

Braintree District Council

Sustainability Appraisal of the Braintree District Section 2 Local Plan 2013-2033 Non-Technical Summary

Draft final report

Prepared by LUC

November 2021

Braintree District Council

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Contents

Chapter 1	
Non-Technical Summary	1
Sustainability Appraisal and Strategic Environmental Assessment	2
Braintree District Local Plan	2
Policy context	4
Baseline information	7
Key sustainability issues	8
SA framework	9
Appraisal symbology	10
Reasonable alternatives	10
Proposed Main Modifications to the Braintree District Section 2 Local Plan	11
Sustainability effects of the additional site allocations and reasonable alternatives	11
Sustainability effects of the Proposed Main Modifications to the Braintree Section 2 Local Plan	16
Cumulative effects	22
Monitoring framework	24
Conclusion and next steps	24
Next steps	26

Chapter 1

Non-Technical Summary

Introduction

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

1.2 Braintree District's emerging Local Plan will replace the adopted Core Strategy¹ and the Local Plan Review saved policies². It will guide future growth and direct new development in the District up to 2033. The emerging Local Plan comprises two distinct sections:

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

1.3 Place Services of Essex County Council undertook the SA, incorporating SEA, of the Publication Draft Section 1 Local Plan³ while LUC undertook the SA of the Publication Draft Section 2 Local Plan⁴. The Publication Draft Local Plan and supporting evidence base, including two accompanying Section 1 and Section 2 SA Reports, was submitted to the Secretary of State for independent examination in October 2017.

1.4 Following the Examination hearings in July 2021, BDC prepared a schedule of proposed Main Modifications to the Section 2 Local Plan and the reasoning behind each proposed

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

² Braintree District Council (2005) Local Plan Review (online) Available at: http://www.planvu.co.uk/bdc/contents_written.htm

³ Place Services of Essex County Council (2017) North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19) Sustainability Appraisal (pdf) Available at:

<https://www.braintree.gov.uk/downloads/file/1551/sa-neass-non-tech-summary-june-17>

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

modification. The Examination process has resulted in the Inspector proposing nearly 100 Main Modifications across the Plan; these changes are necessary in order for the Plan to be found sound and to allow it to be adopted by BDC.

1.5 This Non-Technical Summary (NTS) Addendum relates to the SA of the Main Modifications to the Section 2 Local Plan. It should be noted that this is an addendum to the 2017 SA Report NTS and that the two documents should therefore be read together.

Sustainability Appraisal and Strategic Environmental Assessment

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

1.7 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required by the SEA Regulations⁵. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

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

1.9 SEA and SA are separate processes but have similar aims and objectives. SEA focuses on the likely environmental effects of a plan while SA includes a wider range of considerations, such as social and economic impacts. The Government's Planning Practice Guidance⁶ shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Braintree District Section 2 Local Plan is being undertaken using this integrated approach and

throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

Braintree District Local Plan

Section 1 Local Plan

1.10 Section 1 of the Local Plan includes policies on sustainable development, overall housing and employment needs, infrastructure, place shaping, the spatial strategy and the development of a cross-boundary Garden Community – the Tendring/Colchester Borders' Garden Community. The preparation of the Section 1 Local Plan comprised a number of stages which are summarised in **Table 1.1**. Each stage in the preparation of the Section 1 Local Plan was accompanied by an SA Report.

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

1.12 The initial examination hearings took place between 16th and 25th January 2018 with an additional day for Matter 1 on 9th May 2018⁷. Following the hearings, the Inspector concluded that the Section 1 Local Plan was not sound in its current form. The Inspector wrote to the NEAs in June 2018, advising them of the further steps required in order for the Section 1 Local Plan to be made sound and legally compliant. Several shortcomings were identified by the Inspector, most notably in relation to the selection and deliverability of two of the three proposed Garden Communities.

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

1.14 The Inspector issued a further 'post hearing letter' on 15th May 2020. The Inspector concluded that, as submitted, the Section 1 Local Plan did not meet the Government's tests of soundness. He judged that two of the three (West of Braintree and Colchester/Braintree Borders) proposed Garden

⁵ Statutory Instrument 2004, No 1633, as amended by Statutory Instrument 2018 No 1232 and by Statutory Instrument 2020 No 1531

⁶ See <https://www.gov.uk/government/collections/planning-practice-guidance>

⁷ Matter 1 relates to legal and procedural requirements; key issues; Vision and strategic objectives (chapter 1)

Communities were not demonstrated to be economically viable or deliverable - making the overall plan unsound.

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

- the removal of the West of Braintree and Colchester/Braintree Borders Garden Communities, retaining only the Tendring/Colchester Borders Garden Community, and,
- the inclusion of a new policy (SP1A 'Recreational disturbance Avoidance and Mitigation Strategy (RAMS)').

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

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

1.18 Section 1 of the Braintree District Local Plan 2013-2033 was formally adopted on 22nd February 2021⁸.

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

Section 1 Plan also sets an employment land requirement for Braintree of 20.9 to 43.3 hectares for that period.

SA of the Section 2 Local Plan

1.19 Section 2 of the Local Plan outlines the specific policies and site allocations for Braintree District.

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

1.20 **Table 1.1** summarises the stages of the Braintree District Local Plan preparation and the accompanying SA Reports that have been prepared and consulted on. Please note that for the initial stages in the plan-making process, i.e., for the Scoping stage and Issues and Options stage, the concept of preparing a joint Local Plan between the North Essex Authorities (NEAs) was not yet identified. Therefore, the three authorities prepared separate Scoping Reports and Issues and Options documents (and accompanying Issues and Options SA Reports). There have been four key stages in the SA of the Section 2 Local Plan to date (summarised further in the 'Sustainability Appraisal' section of the 2017 SA Report NTS).

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

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

⁸ Tendring District Council, Colchester Borough Council, and Braintree District Council (2021) North Essex Authorities' Shared Strategic Section 1 Local Plan [online] Available at:

<https://www.braintree.gov.uk/downloads/file/3022/local-plan-2013-2033-section-1-adopted-february-2021->

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2 Local Plan 2013-2033
November 2021

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

Sustainability context for development in Braintree District

1.21 This section updates the 'Policy context', 'Baseline information' and 'Key sustainability issues' sections of the 2017 NTS. **Chapter 3 and Appendix A** of the 2021 SA Addendum Report update the information presented in Chapter 3 and Appendices 1 and 2 of the 2017 SA Report, and provide a detailed review of relevant international and

national plans and programmes and outline the changes to the baseline in more detail, in line with the SEA Regulations.

Policy context

National Planning Policy Framework

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

1.23 Most notable is the publication of the revised **National Planning Policy Framework**⁹ in July 2021, replacing the previous version of the NPPF published in March 2012, and revised in July 2018. The Publication Draft SA Report was published in 2017 and therefore referred to the 2012 version of the NPPF that was extant at that time. Since the Section 2 Local Plan was submitted before 24th January 2019, it is also being examined against the 2012 NPPF, in terms of whether it meets the tests of soundness. Notable changes that have been made to the NPPF since the publication of the original 2012 version include:

- Changes to calculating housing need over the plan period and agreeing a housing five-year land supply.
- Design policies are considered instrumental in delivering new homes, and local planning authorities (LPAs) must make sure that the quality of approved developments does not materially diminish between permission and completion.
- Planning policies and decisions should seek to achieve "appropriate densities", with the use of minimum density standards for city and town centres and other areas well-served by public transport, as this is key to their long-term vitality and viability. They should clarify the range of uses permitted in such locations.
- Planning policies and decisions should support opportunities to use the airspace above existing buildings, by allowing upward extensions. There is also support for local authorities to take a positive approach to applications for alternative uses on land which is currently developed but not allocated.
- Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. There is also additional recognition of the role that planning can play in promoting social interaction and healthy lifestyles.
- Clarity on the ways in which transport should be considered as part of the planning process from the earliest stages of plan-making and development proposals.
- Plans are to have regard to the cumulative impacts of flood risk, rather than just to or from individual development sites.
- Updates also align with the 25 Year Environment Plan, including taking air quality into account in planning policies and decisions.

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

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

National Planning Practice Guidance

1.26 National Planning Practice Guidance¹⁰ (NPPG) provides guidance on the interpretation and implementation of the NPPF. The NPPG is an online resource that is continuously being updated and the following updates have been made since the 2017 SA Report:

- 28th July 2017 – updated guidance on 'Brownfield land registers'.
- 15th March 2019 – updated guidance on 'Climate change'.
- 09th May 2019 – updated guidance on 'Neighbourhood planning' and 'Viability'.
- 26th June 2019 – new information on 'Housing for older and disabled people'.
- 22nd July 2019 – new information on 'Appropriate assessment', 'Effective use of land', 'Green Belt', 'Historic environment', 'Natural environment', 'Noise', 'Water supply, wastewater and water quality', 'Housing needs of different groups' and 'Housing supply and delivery'.
- 1st October 2019 – updated guidance on 'Design: process and tools'.
- 1st November 2019 – updated guidance on 'Air quality', 'Light pollution' and 'Healthy and safe communities'.
- 18th September 2020 – updated guidance on 'Town centres and retail'.

⁹ Ministry of Housing, Communities & Local Government (2021) *National Planning Policy Framework* [online]. Available at: <https://www.gov.uk/guidance/national-planning-policy-framework>

¹⁰ Ministry of Housing, Communities & Local Government (2021) *Planning Practice Guidance* [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2 Local Plan 2013-2033
November 2021

- 25th September 2020 – updated guidance on 'Neighbourhood planning'.
- 15th and 31st December 2020 – updated guidance on 'Housing and economic needs assessment' and 'Strategic environmental assessment and sustainability appraisal'.
- 24th May 2021 – updated guidance on 'Housing needs of different groups'.
- 20th August 2021 – updated guidance on 'Flood risk and coastal change'.

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

Other relevant international and national plans and programmes

1.28 Other relevant plans and programmes that have been published/updated of relevance to the Section 2 Local Plan and SA include the following, which have been reviewed in **Appendix A** of the 2021 SA Addendum:

- National Design Guide (2021)¹¹
- Build Back Better: Our Plan for Growth (2021)¹²
- The Energy Performance of Buildings Regulations (2021)¹³
- Planning for the Future White Paper (2020)¹⁴

- Department for Transport, Decarbonising Transport: Setting the Challenge (2020)¹⁵
- The Waste (Circular Economy) (Amendment) Regulations (2020)¹⁶
- Clean Air Strategy 2019 (2019)
- Public Health England Strategy 2020-25 (2019)¹⁷
- The Flood and Water Regulations (2019)¹⁸
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)¹⁹
- The Road to Zero (2018)²⁰
- Homes England Strategic Plan 2018 to 2023 (2018)²¹
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)²²
- Our Waste, Our Resources: A strategy for England²³ (2018)
- The Environmental Noise Regulations (2018)²⁴
- Transport Investment Strategy (2017)²⁵
- The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)²⁶
- UK Climate Change Risk Assessment 2017 (2017)²⁷
- The Heritage Statement (2017)²⁸

¹¹ Ministry of Housing, Communities and Local Government (2021) *National Design Guide* [online] Available at: <https://www.gov.uk/government/publications/national-design-guide>

¹² HM Treasury (2021) Build Back Better: Our Plan for Growth [online] Available at: <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>

¹³ HM Government (2021) *The Energy Performance of Buildings Regulations*

¹⁴ Department for Housing, Communities and Local Government (2020) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

¹⁵ Department for Transport (2020) *Decarbonising Transport Setting the Challenge* [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

¹⁶ HM Government (2020) *The Waste (Circular Economy) Regulations*

¹⁷ Public Health England (2019) PHE Strategy 2020-25 [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE%20Strategy%202020-25.pdf

¹⁸ HM Government (2019) *The Flood and Water Regulations*

¹⁹ HM Government, 2018. *A Green Future: Our 25 Year Plan to Improve the Environment* [pdf]. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

²⁰ HM Government (2018) *The Road to Zero*

²¹ Homes England (2018) *Strategic Plan 2018 to 2023* [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf

²² HM Government (2018) *The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate*

²³ HM Government (2018) *Our Waste, Our Resources: A strategy for England* Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

²⁴ HM Government (2018) *The Environmental Noise (England) Regulations*

²⁵ Department for Transport (2017) *Transport Investment Strategy* [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf

²⁶ Department for Environment Food and Rural Affairs and Department for Transport (2017) *UK plan for tackling roadside nitrogen dioxide concentrations*

²⁷ HM Government (2017) *UK Climate Change Risk Assessment 2017* [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf

²⁸ Department for Digital, Culture Media and Sport (2017) *Heritage Statement 2017*

- Highways England Sustainable Development Strategy and Action Plan²⁹ (2017)
- UK Industrial Strategy: Building a Britain fit for the future³⁰ (2017)

Baseline information

1.29 Since the preparation of the 2017 SA Report and NTS, the following changes to the baseline have occurred:

- Updated employment land provision over the plan period – the requirement was previously identified as 51.1ha however, this is revised to 42.1ha to reflect the removal of two garden communities.
- Updated housing provision over the plan period to reflect the removal of two garden communities and permissions granted since submission of the Section 2 Local Plan for examination – 15,772 dwellings will be delivered exceeding the supply requirement of 14,320 dwellings (716 dwellings per annum) identified in the Section 1 Local Plan.
- The population projections for Braintree District predict that the population will increase to 159,198 by 2043, a percentage change of 6.3% compared to 2018 (below the England average of 10%, and Essex average of 12.6%)³¹. The projected number of households in the authority is forecast to grow by 13.4% between 2018 and 2043 which is also below the England average (16.2%) and Essex average (17.6%)³².
- Braintree District ranked 194th in 2015 and 203rd in 2019 out of the 317 districts on the Index of Multiple Deprivation³³. Braintree District ranks 7th in comparison to 12 other Essex authorities in terms of average score, with Tendring, Basildon, Harlow, Colchester, Castle Point and Epping Forest the more deprived Essex authorities. Two Lower layer Super Output Areas

(‘LSOAs’ – a small geographic area used for statistical reporting) are in the 20% most deprived in the wards of Bocking North and Halstead Trinity

- Life expectancy for men in Braintree District is 80.1 years which is above the England average (79.8), while life expectancy for women is 83.0 years which is lower than the England average (83.4)³⁴. Life expectancy is 6.9 years lower for men and 3.6 years lower for women in the most deprived areas of Braintree District than in the least deprived areas. According to the Health Deprivation and Disability domain in the Indices of Multiple Deprivation³⁵, only one LSOA in Braintree District is within the 20% most deprived under this domain (Braintree Central & Beckers Green).
- According to the Sport England's Active Lives Adult Survey³⁶ (2021), Braintree District has the third highest rate of inactivity out of the 12 local authorities in Essex (inactive <30 minutes a week) at 31%, after Basildon (34.8%) and Tendring (32%). There is a 'significant decrease' of -8.6% in the percentage of people who consider themselves 'fairly active' (i.e., 30-149 minutes of exercise a week) from the baseline.
- 78% of the population of Braintree District is economically active, which is lower than the regional average (80.5%) and the national average (78.7%)³⁷. In July 2021, 6,130 people (5.3%) in Braintree District claimed out of work benefits, which represents a drastic increase from 3,375 (2.9%) in May 2019. This increase in claimants reflects the economic implications of COVID-19 pandemic. Braintree's claimant rate is higher than the regional average (4.4%) and national average (5.3%).

²⁹ Highways England (2017) *Highways England Sustainable Development Strategy and Action Plan* Available at: <https://www.gov.uk/government/publications/highways-england-sustainable-development-strategy>

³⁰ HM Government (2017) *UK Industrial Strategy: Building a Britain fit for the future* Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf

³¹ Office for National Statistics (2020) *Population projections for local authorities: Table 2* [online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

³² Office for National Statistics (2020) Household projections for England [online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

³³ Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

³⁴ Public Health England (2020) *Local Authority Health Profile 2019: Braintree* [online]. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000067.html?area-name=Braintree>

³⁵ Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

³⁶ Sport England (2019) *Active Lives Adult November 19-20 Tables* <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-04/Active%20Lives%20Adult%20November%2019-20Tables%201-4%20Levels%20of%20activity.xlsx?VersionId=NtDU9.uVjwnhHCnCXpnGSQyr175SJ6t4>

³⁷ NOMIS (2021) *Labour Market Profile: Braintree* [online]. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157211/report.aspx>

Chapter 1

Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2 Local Plan 2013-2033
November 2021

- According to the Braintree District Retail Study³⁸, there are 55 vacant shop units within the three main town centres in the District which equates to an overall vacancy rate of 9.9%. This is below the Experian Goad national average of (11.2%)³⁹. However, retail capacity is anticipated to decline in Braintree District from structural changes in the retail sector and the economic implications of the COVID-19 pandemic.
- All waterbodies in Braintree District are failing in terms of achieving a 'good' chemical status. Just one water body has achieved a 'good' ecological status (Domesy Brook), with the remainder of moderate or poor ecological status. Improvements to water quality are needed to meet The Water Environment (Water Framework Directive) Regulations (2017)⁴⁰ target of 'good ecological status' and 'good chemical status' by 2027.
- Commuting patterns result in a daily 16,525 population decrease in Braintree⁴¹. Around 31,765 people commute out of Braintree District to other local authorities each day, most notably to Tendring, Colchester and the City of London. However, these commuting patterns are expected to have significantly changed due to the increase in working from home as a response to the COVID-19 pandemic.
- There is a significant demand for school places in Essex. The total number of pupils by 2030/31 will reach 131,635 primary pupils and 99,693 secondary school pupils (including sixth form)⁴². The District is anticipated to experience significant capacity issues in its primary schools from 2025 onwards, particularly in Witham/Rivenhall, Kelvedon/Feering, Braintree Town & Surrounds, Earls Colne/Colne Engaine, Cressing/Silver End, and Hatfield Peverel/Terling.
- Braintree District Council declared a climate emergency in 2019 and subsequently prepared a Climate Change Strategy⁴³ for the period 2021 to 2030. The UK Climate Projections (UKCP18) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present⁴⁴.
- The latest DECC⁴⁵ figures show generally decreasing trends for CO₂ emissions (kilotonnes) in Braintree District from 2005-2019. Domestic emissions have seen the greatest reduction, falling by 138.2 kt to 209. In addition, the latest DECC figures for energy consumption⁴⁶ (in thousand tonnes of oil equivalent (ktoe)) show there has been a general decreasing trend in energy consumption as well as CO₂ emissions.
- Historic England's Heritage at Risk Register contains six entries for the District.
- There are currently no Air Quality Management Areas (AQMAs) declared in Braintree District. The main air quality issues in the District relate to nitrogen dioxide (NO₂) and particulate emissions from vehicles travelling on the A12, A131 and A120.
- In 2020, there were 36 sites on the Brownfield Register totalling 20.77ha of previously developed land in the District⁴⁷.
- The condition of the SSSIs at Belcher's and Broadfield Woods, and Glemsford Pits is assessed as unfavourable but recovering. Chalkney Wood and Bovingdon Hall Woods are generally in favourable condition.

Key sustainability issues

1.30 Following the latest review of other relevant plans and updates to the baseline, the following key sustainability issues

³⁸ Lichfields (2018) Braintree Retail Study 2018 Update [online] Available at: <https://www.braintree.gov.uk/downloads/file/3093/bdc032a-braintree-retail-study-update-2018>

³⁹ Experian's Goad Plan Data is a comprehensive dataset that covers retail areas within urban areas across the whole of the UK. The 2018 Retail Study used Goad Plan Data to identify vacancy rates in Braintree District.

⁴⁰ HM Government (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations.

⁴¹ Nomis (online) Location of usual residence and place of work (online) Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>

⁴² Essex School Organisation Service (2021) 10 Year Plan: Meeting the demand for school places in Essex 2021-2030 [pdf]. Available at: https://assets.ctfassets.net/knkzaf64jx5x/1sTwHeX9pKG17ebfWZQ8yS/96075a2a1c4da12ea2af8b873ee76900/ECC_10_year_plan_school_places_2021_2030.pdf

⁴³ Braintree District Council (2021) Climate Change Strategy [online] Available at: <https://www.braintree.gov.uk/advice-environment/climate-change>

⁴⁴ Met Office (2018) Land Projections Maps: Probabilistic Projections [online]. Available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>

⁴⁵ Department for Business, Energy & Industrial Strategy (2021) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 [online]. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019>

⁴⁶ Department for Business, Energy & Industrial Strategy (2013, updated 2019) Total final energy consumption at regional and local authority level 2005 to 2017 [online]. Available at: <https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>

⁴⁷ Braintree District Council (2020) Brownfield Land Register [Excel]. Available at: <https://www.braintree.gov.uk/directory-record/5933/brownfield-land-register>

are identified in addition to those presented in the 2017 SA Report and NTS:

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

1.31 The following key sustainability issues identified in the 2017 SA Report and NTS are updated as follows:

- **Biodiversity and geodiversity:** Braintree District contains areas of ecological and geological value, some of which are in unfavourable condition.
- **Climate change and energy:** Although the District is showing decreasing trends in CO₂ emissions and energy consumption, significant progress will need to be made to achieve the Government's target of net-zero emissions by 2050.
- **Water quality and water resources:** All waterbodies in Braintree District are failing in terms of achieving a 'good' chemical status. Just one water body has achieved a 'good' ecological status (Domesy Brook), with the remainder of moderate or poor ecological status. Improvements to water quality are needed to meet The Water Environment (Water Framework Directive) Regulations (2017)⁴⁸ target of 'good ecological status' and 'good chemical status' by 2027.
- **Health:** Braintree District has the third highest rate of inactivity out of the 12 local authorities in Essex (inactive <30 minutes a week) at 31%, after Basildon (34.8%) and Tendring (32%)⁴⁹, which could be contributing to a higher incidence of excess weight in adults in Braintree District.

■ Population and society:

- Braintree District ranked 194th in 2015 and 203rd in 2019 out of the 317 districts on the Index of Multiple Deprivation⁵⁰. Braintree District ranks 7th in comparison to 12 other Essex authorities in terms of average score.
- Educational attainment is particularly poor in four LSOAs which are classified as being within the 10% most deprived under the Education, Skills and Training domain in the English Indices of Multiple Deprivation (Halstead Trinity, Bocking North, Braintree Central and Beckes Green and Bocking South). There are also an additional eight LSOAs within the 20% most deprived under the education deprivation domain⁵¹.
- **Economy:** Although Braintree District has a lower overall vacancy rate (9.9%)⁵² than the Experian Goad national average (11.2%)⁵³, retail capacity is anticipated to decline in Braintree District from structural changes in the retail sector and the economic implications of the COVID-19 pandemic.
- **Housing:** According to the English Indices of Multiple Deprivation 2019⁵⁴, three LSOAs are within the 20% most deprived under the Barriers to Housing and Services domain, compared to 11 LSOAs in 2015.
- **Transport:** Commuting patterns result in a daily 16,525 population decrease in Braintree⁵⁵. However, these commuting patterns are expected to significantly change due to the increase in working from home as a response to the COVID-19 pandemic.

SA framework

1.32 This NTS and the SA Addendum Report are prepared within the context of the previous SA that was undertaken for the Section 2 Local Plan in 2017. Following the update to the policy review, baseline information and key sustainability issues facing Braintree District, it was concluded that the SA

⁴⁸ HM Government (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations.

⁴⁹ Sport England (2019) Active Lives Adult November 19-20 Tables <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-04/Active%20Lives%20Adult%20November%2019-20%20Tables%201-4%20Levels%20of%20activity.xlsx?VersionId=NtDU9.uVjwnhHChnCXpnGSQyr175SJ6t4>

⁵⁰ Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

⁵¹ Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

⁵² Lichfields (2018) Braintree Retail Study 2018 Update [online] Available at:

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

⁵³ Experian's Goad Plan Data is a comprehensive dataset that covers retail areas within urban areas across the whole of the UK. The 2018 Retail Study used Goad Plan Data to identify vacancy rates in Braintree District.

⁵⁴ Ministry of Housing, Communities & Local Government (2019) English Indices of Deprivation 2019 Explorer (online) Available at: http://dclgapps.communities.gov.uk/imd/iod_index.html

⁵⁵ Nomis (online) Location of usual residence and place of work (online) Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>

framework of sustainability objectives used to guide the previous stages of SA work (as set out in Chapter 2 of the 2017 SA Report and the 'Appraisal methodology' section of the NTS) remains valid. The SA framework is reproduced in **Chapter 2** of the 2021 SA Addendum (**Table 2.2**). The policy assessment criteria outlined in the SA framework are not intended to be exhaustive but helped to guide identification of the likely sustainability effects of the Braintree District Local Plan policies. Appendix 3 of the 2017 SA Report outlines the criteria used to guide assessment of the proposed site allocations by sustainability objective.

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

1.34 The SA framework was developed in consultation with various stakeholders in the early stages of the SA process. The SA objectives in the SA framework:

- Reflect the key sustainability issues facing the District;
- Take into account the environmental protection objectives set out at the international and national level (a requirement of the SEA Regulations);
- Take into account representations made on the SA framework; and,
- Cover all of the topics required by the SEA Regulations.

Appraisal symbology

1.35 The SA uses colour-coded symbols attributed to each policy and site allocation to indicate its likely sustainability effects and performance against each SA objective. **Table 1.2** shows how these symbols are applied during the appraisal. Note that the colours used have been updated since the 2017 SA Report and NTS in order to comply with the Government's accessibility guidelines.

Table 1.2: Key to symbols and colour coding used in the SA of the Main Modifications

Symbol and Colour Coding	Description
++	The policy/site allocation is likely to have a significant positive impact on the SA objective(s).
+	The policy/site allocation is likely to have a minor positive impact on the SA objective(s).

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

Reasonable alternatives

1.36 The SEA Regulations require the consideration of reasonable alternatives to the Section 2 Local Plan. The 2017 SA Report which accompanied the Publication Draft Section 2 Local Plan sets out how reasonable alternatives were considered and selected as part of the SA and plan-making processes up until Submission, as required by the SEA Regulations.

1.37 Most of the proposed Main Modifications to the Local Plan provide clarification or correction and are not considered to have reasonable alternatives. Reasonable alternatives to some of the proposed Main Modifications, which have not previously been subject to SA, have been identified by BDC and LUC in relation to the spatial strategy. A number of new reasonable alternatives were also identified to the new or amended site allocations provided by the Main Modifications and these are identified and appraised in **Chapter 4** of the SA Addendum.

1.38 No further reasonable alternatives to the proposed Main Modifications have been identified, taking into account the reasonable alternatives that were already appraised up to the submission of the Section 2 Local Plan, and the nature of the

proposed Main Modifications (i.e., non-spatial and/or simply text clarifications/corrections).

Proposed Main Modifications to the Braintree District Section 2 Local Plan

1.39 In August 2020, two Inspectors were appointed to examine the 'soundness' of the Section 2 Local Plan. BDC prepared a Draft Schedule of Recommended Modifications to the Section 2 Local Plan⁵⁶ (May 2021) in advance of the hearing sessions which took place in July 2021. Following the Examination hearings, a Final Schedule of Main Modifications to the Section 2 Local Plan has been prepared by the Inspectors, which this NTS and the 2021 SA Addendum relate to (see **Appendix D** of the SA Addendum). The proposed modifications take into account the matters raised by representations, hearing statements and through the hearing sessions. The Inspectors consider these modifications necessary for soundness.

1.40 The most significant modifications to the Section 2 Local Plan relate to:

- the deletion of policies LPP 7 (Design and Layout of Employment Policy Areas and Business Parks), LPP 27 (Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall), and LPP 62 (Enabling Development).
- the amalgamation of Publication Draft policies LPP 75 (Energy Efficiency) and LPP 77 (Renewable Energy within New Developments) to form a new policy 'Resource Efficiency, Energy Generation and Energy Efficiency'.
- the modification of the Strategic Growth Location policies (LPP 18 – LPP 23) and policies LPP 67 (Natural Environment and Green Infrastructure), LPP 68 (Protected Species, Priority Species and Priority Habitat), and LPP 78 (Flooding Risk and Surface Water Drainage).

1.41 LUC has reviewed changes to the previously appraised elements of the Publication Draft Section 2 Local Plan to consider the effects of the proposed Main Modifications.

The SA implications have been considered based on whether each Main Modification changes the conclusion of the 2017 SA Report for the Publication Draft Section 2 Local Plan. Therefore, the SA Addendum and this NTS should be read in conjunction with Chapters 4-8 and Chapter 10 of the 2017 SA Report. Only changes to

previously reported SA findings or new sustainability effects are summarised in this section of the NTS and in Chapters 4 and 5 of the SA Addendum Report.

Sustainability effects of the additional site allocations and reasonable alternatives

1.42 Since the Publication Draft Local Plan was submitted for Examination, BDC has identified a number of new development site allocations. These sites and any new reasonable alternatives to them have now been subject to SA and the findings are set out in **Chapter 4** of the SA Addendum. **Chapter 4** of the SA Addendum should be read in conjunction with Chapter 10 of the 2017 SA Report which appraises and summarises the findings for all sites and their reasonable alternatives up until Submission stage.

1.43 The SA at Main Modifications stage has also given consideration to the need to appraise other development sites, for example where the boundary of the previously assessed site has changed. The categories of sites considered for SA and the sites identified for appraisal within each category are set out below. Where sites are allocated for both residential and employment use, the site is listed twice with the use indicated in brackets after the site name, as it was appraised separately for each use. Any sites identified by BDC as already under construction were not appraised as the Plan cannot affect them and they have effectively become part of the baseline for the purposes of the SA.

1.44 **Table 1.3** identifies the sites subject to SA at Main Modifications stage and their likely effects against the sustainability objectives in the site assessment framework (see **Appendix B** of the SA Addendum). Detailed assessment forms for each site are provided in **Appendix C** of the SA Addendum and a summary of the effects is provided in **Chapter 4** of the SA Addendum.

Categories of sites subject to SA at Main Modifications stage

New site allocations

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

- **BCBG 147A – Unit 1 The Mazes East Street Braintree 20/01118/COUPA 20/01119/COUPA (residential): New**

⁵⁶ Braintree District Council (2021) Local Plan Examination of Section 2 Further Suggested Changes to the Local Plan Section 2 (pdf)
Available at: <https://www.braintree.gov.uk/directory->

<record/1059457/sdbdc008a-1-3-further-suggested-changes-to-the-local-plan-may-2021>

site allocation and therefore was not previously appraised in the SA.

- **BOCN 750 – Foley House 115 High Garrett Bocking (residential):** New site allocation and therefore was not previously appraised in the SA.
- **BRAW 751 – 263 Rayne Road Braintree (residential):** New site allocation and therefore was not previously appraised in the SA.
- **EARC 705 – Land South of Morleys Road (residential):** This site was omitted in error from the list of sites identified for appraisal in the SA of the Publication Draft Local Plan.
- **FINC 708 – Land to the west of Bardfield Road (residential):** This site was omitted in error from the list of sites identified for appraisal in the SA of the Publication Draft Local Plan.
- **HATR 752 – Former Courtauld Boiler Building Factory Lane West Halstead (residential):** New site allocation and therefore was not previously appraised in the SA.
- **WITN 755 – The Old Pool Club 49 Braintree Road (residential):** New site allocation and therefore was not previously appraised in the SA.

Uplift in development capacity or change in development boundary

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

- **BOS 6H – Branoc Park, Land West of Panfield Lane NW Braintree (residential):** Uplift of 225 dwellings. Note that this site was omitted due to being a Core Strategy allocation from the list of sites identified for appraisal in the SA of the Publication Local Plan.
- **Group L – FEER 230, 232 and 233B - Land south of Feering/west of A12, Feering Strategic Growth Location (residential):** The SA of the Publication Draft Local Plan appraised Group L comprising sites FEER 230, FEER 232 and FEER 233. FEER 233 has since been split into FEER 233A and FEER 233B, with FEER 233B now forming part of the group of sites being

allocated and FEER 232A being excluded. Group L has now been reappraised as comprising FEER 230, 232 and 233B. In line with the methodology, FEER 233 A has not been appraised as a standalone allocation as it is already under construction.

- **Group L – FEER 230, 232 and 233B - Land south of Feering/west of A12, Feering Strategic Growth Location (employment):** See previous bullet point.
- **Group J – BOCN 132 – Land at Straits Mill off Broad Road Bocking (residential):** The SA of the Publication Draft Local Plan appraised Group J comprising sites BOCN 123 and 132. BOCN 123 has since been removed and only BOCN 132 now forms this site. This group of sites has now been reappraised as comprising BOCN 132 only.
- **Group J – BOCN 132 – Land at Straits Mill off Broad Road Bocking (employment):** See previous bullet point.

Permitted sites

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

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

Correction of error

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

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

New reasonable alternatives

1.49 At settlements where Plan modifications have provided for additional development on new site allocations or by

significant uplift of the capacity of existing allocations⁵⁷, the Council considered whether this additional development could be provided on reasonable alternative sites. The following reasonable alternative sites had not previously been subject to SA and were therefore appraised at the Main Modifications stage:

- **BOCS 707 – Land East of Church Lane (residential)**
- **COGG 701 – Land South of River Blackwater, West of Grange Barn, Coggeshall (residential)**
- **EARC 706 – East Essex Hunt Kennels, Earls Colne (residential)**
- **GGHR 801 – Land West of Blamsters (residential)**
- **HASA 802 – Land Adj Moys allotment, Halstead (residential)**
- **KELV 805 – Land SE of London Road, Kelvedon (residential)**
- **KELV 805 – Land SE of London Road, Kelvedon (employment)**
- **SILV 809 – Land at Egypys Farm (residential)**

⁵⁷ Braintree Town, Bocking, Halstead, Witham, Halstead, Earls Colne, Silver End, High Garrett, Coggeshall and Kelvedon.

Table 1.3: Summary of SA findings for the allocated sites and reasonable alternative sites appraised at Main Modifications stage

Site ID	Proposed use	Area (ha)	No. of dwellings	Q1a Community facilities	Q1c AD and Waste sites	Q2a Affordable housing	Q3a Primary healthcare	Q3c ANG	Q3e Open space	Q4a Retail provision	Q4c Shops & services	Q5a Mineral reserves	Q5c Employment areas	Q5e Broadband availability	Q6a Designated wildlife	Q7a Public transport	Q8a Service centres	Q8c Public transport	Q8e Highway access	Q9a Primary schools	Q9c Secondary schools	Q10a Historic environment	Q11a Climate change	Q12a Groundwater SPZ	Q12c Sewage capacity	Q13a Flood risk	Q14a Air quality	Q15a Landscape sensitivity	Q15c AONB extension	Q15e Greenfield / brownfield	Q15g VIs	Q15i County parks	Q16a Agricultural land	Q16c Contaminated land	
Allocated sites																																			
BCBG 147A	Residential	0.03	11	0	0	0	+	-?	?	0	+	0	-	++	0	+	++	++	+	-	++	?	N/A	?	?	0	0	0	0	0	0	0			
BOCN 750	Residential	0.29	18	0	0	++	-	-?	+	0	+	0	-	++	0	+	0	++	+	-	-	-	N/A	?	?	0	0	--	0	+	0	0	0		
BRAW 751	Residential	0.21	12	0	0	0	+	-?	+	?	+	0	+	++	0	+	++	++	+	++	++	?	N/A	?	-	0	0	0	0	+	0	0	0		
EARC 705	Residential	0.76	20	0	0	++	+	-?	?	0	+	--	-	++	-	+	+	++	+	-	+	-	N/A	?	-	0	0	-	0	0	-	0	0		
FINC 708	Residential	3.50	50	0	0	++	+	-?	++	0	-	--	-	++	-	+	+	++	+	+	-	-	N/A	?	?	0	0	--	0	-	0	0	0		
HATR 752	Residential	0.20	22	0	0	++	+	-?	?	0	+	0	+	++	0	+	++	++	+	++	++	+	N/A	-	-	--	0	0	0	+	0	0	-		
WITN 755	Residential	0.09	10	0	0	0	+	-?	?	0	+	0	+	++	0	+	+	++	+	++	++	+	N/A	0	-	0	0	0	0	+	0	0	0		
BOS 6H	Residential	43.44	825	0	0	++	+	-?	?	0	+	--	+	++	--?	++	++	++	+	++	++	?	N/A	-	--	0	0	-	0	-	0	0	-		
Group L - FEER 230, 232 and 233B	Residential	56.94	835	+	0	++	-	-?	+	0	+	--	+	++	--?	++	+	++	+	++	+	?	N/A	?	--	-?	--?	-	0	-	0	0	--	?	
Group L - FEER 230, 232 and 233B	Employment	56.94	N/A	0	0	N/A	N/A	N/A	+	0	N/A	--	N/A	++	-	++?	++?	++?	++?	+	N/A	N/A	?	N/A	?	N/A	-?	--?	-?	0	-	0	0	?	?
Group J - BOCN 132	Residential	65.86	1,000	+	0	++	-	-?	?	0	-	--	-	++	--?	++	++	++	+	++	++	?	N/A	?	--	0	0	-	0	-	0	0	--	?	
Group J - BOCN 132	Employment	65.86	N/A	0	0	N/A	N/A	N/A	?	0	N/A	--	N/A	++	-	++?	++?	++?	++?	+	N/A	N/A	?	N/A	?	N/A	0	0	-?	0	-	0	0	--	?
BOS 35	Residential	0.09	11	0	0	0	-	-?	?	0	-	0	+	++	0	+	+	++	+	+	++	?	N/A	?	?	0	0	0	0	+	0	0	0		
EARC 225	Residential	2.25	80	0	0	++	+	-?	+	0	+	--	-	++	0	+	+	++	+	+	+	?	N/A	?	-	0	0	-	0	-	0	0	-		
Group A - BLAN 110, 114, 116 and 117	Residential	117.25	1,750	+	0	++	+	-?	+	0	+	--	+	++	--?	++	++	++	+	++	++	?	N/A	?	--	0	0	-	0	-	0	0	--	0	
Group A - BLAN 110, 114 and 116	Employment	117.25	N/A	0	0	N/A	N/A	N/A	+	0	N/A	--	N/A	++	0	++?	++?	++?	++?	+	N/A	N/A	?	N/A	?	N/A	0	?	-?	0	-	0	0	--	0
Reasonable alternatives																																			
BOCS 707	Residential	1	15	0	0	++	-	-?	?	0	+	0	-	++	-	+	++	++	+	-	++	-	N/A	-	-	0	0	?	0	-	0	0	-	0	
COGG 701	Residential	8	50	0	0	++	+	-?	?	0	+	--	-	++	-	+	+	++	?	-	++	--	N/A	?	-	0	0	+	0	-	0	0	--	0	
EARC 706	Residential	4.1	123	0	0	++	+	-?	++	0	+	--	-	++	--?	+	+	++	+	-	+	-	N/A	?	-	0	0	--	0	-	0	0	-	0	
GGHR 801	Residential	5.35	156	0	0	++	-	-?	?	0	+	--	-	++	--?	+	++	++	+	+	++	-	N/A	?	?	0	0	-	0	-	0	0	-	0	
HASA 802	Residential	1.21	36	0	0	++	+	-?	?	0	+	0	+	++	-	+	++	++	+	-	+	?	N/A	?	?	0	-	0	0	-	0	0	-	0	
KELV 805	Residential	3.10	75	0	0	++	+	-?	?	0	+	--	+	++	-	+	+	++	+	+	-	-	N/A	0	?	-	0	0	0	-	0	0	-	0	

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2 Local Plan 2013-2033
November 2021

Site ID	Proposed use	Area (ha)	No. of dwellings	Q1a Community facilities	Q1c AD and Waste sites	Q2a Affordable housing	Q3a Primary healthcare	Q3c ANG	Q3e Open space	Q4a Retail provision	Q4c Shops & services	Q5a Mineral reserves	Q5c Employment areas	Q5e Broadband availability	Q6a Designated wildlife	Q7a Public transport	Q8a Service centres	Q8c Public transport	Q8e Highway access	Q9a Primary schools	Q9c Secondary schools	Q10a Historic environment	Q11a Climate change	Q12a Groundwater SPZ	Q12c Sewage capacity	Q13a Flood risk	Q14a Air quality	Q15a Landscape sensitivity	Q15c AONB extension	Q15e Greenfield / brownfield	Q15g V/S	Q15i County parks	Q16a Agricultural land	Q16c Contaminated land
KELV 805	Employment	3.10	N/A	0	0	N/A	N/A	N/A	?	0	N/A	--	N/A	++	-	+	+	++	N/A	N/A	N/A	N/A	?	0	-	0	0	0	0					
SILV 809	Residential	37.55	1,125	+	0	++	+	-?	?	0	+	--	-	++	--?	++	+	++	+	++	+	+	N/A	?	-	-	0	0	0	0				

Sustainability effects of the Proposed Main Modifications to the Braintree Section 2 Local Plan

1.50 **Table 1.4** summarises the changes to the SA findings previously reported as a result of the Main Modifications to the Vision, Key Objectives, policies and supporting text of the Section 2 Local Plan. Therefore, **Table 1.4** only includes those policies where the SA effects have been identified as being different to the policy as it was set out in the Publication Draft Local Plan.

1.51 Where policies have a spatial element, i.e., they refer to housing, employment, retail or mixed-use sites, these have been appraised with reference to the findings of the relevant site appraisals in **Chapter 4** of the SA Addendum and Chapter 10 of the 2017 SA Report, where appropriate. The site-specific policies are contained within the 'Prosperous District' section of the Section 2 Local Plan.

1.52 The Schedule of Main Modifications for the Section 2 Local Plan proposes a number of changes to several of the policies in the Section 2 Local Plan. A number of changes to SA effects previously recorded in the 2017 SA Report have been identified as resulting from the proposed Main Modifications, some positive and some negative; other modifications have had a negligible effect in relation to the previously reported SA findings (as shown in **Table 1.4**).

1.53 More positive effects are expected for the policies in the 'Creating Better Places', 'The District's Natural Environment' and the 'Delivery and Implementation' sections compared to their appraisal in the 2017 SA Report (e.g., changing from no effect or an uncertain effect to minor or significant positive, or from minor positive to significant positive). This is due to the proposed modifications generally strengthening protection for environmental and/or mitigation requirements, in particular seeking to create and enhance green infrastructure and the provision of open spaces with associated benefits for health and wellbeing, air quality, water quality, flooding and soil

quality. The mitigation provided in the site-specific policies in the 'Prosperous District' section of the Local Plan support the development of facilities, including healthcare facilities, and the protection of heritage assets and their settings, which contribute towards the enhanced positive effects identified for health and wellbeing and the historic environment.

1.54 In a number of cases the proposed Main Modifications have either reduced positive effects previously identified, (e.g., from significant to minor, or from minor to no effect), generally as specific criteria relating to the protection of environmental assets has been removed from the policy. The sustainability effects for SA objective **5: 'Economy'** for policies LPP 18 (Strategic Growth Location - Land East of Great Notley, south of Braintree), LPP 21 (Strategic Growth Location - North West Braintree) and LPP 22 (Strategic Growth Location – Land at Feering) are revised from significant positive effects to mixed effects (significant positive / significant negative) as the reappraisal of sites BOS 6H, Group L and Group A identified that these sites are within Mineral Safeguarding Zones for sand and gravel. Similarly, the sustainability effect for SA objective **13: 'Flood risk'** for policy LPP 22 (Strategic Growth Location - Land at Feering), is revised to take into account the reappraisal of site allocations presented in **Chapter 4** of the SA Addendum.

1.55 The deletion of policies LPP 7 (Design and Layout of Employment Policy Areas and Business Parks), LPP 27 (Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall), and LPP 62 (Enabling Development) means that the effects previously identified in the SA will no longer occur as part of the Section 2 Local Plan. Thus, all effects are revised to negligible effects. Similarly, the removal of site allocation BRE31RW (Land North of Freeport) from Policy LPP 16 (Retail Site Allocations) means that the sustainability effects for this site allocation no longer apply, however the minor positive effect for SA objective **4: 'Service centre vitality'** and significant positive effect for SA objective **5: 'Economy'** remain valid.

Table 1.4: Summary of changes to SA findings as a result of the proposed Main Modifications

Policy	SA objective and assessment criteria	Previous effect	Revised effect
Spatial Strategy			
Spatial Strategy Reasonable Alternative F <i>(assessed for the first time, therefore all 'previous' effects are negligible)</i>	SA1: 'Community safety & cohesion' Create safe environments which improve quality of life and community cohesion.	0	0
	SA2: 'Housing' Provide everyone with the opportunity to live in a decent home.	0	++
	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	0	+/-
	SA4: Service centre vitality Promote the vitality and viability of all service centres throughout the District.	0	+/-
	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	0	+/-
	SA6: Biodiversity & geodiversity Conserve and enhance the biological and geological diversity of the environment.	0	-?
	SA7: Sustainable travel Promote more sustainable transport choices and uptake.	0	--/+
	SA8: Accessibility Promote accessibility and ensure the necessary transport infrastructure to support new development	0	--/+
	SA9: Education and skills Improve the education and skills of the population.	0	+/-
	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	0	-?
	SA11: Climate change mitigation Reduce contributions to climate change.	0	--/+
	SA12: Water environment Improve water quality and address water scarcity and sewerage capacity.	0	-?
	SA13: Flood risk	0	-?

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2
Local Plan 2013-2033
November 2021

Policy	SA objective and assessment criteria	Previous effect	Revised effect
	Reduce the risk of flooding.		-/+
	SA14: Air quality Improve air quality.	0	-/+
	SA15: Landscapes & townscapes Maintain and enhance the quality of landscapes and townscapes.	0	+/-
	SA16: Soil Safeguard and enhance the quality of soil.	0	--
LPP 1 Development Boundaries	SA6: Biodiversity & geodiversity Conserve and enhance the biological and geological diversity of the environment.	0	+
	SA16: Soil Safeguard and enhance the quality of soil.	0	+
'Prosperous District' policies			
LPP 7 Design and Layout of Employment Policy Areas and Business Parks <i>(policy deleted in Section 2 Local Plan as proposed to be modified)</i>	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	0
	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	+	0
	SA7: Sustainable travel Promote more sustainable transport choices and uptake.	+/-	0
	SA8: Accessibility Promote accessibility and ensure the necessary transport infrastructure to support new development	++	0
	SA11: Climate change mitigation Reduce contributions to climate change.	+/-	0
	SA14: Air quality Improve air quality.	+/-	0
	SA15: Landscapes & townscapes Maintain and enhance the quality of landscapes and townscapes.	+	0
	SA6: Biodiversity & geodiversity Conserve and enhance the biological and geological diversity of the environment.	+	0

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2
Local Plan 2013-2033
November 2021

Policy	SA objective and assessment criteria	Previous effect	Revised effect
	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	+	0
LPP 9 Tourist Development within the Countryside	SA16: Soil Safeguard and enhance the quality of soil.	+	0
(relating to site BRE31RW no longer being allocated)	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	?	0
	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	++	0
	SA6: Biodiversity & geodiversity Conserve and enhance the biological and geological diversity of the environment.	-	0
	SA7: Sustainable travel Promote more sustainable transport choices and uptake.	+	0
	SA8: Accessibility Promote accessibility and ensure the necessary transport infrastructure to support new development	++?	0
	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	?	0
	SA11: Climate change mitigation Reduce contributions to climate change.	+	0
	SA15: Landscapes & townscapes Maintain and enhance the quality of landscapes and townscapes.	-	0
	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	++
	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	++	++/-
LPP 21 (Strategic Growth Location - North West Braintree)	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	++	++/-

Policy	SA objective and assessment criteria	Previous effect	Revised effect
LPP 20 (Strategic Growth Location - Former Towerlands Park Site)	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
LPP 22 (Strategic Growth Location - Land at Feering) <i>(relating to reappraisal of Group L sites)</i>	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	++	++/-
	SA13: Flood risk Reduce the risk of flooding	0	-?
LPP 24 (Comprehensive Redevelopment Area - Land East of Halstead High Street)	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	0	+
LPP 25 (Specialist Housing - Mount Hill, Halstead)	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	0	+
(policy deleted in Section 2 Local Plan as proposed to be modified) LPP 27 Comprehensive Redevelopment Area - Former Dutch Nursery, West Street, Coggeshall	SA1: 'Community safety & cohesion' Create safe environments which improve quality of life and community cohesion.	+	0
	SA2: 'Housing' Provide everyone with the opportunity to live in a decent home.	++	0
	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+/-	0
	SA4: Service centre vitality Promote the vitality and viability of all service centres throughout the District.	+	0
	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	-	0
	SA6: Biodiversity & geodiversity Conserve and enhance the biological and geological diversity of the environment.	--?	0
	SA7: Sustainable travel Promote more sustainable transport choices and uptake.	+	0

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2
Local Plan 2013-2033
November 2021

Policy	SA objective and assessment criteria	Previous effect	Revised effect
	SA8: Accessibility Promote accessibility and ensure the necessary transport infrastructure to support new development	++/-	0
	SA9: Education and skills Improve the education and skills of the population.	++/-	0
	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	?	0
	SA12: Water environment Improve water quality and address water scarcity and sewerage capacity.	-	0
	SA13: Flood risk Reduce the risk of flooding.	-	0
	SA15: Landscapes & townscapes Maintain and enhance the quality of landscapes and townscapes.	-	0
	SA16: Soil Safeguard and enhance the quality of soil.	-?	0
LPP 42 (Residential Conversion of Buildings in the Countryside)	SA5: Economy Achieve sustainable levels of prosperity and economic growth.	-	0
	SA8: Accessibility Promote accessibility and ensure the necessary transport infrastructure to support new development	-	0
'Creating Better Places' policies			
Policy LPP 53 Provision for Open Space, Sport and Recreation	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities.	+	++
Policy LPP 54 Equestrian Facilities	SA2: 'Housing' Provide everyone with the opportunity to live in a decent home.	+	0
Policy LPP 61 Demolition of Listed Buildings or Structures	SA1: 'Community safety & cohesion' Create safe environments which improve quality of life and community cohesion.	0	+
Publication Draft Policy LPP 62 Enabling Development	SA10: Historic environment Conserve and enhance the historic environment, heritage assets and their settings.	++	0

Policy	SA objective and assessment criteria	Previous effect	Revised effect
(policy deleted in Section 2 Local Plan as proposed to be modified)			
Policy LPP 64 Educational Establishments	SA16: Soil Safeguard and enhance the quality of soil.	--	0
'District's Natural Environment' policies			
Policy LPP 67 Natural Environment and Green Infrastructure	SA7: Sustainable travel Promote more sustainable transport choices and uptake. SA12: Water environment Improve water quality and address water scarcity and sewerage SA13: Flood risk Reduce the risk of flooding SA14: Air quality Improve air quality. SA16: Soil Safeguard and enhance the quality of soil.	0	+
Policy LPP 73 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	SA3: 'Health' Improve the health of the District's residents and mitigate/reduce potential health inequalities. SA16: Soil Safeguard and enhance the quality of soil.	+	++
'Delivery and Implementation policy			
Policy LPP 82 Infrastructure Delivery and Impact Mitigation	SA12: Water environment Improve water quality and address water scarcity and sewerage SA13: Flood risk Reduce the risk of flooding	0	+

Cumulative effects

1.56 Table 1.5 outlines the cumulative effects of Section 1 and Section 2 of the Local Plan individually and in-combination with each other. Despite the changes to the SA findings resulting from the Main Modifications, the cumulative sustainability effects of the Section 2 Local Plan, both alone and in-combination with the Section 1 Local Plan, have not

been significantly altered and are still largely positive in relation to most of the SA objectives. **Chapter 6** of the SA Addendum updates the cumulative effects assessment presented in Chapter 11 of the 2017 SA Report and takes into account the changes to the effects of the Section 2 Local Plan in light of the Main Modifications (as reported in **Chapters 4** and **5** of the SA Addendum), as well as the cumulative effects

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2 Local Plan 2013-2033
November 2021

presented in Chapter 4 of the Section 1 Main Modifications SA Addendum Report⁵⁸.

Table 1.5: Cumulative effects of Section 1 and Section 2 of the Braintree District Local Plan

Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
SA1: Community safety & cohesion	Create safe environments which improve quality of life and community cohesion.	++/-	++/-	++/-
SA2: Housing	Provide everyone with the opportunity to live in a decent home.	++	++	++
SA3: Health	Improve the health of the District's residents and mitigate/reduce potential health inequalities.	++/-	++	++/-
SA4: Service centre vitality	Promote the vitality and viability of all service centres throughout the District.	++	++	++
SA5: Economy	Achieve sustainable levels of prosperity and economic growth.	++/-	++	++/-
SA6: Biodiversity & geodiversity	Conserve and enhance the biological and geological diversity of the environment.	-?	-?	-?
SA7: Sustainable travel	Promote more sustainable transport choices and uptake.	++/-	++/-	++/-
SA8: Accessibility	Promote accessibility and ensure the necessary transport infrastructure to support new development.	++	++	++
SA9: Education & skills	Improve the education and skills of the population.	++	+	++
SA10: Historic environment	Conserve and enhance the historic environment, heritage assets and their settings.	?	--/+?	+?/-?
SA11: Climate change mitigation	Reduce contributions to climate change.	+/-	+/-	+/-
SA12: Water environment	Improve water quality and address water scarcity and sewerage capacity.	0	0	0
SA13: Flood risk	Reduce the risk of flooding.	0	0	0
SA14: Air quality	Improve air quality.	-	-	-
SA15: Landscapes & townscapes	Maintain and enhance the quality of landscapes and townscapes.	+?/-?	-?	+?/-?

⁵⁸ LUC (2020) SA Addendum Report on the North Essex Authorities Section 1 Main Modifications (pdf) Available at:

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

Section 2 Local Plan – SA objective	Section 2 Local Plan – Assessment criteria	Section 2 Local Plan – Cumulative effects	Section 1 Local Plan – Cumulative effects	Sections 1 & 2 Local Plan – Overall cumulative effects
SA16: Soil	Safeguard and enhance the quality of soil.	--	--	--

Monitoring framework

1.57 Chapter 12 of the 2017 SA Report and the 'Monitoring' section of the NTS present the monitoring framework for monitoring potential sustainability effects of implementing the Section 2 Local Plan. In light of the SA findings of the Main Modifications to the Section 2 Local Plan and having compared the monitoring frameworks in the 2017 SA Report and the SA Addendum Report on North Essex Authorities Section 1 Main Modifications (August 2020), it was concluded that the Monitoring Framework presented in Chapter 12 of the

2017 SA Report remains valid, however, a number of additional indicators are proposed in **Table 1.6** to ensure consistency with the Section 1 Local Plan Monitoring Framework. The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g., the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 1.6: Additional monitoring indicators

SA objectives	Additional monitoring indicators
SA2: 'Housing' Provide everyone with the opportunity to live in a decent home.	Number of zero-carbon homes completed Number of additional Gypsy and Traveller pitches Number of starter homes completed Number of homes for older people completed
SA8: Accessibility Promote accessibility and ensure the necessary transport infrastructure to support new development	Number / amount of new homes / employment development completed at Strategic Growth Locations and Comprehensive Redevelopment Areas
SA11: Climate change mitigation Reduce contributions to climate change.	Renewable energy installed by type Number of zero carbon homes delivered
SA12: Water environment Improve water quality and address water scarcity and sewerage capacity.	Number of planning permissions granted contrary to the advice of the Environment Agency

Conclusion and next steps

1.58 The Schedule of Main Modifications for the Section 2 Local Plan proposes a number of changes to several of the policies in the Section 2 Local Plan. A number of changes to SA effects previously recorded in the 2017 SA Report have been identified as resulting from the proposed Main Modifications, some positive and some negative; other

modifications have had a negligible effect in relation to the previously reported SA findings (as shown in **Table 1.4**).

1.59 Despite the changes to the SA findings resulting from the Main Modifications, the cumulative sustainability effects of the Section 2 Local Plan, both alone and in-combination with the Section 1 Local Plan, have not been significantly altered and are still largely positive in relation to most of the SA objectives (as shown in **Table 1.5**).

1.60 When considered in combination with the Section 1 Local Plan, the cumulative effects of the whole Braintree District Local Plan (i.e., Section 1 and Section 2 as proposed to be modified) are significantly positive for SA objectives **2: 'Housing'**, **4: 'Service centre vitality'**, **8: 'Accessibility'**, **9: 'Education and skills'**. Cumulative mixed effects (significant positive / minor negative) are expected for SA objectives **1: 'Community safety & cohesion'**, **3: 'Health'**, **5: 'Economy'**, and **7: 'Sustainable travel'**, while cumulative mixed effects (minor positive / minor negative) are identified for SA objectives **10: 'Historic environment'**, **11: 'Climate change mitigation'**, and **15: 'Landscapes and townscapes'**.

1.61 The positive effects principally relate to the Braintree District Local Plan:

- Delivering the objectively assessed housing need. The Local Plan supports the delivery of a variety of homes, including affordable homes, homes for an ageing population, and sites for Gypsy and Traveller accommodation.
- Allocating and safeguarding employment land across the District which will ensure equitable access to employment opportunities.
- Focusing development at existing settlements, principally the three Main Towns (Braintree, Witham and Halstead) and the Key Service Villages, where jobs, services and facilities are concentrated, meaning shorter journeys, greater opportunities to walk, cycle or use public transport. The prioritisation of development to the Main Towns and Key Service Villages will contribute to the vitality of the District's service centres.
- Supporting developments which provide an appropriate mix and density of uses, deliver sustainable transport networks, and optimise the efficient use of land.
- Creating pedestrian, cycling and public transport friendly developments, with these modes of transport given priority over cars.
- Supporting the provision of or contribution to services and facilities to support new development, such as community, healthcare and education.
- Requiring the incorporation of open spaces and informal and formal recreation areas into the design of developments which connect to the wider green infrastructure network.
- Supporting developments which respond positively to local character; preserve and enhance the quality of existing places; and exhibit individual architectural quality.
- Ensuring the protection and enhancement of biodiversity and designated habitat sites; the conservation and enhancement (where appropriate) of heritage assets and their settings; and, the protection and enhancement of designated landscapes, landscape character, open spaces and the green infrastructure network.
- Supporting developments which are designed to incorporate environmental sustainability measures including water efficiency, appropriate wastewater and flood mitigation measures; and prioritising the re-use of previously developed land in settlements.
- Supporting the provision of renewable and low carbon technologies; encouraging high-quality design of developments which contribute to climate change mitigation and adaptation; delivering energy efficiency improvements in buildings; and minimising waste and improving reuse and recycling rates.
- Ensuring water supply, wastewater treatment and water efficiency measures are addressed before development is delivered.
- Directing development to locations with the least impact on flooding or water resources and requiring new developments to contribute to the delivery of flood defence/protection measures, flood mitigation measures, Sustainable Drainage Systems (SuDS).

1.62 Despite the positive effects identified above, there are still some overall cumulative negative effects (as well as those mixed with positive effects). A significant negative effect is expected for SA objective **16: 'Soil'** while minor negative effects are identified for **6: 'Biodiversity and geodiversity'** and **14: 'Air quality'**. These negative effects are mainly due to the increased growth of the scale provided for in the Braintree District Local Plan, which inevitably will still result in:

- Loss of greenfield land, with associated loss of BMV agricultural land and potential effects on biodiversity, landscape, heritage assets, and the water environment.
- Sterilisation of mineral reserves. However, it is possible that the loss of mineral reserves may be avoided if extraction takes place prior to development.
- Increased traffic and potentially congestion and localised air pollution as the Local Plan supports improvements to road infrastructure and strategic highway connections along the A12 and A120, which could facilitate car travel and consequently higher emissions.

Chapter 1
Non-Technical Summary

Non-Technical Summary of the SA of the Braintree District Section 2 Local Plan 2013-2033
November 2021

Next steps

1.63 In LUC's professional judgement, the work carried out and presented in this NTS and the SA Addendum is appropriate to meet the requirements of the SEA Regulations in relation to the proposed Main Modifications to the Section 2 Local Plan. This NTS and the SA Addendum will be published alongside the Main Modifications to the Section 2 Local Plan Review during a six-week consultation period from winter 2021. Following the consultation, the Inspectors will consider the representations raised in respect of the Main Modifications and will report on the modified Section 2 Local Plan's soundness. If the Section 2 Local Plan is found to be 'sound', it can be formally adopted by Braintree District Council. Once the Section 2 Local Plan has been adopted, a SA Adoption Statement will be published to report the full plan-making and SA process and the framework for monitoring future effects.

LUC

November 2021