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# **Braintree District Publication Draft Local Plan**

## **Sustainability Appraisal: Non-Technical Summary**

Prepared by LUC  
May 2017

**Project Title:** Sustainability Appraisal for Braintree District Publication Draft Local Plan: Non-Technical Summary

**Client:** Braintree District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	17/05/2017	Sustainability Appraisal for Braintree District Publication Draft Local Plan: Non-Technical Summary	Sarah Temple	Sarah Smith	

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## Introduction

- 1.1 This Non-Technical Summary relates to the Sustainability Appraisal Report for the Braintree District Local Plan, which is being produced by Braintree District Council. The Local Plan sets out the long-term spatial vision and objectives for the District and the policies that are required to deliver that vision over the period up to 2033.
- 1.2 Plans and strategies such as the Braintree District Local Plan are subject to a process called Sustainability Appraisal, which assesses the likely effects of a plan on social, economic, and environmental issues. Braintree District Council has commissioned independent consultants (LUC) to carry out the Sustainability Appraisal of the Local Plan. The Sustainability Appraisal Report and this Non-Technical Summary incorporate all of the work undertaken by LUC.
- 1.3 This Non-Technical Summary relates to the full Sustainability Appraisal (SA) Report for the Publication Draft version of the Local Plan.

## The Braintree District Publication Draft Local Plan

- 1.1 The Braintree District Core Strategy was adopted in 2011. In the first half of 2014, a Strategic Housing Market Assessment (SHMA) was produced to update the Council's evidence on housing need. The SHMA indicated that between 761 and 883 new dwellings were required per year in the District to 2026, which was 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), the Council resolved in June 2014 not to proceed with its draft Site Allocations and Development Management Plan, for which Publication Draft consultation had been completed, and instead commence work on a new Local Plan.
- 1.2 The Braintree District Local Plan will include all major planning policy for the District which, once complete, will replace both the Core Strategy (adopted 2011) and the Local Plan Review saved policies (adopted 2005).
- 1.3 The work completed on the Site Allocations and Development Management Plan and the comments which were received during consultation on the Publication Draft of that document will be rolled forward into the new Local Plan. It is therefore not the intention of the Council to review in detail all the decisions relating to minor site allocations and settlement boundary changes which have been agreed by the Local Development Framework LDF Sub Committee and Council over the last two years.
- 1.4 The Council has consulted on two versions of the Local Plan so far, namely the Issues and Scoping version (January-March 2015) and the Draft Local Plan (June-August 2016). The Publication Draft Local Plan is currently scheduled for consultation between the 16<sup>th</sup> of June and the 28<sup>th</sup> of July 2017.
- 1.5 Following consultation on the Publication Draft version of the Local Plan, it may be necessary for the Council to prepare focussed changes to the Plan and consult on these prior to submission of the Local Plan to the Planning Inspectorate and subsequent Examination in public. Each change to the Publication Draft Local Plan may require further SA work, depending upon the significance of the change being made.

## Sustainability Appraisal

- 1.6 Braintree District Council is required by law to carry out Sustainability Appraisal and Strategic Environmental Assessment (SEA) of the Local Plan, and appointed LUC to lead this work on its

behalf. The Government recommends that these two legal requirements are met through one integrated process, referred to as Sustainability Appraisal (or SA).

- 1.7 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the likely social, economic and environmental effects of the plan and the extent to which sustainable development is expected to be achieved through its implementation.
- 1.8 This Non-Technical Summary relates to the full SA Report for the Braintree District Publication Draft Local Plan (May 2017). The SA has been undertaken in stages alongside the preparation of the Local Plan in order to provide sustainability guidance as the plan is developed.
- 1.9 SA must be carried out in accordance with Government guidance<sup>1</sup> and (as an integrated SA and SEA process is being undertaken) must meet the requirements of the European Strategic Environmental Assessment Directive<sup>2</sup>.
- 1.10 **Table 1** below signposts how the requirements of the SEA Regulations have been met within the SA work undertaken to date (presented in the full SA Report and this Non-Technical Summary).

**Table 1 Requirements of the SEA Regulations and where these have been addressed**

SEA Regulations Requirements	Where covered in this SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Part 3 and Schedule 2 of the SEA Regulations):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapters 1 and 3 in the full SA report and summarised in this Non-Technical Summary.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 in the full SA report and summarised in this Non-Technical Summary.
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 2 in the full SA report and summarised in this Non-Technical Summary.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 in the full SA report and summarised in this Non-Technical Summary.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3 and Appendix 1 in the full SA report and summarised in this Non-Technical Summary.

<sup>1</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>2</sup> European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.

SEA Regulations Requirements	Where covered in this SA report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Chapters 4-11 in the full SA report and summarised in this Non-Technical Summary.
g) 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;	Chapters 4-11 in the full SA report and summarised in this Non-Technical Summary.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 and Appendix 9 in the full SA report and summarised in this Non-Technical Summary.
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 12 in the full SA report and summarised in this Non-Technical Summary.
j) a non-technical summary of the information provided under the above headings	This document is the Non-Technical Summary for the Publication Draft Local Plan.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	The Environmental Report adheres to this requirement.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))</li> </ul>	Consultation on the SA Scoping report for the Braintree District Local Plan was undertaken between January and March 2015. Subsequent updates to this were published for consultation in the Draft Local Plan and are included in this report.
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an effective opportunity to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13(3), 13(4))</li> </ul>	Consultation on the Draft Local Plan and the accompanying SA Report took place between November 2015 and January 2017. Consultation is being undertaken in relation to the Publication Draft Local Plan between June and July 2017. The current consultation documents are accompanied by the full SA report and this Non-Technical Summary.

SEA Regulations Requirements	Where covered in this SA report
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	Unlikely to be relevant to the Braintree District Local Plan.
<b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Reg.s 13 and 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Reg. 12, the opinions expressed pursuant to Reg. 13(2)(d) and the results of consultations entered into pursuant to Reg. 14(4) have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring (Reg. 16(4)(f))</li> </ul>	Requirement will be met at a later stage in the SA process.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	Chapter 12 in the full SA report and summarised in this Non-Technical Summary.
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met.

1.11 The approach that has been undertaken to the SA of the Braintree District Local Plan to date is described below.

### Stage A: Scoping

1.12 The SA process began in December 2014 with production of the SA Scoping Report for the Braintree District Council Local Plan Issues and Scoping document. During the scoping stage of the SA, the work that had previously been carried out as part of the SA of the Council's now-withdrawn Publication Site Allocations and Development Management Plan was drawn upon, as much of that work remained valid.

1.13 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.

- In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Data on social and economic issues were also taken in to consideration. This baseline information provides the basis for predicting and monitoring the likely effects of the Local Plan and helps to identify alternative ways of dealing with any adverse effects identified.
- Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the District were identified (including environmental problems, as required by the SEA Regulations).
- A Sustainability Appraisal framework was then prepared, setting out the SA objectives against which Local Plan proposals (policies and sites) are being appraised. The SA framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. The SA framework is designed to set out a series of sustainability objectives and associated questions that can be used to 'interrogate' options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the District with regard to social, economic and environmental considerations. During the SA, the performances of the plan options (and later, policies and sites) are assessed against these SA objectives and appraisal questions.

1.14 The review of relevant plans, policies and programmes and the baseline information will continue to be updated as necessary at each stage of the SA process to ensure that they reflect the current situation in Braintree District.

1.15 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The Scoping Report for the Local Plan was published between January and March 2015 for consultation alongside the Local Plan Issues and Scoping document with the statutory consultees (Natural England, the Environment Agency and English Heritage), other relevant stakeholders and the public.

1.16 Appendix 8 in the full SA report lists the comments that were received during the scoping consultation and describes how each one has been addressed. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information, key sustainability issues and the SA framework.

#### *SA framework*

1.17 The following set of SA objectives is being used as a framework to assess the sustainability performance of the Local Plan:

SA1: Create safe environments which improve quality of life and community cohesion.

SA2: Provide everyone with the opportunity to live in a decent home.

SA3: Improve the health of the District's residents and mitigate/reduce potential health inequalities.

SA4: Promote the vitality and viability of all service centres throughout the District.

SA5: Achieve sustainable levels of prosperity and economic growth.

SA6: Conserve and enhance the biological and geological diversity of the environment.

SA7: Promote more sustainable transport choices and uptake.

SA8: Promote accessibility and ensure the necessary transport infrastructure to support new development.

SA9: Improve the education and skills of the population.

SA10: Conserve and enhance the historic environment, heritage assets and their settings.

SA11: Reduce contributions to climate change.

SA12: Improve water quality and address water scarcity and sewerage capacity.

SA13: Reduce the risk of flooding.

SA14: Improve air quality.

SA15: Maintain and enhance the quality of landscapes and townscapes.

SA16: Safeguard and enhance the quality of soil.

### **Stage B: Developing and refining options and assessing effects**

- 1.18 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 1.19 The SA findings are not the only factors taken into account by a local authority when determining which options to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, so it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting the approach taken.
- 1.20 The alternative options for Publication Draft Local Plan policies have been identified by the Council based on the most up-to-date evidence, in particular in relation to the levels of development required in the District. Alternatives to some policies in the Local Plan were proposed within the Local Plan Draft Document for Consultation 27<sup>th</sup> June 2016 and a number of alternatives to policies were received from the subsequent public consultation. Published alternatives and alternatives received during public consultation were considered by the Council within Local Plan Sub-Committees reports between October and May 2016/17. For several of the proposed policy approaches, reasonable alternatives were not identified as any approach other than the preferred approach would not be in conformity with the requirements of the National Planning Policy Framework (NPPF).
- 1.21 Development site options were identified through the Council's 'call for sites' exercise held between August and October 2014 with a small number of additional sites submitted during the Issues and Scoping consultation in early 2015 and a number of sites were submitted during the Draft Local Plan Consultation from June to August 2016. The Council then eliminated sites which did not represent a reasonable alternative for allocation through the Local Plan process for one of the following reasons:
- Sites with an area of less than 0.25 ha and therefore not able to deliver 10 or more dwellings.
  - Sites which are outside the District boundary in their entirety.
  - Sites which are entirely within Flood Zone 2 or Flood Zone 3, other than previously developed regeneration sites.
  - Sites which are within a parish where there is no development boundary and hence not consistent with the NPPF principle of focusing significant development in locations which are or can be made sustainable.
- 1.22 The Council's consideration of employment site options was also informed by a viability review carried out in 2012<sup>3</sup>.

#### *Draft Local Plan (2016)*

- 1.23 All of the reasonable site options and policy options were subject to SA prior to the preparation of the Draft Local Plan in 2016, in accordance with the methodology that was set out in the Scoping Report (also described later in this chapter). The draft findings were shared with the Braintree District Council officers preparing the Draft Local Plan. These working papers were intended to

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<sup>3</sup> Viability Review of Employment Sites in Braintree District, Lambert Smith Hampton on behalf of Braintree District Council, 2012

inform the plan preparation process rather than constituting a formal SA report and were not, therefore, made publicly available at the time.

- 1.24 The Council took into account the findings of the SA when deciding which site and policy options to select and develop into preferred approaches in the Draft Local Plan. The SA findings were not the only relevant factors taken into account by the Council when determining which preferred options to take forward in the Local Plan. Indeed, there were often both positive and negative sustainability effects identified for individual options, and it was not therefore possible to 'rank' the options based on sustainability performance in order to select the most sustainable. Factors such as public opinion, deliverability and conformity with national policy were also taken into account by the Council when selecting preferred options.
- 1.25 An initial options appraisal was undertaken during development of the Draft Local Plan on the basis of high level options that were identified by the Council. In some cases, additional detail about the options was included in the Draft Local Plan which had not been available to the SA team while the initial options appraisal work was being carried out. Where this was the case, the options appraisal work was updated to take account of the additional detail, prior to the appraisal of the preferred approaches. The options appraisal work presented in the SA report of the Draft Local Plan incorporated that additional work where relevant. In most cases, the SA scores remained unchanged from those set out in the initial SA working paper that was prepared for the Council to inform the preparation of the Draft Local Plan.

#### *Publication Draft Local Plan (2017)*

- 1.26 Following consultation on the Draft Local Plan, a number of new site and policy options were identified and these have now also been subject to SA, using the same methodology. The SA findings for all policy and site options are summarised in Chapter 10 of the full SA Report. This work incorporates the SA findings for all the reasonable alternative options that have been considered at both stages, including the options that have come forward since consultation on the Draft Local Plan.
- 1.27 The detailed assessments for all reasonable alternative sites can be found in Appendices 6 and 7 in the full SA Report. As at the Draft Local Plan stage, the Council has taken into account the findings of the SA as well as other factors when deciding which options to take forward in the Publication Draft Local Plan. In addition, Appendix 9 in the full SA Report lists the site options considered by the Council and its reasons for selecting or rejecting each one for inclusion as a preferred option in the Draft Local Plan.

#### **Stage C: Preparing the Sustainability Appraisal report**

- 1.28 The full SA Report describes the process that has been undertaken to date in carrying out the SA of Braintree District's Publication Draft Local Plan. It sets out the findings of the appraisal of options, preferred approaches included in the Draft Local Plan and policies and sites included in the Publication Draft Local Plan, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan as it is drafted in full. It also describes the reasons for selecting or rejecting certain options during the preparation of the Publication Draft Local Plan.

#### **Stage D: Consultation on the Braintree District Publication Draft Local Plan and this SA Report**

- 1.29 Braintree District Council is inviting comments on the Publication Draft Local Plan and the accompanying SA Report. Both documents are being published on the Council's website for a six week consultation period from the 16<sup>th</sup> of June to the 28<sup>th</sup> of July 2017.

## Stage E: Monitoring implementation of the Local Plan

- 1.30 Recommendations for monitoring the social, environmental and economic effects of implementing Braintree District's Local Plan, as currently drafted, are presented in Chapter 12 of the full SA Report.

## Policy context

### Reviews of Plans, Policies and Programmes

- 1.31 Braintree District's Local Plan is not being prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at an international and national level.
- 1.32 A review was undertaken of the other plans, policies and programmes of relevance to the Local Plan. This review was amended since it was originally presented in the SA Scoping Report, in light of comments received during the scoping consultation. Further updates have been carried out to ensure the information presented in this report is up to date. The updated review of relevant plans, policies and programmes can be seen in full in Appendix 1 in the full SA Report and the key findings are summarised below.
- 1.33 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Draft Local Plan. These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 1.34 There is a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy.
- 1.35 The most significant development in terms of the policy context for the emerging Draft Local Plan has been the publication of the NPPF which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The purpose of the NPPF was to streamline national planning policy, having reduced over a thousand pages of policy down to around 60 pages. The Braintree District Local Plan must be consistent with the requirements of the NPPF, which sets out information about the purposes of local plan-making. It states that:
- 'Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.'*
- 1.36 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 1.37 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.38 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

#### *Local plans, policies and programmes*

1.39 At the sub-regional and local levels there are a wide range of plans and programmes at the international and national levels that are relevant to the emerging Braintree District Draft Local Plan. The full review of other relevant plans and programmes can be seen in Appendix 1 in the full SA Report.

#### **Baseline information**

1.40 Information on the current state of relevant aspects of the environment, society and economy in Braintree District provides the context for assessing the sustainability of proposals in Braintree District's Local Plan, allowing existing trends to be identified and providing a baseline against which to predict the likely effects of the plan.

1.41 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included; for example information about housing, social inclusiveness, transport, energy, waste and economic growth.

#### *Summary of baseline information*

1.42 Braintree District is a rural district in the north of Essex and is the second largest district by area in the County. Just over half of the residents live in the three main towns of Braintree, Witham and Halstead, with the remainder living in the attractive rural areas, where there are about 60 villages, including six larger villages. The District lies between the regional growth centres of Chelmsford, Colchester and Cambridge and is close to Stansted Airport and the M11, the Haven Ports and is about 45 minutes journey time by rail from London.

1.43 The percentage of economically active people in Braintree is currently 79.2% which is lower than the regional, but higher than the British average. The unemployment rate of 4.5% of the economically active population is less than the England average of 6%.

- 1.44 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>4</sup> The historic features of this landscape and of the urban areas described below are potentially sensitive to development.
- 1.45 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 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>5</sup>.
- 1.46 Braintree has some 3,189 Listed Buildings – the majority of which are Grade II<sup>6</sup>. Of these, 8 are on the Heritage at Risk register<sup>7</sup>. Listed Buildings within the District are fairly widely spread, however clusters of Listed Buildings can be found in the historic settlements such as Coggeshall and linear patterns are also identifiable along historic transport routes. In addition, there are 37 Conservation Areas within the District, 8 Historic Parks and Gardens and 40 Scheduled Monuments.
- 1.47 Air quality in Braintree is generally good and there are no Air Quality Management Areas located in the 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 and A120.
- 1.48 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. 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 which are now defunct.
- 1.49 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. Northern areas of Braintree town are within Flood Zones 2 and 3. These and other areas identified by the Level 1 SFRA update are subject to a higher risk from fluvial flooding.

### Key Sustainability Issues

- 1.50 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. In order to address this requirement, **Table 2** describes the likely evolution of each key sustainability issue if the Braintree District Local Plan were not to be adopted.

**Table 2 Key sustainability issues of relevance to the Braintree District Local Plan**

Key issues	Likely evolution without the Local Plan
<b>Biodiversity and geodiversity</b>	
Whilst there are no internationally designated biodiversity sites in Braintree District, a number within Colchester	Population growth in Essex has the potential to increase recreational disturbance on internationally designated biodiversity sites in Colchester and Tendring Districts.

<sup>4</sup> Essex Historic Landscape Characterisation Project, Essex County Council and English Heritage, 2013.

<sup>5</sup> Essex Historic Landscape Characterisation Project, Essex County Council and English Heritage, 2013.

<sup>6</sup> English Heritage (2016), Local Authority Profile: Historic Environment 2015/16, <https://historicengland.org.uk/research/heritage-counts/indicator-data/local-authority-profiles/>

<sup>7</sup> Historic England (2016) [Heritage at Risk Register](#)

Key issues	Likely evolution without the Local Plan
and Tendring Districts are subject to joint monitoring of potential recreational disturbance.	
Braintree District has sites of national, regional and local ecological significance as well as special roadside verges. In addition, it is also close proximity to a SSSI in neighbouring Chelmsford. The national designations are all in favourable condition.	<p>Although sites in Braintree District are all in favourable condition, uncoordinated development and policies could place pressure on national and local ecological sites resulting in adverse effects upon their condition.</p> <p>The NPPF (paragraph 7) states that the planning system has a key environmental role including, '<i>contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity...</i>'. Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy. However, given the current pressures for growth and development within the district, a Local Plan can help to ensure that less environmentally sensitive locations are chosen, thereby reducing development pressure on wildlife which may already be under pressure from climate change. Therefore the opportunity to protect and enhance the environment and achieve net biodiversity gains (e.g. through restoration) could be greatly enhanced by a Local Plan.</p>
<b>Landscape</b>	
Landscape Character Assessments have identified varying levels of sensitivity to development across the District. The north east part of Braintree District is being considered for the expansion of Dedham Vale AONB.	There is the potential for development to contribute to detrimental changes in landscape character in Braintree District. In the absence of a plan, there is the potential that new development could be located in sensitive areas leading to negative impacts on valued landscapes, including those being considered for an extension to the Dedham Vale AONB, protected lanes, and sensitive river valleys.
<b>Soils</b>	
Braintree District contains some of the most productive agricultural land in the County which could be lost to development.	<p>Continued population growth and economic growth are likely to continue to increase the pressure to develop greenfield sites, with the risk of loss of high quality agricultural land.</p> <p>The NPPF requires local planning authorities to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value, and to take into account the benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to those of a higher quality. Without a Local Plan, National policies would still provide protection to the best agricultural land within Braintree District, but local policies can ensure that development on the best and most versatile agricultural land is, where possible, avoided or required to be temporary and reversible.</p>
Braintree District contains areas of historically contaminated land which could pose a risk to human health and the natural environment or which could be remediated and brought into appropriate use.	The NPPF requires planning policies to ensure that sites are suitable for their new use, taking account of ground conditions including pollution from previous uses, any proposals for remediation and impacts on the natural environment arising from that remediation. This offers some protection from the potential adverse effects of contamination in the absence of a Local Plan. A Local Plan underpinned by evidence on areas of contamination could positively identify and support development which achieves remediation of contaminated sites and avoid development which poses a risk to human health or the wider natural environment.
<b>Open space</b>	
The large increase predicted in Braintree District's population (23.3% between 2011 and 2035) will place increasing	With the rising population, pressures on the quality and availability of open space are likely to continue without a planned approach to development. Without the Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to the enhancement of open green spaces/green networks for

Key issues	Likely evolution without the Local Plan
pressure on open space provision.	recreation, walking and cycling networks, and wildlife.
<b>Air quality</b>	
Air quality is not currently a significant issue in the District. However, locations targeted for large scale development could experience significant increases in road traffic from residents and/or employees, resulting in localised adverse effects, along major roads such as the A12 and A120.	Without action from the Local Plan to direct development to sustainable locations and increase provision of sustainable transport infrastructure, the trend for increasing car ownership and travel is likely to continue with associated emissions of air pollutants are likely to increase.
<b>Climate change and energy</b>	
Braintree District is a significant energy consumer and CO <sub>2</sub> emitter but has a relatively small installed renewable energy generation capacity.	<p>Continued population growth and economic growth are likely to continue to increase energy consumption and associated CO<sub>2</sub> emissions.</p> <p>In the absence of the Local Plan, National renewable energy and carbon reduction targets and the NPPF require local authorities to reduce greenhouse gas emissions and actively support energy efficiency and renewable energy. Braintree District's Climate Local Strategy and Action Plan 2015-2018 (2014) include objectives to ensure future development in the District is sustainable and prepared for climate change.</p> <p>The Local Plan can further contribute to energy efficiency and climate change mitigation through policies which reduce the need to travel and provide for sustainable transport; provide opportunities for renewable and low carbon energy generation; provide opportunities for decentralised energy and heating; and promote low carbon design approaches to reduce energy consumption in buildings.</p>
Road transport is the biggest energy consumer and CO <sub>2</sub> emitter in the District. Braintree District is one of the largest per capita emitters of CO <sub>2</sub> in the County.	<p>Continued population growth and economic growth are likely to continue to increase road traffic and associated CO<sub>2</sub> emissions.</p> <p>In the absence of the Local Plan, National renewable energy and carbon reduction targets and the NPPF require local authorities to reduce greenhouse gas emissions.</p> <p>The Local Plan can further contribute to reducing the energy consumption and CO<sub>2</sub> emissions associated with road transport by promoting sustainable patterns of development which reduce the need to travel and facilitate the use of sustainable modes.</p>
<b>Water quality and water resources</b>	
Water resources in Braintree District are heavily abstracted with further consumptive licences unlikely to be granted.	Population growth, together with the hotter, drier summers expected under climate change, are likely to put ever greater pressure on the District's water resources. National plans and strategies encourage new development to meet water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency. Without the Local Plan, however, it will be more difficult to adopt a co-ordinated approach to water resource planning with water companies and more difficult to implement water efficient design in new development.
None of Braintree District's water bodies meet the water quality requirements of the Water Framework Directive with the River Blackwater and the River Chelmer having the lowest quality.	<p>The Water Framework Directive has set targets for the protection of all inland water courses. The UK has a legal obligation to meet this target and Local Authorities have a duty to work to achieve this. National Planning policy encourages the prevention of both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.</p> <p>Therefore, in the absence of the Local Plan, National Planning policy is likely to provide some protection to Braintree District's water bodies. However, a Local</p>

Key issues	Likely evolution without the Local Plan
	Plan provides opportunities to facilitate cooperation with water companies and the Environment Agency, helping to ensure that wastewater treatment infrastructure is provided in step with increased demand. It can also steer polluting uses away from the most sensitive water environments (e.g. groundwater source protection zones) and specify that new development incorporates appropriate design features to reduce pressure on wastewater treatment infrastructure, e.g. sustainable drainage systems (SuDS).
<b>Flooding</b>	
The northern areas of Braintree town are within Flood Zones 2 and 3. These and other areas identified by the Mid Essex SFRA are subject to a higher risk from fluvial flooding.	All development needs to take account of national policy on flood risk, including the NPPF requirement that <i>'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'</i> (paragraph 100).  The severity and likelihood of flooding is likely to increase with climate change. Without a Local Plan, it will be more difficult to meet the requirements of the NPPF.
Current surface water flood risk in Braintree District is uncertain, pending completion of the Essex SWMP. The 2007 Mid Essex SFRA recommended that runoff rates should be restricted for both greenfield and brownfield developments in Bocking, Braintree, Witham and Coggeshall in particular. This is also likely to be appropriate within other settlements to ease surface water flooding and drainage capacity exceedance.	Any surface water flood risk identified by the forthcoming SWMP for Braintree is likely to be more difficult to manage in the absence of a Local Plan. The Local Plan offers the opportunity to direct inappropriate types of development away from areas of high surface water flood risk as well to specify appropriate design measures in new development to restrict surface runoff.
<b>Cultural heritage and townscape</b>	
Braintree District has a large number of valuable heritage assets which could be sensitive to new development, including scheduled monuments, conservation areas, historic parks and gardens and listed buildings. A number of these are 'at risk'.	Continued development pressure means that the risk of harm to heritage assets would be likely to continue and may be exacerbated without a planned local approach to development. International and national protection is afforded by various strategies and policies (e.g. 1992 European Convention on the Protection of the Archaeological Heritage; 1999 European Spatial Development Perspective; 2005 UK Sustainable Development Strategy 'Securing the Future'; and the NPPF. Paragraph 17 of NPPF states that the planning system should <i>'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'</i> .  Therefore, whilst these policies make provision for the protection of listed buildings and conservation areas, it is considered that the implementation of more specific policies for Braintree District through the new Local Plan would provide greater protection for heritage assets at the local level, especially sites at risk, historic features of the landscape and urban areas identified as potentially sensitive to development. The Local Plan also affords opportunities for enhancement, for example improving the condition of 'at risk' assets and addressing detracting elements of conservation areas.
<b>Health</b>	
The health of Braintree District's population is varied compared with the England average.	The planning system has relatively limited influence on public health and the Local Plan is therefore likely to have relatively little effect on them. However, the NPPF states that, <i>'local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and</i>

Key issues	Likely evolution without the Local Plan
	<p><i>places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being'</i> (paragraph 171).</p> <p>Although the NPPF seeks to improve health and wellbeing, Local Plan policies relating to health and wellbeing in Braintree District, for example increased provision of facilities for sport and recreation or spatial policies to facilitate increased walking and cycling, would provide more certainty in relation to how health issues will be addressed.</p>
<p>Although roughly in line with national averages, Braintree District residents' rates of participation in sport are the second lowest in Essex and well below those in the most active District, which could be contributing to a higher incidence of excess weight in adults in Braintree District.</p>	<p>The NPPF recognises that '<i>access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.</i>' (paragraph 73)</p> <p>A Local Plan can address specific local needs by ensuring that there is adequate provision of facilities to meet the needs of communities, which may help to improve participation and prevent obesity which is proportionally higher in Braintree District, compared to the rest of England.</p>
<p><b>Population and society</b></p>	
<p>In Braintree District 26 of 84 areas are seriously deprived with regards to 'Barriers to housing and services'.</p>	<p>The spatial distribution of deprivation and inequality in access to housing and services amongst communities within Braintree District is likely to continue in the absence of an appropriate local policy response.</p> <p>In order to achieve sustainable development, the NPPF states that the planning system has '<i>a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being'</i> (paragraph 7) Planning policies should seek to '<i>ensure an integrated approach to considering the location of housing, economic uses and community facilities and services'</i> (Paragraph 70)</p> <p>Therefore, the new Local Plan provides the opportunity to improve equality of opportunity by increasing the availability of housing provision for the most deprived groups. The Local Plan could also help to ensure that there is improved access and integration of services through improved transport links to community facilities across Braintree, especially in areas where there is the most need.</p>
<p>In Braintree District 23 of 84 areas are seriously deprived with regards to 'Education, skills and training'.</p>	<p>In the absence of a new Local Plan, the spatial distribution of deprivation and social exclusion in relation to education, skills and training is likely to continue.</p> <p>The NPPF states that '<i>the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future'</i> (paragraph 18). Furthermore, '<i>local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.</i>'</p> <p>Improving the education and skills base of local residents requires a range of interventions, some of which will happen through national initiatives in respect of education. However, a new Local Plan can respond to the specific needs of the local economic context by supporting the growth of key sectors and new employment to areas, which may indirectly improve education and skills levels and access to training.</p>
<p>Whilst improving, educational attainment remains low relative to county and national rates.</p>	<p>Paragraph 20 of the NPPF states that '<i>to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.</i>'</p> <p>In the absence of a Local Plan, educational attainment amongst Braintree District's population could continue to be poor in comparison to the rest of the region and lead to higher levels of unemployment. Improving the education and skills base of local residents requires a range of interventions, some of which will happen through national initiatives in respect of education.</p>

Key issues	Likely evolution without the Local Plan
	Therefore, a Local Plan could set out policies and strategies to improve access to education and support the creation of a wider range of job opportunities and vocational training within the District.
<b>Economy</b>	
Whilst employment rates in Braintree District are relatively good compared to with regional and national averages, job availability within the District is relatively low and a significant proportion of those working in the District are unable to access its main centres of employment by sustainable modes.	<p>The NPPF states that <i>'the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future'</i> (paragraph 18). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy.</p> <p>In the absence of a Local Plan, these economic issues may endure. The implementation of up to date policies in the new Local Plan would help address individual's access to employment and could help stimulate growth in the number of jobs available in the district, for example by ensuring that sufficient local businesses have access to the amounts and types of new employment space they require for expansion.</p>
Braintree District contains a number of sites preferred or reserved for mineral extraction. Other forms of development in the District may be constrained by the need to safeguard mineral resources for extraction.	<p>There will be increased pressure to develop areas containing mineral reserves, in order to support housing, employment and community facilities for an increased population.</p> <p>The NPPF states that <i>'since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation.'</i> (paragraph 142). To this end, Local Planning Authorities should <i>'identify and include policies for extraction of mineral resource of local and national importance in their area,'</i> and <i>'define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas'</i>.</p> <p>The Local Plan can help ensure that there is a coordinated approach to allocating land for social and economic uses that minimises the risk of sterilising mineral resources.</p>
<b>Housing</b>	
Demographic changes, and to a lesser extent, future employment levels and market signals, indicate the need for a significant increase in annual housing delivery in Braintree District to meet objectively assessed need.	The NPPF identifies that local planning authorities should, <i>'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)'</i> (paragraph 50). Without the implementation of the new Local Plan it is therefore uncertain whether there will be sufficient land allocations to develop new housing.
There is the need for a mix of housing types including social rented housing and provision in rural communities.	The NPPF identifies that local planning authorities should, <i>'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)'</i> (paragraph 50). Although the NPPF encourages a mix of housing development, it is anticipated that this requirement would be implemented at the local level through an up-to-date policy in the new Local Plan and without this the mix of housing supply is less likely to match need.
There is a need for affordable housing across Braintree District as the average income of newly formed households is below the minimum required to access entry level private housing in	Without the Local Plan, an on-going lack of affordable housing is likely to lead to many people being priced out of the market and the population profile of the district may become distorted. This may have secondary effects on the economy, reducing the district's ability to attract key workers in particular. Therefore, the implementation of targeted housing objective in the new Local Plan would provide more certainty in relation to how affordable housing provision will be addressed locally.

Key issues	Likely evolution without the Local Plan
the District.	
In meeting the housing needs of older people, there is a need to improve the supply and stock of sheltered housing and provide for 'extra care' accommodation to meet the significant growth in the number of people over 85.	The NPPF identifies that local planning authorities should, ' <i>plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)</i> ' (paragraph 50). Although the NPPF encourages a mix of housing development, it is anticipated that this requirement would be implemented at the local level through an up-to-date policy in the new Local Plan. This would provide more certainty regarding the issue being addressed.
There is a need for additional Gypsy, Traveller and Travelling Showpeople pitches in the District.	<p>The National Planning policy for Traveller Sites seeks to ensure that traveller sites are located in appropriate locations with planning permission, to maintain an appropriate level of supply.</p> <p>The Local Plan could help to ensure that sufficient land is allocated for new or extended private as well as rented sites which enable gypsy and traveller communities to access education, health, welfare and employment. This could help to prevent unauthorised development, which could affect the local landscape and increase social inclusion of these groups, as well as reduce tensions between traveller communities and with settled communities.</p>
<b>Transport</b>	
Availability of public transport is limited in the evenings and in the rural areas where almost half of the District's population live.	<p>The lack of public transport between rural communities and local centres, could lead to increasing car usage, which could lead to increasing air, noise and light pollution and carbon emissions.</p> <p>The NPPF states that planning policies should support economic growth in rural areas by '<i>supporting sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors</i>'. '<i>This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres</i>'.</p> <p>The Local Plan provides an opportunity to improve connections between rural communities and local centres, through improving public and sustainable transport routes, which could support reductions in car use throughout the District.</p>
Braintree District residents have relatively high average travel times by public transport or walking to reach key services, including employment sites.	The Local Plan provides an opportunity to improve connections between key services, including employment centres, and public transport routes. In the absence of the Plan, local business may experience barriers to attracting future employees and job seekers without access to a car, may find it difficult to access employment opportunities.
Rail services between Braintree town and London are infrequent, being constrained by its location on a single track branch line.	<p>In the absence of a Local Plan, the limited transport between Braintree Town and London could make Braintree Town less attractive to investors and labour.</p> <p>The NPPF encourages local authorities to work with '<i>transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development</i>'.</p> <p>The new Local Plan provides an opportunity for Braintree District Council to work with National Rail to develop appropriate ways in which to expand the service provision for Braintree Town.</p>
Stansted Airport in Uttlesford District is a major employer of Braintree District residents, increasing out-commuting by car.	<p>In the absence of a Local Plan, there is likely to be a continued growth in car usage, which could lead to increasing congestion on roads out of the district, particularly in locations targeted for large scale development. This could lead to adverse effects on residents and employees, particularly along the A120.</p> <p>The Local Plan provides an opportunity to allocate new development and employment in locations that help to reduce the need to travel and to require new development to be designed in a way that encourages the use of sustainable transport.</p>

## Appraisal methodology

- 1.51 Each policy and site allocation option in the Publication Draft Local Plan has been assessed and a judgement made as to the likely effect of the option on the baseline in relation to the SA objectives. The findings of the SA have been recorded in SA matrices, which include a colour coded score for the alternatives against each of the SA objectives, along with a concise justification for the score given.
- 1.52 The SA scores differentiate between significant effects and other more minor effects through the use of colour coded symbols, as shown in the key below. Mixed effects were recorded for an SA objective where there was potential for positive effects in relation to one aspect of the objective but potential for negative effects in relation to another. Temporary effects were identified in the related justification text, where relevant.

### Key to sustainability scores to be used in the SA of the Local Plan

++	Significant positive effect likely
+	Minor positive effect likely
0	No or negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
+/-	Mixed effect likely
?	Likely effect uncertain

- 1.53 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 1.54 The dividing line between sustainability scores is often quite small. Where we have distinguished significant effects from more minor effects this was because, in our judgement, the effect of the allocation or policy on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.

### Cumulative effects

- 1.55 Each reasonable alternative policy and site option considered in developing the Publication Draft Local Plan was assessed on its own merits. Once the Local Plan development reached a stage where preferred policies and sites were identified, the cumulative effects of all preferred policies and sites was also assessed. The assessment of individual effects and cumulative effects of policies and sites were revised to reflect the effects of the Publication Draft Local Plan.
- 1.56 The cumulative effects assessment also considered the extent to which the effects identified are likely to be mitigated by strategic or development management policies set out elsewhere in the Local Plan, by national planning policy, or by other regulatory mechanisms.

### Difficulties encountered

- 1.57 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.

- 1.58 Not all baseline data are currently available or are possible to collect. SEA Guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Not all the relevant information was available at the local level and as a result there are some gaps within the data set but it is believed that the available information provides a sufficiently comprehensive view of the sustainability issues within the plan area. In collating the baseline data, problems encountered included the difficulty of obtaining ward or district level data consistently and the difficulty of identifying trends in some data sets.
- 1.59 During the appraisal of the policy options at Draft Local Plan stage, neither the preferred approach nor the reasonable alternatives had been worked up in detail and it was difficult to assess in detail the likely effects of the options on each SA objective. Once the preferred approaches had been worked up into a full policy wording, the preferred policy was reassessed as it was then possible to draw more certain conclusions about the likely effects.
- 1.60 There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of assumptions relating to each SA objective, as described above and detailed in Appendix 4 in the full SA Report.
- 1.61 Where site allocations were close to the Braintree District boundary, the spatial analysis was hampered by the fact that some spatial data required for proximity-based assessments were not available for neighbouring districts, or for part of them. In these cases, a note was added to the table of assessment criteria in Appendix 4 in the full SA Report to explain how SA scores were modified to reflect the uncertainty caused by this lack of spatial data.

## SA findings for the Publication Draft Local Plan Vision and Objectives

- 1.62 The overarching vision and twelve supporting objectives of the Publication Draft Local Plan were subject to SA, in line with the assumptions set out in Appendix 3 of the full SA Report.
- 1.63 The likely sustainability effects of the Vision and Objectives are summarised in Chapter 4 of the full SA Report, in relation to each SA objective. The SA scores for the Vision and Objectives can be seen in **Table 3**.
- 1.64 The Vision for Braintree District sets a general aspiration for development in the district to take place in a sustainable way, supported by social, economic and environmental aspirations, which will enable Braintree to be an attractive place to live, work and invest. The Vision is therefore likely to have minor positive effects (+) in relation to the majority of the SA objectives set out in the SA Framework. However, the Vision's contribution to the achievement of the following objectives is likely to be negligible: SA objective 12: Water environment, SA objective 13: Flood risk, SA objective 14: Air quality and SA objective 16: Soil. The Vision is unlikely to lead to any significant adverse effects in relation to the SA objectives. Most of the effects of the Vision and many of the Objectives are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement them.
- 1.65 It was found that the Objectives are unlikely to have any significant negative effects (--). Most of the Objectives are likely to have significant positive (++) or minor positive effects (+) in relation to the SA objectives, or negligible (0) effects. All the Objectives have at least one significant positive effect where they directly address SA objectives, although a small number of minor negative effects (-) were identified.
- 1.66 The Objectives: Housing Need and Creating a successful economy focus on the delivery of housing or employment land and therefore respectively score a significant positive effect (++) in relation to SA objective 1: Housing and SA objective 3: Economy. However most of the objective are likely to result in a mixture of positive and negative effects (+/-) or minor negative effects, because while they would help to achieve the housing and employment development needed in

the District, construction of new homes and employment development could have potentially negative effects on environmental receptors and could result in increased car traffic within the District. However, there would be opportunities for good design and construction techniques to mitigate potential effects and even have beneficial effects, e.g. on the setting of a heritage asset. For some of the SA objectives, the possibility for minor positive effects is not identified, but the potential minor negative effect is shown as uncertain (-?), as it will depend on how and where the housing and employment development is delivered across the District.

- 1.67 The Objective: Retail and Town Centres focuses on improving the vibrancy and service provision of town centres. Therefore, it is considered likely to have significant positive effects (++) on SA objective 4: Service centre vitality and SA objective 5: Economy.
- 1.68 The Objective: Transport Infrastructure seeks to improve the road network in the area, including the delivery of sustainable transport modes at new developments, ensuring safety and aiding congestion as well as improving connections to the wider network. Therefore, this objective directly addresses SA objective 7: Sustainable travel, SA objective 8: Accessibility and SA objective 11: Climate change mitigation with a significant positive effect for each.
- 1.69 The Objectives: Broadband and Education and Skills are likely to have a significant positive effect for SA objective 5: Economy. The provision of broadband will support businesses and home-workers, while access to education and skills will help provide the skills necessary for businesses in the district to thrive. The objective Education and skills is also directly linked to for SA objective 9: Education and skills and so a significant positive effect is also likely for this SA objective. For both objectives, all SA objectives relating to the environment are likely to score a negligible effect (0).
- 1.70 Two Objectives: Protection of the Environment and Good Quality Design are likely to result in significant positive effects (++) or minor positive (+) in relation to most SA objectives. Both of these Objectives seek to improve the quality of the local environment, by protecting the historic environment and landscape character. Therefore, both of these objectives directly address SA Objective 10: Historic environment and SA objective 15: Landscapes and townscapes and so significant positive effects are expected for these SA objectives. The objective Protection of the Environment will also have a will also have a significant positive effect on SA objective 3: Health and SA objective 6: Biodiversity and geodiversity.
- 1.71 Overall, the Healthy Communities Objective is likely to result in minor positive (+) or negligible (0) effects for most SA objectives, with three significant positive (++) effects. The objective focuses on encouraging active and healthy choices by ensuring the retention and creation of outdoor community areas for sport and recreation, while also encouraging sustainable travel by providing cycle ways and pedestrian links. The policy also addresses the expansion of local health facilities. Therefore, this Objective is identified as having a significant positive (++) effect in relation to SA objective 1: Community safety and cohesion, SA objective 3: Health and SA objective 7: Sustainable travel.
- 1.72 The Objective Social Infrastructure would have a significant positive effect for SA objective 1: Community Safety and cohesion and SA objective 8: Accessibility. The policy focuses on providing access to local and community facilities. A couple of other minor positive (+) effects have been identified for some SA objective, however the majority of SA objective score a negligible (0) for this objective.
- 1.73 The Objective: Sustainability, directly addresses resource efficiency and energy efficiency, by promoting renewables and minimising the use of natural resources. The objective also seeks to ensure that development takes place in well-connected areas making the best use of previously developed land. Therefore, this policy is identified as having a significant positive effect in relation to SA objective 8: Accessibility and SA: objective 11: Climate change mitigation. .
- 1.74 The Objective: Empowering Local People would have a significant positive effect for SA objective 1: Community safety and cohesion. The objective focuses on creating an environment where local residents and businesses feel fully involved and engaged in shaping the future of the district. Documents will be written in ways which are accessible and transparent. This will help support social inclusion. All other SA objective will have a negligible score.

**Table 3 Summary of SA scores for Publication Draft Local Plan Visions and Objectives**

Vision / objective	SA Objectives															
	SA1: Community safety & cohesion	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	SA11: Climate change mitigation	SA12: Water environment	SA13: Flood risk	SA14: Air quality	SA15: Landscapes and townscapes	SA16: Soil
Vision	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	0	0	0	+?	0
Creating a successful economy	+	0	+?	+?	++	-?	+?	+?	+?	0	+/-	0	+?	+/-	+?	-
Retail & town centres	+	0	+	++	++	0	+	+	0	0	+	0	0	+	+?	0
Housing need	+	++	+	0	+	-?	0	0	0	0	+/-	0	+	+/-	-?	0
Transport infrastructure	0	0	+	0	+	0	++	++	0	0	++	0	0	+	0	0
Broadband	+?	+?	0	0	++	0	0	+	+	0	0	0	0	0	0	0
Education and skills	+	0	+	0	++	0	0	+	++	0	0	0	0	0	0	0
Protection of the environment	0	0	++	0	+	++	0	0	0	++	+	+	+	+	++	+?
Good quality design	0	+	+	0	+	+	0	0	0	++	+	+?	+	+	++	0
Healthy communities	++	0	++	0	+	+	++	+	0	0	+	0	0	+	0	0
Social infrastructure	++	0	+	0	+	0	0	++	+	0	0	0	0	0	0	0
Sustainability	0	0	+	+?	+	0	+	++	0	0	++	0	0	+	0	+
Empowering local people	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## SA findings for the 'Spatial Strategy'

- 1.75 The Spatial Strategy section of the Publication Draft Local Plan includes a single policy, LPP 1: Development Boundaries.
- 1.76 A significant positive effect is expected for SA objective 15: Townscapes and landscapes. This is because Policy LPP 1 will prevent rural expansion by strictly controlling development outside of development boundaries, whilst also ensuring that any development protects the character of the countryside. The policy also ensures that development within development boundaries will not have an adverse effect on the character of any settlement.
- 1.77 Positive effects are expected for SA objective 4: Service centre vitality, because focusing development within development boundaries may help to promote existing service centres and increase economic activity within these. Positive effects are also expected for SA objective 7: Sustainable travel and SA objective 8: Accessibility. This is because public transport links and services and facilities are likely to be located primarily within urban areas, therefore focusing development within development boundaries is likely to ensure most development is within proximity to these. Development within development boundaries will also help contribute positively to reduce social exclusion by ensuring easier access to jobs, shopping, services and leisure facilities for all. Lastly, improved sustainable travel options and better access will help mitigate climate change, giving SA objective 11: Climate change mitigation, a minor positive effect.
- 1.78 The spatial strategy is also implemented through the more detailed spatial policies of the Publication Draft Local Plan, notably the New Garden Community policies of the Shared Strategic Plan, Policy LPP 2: Location of Employment Land, Policy LPP 11: Primary Shopping Areas, Policy LPP 12: District Centre, Policy LPP 17 Housing Provision and Delivery, and the Strategic Growth Location policies LPP18-LPP23. Each of these policies and the related site allocations are individually assessed in the full SA Report.

## SA findings for the Publication Draft Local Plan site allocations

- 1.79 Sites which had already been granted planning permission at the time of the appraisal were not subject to SA as these are now considered to form part of the baseline and the SA could not inform decisions on the allocation of these sites.
- 1.80 Appraisals for site allocations that do not include any residential development are presented in the section of the SA Report that covers the corresponding Publication Draft Local Plan Policy. For example, the SA of strategic employment sites allocated by Policy LPP2 Location of Employment Land is presented in the "A Strong Economy" section of Chapter **Error! Reference source not found.** The site allocations were assessed using the same set of assumptions for determining the significance of effects in relation to each SA objective as was used in the assessment of preferred site allocations, with the exception of SA objectives 1: Community safety & cohesion, 5: Economy and 12: Water environment (see Appendix 4 in full SA Report). These scores were then adjusted using professional judgement to reflect any elements of the site-specific allocation policy that were judged to modify the 'raw' effect.
- 1.81 Appraisals for site allocations that include residential development are summarised in this section of the SA Report. As for the non-housing allocations, the preferred housing and mixed use site allocations were assessed using the same set of assumptions for determining the significance of effects in relation to each SA objective as was used in the assessment of preferred site allocations, with changes to SA objectives 1: Community safety & cohesion, 5: Economy and 12: Water environment (see Appendix 4 in the full SA Report). The resulting 'raw' scores are summarised in **Table 5** which also states the Council's estimate of the dwelling capacity of each site which, as described in the Methodology chapter, determined the assumptions made about bus services, schools and community facilities that will be required as part of any development. A

detailed appraisal form setting out the justifications for the raw scores for each preferred housing or mixed use site is included in Appendix 7 in the full SA Report. Most preferred housing sites are allocated by Policy LPP 17 Housing Provision and Delivery and nothing within that policy was judged to alter the raw scores arrived at using the site assessment framework. However, for the small proportion of housing sites allocated by a site-specific policy, for example Policy LPP 20 Strategic Growth Location – Former Towerlands Park Site, raw scores arrived at using the site assessment framework were adjusted using professional judgement to reflect the detailed provisions of the site specific policy. In the few instances where such adjustments were made, this is noted in the assessment text for the relevant policy.

- 1.82 The narrative below summarises the main types of effects identified for proposed housing and mixed use sites, with particular consideration given to those effects which are likely to be significant, in line with the SEA Regulations. SA objective 1: Create safe environments which improve quality of life and community cohesion
- 1.83 No significant effects were identified in relation to this SA objective.
- 1.84 A large number of negligible (0) effects were identified, where evidence demonstrated that development would not result in the loss of community facilities or where a site was not located within 500m of an AD or 250m of a Waste Plant. Additionally, uncertain (?) effects were identified for a number of sites, where there was no evidence that development would either enhance or lead to a loss of community facilities. Minor positive (+) effects were identified for small number of the remaining sites, indicating that they were suitable for new facilities where none exist currently or would be likely to enhance existing facilities.
- 1.85 Minor negative (-) effects were identified for a small number of the remaining sites, due to them being situated within 500m of an AD or 250m of a Waste Plant.

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

- 1.86 Mainly significant positive (++) effects were identified in relation to this objective, reflecting the fact that the proposed allocations would deliver at least 15 new dwellings and therefore contribute significantly to the delivery of affordable housing. Minor positive (+) effects or no effect (0) were identified for the remaining proposed sites.
- 1.87 A very small number of sites scored an uncertain (?) effect because the BDC site assessment forms did not specify the number of dwellings to be delivered at these sites.

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

- 1.88 Minor positive (+) effects were identified in relation to this objective for more than half of the proposed sites, indicating that they were within 800m of the nearest NHS GP surgery or hospital or, in the case of some of the larger sites, contributing to new on-site provision. The remaining sites scored minor negative (-), reflecting the absence of nearby health facilities.
- 1.89 All but one proposed site scored minor negative effects (-) because they fulfilled no more than one of four criteria for accessibility to natural greenspace.
- 1.90 Mainly minor positive effects (+) were identified as most site options would not lead to the loss of publicly accessible open space; insufficient information was available to rule out loss for most of the remaining sites giving them an uncertain (?) effect. A significant positive (++) effect was identified for one site that would provide new publicly accessible open space.

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

- 1.91 One significant positive (++) effect was identified in relation to this SA objective, due to one of the sites being located within a Local Centre.
- 1.92 No effects (0) were identified in relation to retail provision for most of the sites because development generally would not result in an increase or loss of retail provision. Minor negative (-) effects were identified for a very small number of sites where development would result in the

loss of retail provision, whilst one site received a minor positive (+) effect because it would provide for additional retail use. An uncertain (?) effect was given to any site where there was no evidence to determine whether development would result in a net increase or loss of retail provision on-site.

- 1.93 Considering proximity to existing shops and service, mainly minor positive (+) effects were identified, reflecting the fact that site options within or directly adjacent to Main Towns (Braintree, Bocking and Great Notley; Witham; Halstead) were generally within 800 m (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 (-) were identified for the remaining sites, reflecting longer travel distances to shops and services.

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

- 1.94 For the first criterion assessed under this SA objective, potential sterilisation of mineral reserves, all but two had no effect, reflecting the fact that 25% or less of each of the site areas are within an area preferred and reserved for mineral extraction. The exceptions were 'BOCN 127' and 'Group J', for which a significant negative effect was identified, reflecting the fact that a significant proportion of both sites is within a mineral safeguarding area. 'Group J Employment' was awarded an uncertain (?) effect because the actual effect will depend on where development is located within the site. This is because although the majority of the site is within a mineral safeguarding area, the remainder is not and it could be this part of the site that development is located in.
- 1.95 The SA also examined the proximity of site options to main employment areas and against this criterion a minor positive (+) was identified for the majority of sites with the remainder scoring minor negative (-).
- 1.96 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 most sites reflecting the fact that a fast (optic fibre) connection was already available or planned by 2019.

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

- 1.97 Mainly minor negative (-) effects were identified in relation to this objective for most sites, mainly reflecting the fact that they were greenfield sites where development could lead to the loss or fragmentation of undesignated wildlife habitats. Significant negative effects with uncertainty (--?) were identified for two sites, COGG 506 and WITC 421, where a very small proportion of the sites are located in Local Wildlife Sites.

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

- 1.98 Effects on this SA objective were assessed by considering the proximity of the 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 most of the sites are within 400m of an existing bus stop. Significant positive effects were identified for three sites, reflecting the fact that these were sites with capacity for at least 700 new dwellings and were therefore assumed to incorporate a new bus stop.
- 1.99 An uncertain (?) effect was given to three of the sites due to the fact that some parts of these sites are within 400m of existing bus stops while other parts are not. The actual effect would depend on where development is located within those sites. A minor negative (-) effect was identified for two sites.

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

- 1.100 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.

Generally, minor positive (+) or significant positive (++) effects were given, reflecting the location of sites at settlements classed as Villages With Services or Main Towns respectively in the settlement hierarchy. Sites located in the Countryside were given a significant negative (--) effect. An uncertain (?) effect was given to 'Group L Employment' due to the fact that part of the site is adjacent to Feering (Village With Services) whilst the remainder is not. The actual effect will depend on where development is located within the site.

- 1.101 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 most of the 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 sites with a capacity of at least 3,000 dwellings) or within 800m of a railway station with a frequent service. Minor negative (-) effects were identified for the remaining larger sites, while uncertain (?) effects were awarded to the sites where it is unknown where development will be located within them.
- 1.102 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 minor negative (-) or uncertain (?) effects for the remainder.

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

- 1.103 The SA considered the proximity of 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 sites either had capacity to develop at least 700 dwellings and were therefore assumed to provide a new primary school, or that they were within 400 m of an existing primary school. Minor positive (+) or minor negative (-) effects were identified for a number of site options that were further away from existing primary schools. A mixed picture also existed in terms of access to secondary schools, but with most sites scoring significant positive (++), indicating they are within 2.4 km of a secondary school.
- 1.104 A negligible (0) effect was given for 'KELV 332' because the site will provide an extension to an residential care home, and proximity to primary and secondary schools is not relevant.

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

- 1.105 No significant effects were identified in relation to this SA objective.
- 1.106 The SA resulted in uncertain effects being identified for the majority of the larger site options (>5 ha or >150 dwelling capacity), 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 1 km 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. A minor negative (-) effect was identified for a small proportion of sites where the Council's site visit identified a potential negative effect where mitigation was deemed likely to be feasible. A minor positive (+) effect was also identified for a small number of sites, reflecting the potential for enhancement. No effect was identified for five of the sites as there were no historic assets within the vicinity or site visits had been able to rule out such effects.

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

- 1.107 Effects of the Publication Draft Local Plan 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 were

not, therefore, assessed against this SA objective, although effects were subsequently identified for a small number of sites in relation to site-specific policy wording.

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

- 1.108 The first criterion assessed under this SA objective was whether the site option was within a groundwater Source Protection Zone (SPZ). Generally, no effects (0) were identified, reflecting the fact that that the sites did not fall within any SPZ or only an insignificant proportion (less than 25%) was within SPZ1, 2 or 3. Minor negative (-) effects were identified for a small number of sites, reflecting the fact that 25% or more of the site was within SPZ1 or 2. An uncertain effect was identified for sites with 25% or more of their area within SPZ3, or sites where the actual effect will depend on where development is located within them.
- 1.109 The second criterion assessed under this SA objective was whether the local sewage network had sufficient capacity to accommodate development. Minor negative (-) effects were identified for most of the sites, which do not have sufficient headroom to accommodate development. This means that that the pumping station or sewer pipe size may restrict growth, or the site is located in a non-sewered area where there is a lack of infrastructure. A small number of sites received a significant negative (--) effect from scoring red in the wastewater network RAG assessment, due to their being limited capacity in the sewage network. Additionally, a small number of sites received a negligible (0) effect from scoring green in the network RAG assessment, whilst the remaining sites scored a negligible (0) effect for not being assessed by the WCS.

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

- 1.110 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 sites, reflecting the fact that less than 5% of each site was within Flood Zone 3 or less than 25% of each site was within Flood Zone 2. Significant negative (--) effects were identified for one site, 'HATR 299', 73.28% of which is within Flood Zone 3.

### **SA objective 14: To improve air quality**

- 1.111 Significant negative effects with uncertainty (--?) were identified in relation to this SA objective for a small number of sites, reflecting the fact that they would result in residential development within 200m of the A12 or A120 but that mitigation might be possible, for example by site layout or screening. No effect (0) was identified for the remainder of sites with the exception of 'Group A Employment' and 'Group L Employment', whose actual effect will depend on where development is located within each site. This is because some parts of both 'Group A Employment' and 'Group L Employment' are within 200m of the A2 or A120 whilst other parts are not.

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

- 1.112 Effects in relation to this SA objective were assessed via a number of criteria, with results as follows.
- 1.113 Firstly, it was determined whether the site fell 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 ones being significant negative effects for a minority of sites where at least 25% of each site fell within a landscape character area with high sensitivity to change. In a number of cases, these effects were mitigated when site-specific policy text was taken into account.
- 1.114 Secondly, a check was made whether the site was within the proposed extension to Dedham Vale AONB. A significant negative effect with uncertainty (--?) was identified for one site, BURE 165, reflecting the fact that at least 25% of the site fell within the proposed extension; no effect (0) was identified for the remainder of sites.
- 1.115 Thirdly, it was determined whether the site was on 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 most of the sites, reflecting the fact that at least 25% of each the site was on greenfield land. Minor positive (+) or uncertain (?) effects were identified for the remaining sites.

- 1.116 Finally, it was determined whether the site options were located in any locally designated Visually Important Spaces or within a Country Park. No effect (0) was identified for all sites, the only exception being WITC 421 for which a minor negative (-) effect was awarded, due to its overlap with a Visually Important Space.

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

- 1.117 Effects in relation to this SA objective were firstly assessed by considering whether development would lead to the loss of good quality agricultural land. Significant negative (--) effects were identified for a number of sites, reflecting the fact that at least 25% of each the site was on grade 1 (excellent) or grade 2 (very good) agricultural land. A smaller proportion of sites scored minor negative (-) or no effect (0), with the exception of 'Group L Employment' which scored an uncertain (?) effect because although the majority of the site is on grade 1 or 2 agricultural land, the actual effect will depend on where development is located within the site.
- 1.118 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 site options, reflecting the fact that no known contaminated land was present. A minor negative (-) effect was identified for 'HATF 608' because the BDC site assessment form suggests there are possible contamination issues at this site. Uncertain (?) effects were identified for the remainder of sites, indicating potential contamination but no information on whether remediation would be a condition of development.

DRAFT

**Table 4 Summary of SA findings for site allocations in the Publication Draft Local Plan**

N.B. Table shows 'raw' scores using assessment criteria in Appendix 4 in the full SA Report, i.e. prior to any adjustments for effects of any site-specific allocation policy such adjustments are described in the policy assessments in Chapter 6 in the full SA Report.

Site ID	Area (Ha)	No. of Dwellings	Assess site?	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 Design/ated 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	
BCBG 150	0.35	10	Full	0	0	0	-	-	+	0	-	0	+	++	-	+	++	++	+	++	++	0	X	0	-	0	0	0	0	-	0	0	0	0	
BCBG 550	4.36	75	Full	?	0	++	-	-	?	0	-	0	+	++	-	+	++	++	+	+	++	?	X	0	?	0	0	0	0	-	0	0	0	0	
BOCN 127	0.50	9	Full	0	0	0	-	-	+	0	-	-	-	++	0	+	++	++	+	+	++	?	X	-	-	0	0	-	0	-	0	0	-	0	
BOCN 137	31.39	600	Full	0	0	++	-	-	+	0	+	0	+	++	-	+	-	++	+	-	++	?	X	-	-	0	0	-	0	?	0	0	-	0	
BOS 16	0.41	10	Full	?	0	0	+	-	?	0	+	0	+	++	-	+	++	++	+	+	++	?	X	0	-	0	0	0	0	-	0	0	0	0	
BRAW 153	2.77	70	Full	0	0	++	+	-	+	+	-	0	+	0	0	+	++	++	+	++	++	?	X	0	-	0	0	0	0	0	+	0	0	0	0
BRC 34	0.22	10	Full	?	0	0	+	-	?	0	+	0	+	++	-	+	++	++	-	-	++	?	X	-	-	0	0	0	0	0	+	0	0	0	?
BRC 77	0.08	10	Full	?	0	0	+	-	?	0	+	0	+	++	0	+	++	++	+	-	++	?	X	-	-	-	0	0	0	0	0	0	0	0	?
BRE 17H	0.59	10	Full	?	0	++	-	-	?	0	-	0	+	++	0	+	++	++	+	++	++	?	X	0	0	0	0	0	0	+	0	0	0	0	0
BRSO 152	0.75	100	Full	0	0	++	+	-	+	0	+	0	+	++	-	+	++	++	-	-	++	?	X	-	-	0	0	0	0	-	0	0	0	0	?
BURE 165	5.34	85	Full	0	0	++	+	-	++	0	-	0	-	++	-	+	+	++	?	-	-	?	X	-	-	-	0	-	-?	-	0	0	-	0	
COGG 506	3.21	30	Full	0	0	++	+	-	+	0	+	0	-	0	-	+	-	++	+	-	++	?	X	0	-	-	0	-	0	?	0	0	-	?	
CRESS 201	2.29	70	Full	0	0	++	-	-	+	0	+	0	-	0	0	+	-	-	+	+	+	?	X	0	-	0	0	-	0	+	0	0	-	0	
GRBA 255A	2.69	37	Full	0	0	++	+	-	+	0	-	0	-	++	-	+	+	++	+	+	-	?	X	?	?	0	0	-	0	-	0	0	-	0	
Group A (BLAN 110, 114, 116 & 633)	119.04	2000	Full	+	0	++	+	-	+	?	+	0	+	++	-	++	++	++	+	++	++	?	X	0	-	0	0	-	0	-	0	0	-	0	
Group J (BOCN 123 & 132)	66.86	991	Full	+	0	++	-	-	?	0	-	-	-	++	-	++	++	++	+	++	++	?	X	0	-	0	0	-	0	-	0	0	-	?	
Group L (FEER 230, 232 & 233)	81.77	1000	Full	+	0	++	-	-	+	0	+	0	+	++	-	++	+	++	+	++	+	?	X	0	-	0	-?	-	0	-	0	0	-	?	
Group M (HATF 315 & HATF 316)	18.71	450	Full	0	0	++	-	-	+	-	+	0	-	++	0	+	++	++	+	-	++	?	X	0	-	0	-?	-	0	+	0	0	-	0	
GRYE 274	2.06	29	Full	0	0	++	+	-	+	0	+	0	+	0	-	+	+	-	+	++	+	-	X	-	?	0	0	-	0	-	0	0	-	0	
HASA 286	0.92	14	Full	0	0	0	+	-	+	0	+	0	+	++	-	+	++	++	+	+	++	?	X	0	-	0	0	0	0	-	0	0	0	0	0
HASA 287	1.64	50	Full	0	0	++	+	-	+	0	+	0	+	++	0	+	++	++	+	++	++	-	X	-	?	0	0	0	0	+	0	0	0	?	
HASA 295	2.11	70	Full	0	-	++	-	-	+	0	+	0	+	++	-	+	++	++	-	+	++	?	X	0	-	0	0	+	0	-	0	0	-	0	
HATF 313	1.99	40	Full	0	0	++	+	-	+	0	+	0	-	++	-	+	+	++	?	-	+	?	X	0	-	0	-?	-	0	-	0	0	-	0	
HATF 608	3.83	170	Full	0	0	++	+	-	+	0	+	0	-	++	0	+	+	++	+	-	+	0	X	0	-	0	-?	+	0	+	0	0	0	-	0
HATF 630	2.79	51	Full	0	0	++	+	-	+	0	+	0	-	+	-	+	+	++	+	-	+	?	X	0	-	0	-?	-	0	-	0	0	-	0	0
HATR 299	0.81	10	Full	0	0	0	+	-	+	0	+	0	+	++	0	+	++	++	+	++	++	?	X	-	-	-	0	0	0	+	0	0	0	0	?
HATR 309	1.75	N/A	Full	0	0	?	-	-	+	0	+	0	+	++	-	+	++	++	+	+	++	-	X	0	-	0	0	-	0	-	0	0	0	-	0
KELV 332	0.16	N/A	Full	0	0	0	+	-	+	0	+	0	n/a	++	0	+	+	++	-	n/a	n/a	0	X	0	?	0	0	+	0	+	0	0	-	0	
KELV 337	21.45	250	Full	+	0	++	+	-?	+	0	+	0	+	++	-	+	+	++	+	+	+	-	X	0	-	0	0	+	0	-	0	0	-	0	
LPP 21	43.80	600	Full	?	-	++	+	-	?	?	+	0	+	++	-	+	++	++	+	++	++	?	X	-	-	0	0	-	0	-	0	0	-	0	
LPP 28	0.08		Full	0	0	0	+	-	?	0	+	0	+	++	0	+	++	++	+	+	++	+	X	0	-	0	0	0	0	+	0	0	0	0	0
LPP 31	10.62	285	Full	0	0	++	+	-	+	0	+	0	-	++	-	+	+	++	+	-	+	-	X	0	-	0	-?	-	0	-	0	0	-	0	0
RIDG 359	0.79	10	Full	0	0	+	-	0	+	0	-	0	-	++	-	+	+	+	?	++	-	?	X	?	0	0	0	-	0	-	0	0	-	0	0
SIBH 617 & SIBH 377	2.26	75	Full	0	0	++	-	-	+	0	+	0	+	++	0	-	+	-	+	+	++	?	X	-	-	0	0	-	0	-	0	0	-	0	0
SILV 388	3.55	80	Full	0	0	++	+	-	+	0	+	0	-	++	0	+	+	++	+	++	-	+	X	0	-	0	0	-	0	+	0	0	-	0	0
STEB 395	1.22	20	Full	0	0	++	+	-	+	0	-	0	-	++	-	+	+	+	?	++	-	-	X	?	0	0	0	-	0	-	0	0	-	0	0
WCH 14CD	0.64	10	Full	?	0	0	+	-	?	0	+	0	+	++	0	+	++	++	+	+	++	+	X	0	-	0	0	0	0	+	0	0	0	0	0
WETH 414	0.24	12	Full	0	0	+	+	-	+	0	-	0	-	++	-	+	+	++	?	+	-	?	X	-	0	0	0	-	0	-	0	0	-	0	0

WETH 624	1.45	23	Full	?	0	++	+	-	?	0	-	0	-	++	-	+	+	++	+	++	-	-	X	?	?	0	0	-	0	-	0	0	-	0	
WITC 421	3.06	40	Full	0	-	++	+	-	+	0	+	0	+	++	--?	+	++	++	?	+	++	-	X	0	-	0	0	-	0	-	-	0	0	-	?
WITN 425 & WITN 613	0.45	40	Full	0	0	++	+	-	+	-	+	0	-	++	0	+	++	++	?	++	++	?	X	0	-	0	0	0	0	+	0	0	0	0	0
WITN 427	0.32	10	Full	-	0	0	-	-	+	0	-	0	-	++	-	+	++	++	+	++	++	?	X	0	0	0	0	-	0	-	0	0	-	0	
WITN 429	0.55	13	Full	0	0	0	-	-	+	0	-	0	+	++	0	+	++	++	+	++	++	?	X	0	-	0	0	0	0	+	0	0	0	0	0
WITW 431	1.72	40	Full	0	0	++	+	-	+	0	-	0	-	++	-	+	++	++	+	+	++	0	X	0	-	0	0	-	0	-	0	0	-	0	
Group A Employment	119.04	0	Non-Housing	0	0	n/a	n/a	n/a	+	?	n/a	0	n/a	++	-	?	++	?	?	n/a	n/a	?	X	0	n/a	0	?	?	0	-	0	0	-	0	
Group J Employment	66.86	0	Non-Housing	+	0	n/a	n/a	n/a	?	0	n/a	?	n/a	++	-	?	++	?	+	n/a	n/a	?	X	?	n/a	0	0	?	0	-	0	0	-	?	
Group L Employment	81.77	0	Non-Housing	0	0	n/a	n/a	n/a	+	0	n/a	0	n/a	++	-	?	?	?	+	n/a	n/a	?	X	?	n/a	?	?	?	0	-	0	0	?	?	
BRE31RW	1.72	0	Non-Housing	0	0	n/a	n/a	n/a	?	0	n/a	0	n/a	++	-	+	++	++	?	n/a	n/a	?	X	0	n/a	0	0	0	0	-	0	0	0	0	
COLE 188	11.39	0	Non-Housing	0	-	n/a	n/a	n/a	+	0	n/a	0	n/a	++	-	+	++	++	+	n/a	n/a	?	X	?	n/a	0	0	-	0	-	0	0	-	0	
CRESS 202	3.92	0	Non-Housing	0	-	n/a	n/a	n/a	+	0	n/a	0	n/a	0	-	+	++	++	?	n/a	n/a	0	X	0	n/a	0	--?	+	0	-	0	0	-	0	
GRNO 260	39.57	0	Non-Housing	0	0	n/a	n/a	n/a	+	0	n/a	0	n/a	++	-	+	++	++	+	n/a	n/a	?	X	0	n/a	0	0	-	0	-	0	0	-	0	
LPP 4	9.47	0	Non-Housing	0	0	n/a	n/a	n/a	?	?	n/a	0	?	++	-	+	--	++	+	n/a	n/a	?	X	0	n/a	0	--?	--	0	+	0	0	-	0	
RIVE 362, RIVE 363	6.86	0	Non-Housing	0	0	n/a	n/a	n/a	+	0	n/a	0	n/a	++	0	-	++	-	?	n/a	n/a	?	X	0	n/a	0	--?	-	0	-	0	0	-	0	
X1	8.60	0	Non-Housing	?	-	n/a	n/a	n/a	?	?	n/a	0	n/a	++	-	+	--	+	?	n/a	n/a	?	X	-	n/a	0	0	-	0	-	0	0	-	0	



## SA findings for the Publication Draft Local Plan policies

- 1.119 Following consultation on the Draft Local Plan and the accompanying SA Report, Braintree District Council made some amendments to the policies which are now set out in the Publication Draft version of the Local Plan.
- 1.120 The detailed SA matrices that were prepared previously for the draft policies have been updated to reflect the policies as they appear in the Publication Draft Local Plan. The SA findings for each group of policies in the Publication Draft Local Plan are summarised in Chapter 10 of the full SA Report.

### Cumulative effects of the Publication Draft Local Plan

- 1.121 **Table 5** presents a summary of the SA scores for all of the site allocations in the Publication Draft Local Plan, and **Table 6** below presents a summary of the SA scores for all of the policies in the Publication Draft Local Plan.
- 1.122 Under each of the SA objectives below, a summary is provided of the cumulative effects of the Publication Draft Local Plan in relation to each SA objective. The summary also describes ways in which any significant negative effects of the Publication Draft Local Plan may be mitigated by other policies within the Publication Draft Local Plan. Similarly, where an allocated site was the subject of a site-specific policy (the larger, strategic sites), the score awarded to the policy was referenced rather than that awarded to standalone site as the site specific policy provisions were taken into consideration to arrive at an adjusted score for such sites.

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

- 1.123 A number of the 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 were identified for a number of other policies.
- 1.124 No significant negative effects on SA objective 1 were identified by the SA of the Publication Draft Local Plan. Potential minor negative effects were identified for a small number of policies (LPP 32 Residential Allocation Area – Gimsons, Witham, LPP 42: Residential Conversion of Buildings in the Countryside) and for two non-strategic site allocations (HASA 295 and WITN 427).
- 1.125 With respect to the non-strategic site allocations, most were assessed as having a neutral effect with a smaller number of minor or uncertain effects also identified.
- 1.126 The Strategic Section One for Local Plans was assessed as having minor positive effects on this objective where relevant, predominantly through general place shaping principles and the policy criteria relevant specific to the Garden Communities.
- 1.127 Given the number of significant positive and minor positive effects identified by the SA, it is considered that the Publication Draft Local Plan is likely to have a significant positive cumulative effect on SA objective 1.

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

- 1.128 The Publication Draft Local Plan allocates sufficient sites to meet the objectively assessed housing need for the District through a combination of strategic growth locations and smaller non-strategic sites. In addition, a range of non-site specific policies (LPP 33: Affordable Housing, LPP 34: Affordable Housing in Rural Areas, LPP 35: Specialist Housing, LPP 36: Gypsy and Traveller and Travelling Showperson's 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. No significant negative effects and few minor effects were identified.

- 1.129 The Strategic Section One for Local Plans was assessed as having significant positive effects in ensuring good quality and inclusive homes.
- 1.130 As a result, a significant positive cumulative effect is likely for SA objective 2.

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

- 1.131 A significant positive effect (with uncertainty) was identified from provision for expansion of the Essex County Fire and Rescue Headquarters by Policy LPP 4: Kelvedon Park. The requirement in Policy LPP 21 for provision of open space in the North West Braintree Strategic Growth Location also gave rise to a significant positive effect. Policy LPP 52: Health and Wellbeing Impact Assessment was considered 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 LPP55: Local Community Services and Facilities was assessed as having a significant positive effect (with uncertainty) due to the protection it gives to existing health facilities and support for enhanced provision.
- 1.132 No significant negative effects were identified from the Local Plan in relation to this SA objective.
- 1.133 Whilst Strategic Growth Locations had mainly minor positive effects, a number of the Comprehensive Redevelopment Areas had negative effects due to their lack of access to primary healthcare facilities and/or natural greenspace, although loss of existing open space was generally avoided.
- 1.134 With respect to the non-strategic site allocations, one site BURE 165, was assessed as having a significant positive effect due to the proposed provision of new open space. The majority of non-strategic sites scored minor positive due to their proximity to primary healthcare facilities but minor negative effects due to relatively poor access to natural greenspace. Nearly all scored minor positive effects for access to open space, with a small number scoring uncertain effects. There were a number identified that are not within easy access to primary healthcare facilities, and these scored minor negative against this SA objective.
- 1.135 The Strategic Section One for Local Plans was assessed as having significant positive effects due to a combination of health related infrastructure provision and also adherence to Garden City Principles regarding walking and cycling infrastructure and the provision of open space and recreational facilities.
- 1.136 Overall the Publication Draft Local Plan is likely to give rise to significant positive cumulative effects on SA objective 3 mixed with some minor negative cumulative effects, reflecting the number of mainly non-strategic sites that are not well located to natural greenspace or primary health facilities.

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

- 1.137 The scale of development proposed in the Publication Draft Local Plan, and the focus for development on the Main Towns and Key Service Villages should provide additional demand and use for the existing services and facilities provided by these service centres in the District. Policies LPP 10: Retailing and Regeneration, LPP 11 Primary Shopping Areas, and LPP 12: District Centre scored significant positive effects against this SA objective by continued support for service centres.
- 1.138 All of the Strategic Growth Locations and Comprehensive Redevelopment Areas had minor positive effects on this SA objective, as did a number of the non-strategic site allocations due to their accessibility to primary shopping areas or Local Centres. A minority of non-strategic sites scored minor negative effects as they are more remote from local shops and services.

- 1.139 No significant negative effects were identified. There is a potential risk that the service centre of Halstead could be adversely affected by competition from the greater amounts of new development focused at the other two Main Towns of Braintree (including the out of centre allocations at land north of Freeport and land off Millennium Way) and Witham and the two Garden Communities proposed by Section One of the Local Plan in Braintree District. The two Comprehensive Redevelopment Areas identified for the town should help to mitigate such effects by improving the service offer of the town.
- 1.140 The Strategic Section One for Local Plans was assessed as having significant positive effects on the town centre of Braintree as the Spatial Strategy will seek to locate development within such centres in the short-medium term, with long term benefits being experienced in the long term through better infrastructure and connectivity associated with the Garden Communities, particularly regarding public transport networks.
- 1.141 Given the ability of the large scale of development proposed to generate additional demand for goods and services, and the accessibility to service centres for most development proposed in the Publication Draft Local Plan, a significant positive cumulative effect is considered likely for this SA objective.

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

- 1.142 The Publication Draft Local Plan provides for the amount and types of employment land need identified by the Employment Land Needs Assessment, including some larger sites that were previously provided for in the 2011 Core Strategy. This is reflected in the significant positive score for Policy LPP 2: Location of Employment Land. Significant positive effects were also identified for Policy LPP 9: Tourism Development within the Countryside, and LPP 10: Retailing and Regeneration due to their support for economic growth.
- 1.143 The allocations at most of the Strategic Growth Locations, Comprehensive Redevelopment Areas and smaller non-strategic sites were assessed as having significant positive effects with respect to broadband internet accessibility. Accessibility of residential allocations to existing employment areas was more mixed with a number scoring minor negative effects as a result.
- 1.144 Potential significant negative effects were identified in relation to two allocations that could result in the sterilisation of mineral resources, the Strategic Growth Locations 'Land East of Broad Road, Braintree (LPP 21) and the non-strategic residential site BOCN 127.
- 1.145 The Strategic Section One for Local Plans was assessed as having significant positive effects due to the policy requirement to meet employment land requirements and the choice of locations for the Garden Communities from which existing strategic employment areas are accessible, with further positive effects associated with specific employment provision at each Garden Community and with infrastructure commitments of an enhanced public transport offer to key centres.
- 1.146 Given that the Publication Draft Local Plan seeks to allocate sufficient land to meet employment and other economic needs, and that this land is focused around the main population centres where access to labour can be maximised, a significant positive cumulative effect is considered likely.

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

- 1.147 The increase in the area of developed land in the District as a result of the Draft Local Plan will inevitably have an impact on biodiversity. However, greenfield sites do not necessarily exhibit greater biodiversity than urban areas, particularly where they are managed intensively for agriculture. Urban areas can incorporate habitats that are attractive to a range of species, including gardens and green spaces.
- 1.148 The potential for a significant negative effect on biodiversity was identified for one allocation: Policy LPP 27 Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall. This was due to a small proportion of the site being located in Blackwater Plantation Local Wildlife Site. None of the Strategic Growth Locations will result in the loss of designated biodiversity and geodiversity sites, although they will require the use of greenfield

land, and so a minor negative effect on biodiversity was assumed. The majority of the non-strategic allocated sites have been assessed as likely to have minor negative effects for the same reason.

- 1.149 The Strategic Section One for Local Plans was assessed as having minor positive effects since although it will lead to the development of significant areas of greenfield land, it provides for effective enhancement to green and blue infrastructure for net biodiversity gains.
- 1.150 There are eight policies in the Publication Local Plan that the SA considered to result in significant positive effects on biodiversity due to their provisions for the conservation and enhancement of biodiversity. An even greater number of Local Plan policies were identified as having the potential for minor positive effects. A number of Publication Draft Local Plan policies that seek to safeguard and enhance biodiversity, which are likely to contribute to avoidance or mitigation of the potential negative effects of development.
- 1.151 The Habitats Regulations Assessment (HRA)<sup>8</sup> of the Section 2 Local Plan identified potential Likely Significant Effects (LSEs) on the Colne Estuary SPA/Ramsar, Essex Estuaries SAC, and Blackwater Estuary SPA/Ramsar as a result of the effect of recreational impacts in-combination with the Tendring District Part 2 Local Plan, Colchester Borough Section 2 Local Plan, and the Shared Strategic Section 1 for Local Plans which includes the North Essex Authorities of Braintree, Colchester and Tendring.
- 1.152 The Appropriate Assessment stage identified whether the above LSE would, in light of mitigation and avoidance measures, result in adverse effects on the integrity of the European sites as a result of the in-combination effects identified. Where necessary, suitable mitigation measures and modified policy wording was provided which would enable a sufficient level of certainty to conclude no Adverse Effect on Integrity (AEOI).
- 1.153 The key recommendation made in the HRA Report is for Recreation Avoidance and Mitigation Strategies (RAMS) to be prepared jointly by the North Essex Authorities to mitigate the effect of recreational pressures on the above European Sites. The HRA recommends that this should include provision of alternative open space and green infrastructure, on-site management, and an adaptable approach which responds to regular monitoring of both people and birds. To this end, Natural England and the North Essex Authorities are actively engaging in a strategic, proactive and coordinated approach, and as a result the HRA concluded that there is a high degree of certainty that the impacts identified in the HRA can be avoided.
- 1.154 The HRA found that that the approach being taken by Braintree District Council in addressing the key issues, particularly with regards to working alongside the other North Essex Authorities in relation to strategic growth, is advocated and deemed to be the most appropriate and pragmatic approach in ensuring that Section 2 of the Braintree Publication Draft Local Plan is sound.
- 1.155 The HRA concluded that, provided that key recommendations and mitigation requirements detailed within the HRA Report are fully developed and included within Section 2 of the Braintree Local Plan, including a RAMS which is developed in close consultation with Natural England and can be successfully implemented, there will be no adverse effect on the Colne Estuary SPA/Ramsar, Essex Estuaries SAC, and Blackwater Estuary SPA/Ramsar, either alone or in-combination.
- 1.156 Overall, it is concluded that the Publication Local Plan will result in a negligible or possibly minor negative cumulative effect on SA objective 6.

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

- 1.157 The majority of development proposed by the Publication Draft Local Plan will be close to existing bus or rail services.
- 1.158 Three of the Strategic Growth Location allocations in the Publication Draft Local Plan scored significant positive effects for SA objective 7 – LPP18: Land East of Great Notley, South of Braintree; LPP 19: Land East of Broad Road, Braintree; and LPP22: Land at Feering – as these are

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<sup>8</sup> LUC (May 2017) HRA Report for Section 2 of the Braintree Publication Draft Local Plan

expected to incorporate a new bus stop served by a frequent service. Nearly all of the remaining strategic and the non-strategic site allocations were assessed as having a minor positive effect on SA objective 7 due to their proximity to existing bus or rail services. The only spatial development policies found to have a minor negative effect due to poor access were Allshot's Farm, Rivenhall (Policy LPP 5) and the non-strategic allocations SIBH 617 and SIBH 377. Policy LPP 13 Freeport Outlet Centre also scored minor negative.

- 1.159 In addition, LPP 40: Sustainable Transport specifically promotes the facilitation of sustainable modes of transport through new developments.
- 1.160 The Strategic Section One for Local Plans was assessed as having significant positive effects as the infrastructure requirements of the Garden Communities, in adhering to sustainable transport Garden City Principles, can be expected to offer wider benefits and gain for neighbouring areas, and the geographical distribution of the preferred Garden Community options ensure that these benefits can be experienced across all three authorities with an inclusive coverage across North Essex.
- 1.161 Given the emphasis in the Publication Draft Local Plan on promoting sustainable travel through new development, and the good proximity to, or ease of use of, more sustainable modes of travel, it is considered that the Draft Local Plan will have a significant positive cumulative effect on SA objective 7.

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

- 1.162 The majority of development proposed by the Publication Draft Local Plan will be within or close to existing Main Towns, reducing the need to travel to services, facilities and employment. In addition, as described under SA objective 7, the majority of development proposed by the Publication Draft Local Plan will be close to existing bus or rail services. These circumstances together with the provision of new bus services at the larger new developments mean that most of the spatial development policies in the Publication Draft Local Plan (employment land allocations, retail allocations, Strategic Growth Locations, majority of the non-strategic site allocations, and several of the policies relating to the provision of community services) were assessed as having significant positive effects on this SA objective. There were also a number of policies and non-strategic site allocations that were considered to have minor positive effects.
- 1.163 Significant negative effects were identified in relation to this SA objective for the employment allocation LPP 5: Allshot's Farm because the site is in the open countryside, remote from any service centre; this is exacerbated by an absence of regular bus or rail services within walking distance from the site. Significant negative effects were identified due to the remote locations of the allocations made by Policy LPP 4: Kelvedon Park and LPP 29: Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall, although these two sites do have access to frequent bus services.
- 1.164 Policy LPP 82: Infrastructure delivery and impact mitigation policy requires that there will be sufficient infrastructure availability and capacity to serve new development and that this is sustainable over time. This resulted in significant positive effects on SA objective 8: accessibility and may mitigate the existing poor accessibility of a small number of allocated sites.
- 1.165 The Strategic Section One for Local Plans was assessed as having significant positive effects as the infrastructure requirements of the Garden Communities, in adhering to sustainable Garden City Principles can be expected to offer wider benefits and gain, particularly regarding accessibility associated with both transport and services for neighbouring areas, and the geographical distribution of the preferred Garden Community options. This ensures that these benefits can be experienced across all three authorities with an inclusive coverage across North Essex. The Garden Communities are of a sufficient size to stimulate educational infrastructure provision. It should also be noted that the interventionist approach of the North Essex Authorities ensures that both infrastructure provision is self-funded through each Garden Community, and that the approach to their development is one of 'infrastructure first'.

- 1.166 Taken as a whole, the Publication Draft Local Plan seeks to ensure that new development is accessible with respect to community services and facilities, whether existing or proposed, as part of the development proposals, and as a result a significant positive cumulative effect on SA objective 8 should result.

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

- 1.167 All of the Strategic Growth Locations policies provide for new schools as part of the development proposals for the sites and many of the other housing site allocations are well located to existing primary and/or secondary schools, resulting in significant or minor positive effects for these sites, depending on the distances to the existing schools. A notable minority of non-strategic housing allocations are not in proximity to educational establishments, resulting in minor negative effects for these sites.
- 1.168 Policy LPP 54: Educational Establishments seeks to protect existing educational establishments, and to provide support for new school and educational facilities, resulting in significant positive effects.
- 1.169 The Strategic Section One for Local Plans was not explicitly assessed against this SA objective but the SA noted that the Garden Communities are of a sufficient size to stimulate educational infrastructure provision and that this will be self-funded through each Garden Community.
- 1.170 The ability of the planning system to influence educational attainment and skills improvement is limited but it can play its part by ensuring that housing development is well catered for in terms of access to education, and in this respect the Publication Draft Local Plan scores well. Therefore a significant positive cumulative effect is likely to result on SA objective 9.

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

- 1.171 Assessment of the potential effects of site allocations on the historic environment were carried out by Council officers as part of wider site assessments within the SHLAA process, based on a site visit plus relevant desktop sources. . The SA resulted in uncertain effects being identified for the majority of the larger site options (>5 ha or >150 dwelling capacity), 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 1 km 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.
- 1.172 Policies LPP 50: Built and Historic Environment, LPP 56: Conservation Areas, LPP 58: Shop Fronts, Fascias, and Signs in Conservation Areas, LPP 59: Illuminated Signs in Conservation Areas, LPP 60: Heritage Assets and their Settings, LPP 61: Demolition of Listed Buildings or Structures, LPP 62: Enabling Development, and LPP 53: Archaeological Evaluation, Excavation and Recording were all assessed as having significant positive effects on this SA objective. This indicates that strong policy safeguards within the Publication Draft Local Plan are in place that seek to ensure the delivery of development will not have an adverse effect on the historic environment of the District.
- 1.173 The Strategic Section One for Local Plans was assessed as having minor positive effects. There could be a perceived negative cumulative impact on the historic environment associated with strategic development at the scale proposed for the Garden Communities, but despite this, the policies have taken on board those recommendations of the Preferred Options SA and ensure that protection will occur in all instances with enhancement a significant possibility. Forthcoming masterplanning and Garden Community specific DPDs have the potential to enhance site specific assets and their settings and deliver a high quality built environment. Although a degree of uncertainty surrounds the status and content of the masterplans and DPDs and whether their content is appropriate to individual assets and designations, the general distribution of growth

across the strategic area and the Section One policy content seeks to address any perceived or possible effects on the historic environment.

- 1.174 Notwithstanding the policy safeguards within the Publication Draft Local Plan it was not possible to conclude whether a number of site allocations would have significant effects in relation to this SA objective and an uncertain cumulative effect on SA objective 10 is therefore recorded.

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

- 1.175 Given the scale of growth to be delivered by the Publication Draft Local Plan, it is inevitable that this will contribute to increased greenhouse gas emissions, through construction and use of materials, heating and lighting, and the generation of traffic. This has resulted in significant negative effect being assessed for Policy LPP 19 Housing Provision and Delivery.
- 1.176 Aside from this, the Publication Draft Local Plan has been assessed on the principle of whether it is likely to keep these increased greenhouse gas emissions to a minimum. Most of the effects on greenhouse gas emissions from policies in the Publication Draft Local Plan are likely to result in either negligible or minor effects, sometimes positive, sometimes negative, but rarely significant. The following policies were, however, assessed as having significant positive effects: Policy LPP 44: Sustainable Transport, which encourages the use of more sustainable transport modes of transport; LPP 67: Natural Environment and Green Infrastructure, which requires proposals to take account of the potential effects of climate change in their design, and to propose measures to reduce greenhouse gas emissions where necessary; LPP 74: Climate Change, which requires developments to include climate change mitigation principles in their design and which supports renewable and low carbon technologies; and Policies LPP 75 Energy Efficiency, LPP 76: Renewable Energy Schemes, and LPP 77: Renewable Energy within New Developments, which seek to reduce greenhouse gas emissions and encourage the development of renewable energy sources and their use in new developments.
- 1.177 The Strategic Section One for Local Plans was assessed as having a negligible impact on this SA objective.
- 1.178 Even though the Publication Draft Local Plan includes policies to encourage the use of sustainable transport, energy efficient development, and the use of renewable energy, it is unlikely that these will fully offset the carbon emissions generated by new development and associated traffic. Overall the cumulative effect is not expected to be minor negative in relation to SA objective 11.

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

- 1.179 The scale of development proposed is likely to place additional demands on scarce water resources, on the capacity of the sewer network to carry waste water to WRCs, and on the capacity of these WRCs to treat the waste water.
- 1.180 The Water Cycle Study indicates that four WRCs (Bocking, Braintree, Coggeshall and White Notley) do not have sufficient capacity to serve proposed future development across the District. Without further action, increased wastewater resulting from development could exceed environmental permits and have negative effects on the quality of watercourses with negative effects on SA Objective 12. However, the WCS concludes that it is feasible to upgrade these four WRCs to ensure that watercourses are not significantly harmed.
- 1.181 Two of the Strategic Growth Locations were assessed as having a significant negative effect in relation to SA objective 12. For LPP 23 North West Braintree and LPP 24 Land at Feering, this was due to limited capacity in the sewage network serving the sites and the consequent potential for combined sewer overflows or direct sewer flooding to pollute water bodies; the latter site is also served by Feering WRC, which would require upgrades to serve the proposed growth. Similar issues were identified for two non-strategic sites, BOCN 127 and KELV 337. Minor negative effects were identified for a number of sites due to the potential for groundwater contamination from development within source protection zones.
- 1.182 The Draft Local Plan includes a number of policy safeguards regarding the water environment, most notably within LPP 70: Protection, Enhancement, Management and Monitoring of

Biodiversity; LPP 73: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards; LPP 75: Energy Efficiency, which also encourages reduced water consumption and increased water recycling, LPP 79: Surface Water Management Plan, and LPP 80: Sustainable Urban Drainage Systems, most of which were assessed as having significant positive effects on this SA objective.

- 1.183 The Strategic Section One for Local Plans was assessed as having uncertain effects. Whilst it can reasonably be assumed that there could be likely negative implications regarding water scarcity and sewerage emanating from Section One due to the scale of growth stated in Policy SP2, the implications of this are best resolved on a site-by-site basis through early discussions with service providers on a plan-level and in certain areas as required. In the specific context of Garden Communities, Policy SP7 seeks to ensure that such issues are not forthcoming from any successful planning application.
- 1.184 Notwithstanding some localised constraints with the water supply and wastewater network which need to be resolved and agreed between the relevant developer and water company, overall the water cycle study 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. In light of this conclusion and the policy safeguards provided by the Publication Draft Local Plan policies referenced above and the Environment Agency's consenting regimes for water abstraction and discharges, a negligible cumulative effect is recorded on SA objective 12.

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

- 1.185 The assessment of the site allocations in the Publication Draft Local Plan identified very few effects with respect to flood risk. Two sites were considered to have a potentially significant negative effect: the Comprehensive Redevelopment Area at Factory Lane West/Kings Road (Policy LPP 28) and a site safeguarded for community facilities at Butler Road, Halstead (Policy LPP65: Local Community Services and Facilities). There were, in addition, a small number of sites with minor negative effects but most were neutral.
- 1.186 Increased urban development and hardstanding can increase flood risk, for example from run-off and over-flowing water drainage networks during times of extreme rainfall events. Several policies in the Publication Draft Local Plan seek to address such issues and hence scored significant positive effects, being LPP 78: Flooding Risk and Surface Water Drainage; LPP 79: Surface Water Management Plan; and LPP 80: Sustainable Urban Drainage Systems:
- 1.187 The Strategic Section One for Local Plans was assessed as having negligible effects as no significant flood risk concerns were identified from the policies and Garden Communities.
- 1.188 Overall the cumulative effect is expected to be negligible on SA objective 13.

### **SA objective 14: To improve air quality**

- 1.189 There are no Air Quality Management Areas (AQMAs) in Braintree District. However, it is likely that the scale of development proposed in the Publication Draft Local Plan will generate additional road traffic, which is the main source of air pollution in the District. The SA assumed that residential and other sensitive developments within 200 m of the A12 or A120 would be most affected by air pollution from existing and new road traffic.
- 1.190 Two of the strategic growth locations, LPP 24: Land at Feering, and LPP 25: Wood End Farm, Witham, were assessed as having significant negative effects due to their proximity to the A12 or A120, as were the smaller site allocations at Kelvedon Park (LPP 4), the retail allocation Land Off Millennium Way (LPP 16), and the Comprehensive Redevelopment Area on land between the A12 and GEML (LPP 31).
- 1.191 The Publication Draft Local Plan contains a number of policies that were considered to have significant positive effects with respect to SA objective 14, because they would help to mitigate air pollution arising from development and associated traffic. These were LPP 44: Sustainable Transport, LPP 73: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards, and LPP 77: Renewable Energy Within New Developments.

- 1.192 A small number of policies was considered to have either minor positive effects or minor negative effects, with some assessed as having mixed minor effects.
- 1.193 The Strategic Section One for Local Plans was assessed as having minor positive effects. There are no identified implications regarding air quality of the specific content of the policies and preferred Garden Community options contained in the Strategic Part for Local Plans. The Garden Community allocations, as per the Spatial Strategy, correspond to the best possible dispersal across the HMA to alleviate air quality issues in Colchester and associated with the A12 and A120. The stance of allocating Garden Communities as opposed to urban extensions seeks partly to ensure that new growth does not impact on AQMAs, such as those found in Colchester town. It can be expected that there could be some general negative connotations on air quality associated with the level of growth required in North Essex, however the distribution of growth and the policies of Section One seek to address this adequately.
- 1.194 Given that emissions to air are likely to increase as a result of development proposed in the Draft Local Plan, but that only a small number of development locations are likely to be affected, and that there are policies in the Publication Draft Local Plan which will help to mitigate air pollution, a minor negative cumulative effect is considered likely in relation to SA objective 14.

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

- 1.195 The scale of development proposed within the Draft Local Plan in comparison with the extent of existing development and the inevitable development of greenfield sites will undoubtedly have an effect on the landscape and townscape of the District. It will become more developed, and the sense of increased urbanisation will be felt particularly in and around the Main Towns of Braintree (including Great Notley), and Witham, as well as the two proposed Garden Communities. However, the loss of greenfield land will not necessarily result in a significant adverse effect on the landscape if developments are well designed and in less sensitive landscapes.
- 1.196 With respect to SA objective 15, a range of criteria was used in the SA in order to come to judgements on site allocations. These comprised the sensitivity of the landscape to accommodate development (as defined by the Landscape Character Assessment), whether the site would be within the proposed Dedham Vale AONB extension, whether the site is greenfield or brownfield, whether it would affect Visually Important Spaces, and whether it would affect country parks.
- 1.197 Using these criteria, none of the Strategic Growth Locations, and only eight of the non-strategic site allocations were assessed as having a significant negative effect. Of these, one site (BURE 165) is within the proposed Dedham Vale AONB extension and the remainder are in areas of high landscape sensitivity. A larger number of sites were considered to have minor negative effects in terms of landscape sensitivity of the location, or because they would involve the use of greenfield land, or both.
- 1.198 The Publication Draft Local Plan includes a large number of policies that seek to ensure that development within the countryside does not have an adverse effect on the landscape. Similarly, there are a large number of policies that set down criteria for the design of development to ensure landscape and townscape character is respected. These are anticipated to result in a range of significant or minor positive effects.
- 1.199 The loss of greenfield land to development needs to be acknowledged in the SA but in most instances the most sensitive landscapes have been avoided. The Publication Draft Local Plan includes strong safeguards to ensure that development does not significantly affect the open countryside and more rural areas, and that development is well designed. If well designed, some development may, in time, come to be considered to have a positive effect on the landscape of Braintree District, given that the towns and villages of the District which have developed and evolved over time are an integral component of the its landscape and character.
- 1.200 The Strategic Section One for Local Plans was assessed as having uncertain effects on landscapes. These effects are relevant to the specific Garden Community allocations themselves. Potential negative effects are associated with the scale of development required on Greenfield land, however policy exists to ensure that development is sensitive to its surroundings in each instance and within the context of wider landscape character areas. Beyond the principles contained in

Policies SP8-SP10, masterplanning and the Garden Community specific DPDs have further potential to mitigate and minimise site specific issues and deliver a high quality built environment.

- 1.201 For these reasons, it is difficult to come to an overall judgement on the cumulative effects of the proposals and policies in the Draft Local Plan, and how significant these will be. It is concluded that the Publication Draft Local Plan will result in mixed cumulative effects on SA objective 15, and that using the objective criteria for assessing sites these are unlikely to be significant, although perceptions of significance (both negative and positive) are likely to vary depending upon individual views.

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

- 1.202 Given that the majority of development proposed in the Draft Local Plan is to be delivered on greenfield land, this will be lost to agriculture. The test of significance for the SA is whether the greenfield land allocated for development is defined as best and most versatile agricultural land, particularly grades 1 and 2.
- 1.203 Five of the Strategic Growth Locations, the allocation for expansion of Essex County emergency services headquarters, one of the employment allocations, one of the Comprehensive Redevelopment Areas, some of the educational, community and cemetery allocations and 11 of the non-strategic housing allocations will result in the loss of grade 1 or 2 agricultural land and were therefore considered to have a significant negative effect (in a few cases subject to uncertainty about the footprint of new development) on this SA objective. A further eight site allocations were considered to have a minor negative effect.
- 1.204 The SA of site allocations in relation to this objective also considered whether development would be likely to lead to the remediation of a contaminated site. Whilst a number of allocations are on land thought to be contaminated, site allocation policies do not make remediation a condition of allocation for any of these, thus significant positive effects were identified. Instead the minority of sites thought to be on contaminated land scored mostly uncertain effects as it was not known whether remediation will be a condition of development.
- 1.205 The Strategic Section One for Local Plans was assessed as having uncertain effects on soils. There will be minimal effects on safeguarding mineral deposits and the quality of soil associated with the policy content of Section One. The Garden Community allocation at West of Braintree contains a site allocated within the ECC Minerals Local Plan for mineral extraction. Although not considered an insurmountable problem, the implications of this are that the North Essex Authorities will have to work with the Minerals and Waste Planning Authority and the landowner / developer of this minerals site to seek compromises surrounding the restoration of the site for a use compatible with Garden City principles at the masterplanning stage and within the Garden Community specific DPD for West of Braintree.
- 1.206 Whilst a number of Publication Draft Local Plan policies directly seek to protect soils or indirectly benefit soils by seeking to protect the countryside by prioritising development in existing centres (thereby scoring minor positive effects in relation to this SA objective) the fact remains that a considerable amount of best and most versatile agricultural land will be developed, and therefore an irreversible significant negative cumulative effect will result.

**Table 5 Summary of SA scores for Publication Draft Local Plan policies**

Local Plan Policy	SA1: Community safety & cohesion	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	SA11: Climate change mitigation	SA12: Water environment	SA13: Flood risk	SA14: Air quality	SA15: Landscapes and townscapes	SA16: Soil
Policy LPP 1 Development Boundaries	0	0	0	+	0	0	+	+	0	0	+	0	0	0	++	0
Policy LPP 2 Location of Employment Land	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
Policy LPP 3 Employment Policy Areas	0	0	0	+	+	0	+	+	0	0	+	0	0	+	0	0
Policy LPP 4 Kelvedon Park	0	0	++?	0	?	-	+	++/-	0	?	0	0	0	-?	-	-
Policy LPP 5 Allshot's Farm, Rivenhall	0	0	+	0	++	-	-	-	0	?	-	0	0	0	+/-	-?
Policy LPP 6 Business Parks	0	0	0	0	0	0	0	+/-	0	0	-	0	0	-	+	0
Policy LPP 7 Design and Layout of Employment Policy Areas and Business Parks	0	0	+/-	0	+	0	+/-	++	0	0	+/-	0	0	+/-	+	0
Policy LPP 8 Rural Enterprise	+	0	0	0	+	+	+	+	0	+	0	0	0	0	+	0
Policy LPP 9 Tourist Development within the Countryside	0	0	0	0	++	0	+	+	0	+	0	+	0	0	+	+
Policy LPP 10 Retailing and Regeneration	0	0	0	++	++	0	??	++?	0	?	0	0	0	0	+	+
Policy LPP 11 Primary Shopping Areas	0	0	0	++	+	0	0	0	0	0	0	0	0	0	+	0
Policy LPP 12 District Centre	0	0	0	++	+	0	0	0	0	0	0	0	0	0	+	0
Policy LPP 13 Freeport Outlet Centre	0	0	0	+	+	0	-	+/-	0	0	0	0	0	0	+	0
Policy LPP 14 Leisure and Entertainment	+	0	0	+	+	0	0	+	0	0	0	0	0	0	0	0
Policy LPP 15 Retail Warehouse Development	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0
Policy LPP 16 Retail Site Allocations	0	0	0	+	+	0	0	0	0	0	0	0	0	-?	0	0
Policy LPP 17 Housing Provision and Delivery	0	++	0	0	+	0	0	++?	0	0	-	-?	0	?	0	0
Policy LPP 18 Strategic Growth Location - Land East of Great Notley, South of Braintree	+	++	+/-	+	++	-	++	++	++	?	+	?	0	0	-	-
Policy LPP 19 Strategic Growth Location - Land East of Broad Road, Braintree	+	++	+	+	++/-	-	++	++	++	?	+	0	0	0	-	-?
Policy LPP 20 Strategic Growth Location - Former Towerlands Park Site	+	++	+	+	++	-	+	++	++	?	+	-?	0	0	0	-
Policy LPP 21 Strategic Growth Location - North West Braintree	+/-	++	++	+	++	-	+	++	++	?	0	-	0	0	-	-
Policy LPP 22 Strategic Growth Location - Land at Feering	+	++	+	+	++	-	++	++	++	+	+	-	0	-?	-	-
Policy LPP 23 Strategic Growth Location - Wood End Farm, Witham	+	++	+	+	++	-	+	++	++	?	+	?	0	-?	0	-
Policy LPP 24 Comprehensive Redevelopment Area - Land East of Halstead High Street	+	++	+	+	++	0	+	++	++	0	+	-?	0	0	+	0
Policy LPP 25 Specialist housing - Mount Hill, Halstead	0	?	+/-	+	++	-	+	++	++?	0	0	-	0	0	-	-
Policy LPP 26 Comprehensive Redevelopment Area - Factory Lane West/Kings Road	0	0	+/-	+	++	0	+	++	++	?	+	-	-	0	+	?

Local Plan Policy	SA1: Community safety & cohesion	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	SA11: Climate change mitigation	SA12: Water environment	SA13: Flood risk	SA14: Air quality	SA15: Landscapes and townscapes	SA16: Soil
Policy LPP 27 Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall	+	++	+/-	+	-	-?	+	++/-	++/-	?	0	-	-	0	-	-
Policy LPP 38 Comprehensive Redevelopment Area - Kings Chase	0	0	+/-	+	++	0	+	++	++	+	+	-	0	0	+	0
Policy LPP 29 Newlands Precinct	+	0	+?	+	++	0	+	++	++	+	+	0	+	0	+	0
Policy LPP 30 Rickstones Neighbourhood Centre	+	0	-	+	++	0	+	++	++	?	+	0	0	0	+	0
Policy LPP 31 Comprehensive Redevelopment Area - Land between A12 and GEML, Hatfield Peverel	+	++	+/-	+	++?	-	+	++	+/-	-?	0	-	0	-?	-	-
Policy LPP 32 Residential Allocation Area - Gimsons, Witham	-?	++	+?	+	++	-?	+	++	+	-?	0	-	0	0	-?	?
Policy LPP 33 Affordable Housing	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy LPP 34 Affordable Housing in the Countryside	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy LPP 35 Specialist Housing	+	++	+	0	0	0	0	+	0	0	0	0	0	0	+	0
Policy LPP 36 Gypsy and Traveller and Travelling Showpersons' Accommodation	+	++	+	0	0	0	0	+	0	0	0	0	0	0	+	0
Policy LPP 37 Housing Type and Density	+	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy LPP 38 Residential Alterations, Extensions and Outbuildings	0	0	0	0	0	0	0	0	0	+	0	0	0	0	++	0
Policy LPP 39 Replacement Dwellings in the Countryside	0	0	0	0	0	0	0	0	0	+	0	0	0	0	++	0
Policy LPP 40 Rural Workers Dwellings in the Countryside	0	++	0	0	++	0	0	0	0	0	0	0	0	0	++	0
Policy LPP 41 Infill Developments in Hamlets	0	++	0	0	0	0	0	0	0	0	0	0	0	0	++	0
Policy LPP 42 Residential Conversion of Buildings in the Countryside	-	++	0	0	-	+	0	-	0	+	0	0	0	0	+	0
Policy LPP 43 Garden Extensions	0	0	0	0	0	++	0	0	0	+	0	0	0	0	++	0
Policy LPP 44 Sustainable Transport	0	0	+	0	0	0	++	++	0	0	++	0	0	++	0	0
Policy LPP 45 Parking Provision	0	0	+/-	0	0	-?	+/-	++	0	0	+/-	0	0	+/-	0	-?
Policy LPP 46 Protected Lanes	0	0	0	0	0	++	0	0	0	0	0	0	0	0	++	0
Policy LPP 47 Transport Related Policy Areas	0	0	0	+	+	0	0	+	0	0	0	0	0	0	++	0
Policy LPP 48 New Road Infrastructure	0	0	+/-	0	+	-?	+/-	+	0	-?	+/-	0	0	+/-	-?	0
Policy LPP 49 Broadband	0	0	0	0	+	0	0	+	0	0	+	0	0	0	0	0
Policy LPP 50 Built and Historic Environment	+	0	0	0	+	0	0	+	0	++	0	0	0	0	++	0
Policy LPP 51 An Inclusive Environment	++	+	+	0	0	0	0	+	0	0	0	0	0	0	0	0
Policy LPP 52 Health and Wellbeing Impact Assessment	+	0	++	0	0	0	0	+	0	0	0	0	0	0	0	0
Policy LPP 53 Provision for Open Space, Sport and Recreation	+	0	+	0	+	+?	0	+?	0	0	+	0	0	0	+	0
Policy LPP 54 Equestrian Facilities	0	+	0	0	0	+	0	0	0	+	0	0	0	0	+	0
Policy LPP 55 Layout and Design of Development	+	+/-	+	0	0	+	+	+	0	+	0	+	+	+	+	0
Policy LPP 56 Conservation Areas	0	0	0	0	0	0	0	0	0	++	0	0	0	0	++	0
Policy LPP 57 Demolition In Conservation Areas	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0

Local Plan Policy	SA1: Community safety & cohesion	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	SA11: Climate change mitigation	SA12: Water environment	SA13: Flood risk	SA14: Air quality	SA15: Landscapes and townscapes	SA16: Soil
Policy LPP 58 Shop Fronts, Fascias and Signs in Conservation Areas	0	0	0	0	0	0	0	0	0	++	0	0	0	0	++	0
Policy LPP 59 Illuminated Signs in Conservation Areas	0	0	0	0	0	0	0	0	0	++	0	0	0	0	++	0
Policy LPP 60 Heritage Assets and their settings	0	0	0	0	+	0	0	0	0	++	0	0	0	0	0	0
Policy LPP 61 Demolition of Listed Buildings or Structures	0	0	0	0	+	0	0	0	0	++	0	0	0	0	+	0
Policy LPP 62 Enabling Development	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0
Policy LPP 63 Archaeological Evaluation, Excavation and Recording	0	0	0	0	0	0	0	0	0	++	0	0	0	0	+	0
Policy LPP 64 Educational Establishments	++	0	0	0	+	-	+	++	++	0	0	0	0	0	-	-
Policy LPP 65 Local Community Services and Facilities	++?	0	++?	??	??	-?	??	++?	0	-?	0	-?	-?	0	-?	-?
Policy LPP 66 Cemeteries and Churchyards	0	0	0	0	0	0	+	+	0	0	0	?	0	0	?	-
Policy LPP 67 Natural Environment and Green Infrastructure	0	0	+	0	+	++	0	0	0	0	++	0	0	0	++	0
Policy LPP 68 Protected Species, Priority Spaces and Priority Habitat	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0
Policy LPP 69 Tree Protection	0	0	+	0	0	++	0	0	0	0	0	0	0	0	++	0
Policy LPP 70 Protection, Enhancement, Management and Monitoring of Biodiversity	0	0	0	0	0	++	0	0	0	0	0	++	0	0	0	0
Policy LPP 71 Landscape Character and Features	0	0	0	0	0	++	0	0	0	0	0	0	0	0	++	0
Policy LPP 72 Green Buffers	0	0	0	0	0	+	0	0	0	0	0	0	0	0	++	0
Policy LPP 73 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	0	0	+	0	0	+	0	0	0	0	0	++	0	++	+	+
Policy LPP 74 Climate Change	0	0	+	0	+	+	+	0	0	+	++	0	??	+	+	+
Policy LPP 75 Energy Efficiency	0	+/-?	0	0	0	0	0	0	0	0	++	++?	0	0	0	0
Policy LPP 76 Renewable Energy Schemes	0	0	0	0	0	++	0	0	0	0	++	0	0	0	++	0
Policy LPP 77 Renewable Energy Within New Developments	0	0	0	0	0	0	0	0	0	0	++	0	0	++	0	0
Policy LPP 78 Flooding Risk and Surface Water Drainage	0	0	+	0	0	??	0	0	0	0	0	0	++	0	0	0
Policy LPP 79 Surface Water Management Plan	0	+	0	0	0	+	0	0	0	0	0	++	++	0	0	0
Policy LPP 80 Sustainable Urban Drainage Systems	0	+	+	0	0	??	0	0	0	0	0	??	++	0	0	0
Policy LPP 81 External Lighting	++	0	0	0	0	+	0	0	0	0	0	0	0	0	++	0
Policy LPP 82 Infrastructure delivery and impact mitigation policy	+	0	+	0	0	+	+	++	+	0	+	0	0	0	0	0

## Monitoring

- 1.207 The SEA Regulations require that 'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action' and that the environmental report should provide information on 'a description of the measures envisaged concerning monitoring'.
- 1.208 Although National Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reasons for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.
- 1.209 Table 6 sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**Table 6 Proposed Monitoring Framework for Braintree District Local Plan**

SA objectives	Proposed monitoring indicators
1) Create safe environments which improve quality of life and community cohesion	Recorded key offences KSI casualties for adults and children Public perceptions on leisure / community facilities. Street level crime statistics.
2) Provide everyone with the opportunity to live in a decent home	House Prices. Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain. Number of affordable dwelling completions. Annual dwelling completions. Population projections and forecasts.
3) Improve the health of the Districts' residents and mitigate/reduce potential health inequalities	Life Expectancy. Indices of Multiple Deprivation – Health and Disability sub-domain scores. Residents' opinion on availability of open space/leisure facilities. Location and extent of accessible open space to development site. Natural England Accessible Natural Greenspace Standards (ANGSt). Location and extent of recreational facilities to development site. Location and extent of accessible greenspace to development site. Proximity of site to healthcare facilities Percentage of population obese. Number of GPs and dentists accepting new patients. Number or % of open spaces receiving Green Flag Award.
4) Promote the vitality and viability of all service centres throughout the	Amount of retail, leisure and office floorspace in town centres. Implemented and outstanding planning permissions for retail, office

SA objectives	Proposed monitoring indicators
District	<p>and commercial use.</p> <p>Number and type of services from Rural Services Study.</p> <p>Number of post offices closed down.</p> <p>Number of village shops closed down.</p> <p>Pedestrian footfall count.</p>
5) Achieve sustainable levels of prosperity and economic growth	<p>Employment land availability.</p> <p>Typical amount of job creation (jobs per ha) within different use classes.</p> <p>Percentage change and comparison in the total number of VAT registered businesses in the area.</p> <p>Businesses by industry type.</p> <p>Amount of vacant industrial floorspace.</p> <p>Amount of high quality agricultural land.</p> <p>Travel to work flows.</p> <p>Employment status by residents and job type.</p> <p>Job densities.</p> <p>Economic activity of residents.</p> <p>Average gross weekly pay.</p> <p>Proportion of business in rural locations.</p> <p>Implemented and outstanding planning permissions for retail, office and commercial use.</p> <p>Number of minerals sites safeguarded for extraction.</p> <p>Current and planned broadband coverage.</p>
6) Conserve and enhance the biological and geological diversity of the environment	<p>Spatial extent of designated sites within the District.</p> <p>Achievement of Biodiversity Action Plan targets.</p> <p>Ecological potential assessments.</p> <p>Distance from site to nearest:</p> <ul style="list-style-type: none"> <li>• SSSIs.</li> <li>• NNR.</li> <li>• LWS.</li> <li>• Ancient Woodland.</li> <li>• Protected lanes.</li> <li>• Other sensitive designated or non-designated receptors.</li> <li>• Other special landscape features.</li> </ul> <p>Condition of the nearest sensitive receptors (where viable).</p> <p>Site visit surveys on typical abundance and frequency of habitats (DAFOR scale).</p> <p>Number of % of permitted developments providing biodiversity value e.g. green/brown roof, living wall, native planting.</p>
7) Promote more sustainable transport choices and uptake	<p>Access to services and business' by public transport.</p> <p>Indices of Multiple Deprivation.</p> <p>Travel to work methods and flows.</p> <p>Car ownership.</p>

SA objectives	Proposed monitoring indicators
	<p>Network performance on roads.</p> <p>Public transport punctuality and efficiency.</p> <p>Length of Public Rights of Way created/enhanced; number of Rights of Way Improvement Plans implemented.</p>
<p>8) Promote accessibility and ensure the necessary transport infrastructure to support new development</p>	<p>Residents' opinions on availability of open space/leisure facilities.</p> <p>Access to services by public transport.</p> <p>Indices of Multiple Deprivation – sub-domain scores.</p> <p>Recorded traffic flows.</p> <p>KSI casualties for adults and children.</p> <p>Car ownership.</p> <p>Location of site with regards to areas of high deprivation.</p> <p>Transport Assessments.</p>
<p>9) Improve the education and skills of the population</p>	<p>Additional capacity of local schools.</p> <p>GCSE or equivalent performance.</p> <p>Level 2 qualifications by working age residents.</p> <p>Level 4 qualifications and above by working age residents.</p> <p>Employment status of residents.</p> <p>Average gross weekly earnings.</p> <p>Standard Occupational Classification.</p>
<p>10) Conserve and enhance the historic environment, heritage assets and their settings</p>	<p>Number and % of Listed Buildings (all grades), Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, Places of Worship, conservation areas, locally listed heritage assets at Risk.</p> <p>% of Conservation Areas with an up-to-date character appraisal.</p> <p>% of Conservation Areas with published management proposals.</p> <p>Number of historic buildings repaired and brought back into use.</p> <p>% of local authority area covered by historic characterisation studies.</p> <p>Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded.</p> <p>Number of major development projects that enhance the significance of heritage assets or historic landscape character.</p> <p>Number of major development projects that detract from the significance of heritage assets or historic landscape character.</p> <p>Improvements in the management of historic and archaeological sites and features.</p> <p>% change in visits to historic sites.</p> <p>% of planning applications where archaeological investigations were required prior to approval.</p> <p>% of planning applications where archaeological mitigation strategies (were developed and implemented).</p> <p>Number and extent of street / public realm audits.</p> <p>Number of actions taken in response to breach of listed building control.</p>
<p>11) Reduce contributions to climate change</p>	<p>Carbon Dioxide emissions.</p> <p>Energy consumption GWh/households.</p> <p>Percentage of energy supplied from renewable sources.</p> <p>Code for Sustainable Homes certificates.</p>

SA objectives	Proposed monitoring indicators
12) Improve water quality and address water scarcity and sewerage capacity	<p>Percentage of water bodies at good ecological status or potential.</p> <p>Percentage of water bodies assessed at good or high biological status.</p> <p>Percentage of water bodies assessed at good chemical status.</p> <p>Water cycle study capacity in sewerage and resources.</p>
13) Reduce the risk of flooding	<p>Spatial extent of flood zones 2 and 3</p> <p>Residential properties flooded from main rivers</p> <p>Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency</p> <p>Incidences of flooding and location</p> <p>Distance of site to floodplains</p> <p>SFRA results</p> <p>Incidences of flood warnings in site area</p> <p>Distance to 'Areas susceptible to surface water flooding' – EA Maps</p> <p>Number or % of permitted developments incorporating SuDS</p>
14) Improve air quality	<p>Number and spatial extent of potentially significant junctions for air quality in the District</p> <p>NO<sub>2</sub> emissions</p> <p>PM10 emissions</p> <p>Recorded traffic flows on A12 and A120</p>
15) Maintain and enhance the quality of landscapes and townscapes	<p>Developments permitted contrary to Landscape Character Assessment 'sensitivities to change'.</p> <p>Number and extent of field boundaries affected.</p> <p>Development on previously developed land or conversion of existing buildings.</p> <p>Number of permitted developments within Conservation Areas.</p>
16) Safeguard and enhance the quality of soil	<p>Area of high quality agricultural land in District.</p> <p>Number or area of contaminated sites remediated.</p>



## Conclusions and next steps

- 1.210 The reasonable alternative site and policy options, as well as the policies and site allocations now included in the Publication Draft version of the Braintree District Local Plan have been subject to a detailed appraisal against the SA objectives which were developed at the Scoping stage of the SA process. The Publication Draft Local Plan proposes a large amount of housing, employment and other development across Braintree to meet future needs of the District; therefore the SA has identified the potential for negative effects on many of the environmental objectives including biodiversity, cultural heritage and the landscape. However, during the site allocation process the Council considered a large number of reasonable alternative site options and their technical assessment, alongside the Sustainability Appraisal findings, informed the final allocation and rejection of sites.
- 1.211 In addition, the Local Plan also includes a wide range of development management style policies, aiming to protect and enhance the economic, social and environmental conditions of the District. These policies provide appropriate mitigation, seeking to address the potential negative effects of the overall scale of development proposed.

## Next Steps

- 1.212 The SEA Regulations require that authorities with environmental responsibility and the public be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme
- 1.213 To meet this requirement, the views of the three statutory consultees (Natural England, English Heritage and the Environment Agency) and those of the public are being sought on both the Publication Draft Local Plan and this SA Report from 16<sup>th</sup> June to 28<sup>th</sup> July 2017. This is also known as 'Regulation 19<sup>9</sup> consultation'.
- 1.214 Following consultation on the Publication Draft Local Plan, the next stage in the Local Plan preparation process will be the Submission stage (Regulation 22<sup>10</sup>). The Council will submit the Local Plan and any proposed changes it considers appropriate along with supporting documents to the Planning Inspectorate for examination on behalf of the Secretary of State.
- 1.215 The submitted documents will include those that were made available at the Publication stage (updated as necessary), including details of who was consulted when preparing the Local Plan (at Regulation 18 stage) and how the main issues raised have been addressed. The Council will also include details of the representations made following publication of the Local Plan and a summary of the main issues raised.
- 1.216 It may be necessary to carry out further SA work at this stage, in response to consultation comments received or to appraise proposed major modifications to the Publication Draft Local Plan in order to inform the examination of the Submission Local Plan.

LUC  
May 2017

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<sup>9</sup> Of the Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>10</sup> Of the Town and Country Planning (Local Planning) (England) Regulations 2012