

Special Meeting of Full Council

AGENDA

Thursday, 1st August 2019 at 7:15pm

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

THIS MEETING IS OPEN TO THE PUBLIC
(Please note this meeting will be webcast and audio recorded)
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Members of the Council are requested to attend this meeting to transact the business set out in the Agenda.

Membership:-

Councillor J Abbott	Councillor P Horner	Councillor Mrs J Sandum
Councillor J Baugh	Councillor D Hume	Councillor Miss V Santomauro
Councillor Mrs J Beavis	Councillor H Johnson	Councillor Mrs W Scattergood
Councillor D Bebb	Councillor Mrs A Kilmartin	Councillor Mrs W Schmitt
Councillor K Bowers	Councillor D Mann	Councillor P Schwier
Councillor G Butland	Councillor T McArdle	Councillor Mrs G Spray
Councillor J Coleridge	Councillor J McKee	Councillor P Tattersley
Councillor G Courtauld	Councillor A Munday	Councillor P Thorogood
Councillor Mrs M Cunningham	Councillor Mrs I Parker	Councillor N Unsworth
Councillor T Cunningham	Councillor Mrs J Pell	Councillor R van Dulken
Councillor Mrs C Dervish	Councillor I Pritchard	Councillor D Wallace
Councillor P Euesden	Councillor M Radley	Councillor T Walsh
Councillor T Everard	Councillor R Ramage	Councillor Mrs L Walters
Councillor Mrs D Garrod	Councillor S Rehman	Councillor Miss M Weeks
Councillor A Hensman	Councillor F Ricci	Councillor Mrs S Wilson
Councillor S Hicks	Councillor B Rose	Councillor J Wrench
		Councillor B Wright

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

A WRIGHT
Chief Executive

INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS

Declarations of Disclosable Pecuniary Interest, Other Pecuniary Interest or Non-Pecuniary Interest

Any member with a Disclosable Pecuniary Interest, other Pecuniary Interest or Non-Pecuniary Interest must declare the nature of their interest in accordance with the Code of Conduct. Members must not participate in any discussion of the matter in which they have declared a Disclosable Pecuniary Interest or other Pecuniary Interest or participate in any vote, or further vote, taken on the matter at the meeting. In addition, the Member must withdraw from the chamber where the meeting considering the business is being held unless the Member has received a dispensation from the Monitoring Officer.

Question Time

The Agenda allows for a period of up to 30 minutes when members of the public can speak. Members of the public wishing to speak are requested to register by contacting the Governance and Members Team on 01376 552525 or email governance@braintree.gov.uk by midday on the working day before the day of the Committee meeting. For example, if the Committee Meeting is due to be held on a Tuesday, the registration deadline is midday on Monday, (where there is a bank holiday Monday you will need to register by midday on the previous Friday).

The Council reserves the right to decline any requests to register to speak if they are received after this time. Members of the public can remain to observe the public session of the meeting.

Please note that there is public Wi-Fi in the Council Chamber, users are required to register in order to access this. There is limited availability of printed agendas.

Health and Safety

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Documents

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We welcome comments from members of the public to make our services as efficient and effective as possible. If you have any suggestions regarding the meeting you have attended, you can send these via governance@braintree.gov.uk

1 Apologies for Absence**2 Minutes of the Previous Meeting**

To approve as a correct record the minutes of the meeting of Full Council held on 22nd July 2019 (copy previously circulated).

3 Declarations of Interest

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

4 Public Question Time

Only confirmed registered speakers will be permitted to speak at this meeting.

To register to speak, members of the public should contact the Governance and Members Team on 01376 552525 or email governance@braintree.gov.uk by 12pm on Wednesday 31st July 2019. Any requests received after this time and date will be declined. Confirmation will be emailed to the registered speakers.

In order to exercise fairness to all those wishing to speak and to manage this Special Meeting of Full Council, it may be necessary to restrict the number of speakers. Only one speaker's slot will be given to a Parish Council including any specialist groups formed by that Parish Council. Where there are two or more people wishing to speak on the same specific site, the Council reserves the right to request that the speakers collaborate and address the Council in a single speaker's slot.

In the event of large public attendance at this meeting, priority will be given to the registered speakers being seated in the Council Chamber. For those members of the public who cannot be accommodated in the Council Chamber, seating and facilities to view the webcast of the meeting will be available in the reception area of Causeway House.

5 Section 1 Local Plan Examination - Additional Sustainability Appraisal, Evidence and Proposed Amendments 4 - 87

Section 1 Local Plan examination: Additional Sustainability Appraisal, Evidence and Proposed Amendments		Agenda No: 5
Portfolio: Planning and Housing Corporate Outcome: Securing appropriate infrastructure and housing growth Report Presented by: Councillor Mrs G Spray, Cabinet Member for Planning Report Prepared by: Emma Goodings Head of Planning and Economic Development		
Background Papers: National Planning Policy Framework Publication Draft Local Plan 2017 IED011 Inspectors response to the North Essex Authorities June 2018 Local Plan Sub-Committee Agenda and Minutes - 11th July and 18th July 2019 Submission draft Local Plan Evidence Base		Public Report Key Decision: No
Executive Summary: <p>Section 1 of the submitted Local Plan ('the Section 1 Plan') sets out an overarching strategy for future growth across Braintree, Colchester and Tendring – the 'North Essex Authorities' ('NEAs'). As well as including policies setting the overall housing and employment requirements for North Essex up to 2033, the Section 1 Plan proposes three new cross-boundary 'Garden Communities' along the A120 corridor with the potential for longer-term and comprehensively-planned growth. In contrast, 'the Section 2 Plan' for each of the three Authorities contains more specific local policies and proposals relevant only to their individual area.</p> <p>Before a Local Plan can be formally adopted by a Council, it must be examined by a government-appointed Inspector whose job it is to check that:</p> <ol style="list-style-type: none"> 1. The Plan has been prepared in line with various legal requirements, and 2. That the policies and proposals in the plan comply with the 'tests of soundness' contained within the National Planning Policy Framework (NPPF). <p>Examination hearings for the Section 1 Plan took place between January and May 2018; and in June 2018 the Inspector wrote to the North Essex Authorities setting out his initial findings. Whilst he confirmed the legal compliance and soundness of some elements of the plan and praised the NEAs' innovation and ambition, the Inspector found some of the evidence and justification in support of Garden Communities to be lacking and was therefore unable to pass the Section 1 Plan as sound. The Inspector's specific concerns were reported to Members in October 2018.</p>		

In his letter, the Inspector offered the NEAs advice and options for how best to proceed. Having considered his advice, the NEAs in October 2018 confirmed that they remained committed to using Garden Communities principles to secure the future housing requirements in North Essex and would produce additional evidence to address each of the Inspector's concerns. On 10th December 2018, the Inspector confirmed that he was satisfied that the proposals for further work on the evidence base satisfactorily responded to the points he had raised as identified issues and paused the examination until the NEAs' further work on the evidence base and an Additional Sustainability Appraisal was completed. Monthly updates have been submitted to the Inspector on the programme timetable as requested.

Additional evidence has now been completed in the following areas to address the Inspectors concerns and their findings are summarised within this report;

- Housing Infrastructure Fund (HIF) Bids
- A120 dualling
- Rapid Transit
- Modal Shift
- Marks Tey railway station
- Housing Delivery
- Viability
- Employment Land
- Phasing and Delivery
- Infrastructure
- Habitats Regulation Assessment (HRA)
- Delivery Mechanisms

Some of the Inspector's biggest concerns were about the previous Sustainability Appraisal (SA) which is both a legal requirement of the plan making process and a key piece of evidence in determining the most appropriate 'spatial' strategy for growth. The Inspector found that some of its assumptions were either not properly justified or were biased in favour of the NEA's preferred spatial strategy for three Garden Communities and therefore did not represent an objective or reliable assessment. He advised that further work would be needed to rectify these problems and advised different consultants ought to be selected for that work.

The Additional SA has been undertaken by consultants LUC who have followed a revised methodology that has been shared with the Inspector himself and has been the subject of consultation and engagement with statutory bodies and key participants in the Local Plan examination – taking particular care to ensure it addresses the Inspector's previous concerns. The Additional SA first tests a range of alternative development site proposals against a series of tried and tested 'sustainability criteria' applying assumptions guided, where possible, by information provided by site promoters themselves. The second stage of the SA then tests different combinations of those site proposals against the sustainability criteria which represent a reasonable range of alternative spatial strategies for the authorities to consider in determining the most appropriate approach for the Local Plan.

The findings of the Additional SA indicate that many of the site proposals and alternative spatial strategy options are closely matched when assessed against the sustainability objectives. However, none of the alternative spatial strategies stand out as performing notably stronger than the current strategy in the submitted Section 1 Local Plan. There is consequently nothing arising from this new evidence that would suggest that the

current spatial strategy is not justified or needs to change to make way for an alternative approach. Officers therefore recommend that the NEAs continue to promote the current spatial strategy involving the creation of three new Garden Communities in the locations currently proposed.

All of the above evidence supports Officers' view that the current proposals in the Section 1 Local Plan are sound and, when presented to the Planning Inspector, will address all of his previous concerns.

As well as producing the above evidence in response to the Planning Inspector's concerns about Garden Communities, the North Essex Authorities have also compiled a table of proposed amendments to the Section 1 Plan. These amendments are aimed at addressing certain issues identified by the Inspector, partner organisations and objectors to the Plan and ensuring the plan meets the tests of soundness. Many of the proposed amendments arose from suggestions and discussions at the examination hearings in 2018 and the Inspector's interim findings whereas others arise from the findings of the additional evidence base.

Importantly, Officers are not recommending any substantial changes to the strategy for growth as set out in the Section 1 Local Plan. The additional evidence prepared in response to the Inspector's original concerns demonstrates that the establishment of three Garden Communities in the broad locations already identified in the plan is justified and represents an appropriate, sustainable and deliverable strategy.

Notable amendments include:

- New policies (SP1A and SP1B) to clarify how the Local Plan, taken as a whole, will operate in practice in the determination of planning applications; and to reflect the new Essex-wide approach to recreational disturbance avoidance and mitigation in relation to internationally important wildlife sites.
- Additional wording in Policy SP3: 'Meeting Housing Needs' to explain how the housing figures in the policy will be used for assessing authority's five-year housing supply requirements.
- Corrections to the employment land figures in Policy SP4 for the individual NEAs following the discussions at the examination hearings and the Inspector's subsequent advice.
- Additional wording for the infrastructure and connectivity policy (SP5) to provide greater clarity over what would happen if, for whatever reason, it becomes clear that the infrastructure required for the Garden Communities will not be funded or delivered; as well as identifying the key infrastructure projects that would need to be secured in advance of the start of the Garden Communities.
- The inclusion of specific employment land figures in the Garden Community policies SP7, SP8, SP9 and SP10 as well as additional wording in relation to waste water, the protection European designated sites and the historic environment and specific infrastructure priorities relevant to specific Garden Communities.

It will be the Inspector's choice whether or not to accept the proposed amendments to the Local Plan through the resumed examination process, in determining whether it satisfies the necessary statutory requirements and is sound. Section 20(7C) of the 2004 Act provides that the Inspector must, if asked to do so by the local planning authority, recommend formal modifications to the local plan that would satisfy the requirements mentioned in subsection 20(5)(a) and is sound, therefore such modifications could be suggested by the Inspector following conclusion of the examination.

If Full Council approves and the other NEAs agree, the Additional Sustainability Appraisal, all of the additional new evidence base documents listed above and the table of proposed amendments are published for six weeks public consultation between 19th August and 30th September 2019 before they are submitted, along with any representations received, to the Planning Inspector to enable him to resume the examination. It is expected that the further examination hearings will take place in late 2019 or early 2020.

Recommendation:

That the Council recommends that:

- a) The additional evidence base summarised within this report are accepted as part of the evidence base for Section 1 of the submitted Local Plan which contains strategic planning policies and proposals common to the North Essex Authorities of Braintree, Colchester and Tendring;
- b) To note that the evidence base confirms the need for the infrastructure contained in the current HIF Bids submitted by Essex County Council with regard to the North Essex Garden Communities and as currently being considered by Government and that the Council's would expect a decision on those Bids before submitting further evidence to the Secretary of State under recommendation (g) below
- c) It approves the findings of the Additional Sustainability Appraisal work which appraises the submitted Local Plan strategy for three cross-border Garden Communities and the reasonable alternatives to such strategy;
- d) It agrees that the Additional Sustainability Appraisal work and evidence base (including the additional evidence) supports the existing spatial strategy for growth in the submitted Local Plan proposing three cross-border Garden Communities and that it is justified as being the most appropriate strategy;
- e) It approves the schedule of proposed amendments to the submitted Local Plan
- f) A six-week public consultation on the schedule of proposed amendments, the Additional Sustainability Appraisal work and the additional evidence base be undertaken, starting on 19 August 2019 and ending on 30 September 2019;
- g) Following the period of consultation, the above documents along with any duly-made representations received during the consultation period, be submitted to the Secretary of State to enable the Local Plan Inspector to resume and complete the examination of the Section 1 Local Plan; and
- h) The Council requests the Local Plan Inspector to recommend any further modifications to the Publication Draft Local Plan as necessary to make it sound.

Purpose of Decision:

- a) To approve of the Additional Sustainability Appraisal and to report to the Planning Policy and Local Plan Committee the findings of the additional evidence base having been prepared in response to the Planning Inspector's concerns about the new Garden Communities proposed as part of the Section 1 Local Plan for North Essex.
- b) For Council to seek that a series of proposed amendments to the Local Plan be submitted to the Inspector for consideration as minor and major modifications.
- c) To seek the Council's recommendation that six weeks public consultation is undertaken on the Additional Sustainability Appraisal, additional evidence base and proposed amendments before they are submitted to the Secretary of State to then enable the Local Plan Inspector to resume and conclude their examination.

Corporate implications	
Financial:	Cost of evidence preparation is being met from base budget
Legal:	The Local Plan and Additional Sustainability Appraisal must comply with all relevant Government and European legislation and related guidance.
Equalities/Diversity	<p>Equality Impact Assessment of the Local Plan has been produced and is available at the following link. https://www.braintree.gov.uk/downloads/file/6377/equality_impact_assessment_-_june_2017</p> <p>The changes proposed within this document do not change the equalities impact of the Local Plan</p>
Safeguarding	None
Customer Impact:	The Local Plan will have an impact on customers across the District.
Environment and Climate Change:	Policies within the Plan are in accordance with national planning guidance in relation to the environment and climate change.
Consultation/Community Engagement:	As set out within the next steps, if approved the additional evidence base, additional Sustainability Appraisal and modifications to the Local Plan will be subject of a 6 week public consultation between the 19 th August and the 30 th September 2019.
Risks:	<p>There is a risk of legal challenge following the adoption of the Local Plan if any party believes that the Inspector or the Councils have made any legal or procedural errors.</p> <p>If Members decide to proceed with substantially different approach to existing strategy would necessitate the formal withdrawal of the Section 1 Plan and all three Section 2 Plans from the examination process – requiring the authorities to begin the plan-making process again, either jointly, in partnership or individually. To meet with legal and procedural requirements, the three-stage plan-making process would need to start from scratch with the first stage being consultation on issues and options.</p> <p>Section 1 of the Local Plan is individually submitted by the North Essex Authorities but applies equally to all three Councils, therefore for the Examination to be resumed and proceed, each authority must agree to continue with the existing strategy and submitted plan. Should either Tendring District or Colchester Borough Councils postpone or make an alternative decision Members at Braintree will need to consider their position.</p>
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1. Background

- 1.1 Section 1 of the emerging Local Plan ('the Section 1 Plan') sets out an overarching strategy for future growth across Braintree, Colchester and Tendring – the 'North Essex Authorities' ('NEAs'). As well as including policies setting the overall housing and employment requirements for North Essex up to 2033, the Section 1 Plan proposes three new cross-boundary 'Garden Communities' along the A120 corridor. In contrast, 'the Section 2 Plan' for each of the three authorities contains more specific local policies and proposals relevant only to their individual area.
- 1.2 The three Garden Communities proposed in the Section 1 Plan are:
- Tendring/Colchester Borders Garden Community (Policy SP8) – 7,000-9,000 homes on land between Elmstead Market and Colchester.
 - Colchester/Braintree Borders Garden Community (Policy SP9) – 15,000 to 24,000 homes on land around Marks Tey.
 - West of Braintree Garden Community (Policy SP10) – 7,000 to 10,000 homes on land north of the A120 west of Rayne.
- 1.3 These are long-term comprehensively-planned development proposals designed to follow 'Garden Community Principles' including pro-active collaboration between the public and private sectors, community empowerment and engagement, high quality design and management of the built and public realm, integration of infrastructure and development and long-term governance and stewardship arrangements. The developments are expected to take place partly within the timescale of the Local Plan (to 2033) but mostly beyond that period. The Section 1 Plan currently envisages that each of the three Garden Communities will deliver 2,500 new homes in the plan period up to 2033; i.e. 7,500 homes across North Essex. The majority of new housing development expected in the period between now and 2033 will still however come from sites that are already under construction or have already obtained planning permission and sites that are allocated for housing development in each of the authorities' Section 2 Local Plans.
- 1.4 The final part of the process for the preparation of a Local Plan, before it can be formally adopted, is the examination. The purpose of the examination is for a government-appointed Planning Inspector to ensure the Council has followed relevant legal and procedural requirements and to test the plan for its 'soundness' which includes ensuring that it is consistency with national planning policy. Key legal tests include ensuring the Council has complied with the legal duty to cooperate, the requirements for sustainability appraisal and requirements for community consultation. The 'tests of soundness' which are set out in the National Planning Policy Framework (NPPF) are:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 1.5 In October 2017, the North Essex Authorities submitted their Local Plans to the Secretary of State to begin the formal process of examination. The Secretary of State then appointed an experienced Planning Inspector, Mr. Roger Clews, to undertake the examination for Section 1 of the Plan.
- 1.6 Following the examination hearings, the Councils received three letters from the Local Plan Inspector containing interim feedback on the soundness and legal compliance of the Section 1 Local Plan. The first letter dated 8th June 2018 set out the Inspector's initial findings mainly in respect of legal compliance and the soundness of the Garden Community proposals. The second letter dated 27th June 2018 set out the Inspector's findings in respect of the need for new homes. The third letter dated 2nd August 2018 contained the Inspector's response to questions of clarification raised by the NEAs in respect of the Inspector's first letter. The content of these letters were all reported to Members in 2018.
- 1.7 Overall, the Inspector was satisfied that the Authorities had complied with the legal duty to cooperate and other legal and procedural matters and was also satisfied that the overarching employment and housing targets in the plan had been justified on the basis sound evidence. He also praised the authorities for their innovation and ambition in promoting three new Garden Communities in North Essex and stated that if carried out successfully it has the potential to provide for housing and employment needs not just in the current Plan period but well beyond it.
- 1.8 However, the Inspector found the evidence provided to support the Garden Communities was lacking in a number of respects. The main areas of concern related to:
- Transport infrastructure – in particular the lack of certainty over its practical delivery, timing, costs and funding;
 - Housing delivery – in particular the assumptions about how many new homes could realistically be built at the Garden Communities in the period up to 2033;
 - Employment provision – the lack of any indication as to how much employment land would be provided as part of the new Garden Communities;
 - Viability – in particular some of the assumption made in respect of transport infrastructure costs, land purchase and interest costs and contingency allowances.
 - Delivery mechanisms - questions over the NEAs approach to delivering Garden Communities through the formation of a locally-led 'development corporation' and whether the development could be delivered through other alternative methods.
 - Sustainability appraisal – in particular the objectivity of the appraisal and concerns that it was biased in favour of the NEA's preferred strategy.

- 1.9 In summary, the Inspector identified a number of key issues about the viability and deliverability of the Garden Community proposals and the way in which the authorities had selected the option of Garden Communities over other reasonable alternatives. Because of this, he was unable to endorse the Section 1 Local Plan as being sound. Instead, the Inspector provided the authorities with three options for how to progress a Local Plan towards adoption.
- 1.10 Option 1 would have involved removing Garden Communities from the Local Plan and proceeding with the examination of Section 2, so long as the Local Plan was reviewed again within 2-3 years (at which point the evidence in support of Garden Communities might have been stronger). Option 2 effectively meant undertaking more work to fill the gaps in the evidence and delaying the examination of Section 2 until the Inspector had been satisfied that the Garden Communities were deliverable and that Section 1 of the Plan was sound. Option 3 would have meant withdrawing the Local Plan and starting again.
- 1.11 On 22nd October 2018, the NEAs wrote to the Inspector to advise him that the Councils remained committed to using Garden Communities principles to secure the future housing requirements in the North Essex Authorities area and would provide the further evidence requested by the Inspector including evidence on:
- The availability of funding for the necessary strategic infrastructure;
 - the financial viability of the proposed communities;
 - the environmental effects, including transport issues;
 - employment provision within the Communities (and elsewhere) to ensure housing growth is matched with economic growth; and
 - continuing engagement with the local communities.
- 1.12 The Councils also committed to reviewing the 'Sustainability Appraisal' underpinning the choice of strategy in the Local Plan, ensuring that it considered a full range of reasonable alternatives to the Garden Communities, at a range of different sizes. Importantly, the Councils committed to reviewing all of the above evidence before submitting it to the Inspector and before any further consultation – to see whether any changes to the plan or the overall strategy were necessary.

2. Additional Sustainability Appraisal (SA)

The role of Sustainability Appraisal (SA)

- 2.1 The strategy for growth or 'spatial strategy' in the Section 1 Local Plan includes the establishment of three Garden Communities along the A120 corridor to deliver long-term growth within the current plan period to 2033 and beyond. One of the tests of soundness is to ensure that the plan and its spatial strategy is 'justified'. To be justified, the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. The Sustainability Appraisal (SA) is a legal requirement and key piece of evidence designed to test different policies, proposals and alternative strategies and to inform the decisions a Planning Authority takes when choosing its strategy for growth.

- 2.2 The purpose of the SA is to ensure that potential environmental effects are given full consideration alongside social and economic issues. SA is also a legal requirement and should be undertaken at each of the key stages of the plan making process. Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out an SA of each of the proposals in a Local Plan and the consequence of reasonable alternatives, during its preparation. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”. SAs also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’), which implement the requirements of the European Directive 2001/42/EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment.

The Inspector’s concerns and suggestions for further work

- 2.3 In his June 2018 letter (paragraphs 93-129) the Inspector raised a number of concerns about the previous SA prepared and submitted alongside the Section 1 Local Plan. He firstly questioned the objectivity of the assessment; concluding that its authors had made optimistic assumptions about the benefits of Garden Communities and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions - thus he felt that the assessment lacked objectivity and was unreliable. He secondly questioned the rationale behind the choice of alternative strategies that were tested as part of the assessment and identified a lack of clarity in the description of the alternatives and why they were tested at certain scales – making it difficult for the public to understand the alternatives and to give an effective opinion. Thirdly, the Inspector questioned the combinations of sites that were tested, in particular the reasons for excluding of the alternative ‘Monks Wood’ development proposal from Lightwood Strategic as an option for testing in combination with other Garden Communities. Because of the shortfalls identified in the previous SA, the Inspector concluded that the choice of three Garden Communities as part of the preferred spatial strategy had not been properly justified and it had not been demonstrated that the chosen strategy was the most appropriate when considered against the reasonable alternatives.
- 2.4 In advising the NEAs on how to proceed, the Inspector provided some suggestions in his letter as to how the shortcomings in the SA might be rectified. He first suggested (paragraph 122) that before embarking on any Additional SA work the NEAs re-examine the evidence base for any Garden Community proposals they wish to assess, especially with regard to viability, the provision of transport infrastructure and employment opportunities, in order to ensure that they have a sound basis on which to score them against the SA objectives. As explained elsewhere in this report, additional evidence in respect of each of these subjects has now been prepared.
- 2.5 The Inspector also advised (paragraph 123) that Additional SA work must be an objective comparison of individual Garden Community site options at a

range of different sizes, insuring (in particular) that the Monks Wood proposal is assessed as an alternative at an appropriate scale. Adequate reasons (paragraph 124) would have to be given for taking forward or rejecting certain options from the first stage of the assessment. In the second stage of the assessment, the Inspector (paragraph 125) would expect an assessment of alternative spatial strategies for the Plan area including, as a minimum, the following:

- Proportionate growth at and around existing settlements;
- CAUSE's Metro Town proposal; and
- One, two or more Garden Communities (depending on the outcomes of the first-stage of the assessment).

- 2.6 The Inspector also advised (paragraph 128) that different consultants be used to undertake the Additional SA work than the authors of the previous SA to help ensure that the further work is free from any earlier influences and is therefore fully objective.

Methodology for the Additional Sustainability Appraisal (SA)

- 2.7 Independent consultants LUC have been appointed to undertake the Additional SA advised by the Inspector. The methodology that LUC has applied takes on board the Inspector's advice and was the subject of consultation in its own right with statutory consultees, other partner organisations and participants in the Local Plan Examination (including campaign groups and site promoters). The methodology has also been shared with the Inspector himself to allow him the opportunity to indicate any suggestions or concerns with the Additional Sustainability Appraisal [SA] Method Scoping Statement. In his letter in December 2018, the Inspector confirmed he was satisfied with the approach being adopted. There has also been engagement between LUC and various stakeholders in the form of meetings, a 'check and challenge workshop' and requests for information from alternative site promoters which have all helped to ensure that the assessment is as robust, and transparent, as possible.
- 2.8 The methodology for the Additional SA work has followed a two-stage process – the first involving an assessment of a range of potential development sites throughout North Essex at different scales of development; and the second involving an assessment of different 'spatial strategy' alternatives derived from different combinations of those sites, ensuring that the alternatives identified specifically by the Inspector are tested.
- 2.9 All sites and spatial strategy alternatives are assessed against the established 15 sustainability objectives which include creating safe, cohesive communities; meeting housing needs; achieving more sustainable travel behaviour; conserving and enhancing wildlife and geological sites; improving air quality; conserving and enhancing landscape quality; and safeguarding and enhancing soil quality and mineral deposits.

Options tested

- 2.10 The alternative spatial strategy options tested as part of the Additional SA work have been derived following some key principles to ensure they

represent a good range of reasonable alternatives. The principles include: ensuring all options meet the required housing need in the plan period to 2033; reflecting the relative housing need and commuting patterns as they affect different parts of North Essex; and ensuring alternative strategies are coherent, logical and reasonable. 17 spatial strategy options have been tested which comprise 11 options for the area of North Essex to the west of Colchester (mainly affecting Braintree district) and 6 options for the area east of Colchester (mainly affecting Tendring) – with the idea being that the most appropriate option to the west is combined with the most appropriate option to the east to result in the most appropriate spatial strategy for North Essex overall.

- 2.11 As required by the Inspector, the option of proportionate growth around existing settlements has been tested. It takes two forms in the assessment – a ‘percentage-based’ approach to growth which requires all towns and villages in North Essex area to accommodate the same percentage increase in dwelling stock in the period up to 2033; and a ‘hierarchy-based’ approach which directs more development towards larger towns and less development towards smaller villages with limited services and facilities. Both approaches take into account the amount of housing development that is already proposed through existing planning permissions and housing allocations in respective Section 2 Local Plans – which already account for some 80% of expected growth. The percentage-based growth scenario involves a ‘thin spread’ of development around nearly every town and village in the western part of the North Essex area (Option West 1) and a stronger focus for major development around the coastal towns to the east, including Clacton, Harwich, Frinton, Walton, West Mersea and Wivenhoe (Option East 1). In contrast, the hierarchy-based growth scenario involves a greater focus on development on the edge of Braintree and at Hatfield Peverel and Halstead to the west (Option West 2); and significant growth around the coastal town of Brightlingsea to the east (Option East 2).
- 2.12 Options involving different numbers and different combinations of Garden Communities have been also tested in line with the Inspector’s advice. To the west of North Essex, the current strategy in the Section 1 Local Plan of Garden Communities west of Braintree and at the Colchester/Braintree border at Marks Tey (Option West 3) has been re-assessed as well alternatives incorporating the Monks Wood alternative Garden Community proposal from Lightwood Strategic. These include Monks Wood being developed alongside and in addition to the existing Local Plan Garden Community proposals (Option West 4); and as a direct alternative to either of the two current proposals (Options West 5 and West 6).
- 2.13 Strategic developments in the form of major urban extensions to the east of Braintree (Option West 7) and on land at Halstead (Option West 8) have been tested alongside proportionate growth around other settlements; and the option of just having one single Garden Community alongside proportionate growth around existing settlements has also been tested in a different combinations involving the West of Braintree Garden Community alone (Option West 9); the Colchester/Braintree Borders Garden Community alone (Option West 10); and the Monks Wood alternative Garden Community alone (Options West 11).

- 2.14 For the eastern part of North Essex, the alternative options that have been tested are the current Tendring/Colchester borders Garden Community (Option East 3); a north-east urban extension to Colchester crossing the administrative boundary at Ardleigh (Option East 4); 'Tendring Central Garden Village' – a proposal for major development on land around Frating, as promoted by Edward Gittins & Associates (Option East 5); and, in line with the Inspector's advice, the 'Metro Plan' concept promoted as an alternative by the Campaign Against Urban Sprawl in Essex (CAUSE) which involves developing land around the railway stations at the villages of Alresford, Great Bentley, Weeley and Thorpe le Soken which are all along the Colchester to Clacton branch line.

Assessment findings

- 2.15 The options for further proportionate growth around existing settlements to end of the plan period in 2033 performed relatively poorly against the various sustainability objectives compared to alternatives that involved more focussed strategic development in the form of new settlements or major urban extensions – particularly in relation to travel patterns, modes of transport and the delivery of affordable housing. The proportionate growth scenarios have therefore been found to be less sustainable - which demonstrates, importantly, that the NEAs are justified in exploring more strategic alternatives that involve the establishment of new communities.
- 2.16 For those more strategic spatial strategy alternatives to the west of Colchester, the SA finds that performance against the various sustainability objectives is fairly similar and there is consequently 'little to choose' between the different options. Professional judgement is therefore required to distinguish between them, taking other factors into account.
- 2.17 For the spatial strategy alternatives to the east of Colchester, again the options perform similarly against the sustainability objectives although the proposal for a north-east extension to Colchester (Options East 4) is considered to be the weakest due to its potential negative impacts on the Bullock Wood SSSI and limited transport connections into Colchester. The Tendring/Colchester Borders Garden Community (Option East 3) and Tendring Central Garden Village (Option East 5) perform better than the CAUSE Metro Plan (Option East 6) in the longer term because they would provide for a scale of development sufficient to accommodate a health care facility; although Tendring Central is likely to be subject to significant adverse effects from noise pollution.
- 2.18 The Tendring/Colchester Borders Garden Community performs well in terms of potential economic growth. Metro Plan performs well in terms of is easy access to railway stations which could help to reduce carbon emissions, however the rural location of the Metro Plan developments could lead to longer journeys by car where rail is not a realistic choice. For shorter journeys, the Garden Community performs most strongly.
- 2.19 In many respects Tendring Central Garden Village performs as well as the Tendring/Colchester Garden Community, although no better; and whilst it has

the advantage of an existing employment area and would retain its own distinctiveness being separated by some distance from Colchester, its location and distance from Colchester is likely to encourage a high proportion of journeys by car.

Conclusion following the findings of the Additional SA work

- 2.20 Whilst many of the alternative spatial strategy options perform similarly against the various sustainability objectives, the findings of the Additional SA work do not suggest in any way that there is a clearly stronger alternative to the current strategy for three Garden Communities set out in the submitted Section 1 Local Plan. On this basis, there are no reasons arising from the SA findings for Officers to change their recommendation in respect of the most appropriate strategy for growth in North Essex. It is considered that the Additional SA work will satisfy the Inspector that reasonable alternatives have been considered in an objective way and that the choice of spatial strategy for the Section 1 Plan is both justified and sound.

3. Additional evidence base

- 3.1 As well as the additional work on the Sustainability Appraisal, there are various pieces of other evidence aimed at addressing the Inspector's specific concerns. These evidence base documents have been considered individually by reports to the Local Plan sub-committee on the 11th and 18th of July 2019 and are summarised below.
- 3.2 HIF Bids: A progress update on two bids to the government's 'Housing Infrastructure Fund' (HIF) by Essex County Council to secure funding a) for the realignment of the A12 between Marks Tey and Kelvedon and b) for the construction of a link road between the A133 and A120 and a rapid transit system to the east of Colchester. This will demonstrate to the Inspector that positive progress is being made in securing the road infrastructure that will be key to the delivery of the proposed Garden Communities. The bids are currently being evaluated by Homes England. ECC has written to Government Ministers setting out the importance of announcements on the outcome of the HIF bids as quickly as possible.
- 3.2 A12 Dualling: Indicative timescales for constructing of a new dual carriageway between Braintree and the A12 south of Kelvedon following Essex County Council's favoured route announcement in June 2018. This will provide greater clarity to the Inspector over the timing of works and their implications for highway capacity and the delivery of Garden Communities.
- 3.3 Rapid Transit: Technical feasibility study from transport consultants Jacobs showing how and when a 'Rapid Transit System' (RTS) can be delivered to connect the new Garden Communities to key services, facilities and employment opportunities in and around Colchester, Braintree and Stanstead; and how much it is likely to cost. This will address the specific shortcomings in the previous evidence identified by the Inspector in his letter.
- 3.4 Modal Shift: Technical paper from consultants ITP explaining how, through RTS proposals and other measures, the NEAs can achieve a 'modal shift'

target for 30% of all journeys to, from and within the Garden Communities to be made by rapid transit. Again, this will address the Inspector's previous concern about the likelihood of achieving that target.

- 3.5 Marks Tey Station: Update from discussions with Network Rail that suggest relocating Marks Tey Station to the centre of the proposed Garden Community for the Colchester/Braintree Borders Garden Community is unlikely to be practical option. Although the Garden Community was never reliant on the station being relocated, there is now clarity in moving forward that the development will need to be planned to integrate with the station's existing location.
- 3.6 Housing Delivery: Research by the NEAs on the rates of housing development that can be achieved on large scale developments following different models and approaches to satisfy the Inspector that the scales of development proposed for the Garden Communities are realistically deliverable.
- 3.7 Viability: Viability Assessment Update from Consultants Hyas which re-tests the economic viability of three Garden Community proposals in light of updated cost and value assumptions, and addresses the specific concerns raised by the Inspector in relation to assumptions made in the previous assessment – including the cost of RTS. The updated assessment confirms that all three Garden Communities can be considered to be economically viable under a range of situations and scenarios which are considered to be rational and reasonable. West of Braintree Garden Community is viable under all modelled scenarios. The viability of the Colchester Braintree Borders Garden Community and (to a lesser degree) the Tendring Colchester Borders Garden Community are more dependent on securing Government investment for upfront infrastructure and/or inflation in future property values.
- 3.8 Employment Land: Paper prepared by the Centre of Economics and Business Research (Cebr) advising on the calculation of how much 'employment land' ought to be incorporated into the Garden Community proposals to meet the needs likely to arise from growth in business and industrial activities and to contribute towards overall employment growth. This addresses the Inspector's specific concern about the lack of any indication as to how much employment land would be provided at each of the three Garden Communities. Cebr's paper provides figures which form the basis of proposed modifications to the Section 1 Plan.
- 3.9 Phasing and Delivery: Infrastructure Planning, Phasing and Delivery report prepared by consultants AECOM which explores and sets out reasonable assumptions for how each of the three Garden Communities could be delivered in a phased manner. The assumptions in this report are particularly useful in informing wider assumptions about infrastructure delivery and economic viability.
- 3.10 Infrastructure Costs: A detailed cost estimate produced by Gleeds has set out the overall scope, scale and estimated costs of all strategic infrastructure requirements for each proposed Garden Community.

- 3.11 Habitats Regulation Assessment (HRA): An assessment undertaken by consultants LUC of the likely effects of development in the Local Plan on wildlife sites of European importance. HRA is a legal requirement and the report has been updated to take into account an important legal ruling from the Court of Justice for the European Union and the progress that Essex Authorities have made in developing the Essex Recreation disturbance Avoidance Mitigation Strategy (RAMS).
- 3.12 Delivery Mechanisms: A paper from legal firm Dentons which explains how it is intended that a public and private sector partnership in the form of a Local Delivery Vehicle will be used to deliver the Garden Communities and how this fits with current government thinking. This evidence also included a paper on State Aid considerations.
- 3.13 All of the above evidence supports Officers' view that the current proposals in the Section 1 Local Plan are sound and, when presented to the Planning Inspector, will address all of his previous

4 Overall Conclusions

- 4.1 Officers consider that the findings of the further Sustainability work and the additional pieces of evidence outlined above provide responses to all of the issues raised by the Inspector in his 2018 letters and demonstrate that the spatial strategy for growth set out in the submitted Section 1 Local Plan, including the three Garden Communities, meets the tests of soundness set out in the National Planning Policy Framework (NPPF).
- 4.2 The further SA work provides an objective assessment that addresses the Inspector's concerns about the previous assessment and follows a robust and transparent methodology developed through positive engagement with objectors to the plan and promoters of alternative development proposals. The findings of the SA work demonstrate that none of the reasonable alternative spatial strategy options perform notably better than the current strategy in the Section 1 Plan and provides no reason for Officers to conclude that the strategy should change. Given that the findings of the additional SA work suggest that many of the options perform similarly against the sustainability objections, planning judgement based on wider factors has to be exercised in determining the most appropriate strategy for growth in North Essex.
- 4.3 The alternative of further proportionate growth around existing settlements up to 2033 has been assessed as part of the additional SA work to help determine whether or not the NEAs are justified in taking a more strategic cross-border approach involving the establishment of new communities. However, the Local Plan process has already considered options relating to growing the main urban areas across North Essex and the majority of housing allocations in the three authorities' Section 2 Local Plans comprise such sites. The NEAs consider that reasonable opportunities to accommodate growth around existing settlements have been exhausted for the purposes of the plan period to 2033. It should be noted that the NEAs have also had a strong record in making use of existing previously developed 'brownfield' sites within settlements where possible.

- 4.4 Adding more development to existing towns and villages to make up the residual housing requirement to 2033 raises some genuine concerns about the efficient provision of infrastructure with existing and future residents having to cope with unnecessary pressure and demand on existing services and facilities that are not able to be efficiently expanded to cater for growth. Applying a 'percentage-based' approach to achieving further proportionate growth around existing settlements, including rural settlements would result in a thin distribution of development around numerous settlements, particularly to the west of Colchester and from a transportation perspective, such a thin distribution of growth is likely to lead to further dependence on the private car. The percentage-based approach would also push more development to coastal towns such as Clacton, Harwich, Frinton/Walton, Brightlingsea, Wivenhoe and West Mersea and this raises serious concerns about environmental impacts on internationally important wildlife areas, impacts on existing transport infrastructure and the ability for the market to realistically deliver the number of homes required given the weaker housing market conditions to the east.
- 4.5 A 'hierarchy-based' approach to proportionate growth which directs additional housing to larger settlements would, in contrast, place a large proportion of North Essex's development to land on the edge of Braintree (a town that is already earmarked for significant growth in the plan period to 2033 in the Braintree Section 2 Plan); and, to a lesser extent, Halstead and Hatfield Peverel. In the face of highly challenging housing requirements going into the future and the constraints and challenges associated with continuing to expand existing settlements, the NEAs are justified in working together to establish new communities in line with Garden Community principles that provide scope for long-term managed growth in strategically important locations extending beyond the timeframes of the current plan that achieve a scale of development that will incorporate and deliver new infrastructure and thus reduce the pressure for expansion of existing communities.
- 4.6 To the west of Colchester, whilst many of the alternative strategies for strategic growth perform similarly against the sustainability objectives in the additional SA work, the proposals for Garden Communities to the West of Braintree and crossing the Colchester/Braintree Border carry genuine advantages. The proposal West of Braintree provides a strategic long term opportunity to deliver growth within the current plan period and beyond and to address needs in the western part of North Essex with direct access to the A120. It is well located to Stansted Airport both as a centre of local employment but also providing opportunities for new business growth. It also provides access to the M11 and the London Stanstead Cambridge Corridor. It is well located to the urban area of Braintree thus enabling it to benefit from the services and facilities provided in that higher order settlement, with a rapid transport system integral to realising that benefit.
- 4.7 The Colchester/Braintree Borders Garden Community also provides the potential for long term growth on a site with close proximity to the mainline railway station at Marks Tey and regular train links to London, Colchester and beyond within walking, cycling or bus rapid transport system to the station. It is well located at the intersection of the A12 and A120 thus providing opportunities for good accessibility and attractiveness to prospective residents

and employers alike. There are also more opportunities for sustainable travel links into Colchester, a regionally important centre of employment offering a full range of facilities including a hospital and a major shopping and cultural destination.

- 4.8 Lightwood Strategic's proposal for an alternative Garden Community at Monks Wood (Pattiswick) is located within 3km of the proposed Colchester/Braintree Borders Garden Community with Coggeshall located between the two. It performs similarly against the sustainability objectives in the additional SA work but given the scale and proximity of these two proposals, it is not considered appropriate to include Monks Wood in the plan as well as the current Colchester/Braintree Garden Community given the impact on infrastructure, landscape and the existing resident population that these two large developments would have. Monks Wood is accessible to a much smaller, albeit very successful, cluster around Earls Colne Airfield and Coggeshall and is closer to Braintree than the Colchester/Braintree Borders Garden Community. However, the employment market in Braintree is not as strong as Colchester's and major new employment areas are proposed on the west side of Braintree which is in closer proximity to the proposed West of Braintree Garden Community. A Garden Community at Monks Wood would be located on the highly trafficked single carriageway of the A120 and whilst it is proposed that the A120 is dualled and realigned further south (between Kelvedon and Braintree), the only other roads in the vicinity are rural lanes with very limited opportunity to access a site of this size by other routes. The impact on the historic character of the dispersed settlement of Pattiswick is also considered to be greater than on the character of Marks Tey which is much more of a modern settlement.
- 4.9 To the east of Colchester, the Tendring/Colchester borders Garden Community offers multiple benefits to both Colchester and Tendring in terms of housing delivery, the A133/120 link road and the opportunities to relieve traffic and unlock the economic potential for more expansion of the University of Essex and the Knowledge Gateway whilst relieving pressure caused by continued growth on the edge of existing towns and villages. CAUSE's Metro Plan concept does not offer such mutually beneficial outcomes, raises concerns about encouraging car-borne journeys where rail is not a viable alternative, and would significantly and unnecessarily alter the character of a number of rural communities in Tendring that are already under pressure from current developments, and in a district that does not need any further housing sites to meet its objectively assessed housing need up to 2033 over and above the allocations in its Section 2 Local Plan. The Tendring Central Garden Village concept scores similarly to the Tendring/Colchester Borders Garden Community in the additional SA work, but critically does not offer the mutual cross-border benefits to Colchester and Tendring that arise from the link road and potential for growth at the University of Essex and the Knowledge Gateway – it would be an unnecessary standalone development further east into Tendring that would encourage longer car journeys.
- 4.10 Officers therefore consider that the current strategy in the Section 1 Local Plan which proposed three Garden Communities in the locations currently suggested remains the most appropriate strategy for North Essex. The other additional evidence, including studies on rapid transit, housing delivery and

viability respond directly to the issues raised by the Inspector and demonstrate that the three proposed Garden Communities are viable and deliverable.

5 Proposed amendments

- 5.1 If, through the examination process, an Inspector identifies certain issues with the soundness of a Local Plan that can be easily resolved, they can recommend 'modifications' to the plan. Under normal circumstances, modifications are published for consultation following the completion of the examination and responses are considered by the Inspector before they confirm that the plan is sound and can be formally adopted.
- 5.2 For the Section 1 Plan for North Essex, a number of areas have already been identified which would benefit from amendments which have arisen from a number of sources, including representations received in response to the publication of the plan in 2017; statements of common ground entered into with statutory consultees in the run up to the examination hearings; responses to the Inspector's initial Matters Issues and Questions (MIQs) before the examination hearings; the discussions at the examination hearings themselves; and the Inspector's post-examination letters.
- 5.3 Officers have compiled a schedule of proposed amendments and the Inspector has agreed that these should be published for consultation alongside the Additional Sustainability Appraisal work and other evidence before the examination is resumed. The majority of the proposed amendments are minor changes to the wording of policies and supporting text but others could be considered to represent more fundamental changes to policies and how they are interpreted.
- 5.4 Whilst Members are being asked to endorse the proposed amendments for public consultation, it will be the Inspector who will ultimately decide which, if any, of the amendments should be main modifications to the final version of the plan before it is adopted. Any final modifications recommended by the Inspector will require further consultation following the completion of the examination, but the consultation proposed for the current schedule of modifications will enable objections to be considered, by the Inspector, when he resumes the examination in due course.
- 5.5 The full schedule of proposed amendments is provided at Appendix 2 to this report. None of these amendments represent fundamental changes to the overarching strategy in the plan. The most significant of the proposed amendments are highlighted below:
- 5.6 New Policy SP1A 'Delivering Sustainable Development through the planning system'

An additional policy is suggested for inclusion in the Section 1 Local Plan, on the advice of the Inspector, to clarify how the policies in the Local Plan, taken as a whole, will operate in practice in the determination of planning applications. The proposed policy would state:

“Development that demonstrably contributes to the achievement of the policies in this Local Plan (and, where relevant, of policies in neighbourhood plans) will normally be permitted unless material considerations indicate otherwise. Development that is not in accordance with, or which will prejudice the delivery of, the strategic scale development or the achievement of the place making principles, in this Local Plan will not normally be permitted.”

5.7 New Policy SP1B ‘Recreational disturbance Avoidance and Mitigation Strategy (RAMS)’

An additional policy is suggested for inclusion in the Section 1 Local Plan, as agreed with Natural England, to reflect the new Essex-wide approach to mitigating against the impacts on internationally important wildlife sites arising from an increase in development and the associated risk of increased recreational disturbance at those sites. The proposed wording would state:

“An Essex Coast Recreational disturbance Avoidance and Mitigation Strategy will be completed in compliance with the Habitats Directive and Habitat Regulations. Contributions will be secured towards mitigation measures identified in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted.

Prior to RAMS completion, the NEAs will seek contributions from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.”

5.8 Policy SP3: ‘Meeting Housing Needs’

Modifications to Policy SP3 are suggested to provide some explanation, on the Inspector’s advice, as to how the housing figures in the policy will be used for assessing each authority’s five-year housing supply requirements. The additional wording proposed would state:

“The annual housing requirement figures set out below will be used as the basis for assessing each authority’s five-year housing land supply subject to any adjustments in Section 2 of each plan to address any undersupply since 2013. The North Essex authorities will review their housing requirement regularly in accordance with national policy requirements, and in doing so will have regard to the housing needs of the wider area.”

5.9 Policy SP4: ‘Providing for Employment’

Adjustments to the employment land requirements for the three Authorities have been recommended by the Inspector to reflect the outcome of discussions at the examination hearings. In particular, they will rectify errors found within the figures for Braintree and Tendring. The revised employment land figures will be as follows:

	Baseline (ha)	Higher Growth Scenario (ha)
Braintree	20.9	43.3
Colchester	22.0	30
Tendring	12.0	20.0
North Essex	54.9	93.3

5.10 Policy SP5: 'Infrastructure and Connectivity'

Modifications to the infrastructure and connectivity policy are suggested to provide greater clarity over what would happen if, for whatever reason, it becomes clear that the infrastructure required for the Garden Communities will not be funded or delivered. The modifications also provide greater clarity over what key infrastructure projects will need to be secured in advance of the start of the Garden Communities. The main relevant wording would be as follows:

"If the necessary strategic infrastructure for the Garden Communities as required by Policy SP5 is not committed within a reasonable period of time and phased alongside the delivery of new communities a review of the Plan will be undertaken prior to any consent being implemented, in order that the consequential shortfall in housing delivery does not overburden the infrastructure of existing communities/settlements."

"Infrastructure provision will be secured in a timely manner and programmed to keep pace with growth of new communities."

Funding and route commitments for the following strategic transport infrastructure projects will need to be secured in advance of the start of the Garden Communities as follows:

- Colchester/ Braintree Borders –
 - A12 widening and junction improvements
 - A dualled A120 from Braintree to the A12
- Tendring /Colchester Borders –
 - A120-A133 Link road
- A scheme and specification for a phased rapid transit network and programme for the integration of the three Garden Communities into the rapid transit network
- Provision of appropriate sustainable travel options will be required to encourage and facilitate sustainable travel behaviour from the outset and to provide viable alternatives to single-occupancy private car use, and will be informed by masterplanning.

Requirements for other strategic Garden Community infrastructure are outlined in sections D, E and F of Policies SP8, 9, and 10 and will be further set out in the Development Plan Documents for each Garden Community."

5.11 Policy SP7: 'Development and Delivery of New Garden Communities in North Essex'

A number of modifications are suggested for the wording of this policy, the most significant of which is to address the Inspector's request that the Section

1 Local Plan specifies the employment land requirements for the Garden Communities. The relevant wording would be as follows:

“In accordance with the Garden Community Charter principle of providing one job per household within the new community or within a short distance by public transport, provide and promote opportunities for employment within each new community and within sustainable commuting distance of it. Around 850,000 square metres of floorspace will be provided in total, with allocations to be defined within Development Plan Documents for each Garden Community totalling some 138 hectares”.

5.12 Policies SP8, SP9 and SP10: Specific policies for each of the three Garden Communities

It is suggested that each of the policies that correspond with the specific Garden Community proposals are modified to include wording agreed with Natural England in relation to the impact of waste water on internationally important wildlife sites. The wording would be:

“To ensure new development does not have an adverse effect on any European Protected sites, the required waste water treatment capacity must be available including any associated sewer connections in advance of planning consent.”

Additional wording is also proposed to address issues raised by Historic England at the examination in respect of the potential impact of the Garden Communities on the historic environment, as follows:

“A Heritage Impact Assessment for each DPD in accordance with Historic England guidance will be required in order to assess impact of proposed allocations upon the historic environment, to inform the appropriate extent, nature and form of the development and establish any mitigation measures necessary.”

Each Garden Community policy will also include a section to set out the amount of employment space to be created as part that development – based on the evidence contained within the report from Cebr. For the Tendring/Colchester Borders Garden Community (SP8) the figure will be 24.5 hectares; for the Colchester/Braintree Borders Garden Community (SP9) it will be 70.1 hectares; and for the West Braintree Garden Community (SP10) it will be 43.4 hectares.

Further bespoke modifications to each of the Garden Community policies are also proposed to reflect specific infrastructure or environmental requirements, for example additional wording around the proposed A120/A133 link road, the realignment of the A12 and the dualling of the A120 and the need to protect relevant internationally and nationally important wildlife designations.

6 Next Steps

- 6.1 The relevant Committees of the three Councils are all considering the additional evidence base that has been prepared, the findings of the Additional

Sustainability Appraisal work and proposed amendments. If all three authorities agree, the additional evidence base, Additional Sustainability Appraisal work and the proposed amendments will be published for six-weeks consultation to allow the public and stakeholders the opportunity to consider both the modifications and the evidence and make any comments. The six-week consultation period is expected to run from 19th August 2019 to 30th September 2019.

- 6.2 The Officers of the three Authorities will collect any representations made and, following the six-week consultation period, will submit the schedule of proposed amendments, Additional SA work and all the other additional evidence base to the Inspector, along with all the representations received from third parties. The Inspector will then consider all of this information and will liaise with the NEAs to confirm the timetable for resuming the examination and undertaking further examination hearings. The Inspector may issue a further series of Matters, Issues and Questions (MIQs) to establish the main topics he wishes to examine and to invite written responses from participants in the examination ahead of the hearings. It is currently anticipated that hearings will take place either at the end of 2019 or in early 2020.
- 6.3 Following the completion of the further examination hearings, the Inspector will write to the NEAs to confirm whether or not his concerns about the Garden Communities have been addressed and whether or not the Section 1 Local Plan now meets the tests of soundness. The Inspector will have the ability to recommend additional post-examination main modifications to the plan which would need to be the subject of further consultation in their own right before the plan can be finalised and formally adopted by the NEAs.
- 6.4 The examination of the Authorities' individual Section 2 Local Plans will not take place until Section 1 has been examined and found to be sound.

Recommendations

That Council recommends that:

- a) The additional evidence base summarised within this report are accepted as part of the evidence base for Section 1 of the submitted Local Plan which contains strategic planning policies and proposals common to the North Essex Authorities of Braintree, Colchester and Tendring;
- b) To note that the evidence base confirms the need for the infrastructure contained in the current HIF Bids submitted by Essex County Council with regard to the North Essex Garden Communities and as currently being considered by Government and that the Council's would expect a decision on those Bids before submitting further evidence to the Secretary of State under recommendation (g) below
- c) It approves the findings of the Additional Sustainability Appraisal work which appraises the submitted Local Plan strategy for three cross-border Garden Communities and the reasonable alternatives to such strategy;

- d) It agrees that the Additional Sustainability Appraisal work and evidence base (including the additional evidence) supports the existing spatial strategy for growth in the submitted Local Plan proposing three cross-border Garden Communities and that it is justified as being the most appropriate strategy;
- e) It approves the schedule of proposed amendments to the submitted Local Plan
- f) A six-week public consultation on the schedule of proposed amendments, the Additional Sustainability Appraisal work and the additional evidence base be undertaken, starting on 19 August 2019 and ending on 30 September 2019;
- g) Following the period of consultation, the above documents along with any duly-made representations received during the consultation period, be submitted to the Secretary of State to enable the Local Plan Inspector to resume and complete the examination of the Section 1 Local Plan; and
- h) The Council requests the Local Plan Inspector to recommend any further modifications to the Publication Draft Local Plan as necessary to make it sound.



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Additional Sustainability Appraisal of North Essex Section 1 Local Plan

Non-Technical Summary

Prepared by LUC
July 2019

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

Client: North Essex Authorities

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Additional Sustainability Appraisal of North Essex Section 1 Local Plan

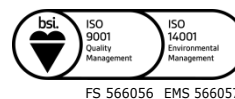
Non-Technical Summary

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1 Non-technical summary of the Additional SA of the North Essex Section 1 Local Plan

Background

- 1.1 This document is a Non-Technical Summary of the Additional Sustainability Appraisal (SA) of the North Essex Section 1 Local Plan.
- 1.2 The North Essex Authorities (NEAs) comprise Braintree District Council, Colchester Borough Council, and Tendring District Council. The NEAs, have prepared a shared, strategic level plan which is intended to form part of the Local Plan for each of the NEAs. Specifically, the shared plan comprises 'Section 1' of each authority's Local Plan. Section 2 of each authority's Local Plan contains more specific and detailed policies and will be examined following the adoption of the Section 1 Local Plan.
- 1.3 The Publication Draft of the North Essex Section 1 Local Plan (hereafter, 'the Section 1 Local Plan') was submitted to the Secretary of State for examination on 9th October 2017. The examination hearings took place between 16th January 2018 and 9th May 2018. Following the hearings the Inspector concluded that the Section 1 Local Plan was not sound in its current form. The Inspector wrote to the NEAs in June 2018¹, advising them of the further steps required in order for the Section 1 Local Plan to be made sound and legally compliant. Several shortcomings were identified by the Inspector in relation to the SA² of the Section 1 Local Plan, as discussed below.
- 1.4 In response to the shortcomings of the original SA, the NEAs commissioned LUC in 2018 to carry out Additional SA work with respect to Section 1 of the Local Plan. The Inspector's concerns relate to the SA of alternative Garden Communities and of alternative spatial strategies including non-Garden Communities options. The Additional SA was therefore limited to addressing these concerns and as such forms an addendum to, and should be read in conjunction with, the SA of the Section 1 Local Plan³ as a whole.

Shortcomings of the earlier SA work

- 1.1 Following the commencement of the Section 1 Local Plan's Examination and initial hearing sessions, the Inspector wrote to the NEAs expressing concerns regarding the SA work undertaken prior to the submission of the Section 1 Local Plan⁴ - with respect to three main 'shortcomings':
 - **Objectivity of the SA:** the Inspector identified potential inconsistencies in the scoring of the alternative spatial strategies, and the use of evidence underpinning the SA scores, stating that *"the authors of the SA report have generally made optimistic assumptions about the benefits of the GCs [Garden Communities], and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions. As a result these assessments lack the necessary degree of objectivity and are therefore unreliable"*.

¹ Clews, R. (2018) Letter to Emma Goodings (Braintree DC), Karen Syrett (Colchester BC), and Gary Guiver (Tendring DC), 8 June.

² Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC). Therefore, it is a legal requirement for Section 1 of the shared Publication Draft Local Plan to be subject to SA and SEA throughout its preparation.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance), whereby users can comply with the requirements of the SEA Directive through a single integrated SA process – this is the process that is being undertaken in this case, and therefore within this report, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Directive'.

³ Place Services (June 2017) North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19) Sustainability Appraisal (SA).

⁴ *ibid.*

- **Clarity of the alternatives and reasons for selection:** the Inspector raised concerns regarding the difficulty of understanding the descriptions of the Garden Community options, the rationale for choosing particular alternatives, and the assumptions underpinning the rejection of the reasonable alternatives, including providing significant numbers of dwellings at or around existing settlements.
 - **Selection of the Garden Communities and combinations for assessment:** the Inspector identified some confusion with respect to the basis upon which Monks Wood was assessed as a Garden Community option, and questioned the conclusions of the SA with respect to different scales of growth at this location. Similarly, the Inspector challenged the rationale behind the combinations of alternatives and the reasons for selecting the preferred combination and rejecting others. The Inspector is of the view that equivalent assessments of the combinations were not comprehensive.
- 1.2 The Inspector also drew attention to issues regarding the minimum size threshold of the Garden Communities assessed in the SA, but concluded that the SA provided adequate reasons for a 5,000 dwelling threshold.
- 1.3 The Inspector concluded that:
- "It has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require".*
- 1.4 He suggested that the following two stages of SA work would be required to rectify the shortcomings:
- (1) Carry out an objective comparison of individual Garden Community site options at a range of different sizes. Adequate reasons will need to be given for taking forward or rejecting each of the GC options assessed.
 - (2) Assess alternative spatial strategies for the Section 1 Local Plan area, using a clear rationale of the alternative spatial strategies and descriptions of them. As a minimum the spatial strategy alternatives should include proportionate growth at and around existing settlements, CAUSE's Metro Town proposal, and one, two or more Garden Communities, depending on the outcomes of the first stage assessment.
- 1.5 Prior to embarking on the Additional SA work, the Inspector recommended that the NEAs re-examine the evidence base for any Garden Community proposals they wish to assess, especially with regard to viability, the provision of transport infrastructure and employment opportunities. The Inspector recommended that there should be liaison with CAUSE to ensure that their Metro Town proposal is fully understood and assessed appropriately, and similar liaison with the promoters of the Garden Community site options where necessary.
- 1.6 The Inspector also stated that, for the spatial strategy alternatives:
- Explicit assumptions should be made about the amount of development each option would involve, both at Garden Communities and elsewhere, and the broad locations for that development.
 - For the options involving Garden Communities, each of the individual site options that survive the first-stage assessment, and each feasible combination of those surviving site options, should be assessed.
 - Options including one or two Garden Communities should also include appropriate corresponding levels of proportionate growth at existing settlements.
- 1.7 In order to address these concerns of the Inspector, a two-stage methodology involving the application of new SA criteria and a renewed approach to the identification of potential strategic development sites was developed for the Additional SA, as described in the Methodology section.

Relationship of the Additional SA Report with the original SA Report

- 1.8 This Additional SA Report is intended to supplement the earlier SA work. The primary purpose of the Additional SA is to provide a consistent and objective appraisal of alternative strategic sites and alternative spatial strategies to those included in the Section 1 Local Plan under Policy SP2

'Spatial Strategy for North Essex', and the three garden communities presented in Policies SP7 to SP9, rather than to re-appraise the strategic policies themselves.

- 1.9 Should any modifications be proposed to the Section 1 Local Plan in light of the Additional SA and the provision of other evidence to inform the examination, these will be subject to SA and consultation at a later date, and prior to adoption of the Section 1 Local Plan.
- 1.10 The Additional SA Report primarily replaces the following section of the original SA Report:
 - Appendix 1 'Appraisal of the Garden Community Options and Alternative Permutations'.
- 1.11 Although not a direct and comprehensive replacement, the Additional SA also provides further appraisal information in relation to other chapters of the original SA Report.

Methodology

- 1.12 In response to the Inspector's recommendations, the Additional SA of the North Essex Section 1 Local Plan followed a two stage process:
 - Stage 1 appraised strategic sites that could form part of alternative spatial strategies for the Section 1 Local Plan.
 - Stage 2 appraised alternative spatial strategies.
- 1.13 The SA of the strategic sites, which fed into the SA of the spatial strategies, was undertaken in a consistent and objective way, using assumptions for the SA objectives that were applied in the same way for all strategic sites, using the same evidence base.
- 1.14 In carrying out the SA of the spatial strategies, an element of professional judgement was required to interpret the findings of the individual strategic sites when combined into a spatial strategy, and taking into account existing commitments, Section 2 Local Plan allocations, and strategic infrastructure requirements.
- 1.15 The approach to each of these stages is described in more detail below.

Sustainability context and baseline

- 1.16 The original SA report prepared by Place Services set out the sustainability context for the Section 1 Local Plan and the SA set by other policies, plans and programmes. It also provides a description of the current state of the environment and its likely future evolution in the absence of the Section 1 Local Plan. This information continues to form a suitable basis for the identification of the key sustainability issues facing the Plan area which, together with the sustainability policy context, provided the basis for defining the sustainability objectives that provide the framework for the original and Additional SA (see Table 1.1). Each alternative strategic site and each alternative spatial strategy was appraised in relation to its likely effects in relation to the sustainability objectives set out in this SA framework.
- 1.17 While the key issues facing the Plan area remained unchanged since the original SA work, where more recent evidence had emerged since that work, this was referred to as relevant in the Additional SA work.

Table 1.1: SA framework

SA objective	Appraisal questions
1. Create safe environments which improve quality of life, community cohesion	<ul style="list-style-type: none">• Does it seek to improve / supply community facilities for young people?• Does it seek to increase cultural activities or suitable development to stimulate them?• Does it seek to support cultural identity and social inclusion?• Will there be measures to increase the safety and security of new development and public realm?

SA objective	Appraisal questions
2. To ensure that everyone has the opportunity to live in a decent, safe home which meets their needs at a price they can afford	<ul style="list-style-type: none"> • Will it increase the range and affordability of housing to support the growing population and for all social groups? • Does it respond to the needs of an ageing population? • Does it seek to provide appropriate rural affordable housing? • Will it deliver well designed and sustainable housing? • Will it contribute to meeting Gypsy and Traveller pitch requirements of the GTAA?
3. Improve health/reduce health inequalities	<ul style="list-style-type: none"> • Will it ensure access to health facilities? • Will it ensure access to sport and recreation facilities, open space and accessible green space? • Will it encourage access by walking or cycling?
4. To ensure and improve the vitality & viability of centres	<ul style="list-style-type: none"> • Does it seek to prevent loss of retail and other services in rural areas? • Does it promote and enhance the viability of existing centres by focusing development in such centres? • Does it seek to locate development in close proximity to town centres? • Does it seek to located development within easy public travelling distance to town centres? • Does it seek to improve public transport networks to town centres?
5. To achieve a prosperous and sustainable economy that creates new jobs, improves the vitality and viability of centres and captures the economic benefits of international gateways	<ul style="list-style-type: none"> • Will it improve the delivery of a range of employment opportunities to support the growing population? • Will it tackle employment associated deprivation? • Will it enhance the area's potential for tourism? • Will it promote development of the ports? • Will it encourage the rural economy and diversification of it? • Will it support business innovation, diversification, entrepreneurship and changing economies? • Does it seek to improve existing training and learning facilities and/or create more facilities? • Will the employment opportunities available be mixed to suit a varied employment skills base?
6. To value, conserve and enhance the natural environment, natural resources, biodiversity and geological diversity	<ul style="list-style-type: none"> • Will development have a potential impact on a national, international or European designated site (SPA, SAC, Ramsar, SSSI)? • Will it maintain and enhance sites otherwise designated for their nature conservation interest? • Will it conserve and enhance natural/semi natural habitats? • Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species?
7. To achieve more sustainable travel behaviour, reduce the	<ul style="list-style-type: none"> • Will it increase and/or improve the availability and usability of sustainable transport modes?

SA objective	Appraisal questions
need to travel and reduce congestion	<ul style="list-style-type: none"> Will it seek to encourage people to use alternative modes of transportation other than private vehicle? Will it lead to the integration of transport modes? Will it improve rural public transport? Does it seek to increase the uptake or viability of walking and cycling as methods of transportation, through new infrastructure or integration?
8. To promote accessibility, ensure that development is located sustainably and makes efficient use of land, and ensure the necessary infrastructure to support new development	<ul style="list-style-type: none"> Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all? Does it seek to concentrate development and facilities where access via sustainable travel is greatest? Does it seek to minimise congestion at key destinations / areas that witness a large amount of vehicle movements at peak times? Would the scale of development require significant supporting transport infrastructure in an area of identified need? Will it ensure adequate school places (through expansion / new facilities) and early years provision to support growth? Will it ensure the required improvements to utilities infrastructure? Will it ensure the required improvements in capacity to GP services? Will it provide a suitable amount of sports, recreational, leisure and open space facilities?
9. To conserve and enhance historic and cultural heritage and assets and townscape character?	<ul style="list-style-type: none"> Will it protect and enhance designations, features and areas of historical, archaeological and cultural value in both urban and rural areas? Will it have a negative impact on the significance of a designated historic environment asset or its setting? Does it seek to enhance the range and quality of the public realm and open spaces? Will it reduce the amount of derelict, degraded and underused land? Does it encourage the use of high quality design principles to respect local character? Will / can any perceived adverse impacts be reduced through adequate mitigation?
10. To make efficient use of energy and reduce contributions to climatic change through mitigation and adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased generation of energy from renewable sources? Will it encourage greater energy efficiency? Will it improve the efficient use of natural resources, minimising waste and promoting recycling?
11. To improve water quality and address water scarcity and sewerage capacity	<ul style="list-style-type: none"> Will it lead to no deterioration on the quality of water bodies? Will water resources and sewerage capacity be able to accommodate growth?
12. To reduce the risk	<ul style="list-style-type: none"> Does it promote the inclusion of Sustainable Drainage Systems

SA objective	Appraisal questions
of fluvial, coastal and surface water flooding	<p>(SuDS) in new developments and will their integration be viable?</p> <ul style="list-style-type: none"> Does it seek to avoid development in areas at risk of flooding (fluvial, coastal, surface water)? Does it seek to avoid increasing flood risk (fluvial, surface water, groundwater) in areas away from initial development?
13. To improve air quality	<ul style="list-style-type: none"> Will it improve, or not detrimentally affect air quality along the A12 or A120? Does it direct growth away from AQMAs? Does it seek to improve or avoid increasing traffic flows generally?
14. To conserve and enhance the quality of landscapes	<ul style="list-style-type: none"> Will landscapes sensitive to development be protected? Will it lead to rural expansion or development outside development boundaries/limits that increases coalescence with neighbouring settlements? Is the scale / density of development in keeping with important and valued features of the local landscape?
15. To safeguard and enhance the quality of soil and mineral deposits?	<ul style="list-style-type: none"> Will it avoid the loss of high quality agricultural land? Will it avoid the sterilisation of mineral deposits / is the site within a Minerals Safeguarding Area (MSA)? Will it support or lead to the remediation of contaminated land, avoiding environmental pollution or exposure of occupiers or neighbouring land uses to unacceptable health risk?

The approach to Stage 1: Appraisal of alternative strategic sites

1.18 The Stage 1 appraisal of alternative strategic sites was initially carried out in two steps:

- Stage 1a** comprised an appraisal of the principle of housing-led development at each alternative strategic site on its own merits, i.e. an appraisal of the geographical location in relation to existing key services, facilities, employment locations, transport links, and environmental assets and constraints without considering what the development itself might deliver.
- Stage 1b** then took into account how the accessibility to key services, facilities, employment locations, and transport links identified by Stage 1a would be modified if standard assumptions were made about what is likely to be provided as part of development coming forward at different scales of development. The Stage 1a appraisal of effects on environmental assets was unaffected by Stage 1b.

1.19 To facilitate an objective, transparent, and consistent appraisal of alternative strategic sites during Stages 1a and 1b, a series of spatially-based criteria was developed and applied in a geographic information system (GIS) to examine the locations of alternative strategic sites in relation to:

- local infrastructure facilities, to inform judgements on whether the services these provide would be readily accessible on foot to residents of new developments; and
- environmental assets, to inform judgements on the risk of harm to these from new developments.

1.20 Consultation comments received on the Stage 1 method indicated the need to vary some of the standard assumptions made in Stage 1b and to make some of them more site-specific. In addition, draft appraisal results from Stage 1b showed little differentiation between sites and indicated the need for a wider range of evidence to be taken into account when assessing sites, a

view supported by consultation comments received on the Stage 1 method. In response, Stage 1b was replaced by a more detailed 'Stage 1c' appraisal of sites:

- **Stage 1c** replaced standard assumptions about what is likely to be provided as part of development coming forward at different scales of development with site-specific assumptions drafted by the NEAs and confirmed with site promoters and CAUSE⁵ via 'site information forms'. The spatial tests carried in GIS at Stage 1a were supplemented with information gathered from a wider range of evidence sources and brought together to form a judgement on the likely significance of effects of each alternative strategic site in relation to each SA objective.

- 1.21 In Stage 1a, each alternative strategic site location was assessed against spatial criteria relating to:
- access to services, facilities, transport and centres of employment; and
 - risk of environmental harm.
- 1.22 This resulted in a score being awarded to each site location in relation to each assessment criterion. The scores achieved by alternative development locations against the individual assessment criteria provided an initial indication of whether development for housing use in the proposed location would be consistent with achievement of the related sustainability objectives and also fed into the subsequent, more detailed Stage 1c site assessments. The spatially-based appraisal criteria were linked to the existing framework of SA objectives.
- 1.23 Alternative strategic sites were assessed at different reasonable alternative housing capacities but a single site boundary was tested for each site, large enough to accommodate the largest capacity option for that site.
- 1.24 Large developments can take many years to fully build out and in some cases it may be that a significant proportion would remain to be built at the end of the Plan period. To ensure a consistent approach to the assessment of the effects of development expected to take place beyond the end of the Plan period, all locations were assessed in their entirety (taking account of all development, including that to be delivered beyond the end of the Plan period) during Stage 1b. Stage 1c and Stage 2 also considered what is likely to be delivered within the Plan period.
- 1.25 The potential benefits of provision of strategic transport infrastructure were not assumed in coming to a conclusion on the effects of any individual sites in Stage 1; consideration of this was deferred to Stage 2 on the basis that sensible assumptions on what is likely to be provided can only be made at the scale of spatial strategy alternatives rather than individual sites.

Scoring system

- 1.26 Scores were attributed to each alternative strategic site during Stage 1c of the SA and to each spatial strategy alternative during Stage 2 of the SA to indicate its likely effects in relation to each SA objective (see Table 1.2). Where a potential positive or negative effect was uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score was colour coded as per the potential positive, negligible or negative effect (green, yellow, orange, etc.). For some SA objectives, mixed effects may occur as more than one factor was taken into account during the assessment. In such cases, mixed effects were recorded with one element of the score relating to each factor, for example '+/-' or '+ +/+ '.

⁵ CAUSE have stated that they are not land promoters or site promoters and have no interest in any land. Instead they wish to be recognised as a group with an alternative Local Plan strategy which they wish the local authorities to investigate.
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Table 1.2: Key to scoring used in the Stage 1c SA of alternative strategic sites

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
++/--	Mixed significant effects likely
+/-	Mixed minor effect likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
?	Potential for a significant effect but uncertain whether it will be positive or negative or insufficient information to assess effect
0	Negligible effect likely

Identification of sites to be assessed

- 1.27 Stage 1c appraised alternative strategic sites at a range of alternative, fully built dwelling capacities, as well as at the scale of the development expected to be achieved by the end of the Plan period (2033), for those sites not expected to be fully built by this time. The sites assessed are set out in Table 1.3.

Table 1.3: Alternative strategic sites appraised in Stage 1 SA




Site ref	Option Name	Site ref and housing capacity options Promoter preferred capacity <u>underlined</u> if known * Max by end of plan period
ALTGC2	Land East of Silver End	<u>ALTGC2a 1,800</u> ALTGC2b 2,500*
ALTGC3	Monks Wood	ALTGC3a 2,000 ALTGC3b 2,500* <u>ALTGC3c 5,500</u> ALTGC3d 13,500
ALTGC4	Land at Marks Tey Option One	ALTGC4a 2,000 ALTGC4b 2,500* <u>ALTGC4c 17,000</u> ALTGC4d 21,000
ALTGC6	Land at Marks Tey Option Three	ALTGC6a 2,000 ALTGC6b 2,500* <u>ALTGC6c 3,500</u> ALTGC6d 5,000
ALTGC7	Land at East of Colchester Option One	ALTGC7a 2,000 ALTGC7b 2,500* <u>ALTGC7c 4,000</u>
ALTGC8	Land at East of Colchester Option Two	ALTGC8a 2,000
ALTGC9	Land at East of Colchester Option Three	ALTGC9a 2,000 ALTGC9b 2,500* ALTGC9c 3,000
ALTGC10	Land at East of Colchester Option Four	ALTGC10a 2,000 ALTGC10b 2,500* ALTGC10c 4,500
ALTGC11	Langham Garden Village	ALTGC11a 2,000 ALTGC11b 2,500* ALTGC11c 5,000
C1	CAUSE Alresford	C1a 700 C1b 2,000 (CAUSE recommended maximum) C1c 2,500 (theoretical maximum, based on site capacity)

Site ref	Option Name	Site ref and housing capacity options Promoter preferred capacity <u>underlined</u> if known * Max by end of plan period
C2	CAUSE Great Bentley	C2a 700 C1b 2,000 (CAUSE recommended maximum) C1c 2,500 (theoretical maximum, based on site capacity)
C3	CAUSE Weeley	C3a 700 C1b 2,000 (CAUSE recommended maximum) C1c 2,500 (theoretical maximum, based on site capacity)
C4	CAUSE Thorpe-le-Soken	C4a 700 C1b 2,000 (CAUSE recommended maximum) C1c 2,500 (theoretical maximum, based on site capacity)
NEAGC1	West of Braintree	NEAGC1a 2,000 NEAGC1b 2,500* NEAGC1c 5,500 NEAGC1d 7,500 <u>NEAGC1e 10,000</u>
NEAGC2	Colchester Braintree Borders Garden Community (Marks Tey)	NEAGC2a 2,500* NEAGC2b 5,500 NEAGC2c 15,000 <u>NEAGC2d 21,000</u> NEAGC2e 27,000
NEAGC3	Tendring Colchester Borders Garden Community	NEAGC3a 2,000 NEAGC3b 2,500* <u>NEAGC3c 7,500</u> NEAGC3d 8,000
SUE1	Land at Halstead	SUE1a 2,000 SUE1b 2,500* <u>SUE1c 6,000</u> SUE1d 8,500
SUE2	Land East of Braintree (including Temple Border)	SUE2a 2,000 SUE2b 2,500* <u>SUE2c 5,000</u> *Site promoter notes capacity is less than 5,000

Site ref	Option Name	Site ref and housing capacity options Promoter preferred capacity <u>underlined</u> if known * Max by end of plan period
SUE3	Land South East of Braintree	SUE3a 2,000 SUE3b 2,500* <u>SUE3c 5,000</u> SUE3d 12,500
SUE4	Land South of Haverhill	SUE4a 2,000 SUE4b 2,500* <u>SUE4c 3,500</u>
VE1	Land at Kelvedon	VE1a 2,000 VE1b 2,500* <u>VE1c 5,000</u> VE1d 17,000
VE4	Weeley Garden Village	VE4a 2,000
VE5	Tendring Central Garden Village	VE5a 2,000 VE5b 2,500* <u>VE5c 4,500</u>

North Essex Local Plan Section 1 Additional Sustainability Appraisal

Figure 1.1: Strategic sites taken forward for inclusion in spatial strategy alternatives

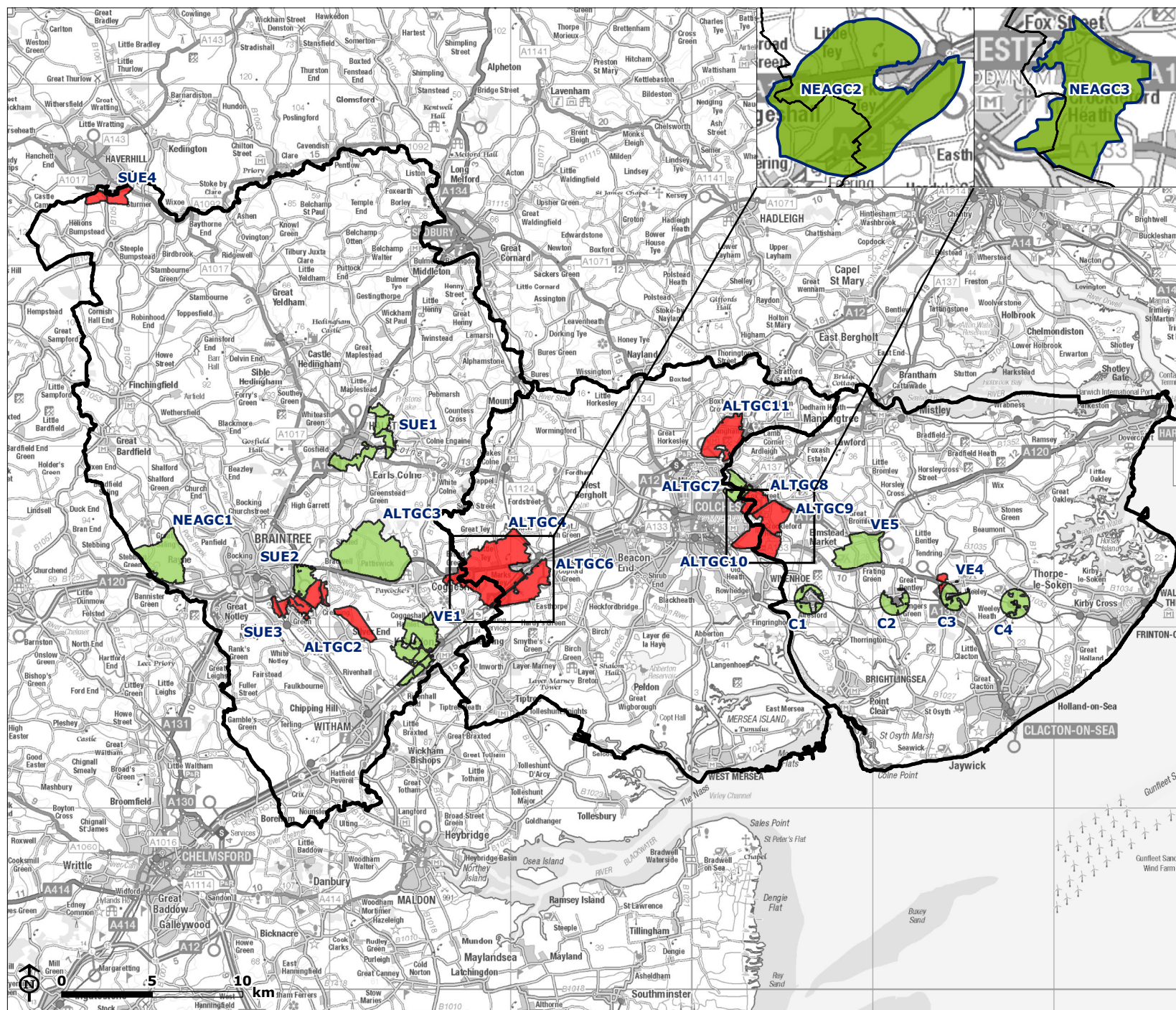
-  North Essex Authority Boundaries
-  Site taken forward
-  Site not taken forward

- ALTGC2: Land east of Silver End
- ALTGC3: Monks Wood
- ALTGC4: Land at Marks Tey Option 1
- ALTGC6: Land at Marks Tey Option 3
- ALTGC7: Land east of Colchester Option 1
- ALTGC8: Land east of Colchester Option 2
- ALTGC9: Land east of Colchester Option 3
- ALTGC10: Land east of Colchester Option 4
- ALTGC11: Langham Garden Village
- C1: CAUSE Alresford
- C2: CAUSE Great Bentley
- C3: CAUSE Weeley
- C4: CAUSE Thorpe-le-Soken
- NEAGC1: Land west of Braintree
- NEAGC2: Colchester Braintree Borders
- NEAGC3: Tending Colchester Borders
- SUE1: Land at Halstead
- SUE2: Land east of Braintree
- SUE3: Land south east of Braintree
- SUE4: Land south of Haverhill
- VE1: Land at Kelvedon
- VE4: Weeley Garden Village
- VE5: Tending Central Garden Village

Source: BDC, CBC, TDC, LUC

Map Scale @ A4: 1:300,000

LUC



The approach to Stage 2: Appraisal of alternative spatial strategies

- 1.28 Taking into account the findings of Stage 1 of the SA, the NEAs selected the alternative strategic sites to be taken forward for inclusion in alternative spatial strategies (see Figure 1.1 above) and defined the 17 alternative spatial strategies set out in Table 1.4 to be subject to SA during Stage 2 of the Additional SA process. The spatial strategies were divided into two geographical areas to reflect a natural division between combinations of strategic sites: west of Colchester; and east of Colchester.
- 1.29 The SAs of the alternative spatial strategies were informed by the SA of the strategic sites carried out in Stage 1, including information included in the site information forms. Each alternative spatial strategy included information on employment and the strategic infrastructure that would be needed to support delivery of the strategy.
- 1.30 For the proportionate growth alternatives and those alternatives where a strategic site was combined with an element of proportionate growth, a greater element of professional judgement was required to appraise them, particularly for the spatial strategy alternative whereby each settlement would grow at the same percentage (18%), because specific sites were not identified. However, the SA for these alternatives was based on clear descriptions of how much development would go to each settlement, which provided a reasonable basis for coming to judgements.

Table 1.4: Spatial strategy alternatives

WEST OF COLCHESTER (Whole of Braintree and most of Colchester) Target of approximately 5,000 additional homes up to 2033	EAST OF COLCHESTER (Tendring and eastern part of Colchester) Target to deliver approximately 2,500 additional homes up to 2033
<ol style="list-style-type: none"> Proportionate (percentage-based) growth Proportionate (hierarchy-based) growth West of Braintree GC [NEAGC1] + Colchester/Braintree GC [NEAGC2] West of Braintree GC [NEAGC1] + Monks Wood GC [ALTGC3] + Colchester/Braintree GC [NEAGC2] West 4a: smaller scale of West of Braintree [NEAGC1] + Monks Wood GC [ALTGC3] + smaller scale of Colchester/Braintree GC [NEAGC2] Monks Wood GC [ALTGC3] + Colchester/Braintree Borders GC [NEAGC2] West of Braintree GC [NEAGC1] + Monks Wood GC [ALTGC3] East of Braintree [SUE2] + Kelvedon [VE1] Land at Halstead [SUE1] + proportionate growth. West of Braintree GC [NEAGC1] + proportionate growth Colchester/Braintree GC [NEAGC2] + proportionate growth Monks Wood GC [ALTGC3] + proportionate growth 	<ol style="list-style-type: none"> Proportionate (percentage-based) growth Proportionate (hierarchy-based) growth Tendring Colchester Borders GC [NEAGC3] Colchester North-East Urban Extension [ALTGC7] Tendring Central Garden Village [VE5] CAUSE Metro Plan [C1, C2, C3 & C4]

Cumulative effects

- 1.31 The significance of the effects identified by the SA relates to the growth that would be provided by the Section 1 Local Plan alone but the potential for cumulative effects with proposed allocations within the submitted Section 2 Local Plans or significant permitted developments was described in the assessment text of the main SA report and appendices, where relevant. Cumulative effects are also described later in this Non-Technical Summary.
- 1.32 Similarly, where sites cross over the NEA boundary, specifically for example to the west of the NEAGC1, the proposed allocations within neighbouring districts are also taken into account – however, the significance of the effects identified by the SA relates only to the growth that would be provided by the Section 1 Local Plan alone.

Balancing effects of different development locations

- 1.33 A number of spatial strategy alternatives comprised some alternative strategic sites or proportionate growth locations likely to have positive effects in relation to an SA objective and other sites/locations likely to result in negative or less positive effects in relation to the same SA objective. In these cases, judgement was necessary in coming to a view of the overall effect of the spatial strategy alternative, applying the precautionary principle unless a spatial strategy alternative would allocate the clear majority of development to a location with significant positive effects, and only a very small amount of development to a less suitable location – in such circumstances, greater weight would be placed on the more positive effects identified.

The approach to consultation

- 1.34 The proposed scope and methodology of the Additional SA were set out in a Method Scoping Statement, which was reviewed by the Inspector and subsequently amended based on his advice⁶. This amended version of the Method Scoping Statement was subject to focussed consultation between 14 December 2018 and 1 February 2019 and supplemented by discussion sessions with site promoters and other stakeholders during January 2019. As a result of consultation feedback and subsequent discussion with NEA officers, some amendments to the Stage 1 methodology and the details of the sites to be assessed were made.
- 1.35 A 'check and challenge' workshop allowed early dissemination of draft results from Stage 1 of the SA and input to the approach to Stage 2. The format of the workshop allowed attendees the opportunity to engage more fully with the SA process via opportunities to ask questions at the end of each agenda item, and group discussions, the outputs of which were intended to help inform the next stage of SA work. From the round table discussions, a number of key principles, ideas, arguments and factors were identified. These ideas were taken into account along with the Local Plan Inspector's specific comments both by LUC in developing the methodology for the Additional SA and by the NEAs in developing an overarching set of principles to guide the planning judgement that was applied in the selection of the reasonable alternative spatial strategies to be appraised.

Difficulties encountered

- 1.36 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. Those encountered during the Additional SA are set out in the full report of the Additional SA below. Notwithstanding these limitations, it is considered that the SA provides an adequate basis for comparing the sustainability implications of the reasonable alternatives appraised.

Results of Stage 1 - SA of alternative strategic sites

- 1.37 This section summarises the findings of the Stage 1a and Stage 1b appraisals of the alternative strategic sites.

⁶ As set out in the Inspectors letter dated 21 November 2018. The Inspector stated that the amendments 'dealt appropriately with his points' in his letter dated 10 December 2018.

Stage 1 access criteria

Stage 1a assessment

- 1.38 The results of the Stage 1a assessment in relation to access to existing key services and facilities are shown in Table 1.5. Few sites scored well against all the criteria, primarily because they would be either stand-alone developments, or on the edge of settlements in the form of urban extensions. The criteria against which a number of sites scored well were in relation to access to open space and sports centres, public rights of way, and employment areas.
- 1.39 Three of the CAUSE sites – C1 CAUSE Alresford, C2 Great Bentley and C3 CAUSE Weeley – performed relatively well because they are focused around village centres and railway stations. For similar reasons, VE4 Weeley Garden Village also performed relatively well.
- 1.40 Of the urban extensions, SUE1, SUE2 and SUE3 performed better than SUE4, although SUE1 performed less well in relation to access to a primary/middle school and a railway station. However, incomplete data were available to inform the appraisal of SUE4 in relation to accessibility to existing services and facilities; the Stage 1c assessment provides a more complete appraisal of this site.
- 1.41 Of the Alternative Garden Community sites, ALTGC2, ALTGC7 and ALTGC10 performed relatively well and ALTGC3 and ALTGC9 performed least well. There was little to distinguish between the other Alternative Garden Community sites.
- 1.42 The Garden Community sites NEAGC1, NEAGC2, NEAGC3, performed relatively poorly compared to many of the alternatives, because they are less well related to existing services and facilities. Even with NEAGC2, which is focused on a railway station, the majority of the site would be in an 'unacceptable' walking distance of the station.

Table 1.5: Stage 1a assessment findings for the Access to Services SA criteria

Site	GP surgeries / health centres	Primary or middle schools	Secondary schools	Further and higher education facilities	Local centres	Town centres	Railway stations	Bus stops	Cycle paths	Open spaces and sports centres	Public Rights of Way (PRoW)	Centres of employment including employment areas and town centres
ALTGC2	✓	✓						✓		✓✓✓	✓✓	✓
ALTGC3											✓✓	
ALTGC4								✓		✓	✓✓	✓
ALTGC6							✓			✓✓	✓✓	✓
ALTGC7		✓	✓					✓		✓✓✓	✓✓	✓✓
ALTGC8			✓					✓		✓✓	✓✓	✓
ALTGC9										✓	✓✓	✓
ALTGC10			✓	✓				✓✓	✓✓	✓✓	✓✓	✓
ALTGC11								✓	✓	✓	✓✓	✓✓✓
C1	✓✓	✓✓			✓		✓✓✓	✓✓		✓✓	✓✓✓	
C2	✓✓	✓✓✓			✓		✓✓✓	✓		✓✓	✓✓	✓✓
C3		✓✓✓					✓✓✓	✓✓		✓✓	✓✓	
C4							✓✓✓	✓✓		✓	✓✓	
NEAGC1											✓✓	
NEAGC2										✓	✓✓	✓
NEAGC3								✓		✓	✓✓	✓
SUE1			✓					✓		✓✓	✓✓	✓✓
SUE2		✓	✓				✓	✓	✓	✓✓	✓✓	✓
SUE3		✓	✓				✓	✓		✓✓	✓✓	✓
SUE4								✓			✓✓	✓✓
VE1							✓			✓	✓✓	✓
VE4		✓					✓✓✓	✓✓		✓✓	✓✓	
VE5								✓✓	✓	✓✓	✓✓	✓✓
Key	✓✓✓	'Desirable' walking distance		✓✓	'Acceptable' walking distance		✓	'Maximum preferred' walking distance			'Unacceptable' walking distance	

Stage 1b assessment

- 1.43 Stage 1a assessed each strategic site based on its existing situation. The purpose of Stage 1b was to factor in the services and facilities that would be likely to be delivered should development take place. At this stage, provision for strategic transport infrastructure was not taken into account, and neither was provision for additional employment land. The Stage 1b assessment used consistent assumptions about what would be likely to be provided on site in the way of services and facilities, and also assumed that the maximum development capacity would be delivered.
- 1.44 The Stage 1b assessment took place at a point in time in the SA process, and was subsequently replaced by a Stage 1c more detailed assessment. However, the overall findings at that stage of the process are summarised in relation to access to key services and facilities in Table 1.6. Comparing the results to those from Stage 1a (Table 1.5), it can be seen that once the assumed services and facilities that would be delivered at strategic sites are built into the assessment framework in Stage 1b, the differences in performance between the strategic sites begin to narrow.
- 1.45 The larger strategic sites, such as the three proposed Garden Communities, some of the Alternative Garden Communities, and strategic urban extensions have the potential to include a range of services and facilities, including secondary schools and health care facilities, which brings them up in terms of overall performance. On the other hand, some of the smaller strategic sites, such as the four CAUSE sites, retain their advantage in terms of access to a railway station, but are less likely to deliver the full range of services and facilities, when considered individually.

Table 1.6: Stage 1b assessment findings for the Access to Services SA criteria

Site	GP surgeries / health centres	Primary or middle schools	Secondary schools	Further and higher education facilities	Local centres	Town centres	Railway stations	Bus stops	Cycle paths	Open spaces and sports centres	Public Rights of Way (PRoW)	Centres of employment including employment areas and town centres
ALTGC2	✓	✓✓✓			✓✓✓			✓✓✓		✓✓✓	✓✓	✓
ALTGC3	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓		✓✓✓	✓✓	
ALTGC4	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓		✓✓✓	✓✓	✓
ALTGC6	✓✓✓	✓✓✓	✓✓✓		✓✓✓		✓	✓✓✓		✓✓✓	✓✓	✓
ALTGC7		✓✓✓	✓		✓✓✓			✓✓✓		✓✓✓	✓✓	✓✓
ALTGC8		✓✓✓	✓		✓✓✓			✓✓✓		✓✓✓	✓✓	✓
ALTGC9		✓✓✓			✓✓✓			✓✓✓		✓✓✓	✓✓	✓
ALTGC10	✓✓✓	✓✓✓	✓✓✓	✓	✓✓✓			✓✓✓	✓✓	✓✓✓	✓✓	✓
ALTGC11	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓	✓	✓✓✓	✓✓	✓✓✓
C1	✓✓	✓✓✓			✓✓✓		✓✓✓	✓✓✓		✓✓✓	✓✓✓	
C2	✓✓	✓✓✓			✓✓✓		✓✓✓	✓✓✓		✓✓✓	✓✓	✓✓
C3		✓✓✓			✓✓✓		✓✓✓	✓✓✓		✓✓✓	✓✓	
C4		✓✓✓			✓✓✓		✓✓✓	✓✓✓		✓✓✓	✓✓	
NEAGC1	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓		✓✓✓	✓✓	
NEAGC2	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓		✓✓✓	✓✓	✓
NEAGC3	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓		✓✓✓	✓✓	✓
SUE1	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓		✓✓✓	✓✓	✓✓
SUE2		✓✓✓	✓		✓✓✓		✓	✓✓✓	✓	✓✓✓	✓✓	✓
SUE3	✓✓✓	✓✓✓	✓✓✓		✓✓✓		✓	✓✓✓		✓✓✓	✓✓	✓
SUE4		✓✓✓			✓✓✓			✓✓✓		✓✓✓	✓✓	✓✓
VE1	✓✓✓	✓✓✓	✓✓✓		✓✓✓		✓	✓✓✓		✓✓✓	✓✓	✓
VE4		✓✓✓			✓✓✓		✓✓✓	✓✓✓		✓✓✓	✓✓	
VE5	✓✓✓	✓✓✓	✓✓✓		✓✓✓			✓✓✓	✓	✓✓✓	✓✓	✓✓
Key	✓✓✓	'Desirable' walking distance		✓✓	'Acceptable' walking distance		✓	'Maximum preferred' walking distance			'Unacceptable' walking distance	

Stage 1 environmental criteria

Stage 1a and Stage 1b assessment

- 1.46 Table 1.7 below shows the Stage 1a and 1b assessment findings for each strategic site against the SA criteria which relate to 'risk of environmental harm'. When looking across all the 'risk of harm' to environmental assets criteria, no strategic sites perform particularly well or particularly poorly. For some criteria, most if not all of the sites have the same score, for example in relation to heritage assets, internationally and nationally designated biodiversity and geological sites, proximity to AQMAs, mineral resources and best and most versatile agricultural land. The differences relate to other environmental criteria, such as risk of harm to local wildlife sites and exposure to noise, which may be capable of mitigation through the design and delivery process. Although all sites recorded a 'High' risk of harm against at least two of the criteria, this does not necessarily mean that they are 'showstoppers'.
- 1.47 Note that for the risk of environmental harm criteria, the Stage 1b results are the same as the Stage 1a results, as any variations would be dependent upon the design and layout of development, which was not known at this stage of the GIS led assessment process. The only exception to this is in relation to criterion 'Likely contribution to road traffic within areas suffering from traffic-related air pollution' as there is no Stage 1a assessment for this, because it is based on professional judgement. As such, only the Stage 1b results are reported in this section.

Table 1.7: Stage 1a and 1b assessment findings for risk of environmental harm

Site	Heritage assets	Internationally or nationally designated biodiversity or geological sites	Locally designated biodiversity sites and ancient woodland	Priority Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat	Designated landscapes	Source Protection Zones (SPZs)	Flood risk areas	Proximity to sources of air pollution	Exposure to noise pollution from roads and railways	Mineral resources	Best and most versatile agricultural land
ALTGC2	High	Medium	Medium	Low	Low	Low	Low	Low	Low	High	High
ALTGC3	High	Medium	High	Medium	Low	Low	Low	Low	Medium	High	High
ALTGC4	High	Medium	Medium	Low	Low	Low	Low	Low	High	High	High
ALTGC6	High	Medium	Low	Low	Low	Low	Medium	Low	High	High	High
ALTGC7	High	Medium	Medium	Low	Medium	Low	Low	Low	High	High	High
ALTGC8	High	Medium	High	Medium	Medium	Low	Low	Low	High	High	High
ALTGC9	High	Medium	Medium	Medium	Medium	Low	Low	Low	High	High	High
ALTGC10	High	Medium	High	Medium	Low	Low	High	Low	High	High	High
ALTGC11	High	Medium	Medium	Low	Medium	Low	Low	Low	High	High	High
C1	High	Medium	High	Medium	Low	Low	Low	Low	Low	High	High
C2	High	Medium	Medium	Low	Low	Medium	Low	Low	Low	High	High
C3	High	Medium	Medium	Low	Low	Low	Medium	Low	Medium	High	Medium
C4	High	Medium	High	Medium	Low	Low	High	Low	Low	High	Medium
NEAGC1	High	Medium	Medium	Low	Low	Low	Low	Low	Low	High	High
NEAGC2	High	Medium	Medium	Low	Low	Low	Low	Low	High	High	High
NEAGC3	High	Medium	Medium	Low	Medium	Low	Low	Low	High	High	High
SUE1	High	Medium	Medium	Low	Low	Medium	Low	Low	Medium	High	High
SUE2	High	Medium	Medium	Low	Low	Low	Low	Low	High	High	High
SUE3	High	Medium	Medium	Low	Low	Low	Low	Low	High	High	High
SUE4	High	Low	Medium	Low	Low	Medium	Low	Low	Low	Low	High
VE1	High	Medium	Low	Low	Low	Low	Low	Low	High	High	High
VE4	High	Medium	Medium	Low	Low	Low	Low	Low	High	Low	Medium
VE5	High	Medium	Low	Low	Low	Medium	Low	Low	High	High	High

Conclusions of Stage 1a and 1b assessments

- 1.48 The overall performance of the alternative strategic sites against the SA objectives, once services and facilities that may be delivered as an integral component of development are taken into account, the difference between them is not that great. There are no sites that perform extremely well against all the criteria and no sites that perform extremely poorly.
- 1.49 Given that some criteria that underpin the SA objectives can give rise to a 'high' risk of significant effect even though the proportion of the site affected may be very small, the results need to be treated with caution. It could be expected that, all other things being equal, the larger the site, the more likely it is that it will intersect with environmental assets. But on the other hand, larger sites are likely to give greater scope for flexibility in terms of design and mitigation through the masterplanning process. Similarly, the larger the site, the more likely it is to be able to deliver a range of services and facilities.
- 1.50 This assessment was undertaken purely using GIS and did not generate definitive results as to which sites to rule out to take to the Stage 2 alternative spatial strategy assessment. It was therefore considered that a more detailed, 'Stage 1c', assessment should be carried out.

Stage 1c findings

- 1.51 The findings of the Stage 1c appraisals of the alternative strategic sites at all dwelling capacities in Table 1.8.
- 1.52 The enhanced Stage 1c assessment confirmed and reinforced many of the findings of the Stage 1a and 1b assessment. When considered across the SA objectives as a whole, the differences between sites were not that great with no sites performing particularly well and no sites performing particularly poorly in comparison with the other sites.
- 1.53 The Stage 1c assessment brought out more differences between sites in relation to their scale of development, with larger scale sites being more likely to deliver a good range of community services and facilities, including health care, secondary schools, and employment land.
- 1.54 The Stage 1c assessment also brought out some of the differences between sites with respect to effects on biodiversity (SA objective 6) and townscape (SA objective 9), but these assessments were prior to mitigation being taken into account.
- 1.55 Given that most of the sites are of a large scale that they may offer scope to avoid sensitive assets, incorporate mitigation, and provide flexibility in design to reduce impacts on matters such as visual intrusion or impacts on the setting of heritage assets, it was not possible to definitively rule out sites on the basis of the SA alone.

Table 1.8: Stage 1c assessment findings

Site	Dwelling capacity	SA objective														
		SA1 Community cohesion	SA2 Housing provision	SA3 Health	SA4 Vitality and viability of centres	SA5 Economy	SA6 Biodiversity and geological diversity	SA7 Sustainable travel	SA8 Accessibility & infrastructure provision	SA9 Historic environment and townscape	SA10 Energy efficiency and climate change	SA11 Water resources and quality	SA12 Flood risk	SA13 Air quality	SA14 Landscape	SA15 Soil and mineral resource
ALTGC2 a	1,800	--?/++	++?	+/-?	+	++	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC2 b	2,500	--?/++	++?	+/-?	+	++	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC3 a	2,000	--?/++	++	+/0	+	+	--?	+?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/--
ALTGC3 b	2,500	--?/++	++	+/0	+	++	--?	++?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/--
ALTGC3 c	5,500	--?/++	++?	++/0	+	++	--?	++?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/--
ALTGC3 d	13,500	--?/++	++?	++/0	+	++	--?	++?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/--
ALTGC4 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC4 b	2,500	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC4 c	17,000	--?/++	++?	++/-	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC4 d	21,000	--?/++	++?	++/-	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC6 a	2,000	--?/++	++?	+?/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC6 b	2,500	--?/++	++?	+?/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC6 c	3,500	--?/++	++?	+?/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC6 d	5,000	--?/++	++?	++?/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC7 a	2,000	--?/++	++	+/-	+	+	--?	+?/-?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
ALTGC7 b	2,500	--?/++	++	+/-	+	+	--?	+?/-?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
ALTGC7 c	4,000	--?/++	++?	+/-	+	+	--?	+?/-?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
ALTGC8 a	2,000	--?/++	++	+/-	+	+	--?	+?/-?	+	--?/0	+	0/0?	-?	0/-?	--?	-?/--
ALTGC9 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
ALTGC9 b	2,500	--?/++	++?	+/-	+	+	-?	+?/-?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
ALTGC9 c	3,000	--?/++	++?	+/-	+	+	-?	+?/-?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
ALTGC10 a	2,000	--?/++	++	+/-	+	+	--?	+?/-?	+	--?/?	+	0/0?	-?	0/-?	--?	--?/--
ALTGC10 b	2,500	--?/++	++	+/-	+	+	--?	+?/-?	+	--?/?	+	0/0?	-?	0/-?	--?	--?/--
ALTGC10 c	4,500	--?/++	++?	++/-	+	+	--?	+?/-?	+	--?/?	+	0/0?	-?	0/-?	--?	--?/--
ALTGC11 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC11 b	2,500	--?/++	++	+/-	+	+	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
ALTGC11 c	5,000	--?/++	++?	++/-	+	+	-?	++?/-?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
C1 a	700	--?/+	++	++/0	+	+	--?	+?/+++	+	--?/?	+	0/?	0	0/0	--?	--?/--
C1 b	2,000	--?/++	++	++/0	+	+	--?	+?/+++	+	--?/?	+	0/?	0	0/0	--?	--?/--

		SA objective														
Site	Dwelling capacity	SA1 Community cohesion	SA2 Housing provision	SA3 Health	SA4 Vitality and viability of centres	SA5 Economy	SA6 Biodiversity and geological diversity	SA7 Sustainable travel	SA8 Accessibility & infrastructure provision	SA9 Historic environment and townscape	SA10 Energy efficiency and climate change	SA11 Water resources and quality	SA12 Flood risk	SA13 Air quality	SA14 Landscape	SA15 Soil and mineral resource
C1 c	2,500	--?/++	++	++/0	+	+	--?	+?/+++	+	--?/?	+	0/?	0	0/0	--?	--?/--
C2 a	700	--?/+	++	++/0	+	+	-?	+?/+++	+	--?/?	+	-?/0?	-?	0/0	--?	--?/--
C2 b	2,000	--?/++	++	++/0	+	+	-?	+?/+++	+	--?/?	+	-?/?	-?	0/0	--?	--?/--
C2 c	2,500	--?/++	++	++/0	+	+	-?	+?/+++	+	--?/?	+	-?/?	-?	0/0	--?	--?/--
C3 a	700	--?/+	++	+?/0	+	+	--?	+?/+++	+	--?/?	+	0/?	0	0/0	--?	-?/-
C3 b	2,000	--?/++	++	+?/0	+	+	--?	+?/+++	+	--?/?	+	0/?	0	0/0	--?	-?/-
C3 c	2,500	--?/++	++	+?/0	+	+	--?	+?/+++	+	--?/?	+	0/?	0	0/0	--?	-?/-
C4 a	700	--?/+	++	+?/0	+	++	--?	+?/+++	+	--?/?	+	0/?	-?	0/0	--?	-?/-
C4 b	2,000	--?/++	++	+?/0	+	++	--?	+?/+++	+	--?/?	+	0/?	-?	0/0	--?	-?/-
C4 c	2,500	--?/++	++	+?/0	+	++	--?	+?/+++	+	--?/?	+	0/?	-?	0/0	--?	-?/-
NEAGC1 a	2,000	--?/++	++	+/-?	+	+	--?	+?/-?	+	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 b	2,500	--?/++	++	+/-?	+	+	--?	+?/-?	+	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 c	5,500	--?/++	++?	++/-?	+	++	--?	++?/-?	+	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 d	7,500	--?/++	++?	++/-?	+	++	--?	++?/-?	+	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 e	10,000	--?/++	++?	++/-?	+	++	--?	++?/-?	+	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC2 a	2,500	--?/++	++	+/-?	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 b	5,500	--?/++	++?	++/-?	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 c	15,000	--?/++	++?	++/-?	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 d	21,000	--?/++	++?	++/-?	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 e	27,000	--?/++	++?	++/-?	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 b	2,500	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 c	7,500	--?/++	++?	++/-	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 d	8,000	--?/++	++?	++/-	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
SUE1 a	2,000	--?/++	++	+/0	+	+	-?	+?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/-
SUE1 b	2,500	--?/++	++	+/0	+	+	-?	++?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/-
SUE1 c	6,000	--?/++	++	++/0	+	+	-?	++?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/-
SUE1 d	8,500	--?/++	++	++/0	+	+	-?	++?/-?	+	--?/?	+	0/?	0	0/0	--?	--?/-
SUE2 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/0	+	0/0?	0	0/0?	--?	--?/--
SUE2 b	2,500	--?/++	++	+/-	+	+	-?	+?/-?	+	--?/0	+	0/0?	0	0/0?	--?	--?/--
SUE2 c	5,000	--?/++	++	++/-	+	++	-?	++?/-?	+	--?/0	+	0/?	0	0/0?	--?	--?/--

		SA objective														
Site	Dwelling capacity	SA1 Community cohesion	SA2 Housing provision	SA3 Health	SA4 Vitality and viability of centres	SA5 Economy	SA6 Biodiversity and geological diversity	SA7 Sustainable travel	SA8 Accessibility & infrastructure provision	SA9 Historic environment and townscape	SA10 Energy efficiency and climate change	SA11 Water resources and quality	SA12 Flood risk	SA13 Air quality	SA14 Landscape	SA15 Soil and mineral resource
SUE3 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	++	--?/?	+	0/0?	0	0/0?	--?	--?/--
SUE3 b	2,500	--?/++	++	+/-	+	+	-?	+?/-?	++	--?/?	+	0/0?	0	0/0?	--?	--?/--
SUE3 c	5,000	--?/++	++?	++/-	+	++	-?	++?/-?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
SUE3 d	12,500	--?/++	++?	++/-	+	++	-?	++?/-?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
SUE4 a	2,000	--?/++	++	+0	+	+	-?	+?/-?	++	--?/?	+	-?/?	-?	0/-?	--?	0/--
SUE4 b	2,500	--?/++	++	+0	+	+	-?	+?/-?	++	--?/?	+	-?/?	-?	0/-?	--?	0/--
SUE4 c	3,500	--?/++	++	+0	+	+	-?	+?/-?	++	--?/?	+	-?/?	-?	0/-?	--?	0/--
VE1 a	2,000	--?/++	++	+?/-	+	+	-?	+?/-?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
VE1 b	2,500	--?/++	++	+?/-	+	+	-?	+?/-?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
VE1 c	5,000	--?/++	++	++?/-	+	++	-?	++?/-?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
VE1 d	17,000	--?/++	++	++?/-	+	++	-?	++?/-?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
VE4 a	2,000	--?/++	++	+?/-	+	+	-?	++/++?	++	--?/?	+	0/?	0	0/0	--?	0/-
VE5 a	2,000	--?/++	++	+?/--	+	+	-?	+?/-?	++	--?/?	+	0/?	0	0/-?	--?	--?/--
VE5 b	2,500	--?/++	++	+?/--	+	++	-?	++?/-?	++	--?/?	+	0/?	0	0/-?	--?	--?/--
VE5 c	4,500	--?/++	++?	++?/--	+	++	-?	++?/-?	++	--?/?	+	0/?	0	0/-?	--?	--?/--

Results of Stage 2 - SA of alternative spatial strategies

Plan period versus fully built out scenarios

- 1.56 The Additional SA assessed the Section 1 Local Plan alternative spatial strategies both within the Plan period (i.e. to 2033) and when fully built out (no specified end date, but likely to be several years, if not decades, beyond the end of the Plan period). This makes direct comparisons between the alternative spatial strategies difficult, because some (e.g. proportionate growth) will be delivered by 2033, whereas others that include major strategic sites will continue well beyond 2033. In a sense, this is comparing 'apples and pears'.
- 1.57 It should be noted that, although some spatial strategies only allocate development to the end of the Plan period, development is, in reality, likely to continue beyond 2033. However there is no spatial strategy for this post-2033 development, although it could be presumed that development would continue in the same vein. The effects of the spatial strategies that involve major strategic sites will not be fully felt until well after the end of the Plan period. Similarly, temporary effects related to their construction (e.g. noise and disturbance) are likely to be experienced over many years.
- 1.58 In addition, it should be noted that existing commitments and allocations in the Section 2 Local Plans already make up over 80% of the total housing required to be delivered within the Plan period (approximately 35,600 of 43,200 homes). In this respect, those spatial strategies that seek to deliver the remaining approximate 7,500 homes within the Plan period and no more could be considered too small in scale to be strategic. Conversely, although all spatial strategy alternatives seek to deliver the required additional 7,500 homes in the Plan period, some could go on to deliver potentially as much as 35,500 additional homes beyond the Plan period. In fact, taking into account the 7,500 they will deliver within the Plan period, they could total a similar amount of housing that is planned for through the Section 2 Local Plans.
- 1.59 The Section 2 Local Plans already seek to focus development at existing settlements within North Essex, through Policy SP2 of the Section 1 Local Plan, according to settlement scales, sustainability and existing role. In this respect, a number of the settlements are already likely to experience significant housing growth relative to their existing size.
- 1.60 The cumulative effects from this development proposed by the Section 2 Local Plans provide the context for the Additional SA work, and the consideration of further growth, both within the Plan period and beyond.

Pros and cons of different urban forms

- 1.61 As part of the Additional SA, a review of research was undertaken with respect to urban form. This looked at the in-principle pros and cons of new settlements, urban extensions and dispersed development and provided some useful indicators as to how these different types of urban form compare in sustainability terms. The review found that:
- Dispersed development, which bears many similarities with the proportionate (percentage-based) growth spatial strategy alternative appraised in the Additional SA, performs less well across a range of criteria than new settlements or urban extensions, for example in relation to travel patterns and modes of transport and the delivery of affordable housing.
 - New settlements and urban extensions can perform similarly, depending upon where they are located, and how they are designed and delivered.
- 1.62 For new settlements to perform well in sustainability terms, it is critical that the infrastructure is provided in the early stages of development in order to avoid unsustainable travel behaviours becoming embedded before sustainable transport alternatives become available, and to develop a sense of community cohesion. New settlements can involve a significant amount of embodied carbon by having to develop 'from scratch', although new settlements can be designed to be efficient in carbon terms, including inclusion of renewable energy and encouraging low carbon behaviours, such as sustainable modes of transport. Larger new settlements are more likely to attract economic activity.
- 1.63 Urban extensions can make use of existing infrastructure, or expansions to existing infrastructure, rather than having to start from scratch. If well integrated with the settlements they are attached

to, they can offer immediate access to a range of existing jobs, services and facilities, although they can lack a sense of place. Larger urban extensions can also deliver their own services and facilities, economic activity, and the design features associated with new settlements with respect to sustainable travel and reduced carbon.

- 1.64 Viability and deliverability issues can affect both new settlements and urban extensions, but tend to be more pronounced with new settlements unless appropriate funding and governance structures are put in place. Dispersed development may have less in the way of upfront investment, but on the other hand can lead to an accumulation of development with insufficient investment in supporting services, facilities and infrastructure.
- 1.65 In terms of guiding principles, the research found that new settlements are likely to perform best when they are in close proximity to thriving towns and cities in order to share infrastructure and access to jobs and services during the early stages. On the other hand, there is a risk that such new development can draw resources and investment away from the towns and cities with which they are associated.
- 1.66 Of critical importance is that new strategic development should be located in areas with high public transport accessibility, for example along well-served bus corridors, and in close proximity to railway stations and other transport interchanges. The potential to extend existing networks, making better use of existing mainline stations or disused lines, and additional branches (e.g. rapid transit systems) through new neighbourhoods are considered to help make new strategic development more accessible and more successful.
- 1.67 In terms of design, connectivity is important, and the need to avoid severance by major roads and roundabouts. While landscape buffers and green space are to be encouraged, they should not threaten permeability and connectivity with surrounding land uses.
- 1.68 It is acknowledged in the research that the achievement of 'self-containment' is an unrealistic ambition given the choice of modes of transport available to modern communities, but that if developments are of a sufficient scale, they can provide for many of the everyday needs of residents within the development, reducing the incentive to travel elsewhere. This can be helped by designing compact developments, which incorporate a mix of uses.
- 1.69 The Additional SA of the spatial strategy alternatives for North Essex largely mirrors the findings of the research. The proportionate growth alternatives West 1, West 2, East 1, and East 2 (particularly those based on a simple percentage increase in growth of each settlement - West 1 and East 1) performed relatively poorly against the SA objectives, whereas many of the new settlement and urban extension alternatives performed similarly.

Summary of findings of the SA of alternative spatial strategies

West of Colchester

- 1.70 The proportionate growth spatial strategy alternatives (West 1 and West 2) perform less well across a number of the SA objectives than the other spatial strategy alternatives, as noted above, and therefore can be considered less sustainable.
- 1.71 The remaining spatial strategy alternatives (West 3 to West 11) perform similarly, albeit with some differences between them:
 - All of the remaining spatial strategy alternatives are likely to have significant adverse effects on the existing communities affected by the large-scale developments, primarily because of the considerable change of character around existing settlements. However, several of the spatial strategy alternatives are considered to deliver significant positive effects when the new communities are delivered, due to their being designed as coherent settlements in their own right, with a range of services and facilities (SA objective 1).
 - It is considered that the remaining spatial strategy alternatives will all be capable of delivering the residual housing requirement (approximately 7,500 homes) within the Plan period, and those that extend beyond the Plan period will continue to deliver new homes for many years to come. This includes appropriate provision for affordable housing, and a mix of types and tenures, in line with North Essex policy objectives (SA objective 2).
 - The health benefits will tend to be delivered beyond the Plan period, as the level of housing becomes sufficient to accommodate health care facilities at 4,500 dwellings (SA objective 3).

- Given the scale of development proposed, all of the remaining spatial strategy alternatives will be of sufficient size to incorporate local centres (SA objective 4) and employment land and other jobs (SA objective 5).
- All of the remaining spatial strategy alternatives could have adverse effects on biodiversity, and for West 3, West 4, West 4a, West 5, West 6, and West 11 this could be significant depending upon mitigation (SA objective 6). It should be noted that West 3, West 4, West 4a, and West 5 are located very close to Marks Tey Brickpit SSSI, although being a geological SSSI it should be possible to mitigate and manage adverse effects. All spatial strategies include development within SSSI 'Impact Risk Zones', whereby Natural England should be consulted for potential impacts, although this does not mean that they cannot be mitigated.
- With respect to shorter journeys, the majority of the remaining spatial strategy alternatives will have significant positive effects in the long-term as services and facilities, and jobs, are provided on site, although those strategies which involve building near existing facilities and services, or the provision of Rapid Transit System could achieve this within the Plan period (SA objective 7). West 7 will only have minor positive effects in the long term as the two sites for proportionate growth are likely to have less capacity to support the delivery of on-site facilities.
- With regard to longer journeys, it is considered that those spatial strategy alternatives that include both access to a railway station, particularly on the Great Eastern mainline, as well as investment in a Rapid Transit System, will result in significant positive effects in the longer term (SA objective 7). This is because commuting patterns suggest that the primary commuting destinations for residents of Braintree District are Chelmsford, Colchester, Uttlesford and London, and that Braintree, Chelmsford and London represent three of the top four commuting destinations for residents of Colchester Borough. Therefore, those spatial strategy alternatives that include relatively easy access to a choice of sustainable transport modes (rail and rapid transit) perform most strongly.
- All of the remaining spatial strategy alternatives could potentially have a significant negative effect on heritage assets (SA objective 9). In many instances, the heritage assets include Grade I and Grade II* listed buildings, either within the site or in close proximity. All of the spatial strategy alternatives also have the potential for significant effects on the townscape of nearby settlements due to their scale, but whether these effects would be positive or negative is uncertain.
- Although all of the remaining spatial strategy alternatives are considered to have minor positive effects on carbon, this is primarily with respect to delivery on site, rather than from traffic. From a traffic perspective, those sites that perform most strongly against SA objective 7 are also likely to perform most strongly with respect to transport related carbon emissions (SA objective 10).
- None of the remaining spatial strategy alternatives were identified as having significant effects with respect to water (SA objective 11), flood risk (SA objective 12) or air quality (SA objective 13).
- All of the remaining spatial strategy alternatives were considered to have potentially significant adverse effects with respect to landscape (SA objective 14).
- All of the remaining spatial strategy alternatives were considered likely to have potentially significant adverse effects with respect to minerals and likely to have significant adverse effects with respect to soils (SA objective 15).
- In many instances, there was uncertainty with respect to the effects identified as it may be possible to include mitigation, given the scale of the strategic sites that form components of many of the alternative spatial strategies, depending upon how development is designed and delivered.

1.72 In light of the findings of the SA, there is little to choose between the spatial strategies in terms of significant effects at the strategic scale (other than West 1 and West 2, as noted above). However, the following observations using professional judgement may help to distinguish between them a little more than the objective, assumptions-led SA has achieved:

- The research into urban form suggests that access to good sustainable transport links and services is critical to the achievement of sustainability, and it also makes sense to work with

established patterns of travel but seek to achieve changes in travel mode. Those strategies that combine both development focused on railway stations, particularly the Great Eastern mainline, and provision for a Rapid Transit System, are therefore likely to perform well.

- Those spatial strategies that do not include easy access to rail, especially to the Great Eastern mainline, could be considered to perform less well. For example, Halstead is not well connected in sustainable transport terms, and is not in the major commuting corridors, so those spatial strategies that include significant additional development at Halstead may be considered less sustainable than some of the other spatial strategies.
- On the other hand, those spatial strategies that focus a significant proportion of development along the Great Eastern mainline, for example West 3, West 4, West 5, West 7 and West 10, could, cumulatively with the effects of development already committed or allocated in the Section 2 Local Plans, lead to the perception of continued urbanisation of the Great Eastern mainline/A12 corridor. Consultations during the SA have also highlighted the lack of capacity on the mainline services to accommodate more passengers at peak times.
- Some strategies rely on Rapid Transit to be successful, including West 3, West 4 and West 4a, West 5, West 6, West 9 and West 11. We understand that developments in the order of 2,500 homes should enable Rapid Transit to begin to become viable, and that as the number of homes increases, services can become more frequent, viability improves, and extensions to the Rapid Transit System can be considered. However, it should be noted that this is based on informal advice from the NEA's transport consultants and in the absence of formal evidence is subject to uncertainty. Should a Rapid Transit System be delivered, this would help to address sustainable access issues to key journey destinations that are currently not within 'Acceptable' walking distance, such as existing employment areas and town centres, and to modal transfer nodes, such as railway stations. It could be assumed that, the shorter the journey by Rapid Transit to reach a destination or transfer node, the more likely it is that people will wish to use this form of transport rather than travel by car.
- Braintree is already earmarked for 22% growth in the Plan period, through commitments and Section 2 Local Plan allocations. Urban extensions to the east of Braintree, such as in spatial strategies West 2, West 7, West 8, West 9, West 10 and West 11 would increase this growth further, resulting in cumulative effects significantly greater than those from the Section 1 Local Plan alone. It should be noted that these strategies would result in the first encroachment of development east of the A120 Braintree bypass, and the bypass itself could act as a barrier to integration of new development with the town.
- The scale of development proposed, in particular under spatial strategy alternatives West 3, West 4, and West 5, is very significant (over 25,000 additional homes when fully built out). Once fully built out, each of these spatial strategies would provide more houses than there currently are in the town of Braintree (even before taking into account planned growth through commitments and Section 2 allocations). It is recognised that large scale development is more likely to attract investment, but it is also more likely to change the character of this part of North Essex. Primarily rural areas would become a chain of settlements linking into the existing settlements. This would particularly be the case for those strategies, such as West 4, which would see considerable development along the A120 corridor. It is difficult to judge what the impacts may be on the existing settlements, which could either be positive (e.g. providing further support for jobs, services and facilities) or negative (e.g. diverting investment away from the existing settlements to new settlements).

1.73 With all the spatial strategies, given the scale of development proposed, there is considerable risk. If for any reason they are not delivered as planned, for example through lack of government funding, or changing market conditions, then delivery may not happen as quickly as anticipated, quality could be compromised, and some aspects may not be delivered as wished. For example, there may be choices to be made with respect to the delivery of affordable housing, a full range of services and facilities, open space, sustainable transport infrastructure and services. This is not to say that these will not be delivered, but simply to observe that development on this scale does carry the risk that its full sustainability potential may not be realised in practice.

1.74 Summaries of the assessment findings for the spatial strategies West of Colchester within the Plan period (Table 1.9) and when fully built out (Table 1.10) are included below.

Table 1.9: Summary of SA scores for spatial strategies west of Colchester within the Plan period

		SA objective														
		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
Strategy	West 1	--?/?	++?	--/-?	--	-	-?	--?/--?	++	--?/?	++	-?/?	0	0/-?	-?	--?/--
	West 2	--?/+	--?	+/-?	+++	+++	-?	+++?/++?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
	West 3	-- ?/++	++	+/-?	++	++	--?	+++?/+++?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
	West 4	-- ?/++	++	+/-?	++	++	--?	+++?/+++?	++	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 4a	-- ?/++	++	+/-?	++	++	--?	+++?/+++?	++	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 5	-- ?/++	++	+/-?	++	++	--?	+++?/++?	++	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 6	-- ?/++	++	+/-?	++	++	--?	+++?/+++?	++	--?/?	+	0/?	0	0/0	--?	--?/--
	West 7	-- ?/++	++	+/-	+	++	-?	+?/++?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
	West 8	--?/+	++	+/-?	++	++	-?	+?/++?	++	--?/?	+	0/?	0	0/0?	--?	--?/--
	West 9	--?/+	++	+/-?	++	++	-?	+++?/++?	++	--?/?	+	-?/?	0	0/0?	--?	--?/--
	West 10	--?/+	++	+/-?	++	++	-?	+++?/+++?	++	--?/?	+	-?/?	0	0/-?	--?	--?/--
	West 11	--?/+	++	+/-?	++	++	--?	+++?/++?	++	--?/?	+	-?/?	0	0/0?	--?	--?/--

Table 1.10: Summary of SA scores for spatial strategies west of Colchester when fully built out

	SA objective														
	SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
Strategy	West 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	West 2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	West 3	-- ?/++	++?	++/-?	++	++	--?	++?/++?	+	--?/?	+	0/0?	0	0/-?	--?
	West 4	-- ?/++	++?	++/-?	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?
	West 4a	-- ?/++	++?	++/-?	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?
	West 5	-- ?/++	++?	++/-?	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?
	West 6	-- ?/++	++?	++/-?	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/0	--?
	West 7	-- ?/++	++	++/-	+	++	-?	++?/++?	+	--?/?	+	0/?	0	0/0?	--?
	West 8	--?/+	++	+/-?	++	++	-?	++?/++?	+	--?/?	+	0/?	0	0/0?	--?
	West 9	--?/+	++?	+/-?	++	++	-?	++?/++?	+	--?/?	+	-?/?	0	0/0?	--?
	West 10	--?/+	++?	+/-?	++	++	-?	++?/++?	+	--?/?	+	-?/?	0	0/-?	--?
	West 11	--?/+	++?	+/-?	++	++	--?	++?/++?	+	--?/?	+	-?/?	0	0/0?	--?

East of Colchester

- 1.75 East of Colchester, the choice of strategies is more straightforward. As previously described for West of Colchester, proportionate (percentage) growth East of Colchester (East 1) also performs less well across a number of the SA objectives than the other spatial strategy alternatives, and therefore can be considered less sustainable. Similarly, proportionate (hierarchy) growth (East 2) does not perform well because it would lead to considerable development at Brightlingsea, which is not a sustainable location for strategic growth due to its poor accessibility and environmental sensitivities. Notably it would also fail to deliver sufficient housing within the Plan period.
- 1.76 With respect to the remaining spatial strategies (East 3, East 4, East 5 and East 6):
- In the longer term, the effects on existing communities and also the effects arising from the new communities would be similar in terms of significance (SA objective 1).
 - All would deliver the homes required in the Plan period (SA objective 2).
 - In terms of access to health care, East 3, East 4 and East 5 perform better than East 6 in the longer term, because they will provide for a scale of development sufficient to accommodate a health care facility (SA objective 3). On the other hand, East 5 could be subject to significant adverse effects from noise pollution.
 - East 3 and East 4 are considered to perform more strongly with respect to access to local centre facilities (SA objective 4) at the end of the Plan period, however East 6 also performs well after the Plan period.
 - East 3 and East 4 are considered to perform more strongly with respect to the economy (SA objective 5) at the end of the Plan period, however East 5 also performs well after the Plan period.
 - East 3 and East 5 are anticipated to perform less negatively than East 4 and East 6 with respect to biodiversity (SA objective 6).
 - The main advantage of East 6 when fully built out is with respect to longer journeys and easy access to railway stations (SA objective 7) which is reinforced by the strong commuting relationship between Tendring and Colchester. This would also feed into effects on carbon emissions from traffic (SA objective 10). On the other hand, the rural locations could lead to longer journeys by car for those journeys where rail is not a realistic choice. For shorter journeys, East 3, East 4 and East 5 perform most strongly.
 - All of the remaining spatial strategy alternatives could potentially have a significant negative effect on heritage assets (SA objective 9). All of the spatial strategy alternatives with the exception of East 4 also have the potential for significant effects on the townscape of nearby settlements due to their scale, but whether these effects would be positive or negative is uncertain.
 - None of the remaining spatial strategy alternatives were identified as having significant effects with respect to water (SA objective 11), flood risk (SA objective 12) or air quality (SA objective 13).
 - All of the remaining spatial strategy alternatives were considered to have potentially significant adverse effects with respect to landscape (SA objective 14).
 - All of the remaining spatial strategy alternatives were considered to have potentially significant adverse effects with respect to minerals and likely to have significant adverse effects with respect to soils (SA objective 15).
 - In many instances, there was uncertainty with respect to the effects identified as it may be possible to include mitigation, taking into account the scale of the strategic sites, and how development is designed and delivered.
- 1.77 East 3 is the Garden Community proposed in the submitted Section 1 Local Plan. Its main disadvantage compared to some of the other spatial strategies is that it is not on a rail link and as a result, a Rapid Transit connection to Colchester and beyond is proposed. It is, though, close to the University of Essex, albeit separated by the A133 dual carriageway. The site is also separated from the urban area of Colchester by Salary Brook Local Nature Reserve, which will help to retain distinctiveness between the communities and act as a resource for both existing and new communities, but may act as a barrier to integration.

- 1.78 Although East 4 performs as well as some of the alternative spatial strategies for the East of Colchester, it would, in effect result in the complete surrounding of Bullock Wood SSSI by development, adding to the development that already exists to the west of this ancient woodland SSSI. In terms of maintaining ecological networks, and potential disturbance effects, this is considered to be a particularly significant risk. It also has no rail link into Colchester.
- 1.79 In many respects, East 5 performs as well as East 3, although no better. It has the advantage of an existing employment area on site, and would retain its own distinctiveness being separated by some distance from Colchester town. Its location on the A120 and its distance from Colchester could encourage a high proportion of journeys by car.
- 1.80 East 6 is designed to operate as a chain of settlements along the Clacton to Colchester rail route, with stations within walking distance and use of rail facilitated by proposed increases in the frequency of services. The chain of settlements would support one another, as well as link into Colchester as the main commuting destination. In this respect it has many advantages, although the rural location of the four settlements could encourage car journeys, notwithstanding the opportunity to travel by train. In other respects, this spatial strategy does not perform any better than the alternatives. It is being promoted by local people rather than landowners or developers, which suggests that it may have a groundswell of support, but it is less certain whether it is deliverable in practice, and therefore there are risks attached.
- 1.81 Summaries of the assessment findings for the sites East of Colchester within the Plan period (Table 1.11) and when fully built out (Table 1.12) are included below.

Table 1.11: Summary of SA scores for spatial strategies east of Colchester within the Plan period

		SA objective														
		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
Strategy	East 1	--?/?	--	--?/0	-	+	--?	-?/-?	-?	--?/?	+	0/?	0	0/-?	--?	--?/--
	East 2	--?/?	--	?/0	+++	+++	--?	+++/-?	-?	--?/?	+	0/?	0	0/-?	--?	-?/--
	East 3	--?/++	++	+/-	++	++	-?	+++/?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
	East 4	--?/++	++	+/-	++	++	--?	+++/?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
	East 5	--?/++	++	+?/--	+	+	-?	+++/-?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	East 6	-?/+	++	+/0?	+	?	--?	?/+?	+	--?/?	+	-?/?	-?	0/0	--?	--?/--

Table 1.12: Summary of SA scores for spatial strategies east of Colchester when fully built out

		SA objective														
		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
Strategy	East 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	East 2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	East 3	--?/++	++?	++/-	++	++	-?	+++?/+?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
	East 4	--?/++	++?	++/-	++	++	--?	+++?/+?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
	East 5	--?/++	++?	+++?/--	+	++	-?	+++?/-?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	East 6	--?/++	++	+/0?	++?	+	--?	+?/+++?	+	--?/?	+	-?/?	-?	0/0	--?	--?/--

Transport infrastructure

- 1.82 The NEAs' paper on the 'Identification of Spatial Strategy Alternatives' sets out infrastructure assumptions that are specific for each spatial strategy alternative. A number of the alternatives include road improvements, and several include provision for a Rapid Transit System. These infrastructure proposals will go through their own assessment processes, but some observations are provided below for the purposes of the SA.

Rapid Transit System

- 1.83 A number of the spatial strategy alternatives include a Rapid Transit System to support the development strategy proposals, although detailed evidence has only been prepared to support the development proposals that are included in the Section 1 Local Plan.
- 1.84 In order to achieve ambitious targets for modal shift to public transport, the research undertaken on behalf of the NEAs suggests that the following headline measures will be required⁷:
- Providing high quality links into existing public transport networks and forward funding public transport infrastructure to provide quick connections to key destinations, driving demand.
 - A high degree of segregation and priority for public transport is required to deliver fast and reliable journey times.
 - Use of powers from the Bus Services Act (such as Quality Bus Partnerships) will ensure high quality (comfortable – pleasurable and productive) services and best use of dedicated infrastructure.
 - Provision of high frequency bus services from opening of new development provides a reliable service to new residents, encouraging use of the Rapid Transit System.
 - Integrated ticketing makes it easier to use public transport and allow simple fare structures to be developed that encourage high levels of use.
- 1.85 The Rapid Transit System evidence base report⁸ breaks the Rapid Transit System network down into four components:
- Route 1: Tendring Colchester Borders Garden Community – Colchester Town Centre – Colchester North Park & Ride.
 - Route 2: Colchester – Colchester Braintree Borders Garden Community.
 - Route 3: Braintree – West of Braintree Garden Community – Great Dunmow – Easton Park – Stansted.
 - Route 4: Colchester Braintree Borders Garden Community – Braintree.
- 1.86 Each of the routes has alternative alignment options, including interim options.
- 1.87 The report notes that it is anticipated that some sections will initially use existing infrastructure, especially where there is reasonable capacity for Rapid Transit System operation within current traffic levels but that priority measures are suggested where these may be required as the network develops.
- 1.88 By 2033, it is expected that two Rapid Transit System sub-systems will be successfully operating: The Colchester sub-system; and a West of Braintree sub-system. At some point after 2033 the report states that it would be an aspiration to connect the subsystems via Route 4, but the report makes clear that neither Rapid Transit System viability nor growth of the Garden Communities depends on this connection being made.
- 1.89 The Rapid Transit System forms an integral part of the proposals for delivering the three Garden Communities as proposed in the Section 1 Local Plan. In this respect, it could also serve a number of other spatial strategy alternatives as described in the NEA 'Identification of Spatial Strategies Alternatives' paper, although presumably in different variations from the proposed Rapid Transit System in the Section 1 Local Plan.

⁷ ITP (July 2019) Mode Share Strategy for the North Essex Garden Communities

⁸ Essex Highways (July 2019) Rapid Transit System for North Essex

- 1.90 If successfully implemented, the Rapid Transit System offers a very real opportunity to achieve modal shift from the car, although the extent of the shift is dependent upon implementation of the measures set out in the 'Mode Share Strategy for the North Essex Garden Communities' report (summarised above).
- 1.91 The Rapid Transit System also offers opportunities to provide high quality public transport links to other components of the public transport network, most notably the mainline rail stations. This would help to address the constraints on 'Acceptable' walking distance that the SA has identified in relation to some of the strategic sites.
- 1.92 However, in terms of service provision, it is likely that service frequency would improve as the garden communities increase in scale and demand rises. In addition, the phasing of delivery could be an issue, particularly with respect to Route 4, which forms an important link between the Colchester and Braintree sub-systems. The Essex Highways report describes this as "an aspiration" and suggests this would be delivered after 2033, and is not essential to the operation of the two sub-systems. If for any reason it is not delivered, it can be assumed the benefits in terms of modal shift would not be as great as if it were in place.
- 1.93 Modal shift to a comprehensive network Rapid Transit System would help to deliver significant positive effects in terms of SA objective 3 (Health), SA objective 7 (Sustainable travel), SA objective 8 (Infrastructure), SA objective 10 (Climate), and SA objective 13 (Air quality).
- 1.94 There has been no detailed environmental assessment of the Rapid Transit System route options to date. For the purposes of this SA, it should be noted that the majority of the route options follow existing transport corridors, but that there is considerable historic interest along some of these corridors, both within the urban areas and the more rural route options, especially listed buildings. In addition, if new routes are considered this could affect ecological networks, and it is also of note that the geological Marks Tey Brickpit SSSI could be close to the alignment of one of the routes. Therefore, there could be negative effects on SA objective 6 (Biodiversity) and SA objective 9 (Heritage), but with the level of detail currently available it is not possible to determine the extent and significance of these potential effects, nor the scope for mitigation.

Rail services

- 1.95 The Braintree Infrastructure Delivery Plan notes that the Great Eastern Mainline railway operates at capacity on trains to and from London in the peak hours⁹, although the Colchester Infrastructure Delivery Plan states that *"the train operating company is making a substantial investment in rolling stock to provide new faster, higher capacity trains with more operational flexibility than the current trains. The new trains will be introduced from 2019/20"*¹⁰.
- 1.96 The SA has assumed that accessibility to the rail network will bring significant positive effects with respect to a number of SA objectives, but this is predicated on there being the capacity on these lines to cater for the increase in demand that will inevitably arise as a result of development under many of the spatial strategy alternatives, especially those that propose significant growth in close proximity to stations on the Great Eastern mainline (i.e. West 3, West 4 and 4a, West 5, and West 7). It should be noted that the Braintree Section 2 Local Plan already allocates a considerable amount of development at Kelvedon, Hatfield Peverel and Witham, where mainline stations are located.
- 1.97 The Braintree Infrastructure Delivery Plan notes that *"capacity improvements on the Braintree branch line, specifically the construction of a passing loop, were identified as an infrastructure requirement in the adopted Braintree Core Strategy (2011) to support growth in the whole District. Work is being undertaken to develop options for improving the line. It is expected, if improvements that facilitate a higher frequency of trains can be made, that this will help encourage more trips by train, which is of significance given the high number of car trips in, to and out of Braintree town."* Therefore, spatial strategy alternatives that include proposed development at Braintree (i.e. West 2 and West 7), would be more likely to achieve positive effects if the services on the Braintree branch line received the necessary improvements.

⁹ Trpy Planning & Design, Navigus Planning (October 2017) Braintree Infrastructure Delivery Plan Report Final Report - updated

¹⁰ Trpy Planning & Design, Navigus Planning (October 2017) Braintree Infrastructure Delivery Plan Report Final Report - updated

- 1.98 The success of the CAUSE Metro Plan proposal (East 6) is dependent upon there being improvements to the services on the Colchester to Clacton-on-Sea line. CAUSE propose that rail services be reorganised from a commuter service to Colchester and onwards to London to a locally focussed 'shuttle' service and a new timetable providing trains every 15 minutes and through services to the Anglia main line every 30 minutes. Currently, the service is much less frequent than this, with small gaps between some trains and large gaps between others, even at peak times.

Other transport infrastructure

- 1.99 A number of the spatial strategy alternatives will rely on other infrastructure to support their delivery including upgrades to the A12 and A120. These potential transport infrastructure improvements have not been individually assessed as part of the Additional SA, and environmental assessment studies would need to be undertaken at the project level. In some instances, the projects already have funding in principle (e.g. upgrading of the A12 or Millennium Slipways at Galley's Corner roundabout), some are currently at the application stage, others would be incorporated within the proposed development envelope (e.g. A120 to A133 link road within East 3), and others have little in the way of detail.
- 1.100 In general, improvements to road capacity can help to ease congestion and localised air pollution issues (SA objective 13) and help to support the economy (SA objective 5), with potential negative effects on environmental assets such as biodiversity (SA objective 6) and heritage (SA objective 9), dependent upon the assets that could be affected and the interaction with the alignment and land take of the improvements, and mitigation measures proposed. There is also some evidence that improved roads can actually lead to additional traffic that would otherwise not have occurred (known as 'induced demand').
- 1.101 For the purposes of this Additional SA, it is not possible to come to definitive conclusions whether the impacts of traffic will increase or decrease as a result of the road infrastructure improvements proposed under each of the spatial strategies, but a risk exists that it will increase through induced demand.

Scale of development

- 1.102 Although, with the possible exception of West 2, East 1 and East 2, all of the spatial strategy alternatives should be capable of delivering the housing required in the plan period, when fully built out they will be very different in scale. Depending upon the combination of East of Colchester and West of Colchester spatial strategy alternatives selected, when fully built out the additional housing stock could range from an additional 7,500 homes to approximately another 40,500 homes in total, over and above those already accounted for as commitments and Section 2 Local Plan allocations, once fully built out.
- 1.103 For stand-alone new settlements, around 4,500 to 5,000 homes would be sufficient to deliver a secondary school and a health care facility in addition to a range of other services and facilities that might be expected to be delivered at smaller scales. Beyond this threshold, there may be advantages to further growth, as additional services and facilities are provided, further employment land is incorporated to meet the needs of new residents, and frequent public transport services become ever more viable as demand increases. It is not possible to ensure self-containment, but it might be considered that the larger scale, the more likely that an element of self-containment could be achieved with appropriate provision of services, facilities, infrastructure, and employment within the new development.
- 1.104 Set against this would be the potential environmental effects of larger scale development, and if intensity of land use increases, such effects may increase. Larger scale development is also more likely to generate a greater sense of change in character of the North Essex landscape as it becomes more urbanised. On the other hand, larger scale development potentially offers greater scope to avoid the most significant effects and incorporate mitigation. Higher density developments, though, are more likely to encourage walking and ease of accessibility to services and facilities and public transport services, although they may also generate greater traffic and congestion.

- 1.105 The effects of large scale new settlements on existing settlements are also difficult to predict, depending upon whether the new settlements complement or compete with them for investment, jobs, services and facilities, and how well they are connected.
- 1.106 Urban extensions, on the other hand, are not normally designed to be 'self-contained', but instead to be part of the settlement to which they are attached, sharing services and facilities and access to jobs, with varying degrees of success. The larger the scale of urban extension, the more likely it is that they will take on their own character and sense of place, and provide for some services and facilities within the development, but this in turn can place strains on transport routes into the 'host' settlement and the capacity of its town centre services and facilities to cater for the increased demands placed upon them.
- 1.107 Finally, it should be noted that landscape character is a reflection of both the countryside and the cities, towns and villages that lie within it. Some of the most highly valued environmental assets can be found within built-up areas, reflecting the many periods of development that have taken place over hundreds of years. The historic towns of North Essex are a good example of this, and demonstrate that new development today has the potential to become tomorrow's heritage. In terms of effects, therefore, the attention paid to high quality design is essential, so that future generations can value the development we build today, just as we value some of the townscapes that were built by generations in the past.

Cumulative effects

- 1.108 Chapter 6 of the original SA Report focuses on the appraisal of the cumulative and synergistic effects of the submitted policies in the Section 1 Local Plan.
- 1.109 The appraisal of cumulative effects in the Additional SA instead focuses on the likely cumulative effects of alternative strategic sites and spatial strategies with existing commitments and allocations in the Section 2 Local Plans, planned development in neighbouring Districts and Boroughs, and the cumulative effects of the different scales of development under the alternative spatial strategies. In this regard, reference has been made to potential cumulative effects in the strategic site assessments and the spatial strategy assessments, as well as in the commentary on the spatial strategy alternatives above.
- 1.110 In terms of the main findings, the larger scale strategic site alternatives and the larger scale spatial strategy alternatives are likely to give rise to more significant negative effects, for example in relation to biodiversity (SA objective 6), heritage (SA objective 9), air quality (SA objective 13), landscape (SA objective 14), and soils and minerals (SA objective 15), and the greater the pressure on water resources (SA objective 11).
- 1.111 In relation to water resources, evidence indicates that water resources within Essex are currently subject to significant levels of stress and will continue to be in the future and that the locations of the garden communities are within areas of moderate to serious water stress as defined by the Environment Agency. There is limited potential for local abstraction to support major site development at a local level and therefore, reliance on strategic water resource management and movement of water into the area is required to sustain growth and demand for potable water.¹¹ This baseline situation is likely to be relevant to all the spatial strategy alternatives, but those that propose lower scales of growth are likely to cause less stress than the higher levels of growth in terms of increases in demand. In relation to the ability of wastewater treatment infrastructure to serve the cumulative scale of growth, although evidence relating to the submitted Local Plans¹² indicates that there are no 'showstoppers', there are drawbacks identified for all the wastewater strategies discussed.
- 1.112 Conversely, the larger scale strategic site alternatives and larger scale spatial strategy alternatives offer the opportunity to deliver significant positive effects in relation to housing delivery (SA objective 2) and the economy (SA objective 5).

¹¹ AECOM (2017) North Essex Garden Communities Integrated Water Management Strategy Stage 1 Report

¹² *ibid*

- 1.113 With respect to sustainable travel (SA objective 7) and infrastructure (SA objective 8), larger scale development will place greater demands on the transport network and other infrastructure, but may also offer opportunities to secure investment (e.g. in the Rapid Transit System or improved rail services on the Colchester to Clacton-on-Sea railway line).
- 1.114 Committed development and allocations in the Section 2 Local Plans already focus development at the larger settlements of Colchester (particularly to the north and west of the town), Braintree (particularly to the north and west and to the south around Great Notley) and Clacton-on-Sea (to the north and west), with considerable development also proposed for the A12/Great Eastern mainline corridor at Witham and Kelvedon.
- 1.115 The strategic urban extension alternatives tend not to be in close proximity to the main commitments and allocations in the Section 2 Local Plans, but they will add to the development already proposed for these settlements. This could add to congestion (SA objective 7), air pollution (SA objective 13) and change in character to these settlements (SA objective 9 and SA objective 14), although they could also help to provide support for town centre services and facilities (SA objective 4) and their economies (SA objective 5). The Garden Community alternatives to the north and east of Colchester are closely related to Colchester itself and could therefore have similar effects as the strategic urban extensions, including potential impacts on the AQMAs in the town centre and along the A12 (SA objective 13), notwithstanding the potential to include a Rapid Transit System or other transport improvements. Although Halstead is not earmarked for as much growth as the other larger settlements in North Essex, an additional strategic urban extension to this town would significantly increase the size of the settlement (with effects on SA objective 1, SA objective 4, SA objective 9 and SA objective 14), although it could assist in the delivery of a bypass for the town (SA objective 8).
- 1.116 The strategic site and spatial strategy alternatives that focus development along the A12/Great Eastern mainline corridor would add to the development already proposed in this corridor at places like Witham and Kelvedon, resulting in an increased urbanisation effect described earlier in this Additional SA Report (SA objective 14). There is also considerable heritage interest along this corridor (SA objective 9), which could be cumulatively affected by further development.
- 1.117 The CAUSE Metro Plan would result in four further expanded settlements along the Colchester to Clacton-on-Sea railway line, to add to the development already committed or allocated in the Section 2 Local Plans, and would be likely to change the character of this chain of settlements. They could also lead to increased traffic in a more rural location, notwithstanding improved rail services (SA objectives 7 and 8). Conversely, the combination of these settlements may give an opportunity to deliver a wider range of services and facilities, including potentially a secondary school, to serve them (SA objective 1 and SA objective 4).
- 1.118 The Garden Community alternatives to the west of Colchester, and also Tendring Central Garden Village to the east of Colchester, would not adjoin the main settlements of North Essex, and therefore their cumulative effects with committed and Section 2 Local Plan allocations would be indirect. However, cumulatively, they would lead to the introduction of urban development within predominantly more rural areas, some adjoining or encompassing existing communities changing the character of these locations (SA objective 1, SA objective 9 and SA objective 14).
- 1.119 The west of Braintree Garden Community would combine with the proposed development in Uttlesford, of which it would form part. The SA of the Uttlesford component of the West of Braintree Garden Community identified the potential for similar significant positive and negative effects as this Additional SA has identified for the North Essex component of the West of Braintree Garden Community (i.e. significant negative effects with respect to biodiversity, landscape, soil/sustainable use of land and historic environment, and significant positive effects with respect to sustainable methods of travel, accessibility to services, housing, resources and infrastructure, education and skills¹³).
- 1.120 In other adjoining districts, Chelmsford's submission Local Plan provides for nearly 22,000 additional dwellings and 11,000 new jobs in the period 2013 to 2036, with significant commitments or allocations to the north-east of Chelmsford including at Great Leighs¹⁴. Although

¹³ AECOM (December 2018) Sustainability Appraisal (SA) for the Uttlesford District Council Local Plan

¹⁴ Chelmsford Council (January 2018) Chelmsford Draft Local Plan (Regulation 19 - Publication Draft)

the proposed developments in Chelmsford are closely related to the A131 corridor (which goes to Braintree), Chelmsford itself is on the same A12/Great Eastern mainline corridor as some of the North Essex strategic site and spatial strategy alternatives. The combination of development is likely to add to pressure on these transport routes, with potentially adverse effects on sustainable travel (SA objective 7) and air quality (SA objective 13), noting that Chelmsford has AQMAs. This is particularly the case given the strong relationship of Chelmsford with Braintree and Colchester in terms of travel movements.

- 1.121 Also to the south of North Essex is Maldon District, whose Local Plan provides for 4,650 dwellings and 2,000 net additional jobs between 2014 and 2029¹⁵, adding to potential cumulative effects, although to a lesser extent than Chelmsford.
- 1.122 To the north, the Ipswich adopted Local Plan¹⁶ provides for at least 9,777 new dwellings and 12,500 new jobs between 2011 and 2031, and the Regulation 18 joint Babergh and Mid Suffolk Local Plan¹⁷ provides for 7,560 additional dwellings between 2018 and 2036. The relationship of North Essex with Babergh and Ipswich is not as strong as the relationship of Colchester and Braintree with Chelmsford in terms of commuting patterns, so cumulative effects are unlikely to be as significant. However, the A12/Great Eastern mainline corridor connects Chelmsford with Ipswich, via North Essex, which could lead to further cumulative effects in relation to travel (SA objective 7), infrastructure (SA objective 8) and air quality (SA objective 13), both within North Essex and beyond.
- 1.123 The cumulative development across all the districts will place further pressure on environmental assets and resources, including biodiversity (SA objective 6), heritage (SA objective 9), water resources (SA objective 11), landscape (SA objective 14) and soils and minerals (SA objective 15), although without detailed sub-regional studies it is not possible to determine whether these will be significant at the sub-regional scale.

Conclusion

- 1.124 The SA of alternative strategic sites showed that many perform similarly against the SA objectives.
- 1.125 With respect to alternative strategic spatial strategies, the clearest conclusion is that those spatial strategies that rely solely on proportionate growth (percentage) are the poorest performing, but for others the differences are much more finely balanced. No spatial strategies stood out as performing much more strongly than the others. None of the spatial strategies are without challenges with respect to environmental assets, such as biodiversity, heritage, minerals and best and most versatile agricultural land.
- 1.126 To the west of Colchester, the choice of strategy is complicated. Those alternatives that include strategic urban extensions (e.g. to Braintree or Halstead) offer the opportunity to be integrated with existing settlements. However, east of Braintree would be severed from Braintree by the Braintree eastern bypass which represents an important eastern limit to the town. Halstead has no rail service and is not in the key commuting corridors.
- 1.127 The other alternatives tend to offer different combinations of new settlements and/or extensions of existing smaller settlements. Those that are associated with the Great Eastern mainline offer use of existing infrastructure and sustainable access to key commuting destinations including Colchester, Chelmsford and London (although concerns have been expressed by local people of the capacity of this route to cater for additional demand at peak times). The opportunity to introduce a coherent and integrated Rapid Transit System to cater for other commuting routes, particularly east-west and to Stansted could be of considerable benefit since these routes are currently poorly served by more sustainable modes of transport. Therefore those alternatives that offer a combination of both access to existing rail and investment in Rapid Transit System perform strongly in sustainable transport terms.

¹⁵ Maldon District Council (July 2017) Approved Local Development Plan 2014 – 2029

¹⁶ Ipswich Borough Council (February 2017) Core Strategy and Policies Development Plan Document Review

¹⁷ Babergh * Mid Suffolk Councils (July 2019) Babergh and Mid Suffolk Local Plan Preferred Options Consultation (Regulation 18)

- 1.128 To the east of Colchester, it appears to be a choice between three alternatives. East 1, being proportionate (percentage) growth does not perform well compared to the alternatives. East 2 does not perform well because it would lead to considerable development at Brightlingsea, which is not a sustainable location for strategic growth due to its poor accessibility and environmental sensitivities. East 4 has potentially significant biodiversity issues due to its potential impact on Bullock Wood SSSI. This leaves East 3 (the Garden Community on the Colchester/Tendring Borders), East 5 (Tendring Central Garden Village), and East 6 (the CAUSE Metro Plan).
- 1.129 East 6 offers the considerable advantage of being on an existing railway line which links into important commuting destinations for people in Tendring (Colchester and Clacton-on-Sea, Kirby Cross, Frinton-on-Sea and Walton-on the-Naze). Taken together, the four constituent growth locations along the railway line form a critical size to support a range of services and facilities, although individually they do not. They are also rural in character, and all four settlements are earmarked for considerable growth through existing commitments and Section 2 Local Plan allocations.
- 1.130 East 3 and East 5 offer similar opportunities to develop a coherent development that incorporates a good range of services and facilities. Both have the drawback of not being on a rail route, although East 3 offers the opportunity to be connected to Colchester and beyond by the Rapid Transit System and is close to the university. East 5 has the advantage of an existing employment area and good connections to the strategic road network.
- 1.131 It is therefore not possible to come to a definitive conclusion that any one strategy, whether west of Colchester or east of Colchester, is the most sustainable option. The advantage of the Section 1 Local Plan as it stands is that it provides clear direction for strategic development to accommodate North Essex over many decades to come and therefore more certainty in terms of coherence and investment, including in new transport infrastructure, services and facilities. However, some of the alternatives offer opportunities to deliver similar benefits.
- 1.132 It should be noted that the scale of development proposed in the Section 1 Local Plan is considerable and will change the character of parts of North Essex, and the effects on the role and function, and relationship between the new and existing settlements is uncertain – if they complement and support one another, then this would be of benefit, but if they compete for investment and resources this could be a dis-benefit. Some of the other alternatives propose a similar scale of development and therefore offer similar opportunities and risks. The alternatives that propose lower amounts of growth would be less likely to alter the character of North Essex and relationships between settlements, but on the other hand may be less likely to attract the scale of investment of the larger scale alternatives. In addition, in the longer-term, it is likely that there will continue to be a need for more development, and so in future years (planning to well beyond the Plan period), similar decisions will need to be made about where the additional growth should go. Under the larger scale alternatives, this decision will already have been made.
- 1.133 Finally, it is worth mentioning that the pace of change of technology, the introduction of 'smart city' thinking, and planning for climate change (both in terms of a net zero carbon future, and adaptation to the effects of climate change), could result in changes in the way that we live our lives that are difficult to comprehend given our embedded lifestyles and, in particular, our reliance on fossil fuels and the private car. It is therefore important that any strategy is future proofed and flexible enough to accommodate these changes as and when they arise.

LUC

July 2019



Suggested Amendments to the Publication Draft Braintree, Colchester and Tendring Local Plans: Section One

July 2019

Main changes from Braintree District Council's perspective

10	Vision for North Essex	<p>North Essex will be an area of significant growth over the period to 2033 and beyond, embracing positively the need to build well-designed new homes, create jobs and improve and develop infrastructure for the benefit of existing and new communities.</p> <p>It will continue to be an attractive and vibrant area in which to live and work, making the most of its rich heritage, town centres, natural environment, coastal resorts, excellent educational facilities and strategic transport links which provide access to the ports, Stansted Airport, London and beyond. Rural and urban communities will be encouraged to thrive and prosper and will be supported by adequate community Infrastructure. (Mod A)</p> <p>Sustainable development principles will be at the core of the strategic area's response to its growth needs, balancing social, economic and environmental issues. Green and blue infrastructure and new and expanded education and health care facilities enabling healthy and active lifestyles (Mod B) will be planned and provided along with other facilities to support the development of substantial new growth; while the undeveloped countryside, (Mod C) natural environment (Mod D) and the countryside and heritage assets historic environment will be protected preserved and enhanced. Key to delivering sustainable development is that new development will address the requirement to protect and enhance be informed by an understanding of the historic environment and settlement character (Mod E)</p> <p>At the heart of our strategic vision for North Essex are new garden communities, the delivery of which is based on Garden City principles covered by policy SP7. The garden communities provide an opportunity to create the right balance of jobs, housing and Infrastructure in the right locations and (Mod F) will attract residents and businesses who value innovation, community cohesion and a high quality environment, and who will be provided with opportunities to take an active role in managing the garden community to ensure its continuing success. Residents will live in high quality, innovatively designed, contemporary homes, (Mod G) accommodating a variety of needs and aspirations, located in well-designed neighbourhoods where they can meet their day-to-day needs. There will be a network of tree-lined streets and green spaces, incorporating and enhancing</p>	<p>To ensure the following clarifying points:</p> <p>Mod A - Highlight the strategic issues relevant to Section 1</p> <p>Mod B -Include high level strategic objective on the need to support healthy and active lifestyles</p> <p>Mod C – To clarify definition of countryside to be protected.</p> <p>Mod D- Include high level strategic objective on the need to protect and enhance the natural environment.</p> <p>Mod E - Include high level strategic objective on the need to protect and enhance the historic environment.</p> <p>Mod F – Clarify role of Garden Communities in meeting planning objectives.</p>
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		<p>existing landscape features and also accommodating safe and attractive routes and space for sustainable drainage solutions; and leisure and recreation opportunities for both residents and visitors of the garden communities. Suitable models for the long term stewardship of community assets will be established and funded to provide long term management and governance of assets. All Garden City principles as specified in the North Essex Garden Communities Charter will be positively embraced including new approaches to delivery and partnership working for the benefit of the new communities. Central to this is the comprehensive planning and development of each garden community, and the aligned delivery of homes and the supporting infrastructure. (Mod H)</p>	<p>Mod G -Reference to 'contemporary' is deleted for limiting flexibility. Strengthen references to importance of comprehensive planning for Garden Communities. Mod H– Clarify role of Garden Communities in meeting planning objectives.</p>
13	New Policy SP1A to follow after Policy SP1	<p>SP 1A Delivering Sustainable Development through the planning system <i>Explanatory Text</i> Development that is in accordance with the policies in this Plan will normally be permitted.</p> <p>The policies in this strategic Section 1 of the Local Plan are common to and important to each North Essex Authority. Accordingly policy SP 1A seeks to make sure that development which would prejudice the delivery of any of the policies in Section 1 will be refused. Examples of prejudice might include a failure to meet the high standards proposed in the place making principles, a lack of comprehensive development or prematurity.</p> <p><i>Policy</i> Development that demonstrably contributes to the achievement of the policies in this Local Plan (and, where relevant, of policies in neighbourhood plans) will normally be permitted unless material considerations indicate otherwise.</p>	<p>To clarify policy wording to distinguish between reference to national policy and its application in local policy.</p>

		Development that is not in accordance with, or which will prejudice the delivery of, the strategic scale development or the achievement of the place making principles, in this Local Plan will not normally be permitted.	
14	New Policy SP1B	<p>SP1B Recreational disturbance Avoidance and Mitigation Strategy (RAMS)</p> <p><i>Explanatory Text</i></p> <p>A Habitat Regulations Assessment (HRA) was completed for Section 1 of the Plan. The loss of off-site habitat, water quality and increased recreational disturbance were identified as issues with the potential to result in likely significant effects on European Sites, without mitigation, to address the effects.</p> <p>The Appropriate Assessment (AA) identified a number of avoidance and mitigation measures to be implemented, to ensure that development proposals in the Plan will not result in adverse effects on the integrity of the Blackwater Estuary SPA and Ramsar site, Colne Estuary SPA and Ramsar Site, Colne Special Area of Conservation Abberton Reservoir SPA and Ramsar, Hamford Water SPA and Ramsar Essex Estuaries SAC and the Stour and Orwell SPA/Ramsar sites and are HRA compliant.</p> <p>To mitigate for the loss of off-site habitat, the AA identified the need for wintering bird surveys for the Tendring/Colchester Borders Garden Community as part of any project level development proposals and masterplanning.</p> <p>To protect water quality, the AA recommended the inclusion of policy safeguards to ensure that adequate water and waste water treatment capacity or infrastructure upgrades are in place prior to development proceeding.</p> <p>Recreation activities can potentially harm Habitats Sites. The Shared Strategic Plan AA identified disturbance of water birds from people and dogs, and impacts from water sports/watercraft as the key recreational threats to Habitats Sites.</p> <p>To mitigate for any increases in recreational disturbance at Habitats Sites, the AA identified the need for a mitigation strategy. Natural England's West Anglian Team identified the Essex coast as a priority for a strategic and</p>	<p>The Essex Coast RAMS Strategy Document is complete and the NEAs are collecting contributions from development within the Zones of Influence. The update to the text reflects the latest position.</p>

		<p>proactive planning approach as it is rich and diverse ecologically, and many of the coastal habitats are designated as Habitats Sites. Consequently, 12 local planning authorities in Essex have prepared an Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Essex Coast RAMS sets out specific avoidance and mitigation measures by which disturbance from increased recreation can be avoided and mitigated thus enabling the delivery of growth without adversely affecting Habitats sites. These measures are deliverable, realistic, underpinned by robust up to date evidence, precautionary and provides certainty for developers around deliverability and contributions. The Essex Coast RAMS Strategy Document was completed in 2019 and will be supported by an SPD.</p> <p><i>Policy</i></p> <p>SP1B Recreational disturbance Avoidance and Mitigation Strategy (RAMS)</p> <p>An Essex Coast Recreational disturbance Avoidance and Mitigation Strategy will be completed in compliance with the Habitats Directive and Habitat Regulations.</p> <p>Contributions will be secured towards mitigation measures identified in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the NEAs will seek contributions from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.</p>	
22	Para 5.9	<p>5.9 As part of the work to assess housing requirements, an analysis of economic forecasts was undertaken together with demographic projections to establish the inter-relationship between population growth, forecasts of new jobs and the number of new homes needed to accommodate these levels of growth. Employment forecasts have been developed using two standard models (East of England Forecasting Model (EEFM) and Experian 2016) which forecast total job growth for each of the local authorities based on past trends. Each local authority has been advised on the most appropriate modelling figure to use</p>	To provide more focussed wording for the policy by moving explanatory wording to the supporting text.

	<p>in the context of reconciling job and housing demand. The forecast growth figures for the housing area for the period 2013-2037 as are set out in Policy SP4. Employment Land Needs Assessments have been carried out by each authority which set out the amount of employment land that is required within the Plan period. In terms of specific B use land provision, each local authority has undertaken work to establish what quantum of employment land would be required within the Plan period to meet the demand identified below for additional B use employment land. These B use employment areas are distributed between each local authority area and based on achieving a sustainable balance between jobs and the available labour force through population growth. As noted above, calculations of employment land required are affected by a range of issues that lead to different employment land portfolios for each local authority area, resulting in a proportionately greater quantum of new floorspace per job in Braintree and Tendring than in Colchester. This is a function of the prominence of higher density office requirements in Colchester and lower density logistics and industrial uses in Braintree and Tendring. The table in Policy SP4 below sets out the three authorities' employment land (B Class uses) requirements for the period 2016 – 33 for two plausible scenarios, baseline and higher growth. These two bookends provide flexibility to allow for each authority's supply trajectory to reflect their differing requirements. Site specific employment allocations meeting the needs of different sectors in each local authority are set out in section 2 of their Local Plan.</p>	
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24	Policy SP4	<p>A strong, sustainable and diverse economy will be promoted across North Essex with the Councils pursuing a flexible approach to economic sectors showing growth potential across the Plan period. Jobs provision is reconciled with housing demand and is informed by modelling. The following forecasts will apply to the North Essex Authorities; (Mod A)</p> <p>Annual Jobs Forecast:</p> <table><tr><td>Braintree (EEFM)</td><td>490</td></tr><tr><td>Colchester (EEFM)</td><td>928</td></tr><tr><td>Tendring (Experian)</td><td>490</td></tr></table> <p><i>Relocate second paragraph to supporting text – see above modifications to para 5.9 (Mod B)</i></p> <p>In order to meet the needs of the three authorities’ employment land requirements for B class employment uses and maintain appropriate flexibility in provision to meet the needs of different sectors, Section 2 of each plan will allocate employment land within the ranges set out below. (Mod C)</p> <p>Hectares of B use employment land required:</p> <table><tr><td></td><td>Baseline (2012 Based SNPP) (ha)</td><td>Higher Growth Scenario</td></tr><tr><td>Braintree</td><td>23-20.9</td><td>43.3</td></tr><tr><td>Colchester</td><td>22.0</td><td>30</td></tr><tr><td>Tendring</td><td>2012.0</td><td>3820.0</td></tr><tr><td>North Essex</td><td>65-54.9</td><td>137-193.3</td></tr></table> <p>(Mod D)</p>	Braintree (EEFM)	490	Colchester (EEFM)	928	Tendring (Experian)	490		Baseline (2012 Based SNPP) (ha)	Higher Growth Scenario	Braintree	23-20.9	43.3	Colchester	22.0	30	Tendring	2012.0	3820.0	North Essex	65-54.9	137-193.3	<p>Mod A – To clarify link between housing and jobs provision</p> <p>Mod B –To provide a more clearly focussed policy, leaving explanatory detail to the supporting text</p> <p>To provide more focus and clarity to policy wording.</p> <p>Mod C -The additional sentence is to make it clear that site allocations are included in section 2 plans to meet the target in policy SP4.</p> <p>Mod D – to update table with corrected figures</p>
Braintree (EEFM)	490																							
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		The requirements in section A apply to only the Garden Communities area of search whilst the remaining sections B, C, D and E apply to all allocations and development proposals in the North Essex Area:	
58	New para A.Garden Communities	<p>A. Garden Communities Infrastructure provision will be secured in a timely manner and programmed to keep pace with growth of new communities.</p> <ul style="list-style-type: none"> • Funding and route commitments for the following strategic transport infrastructure projects will need to be secured in advance of the start of the Garden Communities as follows: <ul style="list-style-type: none"> ○ Colchester/ Braintree Borders – <ul style="list-style-type: none"> ▪ A12 widening and junction improvements ▪ A dualled A120 from Braintree to the A12 ○ Tendring /Colchester Borders – <ul style="list-style-type: none"> ▪ A120-A133 Link road • A scheme and specification for a phased rapid transit network and programme for the integration of the three Garden Communities into the rapid transit network • Provision of appropriate sustainable travel options will be required to encourage and facilitate sustainable travel behaviour from the outset and to provide viable alternatives to single-occupancy private car use, and will be informed by masterplanning. • Requirements for other strategic Garden Community infrastructure are outlined in sections D, E and F of Policies SP8, 9, and 10 and will be further set out in the Development Plan Documents for each Garden Community 	To clarify essential requirements for Garden Communities

59	Policy SP5 B. Transport	<p>B. Transportation and travel The authorities will work with government departments, Highways England, Essex County Council, Network Rail, rail and bus operators, developers and other partners to deliver the following :</p> <ul style="list-style-type: none"> • Changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles. • A comprehensive network of segregated walking and cycling routes linking key centres of activity planned to prioritise safe, attractive and convenient routes for walking and cycling <p>New and improved infrastructure required to support economic growth, strategic and site-specific priorities outlined in the second part of each Local Plan</p> <ul style="list-style-type: none"> • Substantially improved connectivity by promoting and enabling more sustainable travel patterns, introducing urban transport packages to increase ing transport modal choice, providing better public transport infrastructure and services, and enhanced ing inter-urban transport corridors • Increased rail capacity, reliability and punctuality; and reduced overall journey times by rail • Support changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles • Prioritise Improved urban and inter-urban Ppublic transport, particularly in the urban areas, including new and innovative ways of providing public transport provision including; <ul style="list-style-type: none"> ○ high quality rapid transit networks and connections, in and around urban areas with links to the new Garden Communities as required by policy SP5 (A) and policies SP8, 9, and 10 ○ maximising the use of the local rail network to serve existing communities and locations for large-scale growth ○ a bus network providing a high frequency, reliable and efficient service, that is high quality, reliable, simple to use, integrated with other 	To clarify transport requirements and cross-references to other policies in the plan.
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		<p>transport modes serving and offers flexibility to serve areas of new demand</p> <ul style="list-style-type: none"> ○ promoting wider use of community transport schemes <ul style="list-style-type: none"> • Increased rail capacity, reliability and punctuality; and reduced overall journey times by rail • New and improved road infrastructure to help reduce congestion and improve journey time reliability along the A12, A120 and A133 that will also link new development and provide strategic highway connections specifically: to improve access to markets and suppliers for business, widen employment opportunities and support growth • Improved access to and capacity of junctions on the A12 and other main roads to reduce congestion, improve journey time reliability and address safety • A dualled A120 between the A12 and Braintree • A comprehensive network of segregated walking and cycling routes linking key centres of activity contributing to an attractive, safe, legible and prioritised walking/cycling environment • Develop Innovative strategies for the management of private car use and parking including the promotion of car clubs and car sharing, and provision of support for electric car charging points. 	
67	New Para 8.7	<p>Heritage Impacts – To ensure that the significance of designated and undesignated heritage assets and their settings within and adjoining development areas is conserved and where possible enhanced, the detailed nature, form and boundary of new development is to be informed by the site selection methodology set out within Historic England’s Advice Note 3 (2017) (The Historic Environment and Site Allocations in Local Plans) or any subsequent replacement. Heritage Impact Assessments will be undertaken to ensure that the detailed form of development proposals is informed by an understanding of the assets and any adverse impacts mitigated appropriately.</p>	<p>To clarify requirements for conserving and enhancing heritage assets and their settings.</p>

70	SP7, first section	<p>The following three new garden communities are proposed in North Essex. Tendring/Colchester Borders, a new garden community will deliver 2,500 homes and 7 hectares of employment land within the Plan period (as part of an overall total of between 7,000-9,000 homes and 25 hectares of employment land to be delivered beyond 2033),</p> <p>Colchester/Braintree Borders, a new garden community will deliver 2,500 1,350 homes and 4 hectares of employment land within the Plan period (as part of an overall total of between 15,000 – 24,000 homes and 71 hectares of employment land to be delivered beyond 2033).</p> <p>West of Braintree in Braintree DC, a new garden community will deliver 2,500 2,060 homes and 9 hectares of employment land within the Plan period (as part of an overall total of between 7,000-10,000 homes and 44 hectares of employment land to be delivered beyond 2033).</p> <p>Each of these will be an holistically and comprehensively planned new community with a distinct identity that responds directly to its context and is of sufficient scale to incorporate a range of homes, employment, education & community facilities, green space and other uses to enable residents to meet the majority of their day-to-day needs, reducing the need for outward commuting. Each new garden community will be comprehensively planned from the outset with delivery of each new community will be being phased as part of that whole and underpinned by a comprehensive package of infrastructure.</p> <p>The Councils will need to be confident, before any consent is granted, that the following requirements have been secured either in the form of appropriate public ownership, planning agreements and obligations and, if necessary a local infrastructure tariff.</p>	To strengthen references to providing for employment growth
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73	SP7 criteria (vi)	In accordance with the Garden Community Charter principle of providing one job per household within the new community or within a short distance by public transport, provide and promote opportunities for employment within each new community and within sustainable commuting distance of it. Around 850,000 square metres of floorspace will be provided in total, with allocations to be defined within Development Plan Documents for each Garden Community totalling some 138 hectares.	To strengthen references to providing for employment growth and clarify process for identifying allocations
88	SP9 new third para	For the Plan period up to 2033 Colchester Borough Council and Braintree District Council agree that housing delivery from the Colchester Braintree Borders Garden will be distributed to the Authorities as set out in the published Local Plan trajectory, irrespective of where they are built. Should there be additional or fewer new dwellings delivered up to 2033 in the Garden Community then the number above or below the cumulative number will be distributed evenly between the Authorities. If there remains a shortage of overall delivery against need then each Authority, having taken 50% of the shortfall into account, would need to make up the shortfall within their Authority area given their overall Authority position.	To clarify how the housing on cross boundary sites will be distributed
91	SP9 Para D.7. 1 st and 2 nd line	A package of measures will be introduced to encourage smarter transport choices to meet the needs of the new community and maximise the opportunities for sustainable travel. As highlighted in Policy SP5 funding and route commitments for the following strategic transport infrastructure will be required to be in place in advance of the Colchester/Braintree Borders Garden Community starting: A12 widening and junction improvements A dualled A120 from Braintree to the A12 A scheme and specification for a phased rapid transit network and programme for the integration of the Garden Communities into the rapid transit network Additional transport priorities including including the provision of a network of footpaths, cycleways and bridleways to enhance permeability within the site and to access the adjoining area; development of a public rapid transit system connecting	To clarify requirement for essential transport infrastructure in Garden Communities

		<p>this new garden community to the wider Colchester context; development of opportunities to improve accessibility to Marks Tey rail station (or provide for its relocation to a more central location within the garden community); and effective measures to mitigate the transport impacts of the proposed development on the strategic and local road network.</p>	
95	SP10 new 4 th para	<p>Within the Plan period completions in a given year will be assigned to BDC and UDC in line with the trajectory contained within the Local Plans regardless of where dwellings are built in the Garden Community.</p> <ul style="list-style-type: none"> • Within the Plan period if the site over delivers on housing in a given year then that over delivery will be split 75% BDC and 25% UDC regardless of where the dwellings are built in the Garden Community • Within the Plan period if the site under delivers on housing in a given year the number of homes delivered will be split 75% BDC and 25% UDC regardless of where they are built in the Garden Community. • Any completions in 2023/24 and 2024/25 will be wholly assigned to BDC. • The total number of dwellings assigned to UDC will not exceed 3,500, or any subsequent figure for dwellings in Uttlesford defined in the West of Braintree DPD. The total number of dwellings assigned to BDC will not exceed 10,000, or any subsequent figure for dwellings defined in the West of Braintree DPD. This will not artificially constrain the DPD in identifying the capacity of the site, the capacity of the site will be design-led and defined through the DPD and subsequent planning applications. 	<p>To clarify how the housing on cross boundary sites will be distributed</p>