be appropriately designed to accommodate structural tree and hedge planting and ensure that future interference with highway safety, roads, pavements, services and properties is minimised.</b> <del>The planting of trees in inappropriate places such as highway verges and in close proximity to dwellings shall be avoided in order to prevent interference with highway sight lines and root damage to roads, pavements and properties</del></p> <p>11. Use of sustainable modes of transport are promoted in the design and layout of new development, the highway impact shall be assessed and the resultant traffic generation and its management shall seek to address safety concerns. <del>and avoid significant increases in traffic movement, particularly in residential areas.</del> <b>Developments which will result in a severe impact upon the highway network (taking into account cumulative impacts) will be refused unless they can be effectively mitigated.</b></p> <p>18. <del>The provision of P</del>private outdoor amenity space shall be provided <del>in accordance with having regard to</del> the standards set out in the Essex Design Guide, <b>or its successor</b>, and shall be accessible, usable and well-related to the development.</p> <p><b>19. Development proposals should demonstrate that adequate</b></p>	<p>To ensure consistency with national policy</p> <p>To respond to consultee comments</p>	<p><b>No change to SA findings:</b> The proposed Main Modifications to Policy LPP 55 reinforce the minor positive effects previously identified for SA objectives <b>6: 'Biodiversity &amp; geodiversity'</b>, <b>7: Sustainable travel'</b>, <b>8: 'Accessibility'</b>, <b>10: 'Historic environment'</b>, <b>12: 'Water environment'</b> and <b>15: 'Landscape and townscape'</b>.</p>

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		<b>foul water treatment and disposal already exists or can be provided in time to serve the development</b>		
MM62	LPP57	<p>Demolition of an unlisted building or structure in a Conservation Area will only be granted in the most exceptional circumstances, where <b>all</b> the following criteria are fully satisfied;</p> <p>b. The structure to be demolished makes a negative <b>or neutral</b> contribution to the character or appearance of the Conservation Area</p> <p>d. A detailed redevelopment scheme is included and approved as part of the demolition proposal which would preserve or enhance the character <b>and-or</b> appearance of the area</p>	<p>To add clarity</p> <p>To ensure the policy is consistent with national guidance</p>	<p><b>No change to SA findings:</b> The proposed Main Modification reinforces the minor positive effects identified for SA objectives <b>10: 'Historic environment'</b> and <b>15: 'Landscape and townscape'</b>, as demolition of unlisted buildings will only be permitted in exceptional circumstances where all of the policy criteria are satisfied.</p>
MM63	LPP60	<p>Development of internal, or external alterations, or extensions, to a listed building or listed structure (including any structures defined as having equivalent status due to being situated within the curtilage of a listed building and locally listed heritage assets) and changes of use will be permitted when all the following criteria are met;</p> <p><b>For designated heritage assets: the development meets the tests set out in national policy.</b></p> <p>a. <del>The works or uses do not harm the significance of the setting, character, structural stability, and fabric of the building or structure</del></p> <p>b. <del>The works or uses do not result in substantial harm, or damage to the building or structures historic and architectural elements which are considered to be of significance or special importance</del></p> <p><b>For all heritage assets:</b></p>	<p><b>To ensure consistency with national policy</b></p>	<p><b>No change to SA findings:</b> The proposed Main Modification does not alter the SA findings previously identified, including the significant positive effect for SA objective <b>10: 'Historic environment'</b>.</p>

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		<p><b>ea.</b> The works or uses include the use of appropriate materials and finishes</p> <p><b>eb.</b> The application submitted contains details of the significance of the heritage asset, within a Heritage Statement which should include any contribution made by their setting</p> <p><b>ec.</b> There may be a requirement for appropriate specialist recording to be carried out prior to the change of use, demolition or conversion of a listed building or associated historic building</p>		
MM64	LPP61	<p><b>e a. All reasonable efforts have been made to sustain existing uses, find viable new uses through appropriate marketing or secure preservation through a form of charitable or community alternative ownership and that these efforts have failed</b></p> <p><b>a b</b></p> <p><b>b c.</b> The redevelopment of the site would provide <b>a substantial</b> <del>an extraordinary benefit for the local area which would decisively</del> <b>public benefit that</b> outweighs the loss resulting from demolition</p> <p><b>e d</b></p> <p><b>d e</b></p>	To ensure consistency with national policy	<p><b>Changes to SA findings:</b> The proposed Main Modification allows for the demolition of listed buildings or structures where the redevelopment of the site would provide substantial public benefits that outweigh the loss resulting from demolition. Therefore, a minor positive effect is identified for SA objective 1: <b>'Community safety &amp; cohesion'</b>.</p> <p>The applicant must demonstrate that they have taken all reasonable measures to sustain the existing use of the listed building or structure including finding viable alternative uses or ownership, which reinforces the significant positive effect identified for SA objective 10: <b>'Historic environment'</b>.</p>
MM65	Paragraph 7.43, 7.44 Policy LPP62	Delete policy and supporting text	To avoid repetition of national policy	<p><b>Changes to SA findings:</b> The proposed deletion of Policy LPP 62 'Enabling Development' means that the effects previously identified in the SA will no longer occur as part of the Section 2 Local Plan.</p>

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MM66	LPP63	Where important archaeological remains are thought to be at risk from development, or if the development could impact on a Scheduled Monument of <del>Historic</del> <b>Registered</b> Park and Garden, the developer...	To ensure consistency with national policy	<b>No change to SA findings:</b> The minor wording change to refer to Registered Parks and Gardens rather than Historic Parks and Gardens does not alter the previously identified findings of the SA, including the significant positive effect for SA objective <b>10: 'Historic environment'</b> .
MM67	LPP64	a) It can be clearly demonstrated that the use of the site is genuinely redundant and no other alternative educational or community use can be found. <del>B Lodge Farm Witham</del>	To respond to consultee comments  Added in error	<b>Changes to SA findings:</b> The removal of Lodge Farm, Witham as an allocation will result in the previously identified significant negative effect for SA objective <b>16: 'Soil'</b> being revised to a negligible effect, as the remaining site allocation, GGHR 284A, does not include any Grade 1, 2 or 3 Best & Most Versatile (BMV) agricultural land.
MM68	LPP65	<del>In addition to community facilities as specified in the NPPF, the following assets....'</del>	To respond to changes in use class order	<b>No change to SA findings:</b> The revision of the terminology to reflect the recent changes in the Use Class Orders will not alter the previously identified findings of the SA.
MM69	Policy LPP67	Development proposals must take available measures to ensure the protection and <del>where appropriate</del> the enhancement of the natural environment, habitats, biodiversity and geodiversity of the District <b>and to be acceptable, also taking climate change and water scarcity into account in their design</b> This will include, <del>where appropriate</del> , protection from pollution. <b>Proposals inside the district which are likely to adversely affect, either individually or cumulatively, International or Nationally designated nature conservation sites within and outside the district will not normally be acceptable.</b>  The Council will expect all development proposals, where appropriate, to contribute towards the delivery of new Green	To respond to comments of consultees	<b>Changes to SA findings:</b> The proposed Main Modification reinforces the significant positive effects previously identified for SA objectives <b>6: 'Biodiversity &amp; geodiversity'</b> , <b>11: 'Climate change mitigation'</b> , and <b>15: 'Landscape and townscape'</b> . The creation and enhancement of GI will revise the negligible effects previously identified for SA <b>objectives 7: 'Sustainable travel'</b> , <b>12: 'Water environment'</b> , <b>13:</b>

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		<p>Infrastructure which develops and enhances a network of multi-functional spaces and natural features throughout the District. This will be proportionate to the scale of the proposed development and the rural or urban context. The Council will support and encourage development which contributes to the District's existing Green Infrastructure and where possible enhances and protects networks and adds to their functions. It will secure additional provision where deficiencies have been identified. <b>Open space and green infrastructure may in some instances be required to provide alternatives to European sites in accordance with the Section 4 Sustainability Appraisal, and that such sites should be designed and managed appropriately to maximise their potential effectiveness in this role.</b> Proposals which undermine these principles will not be acceptable.</p>	<p>To respond to comments of consultees and to aid clarity</p>	<p><b>Flood risk', 14: Air quality, and 16: 'Soil'</b> to minor positive effects.</p>
<p>MM70</p>	<p>LPP68</p> <p>1<sup>st</sup> paragraph</p> <p>2<sup>nd</sup> paragraph</p>	<p><b>1. Protected Sites, Priority Species and Priority Habitat</b></p> <p><b>(a) National and Internationally Designated sites</b></p> <p>Sites designated for their international, <del>and European and national</del> importance to nature conservation; including Ramsar sites, Special Protection Areas (<b>SPA</b>), Special Areas of Conservation (<b>SAC</b>), should be protected from development that would have an adverse effect on their integrity whether they are inside or outside the District. <del>Proposals likely to have an adverse effect will require a full assessment in line with European legislation.</del></p> <p><del>Planning permission for major development will be refused in these areas except in exceptional circumstances where overriding public interest be demonstrated.</del></p> <p><b>Proposals which are considered to have a likely significant effect on these sites will require an Appropriate Assessment (AA) in line with European and domestic legislation. Developers should provide information sufficient to inform this assessment. Planning</b></p>	<p>To improve clarity and ensure consistency with national policy</p>	<p><b>No change to SA findings:</b> The proposed Main Modification provides greater support for the protection and enhancement of biodiversity, by outlining that proposals for residential developments must contribute to the mitigation measures defined in the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), to avoid impacts of recreational disturbance on habitats sites. Therefore, the previously identified significant positive effect for SA objective 6: <b>'Biodiversity &amp; geodiversity'</b> is strengthened.</p>

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	<p>permission will only be granted if, in light of the AA, it can be ascertained that the development would not adversely affect the integrity of these sites or, if there are no alternative solutions, imperative reasons of overriding public interest can be demonstrated.</p> <p><b>In accordance with the Habitats Regulations</b>, development proposals should follow the avoid-mitigate-compensate hierarchy. Where this cannot be achieved, development proposals will not be permitted.</p> <p><b>Residential developments must contribute to the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038 (RAMS) where they fall within the Zones of Influence of international designations as defined in the RAMS, in accordance with SP2.</b></p> <p><b>(b) Nationally Designated sites</b></p> <p>Sites designated for their national importance to nature conservation; including Sites of Special Scientific Interest (SSSIs) and should also be protected from development which is likely to adversely affect the features for which they are designated. Where necessary, developers should therefore ensure that sufficient assessment of potential impacts to SSSIs is also submitted with any planning application.</p> <p><b>(c) Locally designated sites</b></p> <p>Proposals likely to have an adverse effect on a Local Wildlife Site (LWS), Local Nature Reserve (LNR) and Special Roadside Verge will</p>		
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	<p>5<sup>th</sup> paragraph</p> <p>6<sup>th</sup> paragraph</p>	<p>disfigure it; any tree surgery should be carried out to <b>reflect</b> BS3998:2010 <b>(as superseded)</b>.</p> <p>When considering the impact of development on good quality trees the Council will expect developers to <del>follow</del> <b>reflect</b> the best practice guidance set out in BS5837:2012 <b>(as amended)</b>. The standard recommends that trees of higher quality are a material consideration in the development process.</p> <p>Where trees are to be retained on new development sites there must be a suitable distance provided between the established tree and any new development to allow for its continued wellbeing and ensure it is less vulnerable to pressures from adjacent properties for its removal. Planning conditions will be applied to protect trees during development. New landscape proposals for tree planting on development sites should <del>conform</del> <b>reflect</b> to the recommendations set out in BS5837:2012 <b>(as superseded)</b> and BS8545:2014 <b>(as superseded)</b>.</p>		
MM72	LPP70	<p><del>The Council will require development to be in compliance with and contribute positively towards delivering the aims and objectives of the Anglian River Basin Management Plan.</del></p>	To avoid repetition	<p><b>No change to SA findings:</b> The proposed Main Modification removes reference to delivering the aims and objectives of the Anglian River Basin Management Plan as this is repeated in the supporting text. Therefore, the previously identified significant positive effect for SA objective <b>12: 'Water environment'</b> remains valid.</p>
MM73	<p>LPP71</p> <p>1<sup>st</sup> paragraph</p> <p>3<sup>rd</sup> paragraph</p>	<p>...expressed in NPPF <b>2012</b> paragraph 113.</p> <p>Proposals for new development should be informed by, and be sympathetic to the character of the landscape as identified in the District Council's Landscape Character Assessments. <del>Applications</del>  <b>Proposals which may impact on the landscape such as</b></p>	To ensure the plan remains up to date and effective	<p><b>No change to SA findings:</b> The proposed Main Modification requires proposals which may impact on the landscape such as settlement edge, countryside or large schemes, to undertake an assessment of their impact on the landscape. The remainder of the paragraph text states that development which would not successfully integrate into the local landscape will not be permitted.</p>

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		<p><b>settlement edge, countryside or large schemes</b> will be required to include an assessment of their...”</p>		<p>This ensures the protection of the quality of the District's landscapes and townscapes, thereby reinforcing the significant positive effect identified for SA objective <b>15: 'Landscapes and townscapes'</b>.</p>
MM74	LPP72	<ul style="list-style-type: none"> <li>Land between Braintree, <b>Rayne, Deanery Hill</b>, Panfield, Bocking and High Garrett</li> <li><b>Land between Earls Colne and White Colne</b></li> </ul>	Missing in error	<p><b>No change to SA findings:</b> The proposed Main Modification supports green buffers to be used to prevent the main towns coalescing with neighbouring villages. Therefore, the previously identified significant positive effect for SA objective <b>15: 'Landscape and townscape'</b> is reinforced.</p>
MM75	LPP73	<p>Development will not be permitted where, individually, or-cumulatively <b>and after mitigation</b>, there are likely to be unacceptable impacts arising from the development on;</p> <p>b. Health and safety of the public <b>including existing residents, and future occupiers of all new developments</b></p> <p>d. Surface <b>water</b> and groundwater quality, <b>groundwater source protection areas, drinking water protected zones</b></p> <p>e. Land and soil quality and condition</p> <p><b>e. Odour</b></p> <p><b>h. Noise</b></p>	<p>For clarity.</p> <p>For clarity</p> <p>To respond to comments of consultees</p>	<p><b>Changes to SA findings:</b> The minor positive effect previously identified for SA objective <b>3: 'Health'</b> is revised to a significant positive effect as the policy states that developments which negatively impact on the health and safety of the public, including from noise and odour pollution, will not be permitted, thereby protecting the health, safety and amenity of Braintree's population.</p> <p>The minor positive effect previously identified for SA objective <b>16: 'Soil'</b> is revised to a significant positive effect as the policy requires that soil quality must be protected during development.</p> <p>The modification of criterion D strengthens the significant positive</p>
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	<p>Before final paragraph</p> <p>Final paragraph</p>	<p><b>Soil quality must be protected during development to protect good quality land and to protect the ability of soil to allow water penetration by avoiding compaction.</b></p> <p>In appropriate cases, the Local Planning Authority may impose planning conditions or, including through a legal obligation, secure <b>mitigation measures</b>, remedial works and/or monitoring processes.</p>	<p>To respond to comments of consultees</p> <p>To ensure consistency with National policy</p>	<p>effect previously identified for SA objective <b>12: 'Water environment'</b>.</p>
<p>MM76</p>	<p>LPP74</p> <p>2<sup>nd</sup> paragraph</p>	<p><b>Applicants will be expected to demonstrate that measures to lower carbon emissions, increase renewable energy provision and adapt to the expected impacts of climate change have been incorporated into their schemes, other than for very minor development.</b> Planning permission will only be granted for proposals that demonstrate the principles of climate change mitigation and adaptation into the development. <del>Applicants must submit a Sustainability Statement to demonstrate how these principles have been embedded into the design of the development proposal. will be expected to accompany planning applications, and this will be considered as part of the means by which climate change and mitigation is considered. This will show what and how mitigation and adaptation measures have been incorporated into the design. Failure to provide such a statement will be viewed negatively.</del> <b>Guidance will be made available by the Council on the contents to be included in the Sustainability Statement.</b> The Council intends the District to meet part of its future energy needs through renewable <del>or</del> <b>and</b> low carbon energy sources and will therefore encourage and support the provision of <del>renewable and low carbon</del> <b>these</b> technologies subject to their impacts on landscape and visual amenity, residential amenities including noise, pollution, heritage assets <b>and their settings</b>, biodiversity and</p>	<p>To respond to comments of consultees</p> <p>To add improve clarity and effectiveness</p>	<p><b>No change to SA findings:</b> The proposed Main Modification requires developments to incorporate measures to lower carbon emissions, increase renewable energy provision and adapt to climate change. Planning permission will only be granted for proposals that demonstrate the principles of climate change mitigation and adaptation into the development. These modifications strengthen the significant positive effect previously identified for SA objective <b>11: 'Climate change mitigation'</b>. The modification to the policy requires low carbon and renewable energy developments to be designed to protect heritage assets and their settings which reinforces the minor positive effect previously identified for SA objective <b>10: 'Historic environment'</b>.</p>

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		<p>designated nature conservation sites, soils, and impact on the highway, being acceptable.</p> <p><del>Similarly, other proposals intended to mitigate and adapt to climate change will be expected to conform to other policies of the local Plan relating to layout, design and impact on their surroundings.</del></p>		
MM77	LPP75/77	<p><b>Combined policy LPP75 and LPP77 to read as follows</b></p> <p><b>Resource Efficiency, Energy Generation and Energy Efficiency</b></p> <p>The Local Planning Authority will encourage appropriate energy conservation and efficiency measures in the design of all new development. Such measures could include site layout and building orientation, natural light and ventilation, air tightness, solar shading, reducing water consumption and increasing water recycling in order to contribute to the reduction in their total energy consumption.</p> <p>Opportunities for decentralised energy networks will be encouraged and promoted where possible and where they conform to other Local Plan policies in order to reduce carbon emissions.</p> <p><b>All new dwellings shall meet the Building Regulations optional requirement for water efficiency of 110 litres/person/day</b></p> <p><del>All planning applications shall include renewable energy technology to provide at least 20% of the projected energy requirements of major developments, and 10% of minor developments, unless viability evidence demonstrates otherwise.</del></p>	To aid clarity and ensure consistency with national policy	<p><b>Combined Policy LPP 75 and LPP 77 – No change to SA findings:</b> The combined policy encourages greater energy efficiency in the design of all new developments and the incorporation of renewable and low carbon technology in all new residential developments. Therefore, significant positive effects are identified for SA objective 11: <b>'Climate change mitigation'</b> and 14: <b>'Air quality'</b> as this policy would result in energy conservation and increased renewable energy generation which would reduce GHG emissions associated with the burning of fossil fuels. Water efficiency measures suggested by the policy include reducing water consumption, increasing water recycling, and requiring new dwellings to meet water efficiency standards which will result in a significant positive effect for SA objective 12: <b>'Water environment'</b>. A minor positive effect is identified for SA objective 2: <b>'Housing'</b> as the quality standards for dwellings will improve. The previously identified SA effects for policies LPP 75 and</p>



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	9 <sup>th</sup> paragraph	The benefits of low carbon energy generating potential should be taken into consideration as part of the assessment.		
MM79	LPP78  The following additional text shall be inserted immediately prior to paragraph 1	<del>The Council will ensure that all proposals will be located to avoid the risk of flooding from all sources and where development must....</del>  <b>Development proposals should demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development</b>	To improve clarity  To respond to consultee comments	<b>Changes to SA findings:</b> The proposed Main Modification to LPP 78 (Flooding Risk and Surface Water Drainage) requires proposals to demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development. Therefore, the negligible effect previously identified for SA objective <b>12: 'Water environment'</b> is revised to a significant positive effect.
LPP80	LPP78 (whole policy reworded. Further Rewording afterwards in red)  1 <sup>st</sup> paragraph	<del>The Council will ensure that all proposals will be located to avoid the risk of flooding and where...</del> <b>Where</b> development must be located in an area of higher flood risk...  <del>Development will take climate change into account in accordance with the most up to date analysis of flood risk and will not increase flood risk elsewhere.</del>  <b>New</b> development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, <b>and will not increase flood risk elsewhere</b> . Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. <b>Where development must be located in an area of higher flood risk, it</b>	To aid clarity and to respond to consultee comments  To respond to consultee comments	The modifications to the policy reinforce the significant positive effect previously identified for SA objective <b>13: 'Flood risk'</b> .

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	2 <sup>nd</sup> paragraph	<p><b>must be designed to be flood resilient and resistant and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents into account.</b></p>		
	2 <sup>nd</sup> paragraph continued	<p>Inappropriate development will be steered away from flood zones and <b>For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site specific Flood Risk Assessment will be submitted which meets the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account by using the most up to date allowances available.</b></p>		
	3 <sup>rd</sup> paragraph	<ul style="list-style-type: none"> <li>• <del>Retain at least an 8m wide undeveloped buffer strip alongside Main Rivers and explore opportunities for riverside restoration. Any proposed development within 8m of a main river watercourse will require an environmental permit from the Environment Agency.</del></li> <li>• <del>Retain at least a 3m buffer strip on at least one side of an Ordinary watercourse. Any development that could impact the flow within and ordinary watercourse will require consent from Essex County Council (as LLFA).</del></li> <li>• <del>All new development within Floodzone 2 and 3 must not result in a net loss of flood storage capacity. Where possible opportunities should be sought to achieve an increase in the provision of floodplain storage.</del></li> <li>• <del>Ensure there is no adverse impact on the operational functions of any existing flood defence infrastructure and new development should not be positioned in areas which would be in an area of hazard should defences fail. Where the</del></li> </ul>		

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	<p>9<sup>th</sup> paragraph (moved)</p> <p>7<sup>th</sup> paragraph (moved)</p>	<p><del>development sites will benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.</del></p> <p>For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared.</p> <p>For developments located in areas at risk of fluvial flooding, safe access/egress must be provided for new development as follows in order of preference;</p> <ul style="list-style-type: none"><li>a. Safe dry route for people and vehicles</li><li>b. Safe dry route for people</li><li>c. If a. is not possible a route for people where the flood hazard is low and should not cause risk to people</li><li>d. If b. is not possible, a route for vehicles where the flood hazard permits access for emergency vehicles</li></ul> <p><b>d. If a. - c. is not possible planning permission will not usually be granted</b></p> <p>All new development in Floodzones 2 and 3 should not adversely affect flood routing and thereby increase flood risk elsewhere. <del>Opportunities should be sought within the site design to make a space for water.</del></p> <p><b>All new development within Floodzone 2 and 3 must provide adequate flood storage and not result in a net loss of flood storage capacity. <del>unless there is compensation on site or, rarely if not possible, off site</del></b></p>		
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	10 <sup>th</sup> paragraph	<p><b>Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.</b></p> <p>Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account by using the most up to date allowances available.</p> <p>a. Development shall not: Have an adverse impact on a watercourse, floodplain or its flood defences</p> <p>b. Should not impede access to flood defence and management facilities</p> <p>c. Where the cumulative impact of such developments would have a significant effect on local flood storage capacity of flood flows</p> <p>d. Where appropriate opportunities may be taken to reduce wider flood risk issues by removing development from the floodplain through land swapping</p>		
LPP81	LPP79 Paragraph 1	The Council will require development <del>to be in compliance with</del> <b>have regard to</b> and contribute positively towards delivering the aims and objectives of the Braintree and Witham Surface Water Management Plan as may be updated <del>or superseded</del> .	To ensure the policy is effective	<b>No change to SA findings:</b> The modification to the policy reinforces the significant positive effects previously identified for SA objectives <b>12: 'Water environment'</b> and <b>13: 'Flood risk'</b> .

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	Paragraph 3	All developments in Critical Drainage Areas (excluding minor housing extensions less than 50m2) which relate to a net increase in impermeable area <del>are to</del> <b>must</b> include	To ensure the policy is effective	
<b>MM82</b>	LPP80 2 <sup>nd</sup> Paragraph  5 <sup>th</sup> paragraph  6 <sup>th</sup> paragraph 7 <sup>th</sup> paragraph  Last bullet points to be combined	<p>SuD<del>s</del> design quality will be expected to <b>reflect</b> conform with the up-to-date standards encompassed in the relevant BRE, CIRIA standards, Essex County Council SuDs Design Guide (as updated) and Non-Statutory Technical Standards for Sustainable Drainage Systems, to the satisfaction of the Lead Local Flood Authority, <del>where practical.</del></p> <p><del>Opportunities shall be taken to integrate sustainable drainage within the development, creating amenity and enhancing biodiversity.</del></p> <p><del>It will be necessary to demonstrate why it is not achievable.</del></p> <p>SuDS design should be an integral part of the <del>design</del> <b>layout</b> and clear details of proposed...</p> <p>The dual use of land for Sustainable Urban Drainage and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space, <b>and</b> <del>W</del> where use as open space does not compromise the efficient and effective functioning of the SuDs in the short or longer term.</p>	To aid clarity  To aid clarity  To aid clarity  To aid clarity	<b>No change to SA findings:</b> The proposed Main Modification will not alter the minor positive effects identified for SA objectives <b>3: 'Health', 6: 'Biodiversity &amp; geodiversity', 12: 'Water environment'</b> or the significant positive effect for SA objective <b>13: 'Flood risk'</b> .
<b>MM83</b>	LPP81	Proposals for external <b>lighting within development proposals and standalone lighting schemes</b> , <del>or</del> will be permitted where all the following criteria are met;	To aid clarity	<b>No change to SA findings:</b> The proposed Main Modification requires developments for external lighting to limit the hours of illumination which

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		<p>Proposals for external lighting will be permitted where all the following criteria are met;</p> <p>a. The lighting is designed as an integral element of the development and shall be built to a standard capable of adoption by the Highway Authority</p> <p>b. Low energy lighting is used in conjunction with features such as movement sensors, daylight sensors, and time controls <b>and hours of illumination shall be controlled.</b></p> <p>c. The alignment of lamps and provision of shielding minimises spillage, glare and glow, including into the night sky</p> <p>d. The lighting intensity is no greater than necessary to provide adequate illumination</p> <p>e. There is no loss of privacy or amenity to nearby residential properties and no danger to pedestrians and road users</p> <p>f. There is no harm to biodiversity, natural ecosystems, intrinsically dark landscapes and/or heritage assets</p> <p><del>Consideration should be given to time management and limiting the hours of use for external lighting of all the development.</del></p>		will protect local amenity thereby contributing to the significant positive effect identified for SA objective 1: <b>Community safety &amp; cohesion</b> '.
MM84	LPP82	continuation of bullet points in text instead of final paragraph	To correct error	<b>No change to SA findings:</b> Formatting error.
MM85	Appendix 1	The Publication Draft Local Plan Housing Trajectory currently within the Submitted Plan to be replaced by the updated trajectory which is Appendix 1 to Topic Paper 2. It is also suggested that Figure 1 of this Topic Paper be included.	To reflect updated housing position	MM85 and MM86 relate to part of the plan which was not previously appraised in the SA and so it does not need to be appraised as part of this SA process.
MM86	Appendix 3	<b>The Publication Draft Local Plan schedule of housing allocations currently within the Submitted Plan as Appendix 3 to be replaced by the updated schedule.</b>	To reflect updated housing position	

## **Appendix E**

### **Reasons for selecting or rejecting reasonable alternatives**