



North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19)

Draft Sustainability Appraisal (SA): Annex C - Alternatives and Consultation Comments - June 2017







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1. Introduction

1.1 Background

Braintree District Council, Colchester Borough Council and Tendring District Council, together forming the 'North Essex Authorities,' in conjunction with Essex County Council as a key partner in its strategic role for infrastructure and service provision, commissioned Place Services of Essex County Council to undertake an independent Sustainability Appraisal (SA) for a Section One and Two for the respective Council's Local Plans.

Place Services are acting as consultants for this work; therefore the content of this SA should not be interpreted or otherwise represented as the formal view of Essex County Council.

This document is Annex C of the SA Environmental Report for the Section One for Local Plans. It outlines the comprehensive list and history of alternatives explored throughout the Local Plan processes of Braintree, Colchester and Tendring Councils. It also includes the responses and actions of the SA in light of consultation comments received for the SA at the Preferred Options stage.

1.2 The Purpose of this Annex

This annex acts as a 'one stop shop' for all of the alternatives explored throughout the Section One plan-making process. It outlines the history of why the strategic approach has been developed, and importantly the assists in demonstrating how the SA has influenced the plan-making process in assessing all reasonable alternatives.

- This document explores specifically, the following elements of the Section One:
- The housing requirements
- The Spatial Strategy
- The Garden Communities.



2. The History of Options / Alternatives Explored – Strategic Growth

2.1 Introduction

Appendix 1 of the main Environmental Report states that, 'within the Issues and Options Local Plans of Colchester, Braintree and Tendring, the option of Garden Communities, or 'new settlements' was explored, in response to the emerging growth needs identified across the Housing Market Area (HMA), as identified in the initial work from a Strategic Housing Market Assessment (SHMA) 2014.' This section provides the history behind this statement within the Local Plan process, and identifies the SA of options for growth throughout that process.

2.2 Issues and Options (before the identification of a Section One)

At the Issues and Options stage of the three authorities Local Plans, the notion of a 'Section One' was not yet identified. The three authorities prepared and identified Issues and Options Local Plans in which the principle of new Garden Communities, or 'new settlements' was introduced. As is common, a 'call-for-sites' process was started at the same time, in order to identify sites for strategic and non-strategic growth.

The following table outlines where the notion of new settlements is established:

2.2.1 Colchester Borough Council Local Plan Issues and Options, January 2015

The issues and Options Plan stated, 'as set out in the Introduction and Housing sections of this document, the National Planning Policy Framework requires local planning authorities to meet objectively assessed housing need in full. This means that the starting point for each of the options is that they must be able to accommodate the fully objectively assessed need. As explained in the Housing chapter, we do not yet know exactly what our objectively assessed need is, but we expect that it will be in the region of 1,000 or more dwellings per year. This equates to a total of 15,000 new homes over the plan period.

'However, with existing land already identified and allocated for growth through the existing Core Strategy and Site Allocations Development Plan Document, we have an existing supply of allocated land that can contribute towards accommodating this growth. As a result, the Local Plan will need to identify sufficient additional land to accommodate in the region of 10,000 dwellings in order to meet the objectively assessed housing need over the 15 year Plan period (2017-2032). The options set out in this paper are included on the basis that it is expected that they are each capable of accommodating Colchester's required level of growth.

'It is also possible that the Council will allocate land to accommodate a higher number of homes than the level of housing need identified, in order to plan comprehensively for the longer term - post 2032. This would help to ensure maximum sustainability of development, by minimising the need to find additional sites on a piecemeal basis in the future. This could also provide a wider range of sites, which would help the Council to ensure that it could maintain a five year land supply of deliverable sites throughout the Plan period, as required by the National Planning Policy



Framework.

'Under the duty to cooperate, the Council has been engaging with Braintree and Tendring District Councils and they are aware that we are consulting on options which involve potential development of land in their areas. Both Councils are agreed, in principle, to work cooperatively in respect of any potential cross-boundary developments, should either, or both, cross-boundary development options be identified as a preferred option. The Council will also engage with other authorities, bodies and organisations under the duty to cooperate in order to ensure that any strategic issues are identified and addressed.'

Options Identified

Option 1A:	Development to the East and West (a separate sustainable settlement to the west of Colchester town, a separate sustainable settlement to the east of Colchester town, urban development on sites in and around the existing urban area, and proportional expansion of the Rural District Centres - Wivenhoe, Tiptree and West Mersea)
Option 1B:	Development to the East and West (a separate sustainable settlement to the west of Colchester town, a separate sustainable settlement to the east of Colchester town, urban development on sites in and around the existing urban area, proportional expansion of the Rural District Centres – Wivenhoe, Tiptree and West Mersea, and a proportional element of rural growth across the Borough's villages)
Option 2A:	Development to the West (a separate sustainable settlement to the west of Colchester town, urban development on sites in and around the existing urban area, proportional expansion of the Rural District Centres – Wivenhoe, Tiptree and West Mersea)
Option 2B:	Development to the West (as per 2A above, but with an additional proportional element of rural growth across the Borough's villages)
Option 3A:	Development to the East and North (a separate sustainable settlement to the east of Colchester town, a significant urban extension to the north of Colchester town, crossing the A12, in addition to an extension to the north, other urban development in and around the existing urban area, and proportional expansion of Rural District Centres – Wivenhoe, Tiptree and West Mersea)
Option 3B:	Development to the East and North (as per 3A above, but with an additional proportional element of rural growth across the Borough's villages)

2.2.2 Braintree District Council Local Plan Issues and Scoping, January 2015

The Issues and Scoping Plan stated that, 'the Plan will set out the basis for working with partners to provide for future local needs for homes, employment, and business sites, whilst protecting the most valuable countryside and maintaining a high quality of life. The scale of past population growth has proved a challenge for services such as local health and education; the rapid increase in the rate of growth that is expected to be called for in the future is likely to provide an even greater challenge to services for the population of the District.

'One of the District's key objectives will be to demonstrate that the new Plan can achieve and maintain a supply of



readily available development sites for new homes, meeting a much higher target than in the past.

The Government’s national planning policy - set out in the National Planning Policy Framework (NPPF) and supporting guidance - requires local planning authorities to significantly boost the supply of new homes, building the homes communities want and need. The Council is considering a range of requirements for the number of new homes for Braintree District; at this stage it is expected that the District will need to accommodate an average of between 750 and 950 homes per year between 2014 and 2033.’

The Plan identified two key issues related to growth. These were, ‘Large numbers of new homes are required in the District to support the growing population’ and ‘The District may not have enough brownfield sites (those where buildings have previously been located) to accommodate the new homes that need to be provided.’

Options Identified

Option 1	New homes should be focused on the existing towns and larger villages
Option 2	New homes should be built in one or more new villages
Option 3	New homes should be dispersed between all areas of the District
Option 4	New homes should be built in areas where they can provide funding for major infrastructure projects such as new roads
Option 5	New homes should be built on the existing public transport/rail network to encourage sustainable travel

2.2.3 Tendring District Council Issues and Options September 2015

The Issues and Options Plan states that, ‘To work out how many new homes might be needed in the future, the Council has worked in partnership with Colchester Borough Council, Braintree District Council and Chelmsford Borough Council to commission specialist consultants to calculate the ‘objectively assessed housing need’ for each area taking into account a range of different factors including government population projections which look at births, deaths and patterns of migration, economic projections and the characteristics of the local housing market.

‘The Objectively Assessed Housing Needs Study (2015)’ suggests that, to meet projected population growth, our district will need approximately 600 new homes each year over the period of the Local Plan. This means that our Local Plan will need to identify sufficient land to accommodate approximately 10,000 new homes between now and 2032.

‘To deliver 10,000 new homes, the Council will need to identify a large amount of greenfield land for development. Over the last few years, the Council has been very successful in directing most development to previously developed ‘brownfield sites’ but these sites have nearly run out now, meaning that greenfield land will have to be used. The Council’s latest evidence which includes the Strategic Housing Land Availability Assessment (2014) suggests that around 4,000 homes could be built on sites that have already got planning permission and other sites, including brownfield sites, within existing built up areas. This leaves around 6,000 homes to be built on additional greenfield sites around the edge of our towns and villages or through the creation of new settlements.’



Options Identified

N/A	<p>The Issues and Option Plan stated that, 'a new settlement will be built on land crossing the Colchester/Tendring border planned for jointly by Tendring District Council and Colchester Borough Council (duty to cooperate) which will deliver approximately 2,000 new homes between now and 2032 of which 1,000 would count towards Tendring's housing requirements and 1,000 would count towards Colchester's with the potential for further phases of development in the longer-term beyond 2032. The development would be accompanied by new schools, medical facilities, a link road between the A120 and A133 and rapid bus services into Colchester town centre. The development would maintain a countryside gap around the valley of Salary Brook on the edge of Colchester and around the village of Elmstead Market.'</p>
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2.3 Section One - Preferred Options (2016)

At the Preferred Options stage, the notion of a combined Section One covering the strategic content of the three authorities' Local Plans was introduced. It was decided that a common SA for this Section One was required, to better reflect the sustainability issues and concerns over the wider area. This is due to different issues being prevalent for each distinct authority. An aligned Section One and accompanying SA is better equipped to address the balance of all of these issues, within an appropriate scope.

At the Preferred Option stage, the following options were explored, with a summary of sustainability impacts identified in the accompanying SA:



2.3.1 Spatial Strategy Options across the North Essex Area

Option		Sustainability Impacts identified in the SA	Reasons for Progression / Rejection at the Preferred Options stage
Preferred Option	<p>Existing settlements will be the principal focus for additional growth across North Essex. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.</p> <p>Three new garden communities will be developed as part of the sustainable strategy for growth. These new communities will provide strategic locations for 7,500 additional homes within the Plan period as well as accompanying employment development, with expectation that substantial additional development will be delivered beyond the current Local Plan periods.</p>	<p>The principles behind the Spatial Strategy will have a large number of significant positive impacts on the Sustainability Objectives, most notably on those that correspond to housing delivery, economic growth and accessibility. Further long term significant positive impacts associated with Garden Communities can be expected to be realised on health, sustainable travel, education and skills. Minor positive impacts can be expected through Garden Community developments associated with townscapes, air quality pressures in settlements and energy efficiency.</p> <p>Uncertain impacts can be expected to arise from the principle of Garden Communities regarding the natural environment and landscapes.</p> <p>Areas of short to medium term uncertainty relate to the school capacity pressures, historic cores and areas, air quality issues associated with town centres.</p>	<p>The principles behind the Spatial Strategy will have a large number of significant positive impacts on the Sustainability Objectives. The short and medium term impacts of these are related to the notion that development will be accommodated within or adjoining settlements according to their scale and existing role both within each individual district; these correspond to the NPPF requirements of each LPA in the formulation of a Local Plan and offers a local distinctiveness to the strategic area relevant to local needs and communities. Significant long term impacts are different in that they correspond to the requirement for Garden Communities in the latter stages of the plan period to meet unmet or residual needs in a sustainable manner and in sustainable locations. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area.</p>
Alternative 1	<p>A focus on allocating all broad Garden Community options proposed in the Strategic Area</p>	<p>Although this alternative could offer some perceived benefits in terms of long term infrastructure provision in principle, it would not respond to the need for a distribution of growth across existing settlements (i.e.</p>	<p>The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area.</p>



Option		Sustainability Impacts identified in the SA	Reasons for Progression / Rejection at the Preferred Options stage
		<p>the centres of largest population per District/Borough) and meeting identified needs regarding affordability in all areas. In addition, the general distribution of options would see an overprovision in the Colchester area, and would create housing and employment inequalities across the strategic area. Impacts can be expected to be similar at the broad strategic level, however in line with the housing requirements of the Strategic Area, the short to medium term impacts could be expected to be uncertain on housing and employment related objectives in so far as the needs of existing communities would unlikely be met.</p>	
Alternative 2	A focus on existing settlements, commensurate to proportionate growth across the Strategic Area	<p>Although on the face of it over a wide Strategic Area this would appear a sustainable option, this alternative would require the formulation of a joint or combined settlement hierarchy. The appraisal of this alternative has been undertaken on the basis that existing settlements would have to respond to allowing higher densities and the development of more marginal peripheral land. This has seen a large amount of diminishing impacts associated with this continual albeit theoretical trend, culminating in a large amount of uncertain and negative impacts in the long term, when Garden Communities would be coming forward to meet unmet housing and employment needs. The alternative would not correspond to the Local Plan requirements of the NPPF on a LPA basis, and could lead to the</p>	<p>Strategically, the alternative would not offer a sustainable distribution across the wider area. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For these reasons the alternative has been rejected.</p>



Option		Sustainability Impacts identified in the SA	Reasons for Progression / Rejection at the Preferred Options stage
		overexpansion of some settlements through the possible development of unsuitable extensions with no wider sustainable or infrastructure benefits.	
Alternative 3	A focus on stimulating infrastructure and investment opportunities across the Strategic Area	<p>The location of the preferred Garden Community options in the Strategic Area could be perceived as being located in line with a need to stimulate investment in transport infrastructure along the A120. In addition, their size indicates the threshold required to deliver a new secondary school in each instance. To extend the premise further to other infrastructure requirements across the strategic area would not ensure Garden Communities meet Garden City Principles and infrastructure requirements in less marketable areas could be expected to warrant notions of housing and employment delivery unviable. Although infrastructure considerations partly represent the case for their preferred status, it should be acknowledged that the preferred Garden Community options represent the most sustainable options in their own right as well as in consideration of their distribution as part of a wider Spatial Strategy. In line with the housing requirements of the Strategic Area, the short to medium term impacts could be expected to be increasingly negative on housing and employment related objectives in so far as the needs of existing communities would unlikely be met until the long term. This is also true for impacts on other relevant</p>	<p>To entirely focus on the premise of distributing growth to the A120 and in order to deliver additional secondary school capacity in the wider area would not be a sustainable one, in so far as it would not take into consideration the benefits and indicative impacts associated with other themes and tenets of sustainability, in particular those that are environmental in nature and seek to protect such assets. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For these reasons the alternative has been rejected.</p>



Option		Sustainability Impacts identified in the SA	Reasons for Progression / Rejection at the Preferred Options stage
		Sustainability Objectives in the short and medium term.	
Alternative 4	CAUSE's Metro Plan	<p>This alternative has been deemed as having likely negative impacts due to the focus of growth in Tendring, the least marketable District within the HMA. In addition, the alternative is not clear how the geographic distribution will benefit from the economies of scale of a fewer amount of larger Garden Communities; for this reason no long term impacts have been identified. There is also the potential for cumulative negative impacts on environmental considerations associated with the distribution, especially regarding increasing visitor numbers to the coast and international designations. It should be acknowledged however that a forthcoming HRA or AA would add further detail to these impacts should the option become preferred. The alternative will have significantly positive impacts associated with sustainable transport and accessibility; however it should be acknowledged that the upgrading of multiple rail stations on the same stretch of line would likely have negative implications regarding the deliverability of multiple new settlements in the plan period. In consideration of the OAN Report, it could be considered that this distribution would not meet the existing needs of Braintree District; in particular the requirements to ensure affordable housing and jobs in a range of sectors that could be expected from new</p>	<p>The alternative does not consider the lack of available land within the stated focal points for growth in Tendring. It also does not consider the suitability of land, especially in regard to alternative sites. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For these reasons the alternative has been rejected.</p>



Option	Sustainability Impacts identified in the SA	Reasons for Progression / Rejection at the Preferred Options stage
	Garden Communities in the District.	

2.3.2 Garden Community options

Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
East Colchester	Option 1: Southern Land Focus	- 6,611 homes - 7 ha mixed use - 5 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Significantly positive 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Significantly positive	The broad area of East Colchester has been selected as a preferred option for a new Garden Community due to its ability to stimulate required infrastructure delivery and adhere to Garden City Principles in a largely unconstrained area.
	Option 2: A133 to Colchester - Ipswich rail line	- 8,834 homes - 10 ha mixed use - 5 ha employment	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Significantly positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
		land	4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Positive	
	Option 3: North to South wrap	- 11,409 homes - 13 ha mixed use - 7 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Positive 4) Transport – Uncertain 5) Resilience – Significantly positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Positive	
North Colchester	Option 1: East of	- 6,606 homes	1) Physical limitations – Negative	The broad area of North Colchester has



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
	Langham Lane focus	- 7 ha mixed use - 7 ha employment land	2) Impacts – Negative 3) Environment Amenity – Negative 4) Transport – Uncertain 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Uncertain	been rejected as a preferred option for a new Garden Community due to the limited scope for maximum sustainable benefits associated with adhering to Garden City principles.
	Option 2: Maximum Land Take	- 10,132 homes - 10 ha mixed use - 10 ha employment land	1) Physical limitations – Negative 2) Impacts – Negative 3) Environment Amenity – Negative 4) Transport – Uncertain 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
			10) Developability / Deliverability - Uncertain	
West of Colchester / Marks Tey	Option 1: North and South of A12 / Rail Corridor Focus	- 16,861 homes - 9 ha mixed use - 10 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Uncertain 4) Transport – Positive 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Uncertain	The broad area of West of Colchester / Marks Tey has been selected as a preferred option for a new Garden Community due to its ability to stimulate required infrastructure delivery and adhere to Garden City Principles in a largely unconstrained area.
	Option 2: South of A120 and North of Marks Tey Existing Settlement	- 17,182 homes - 9 ha mixed use - 11 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Uncertain 4) Transport – Positive 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Significantly positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
			8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Uncertain	
	Option 3: South of A120 Focus	- 13,105 homes - 7 ha mixed use - 9 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Positive 3) Environment Amenity – Uncertain 4) Transport – Positive 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Uncertain	
	Option 4: Maximum Land Take	- 27,841 homes - 16 ha mixed use - 15 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Negative 3) Environment Amenity – Significantly positive 4) Transport – Uncertain 5) Resilience – Uncertain	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
			6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Uncertain	
West of Braintree	Option 1: Braintree DC only	- 9,665 homes - 12 ha mixed use - 10 ha employment land	1) Physical limitations – Positive 2) Impacts – Uncertain 3) Environment Amenity – Significantly positive 4) Transport – Uncertain 5) Resilience – Uncertain 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Positive	The broad area of West of Braintree has been selected as a preferred option for a new Garden Community. As Uttlesford District Council are not currently contributing to the work undertaken by the North Essex Authorities, and are located within a different Housing Market Area, option GCWB2 can be rejected at this stage in so far as the option does not respond to the scope and context of the Common Strategic Part 1 for Local Plans.
	Option 2: Braintree DC and Uttlesford DC Land	- 12,949 homes - 16 ha mixed use - 13 ha	1) Physical limitations – Positive 2) Impacts – Uncertain 3) Environment Amenity – Positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA	Reasons for Progression / Rejection at the Preferred Options stage
		employment land	4) Transport – Uncertain 5) Resilience – Uncertain 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - Positive	



2.4 Between Preferred Options (2016) and Draft Publication (2017)

Between the Section One Preferred Options stage and the Draft Publication stage to which this SA relates, a number of additional options were explored. This was to ensure that the North Essex Authorities were continuing to explore sustainable options for growth in the strategic area. Previous Preferred Options and alternatives were re-assessed in light of emerging evidence and consultation responses at the Preferred Option stage. Additional options were also submitted at the Preferred Options consultation stage, and these were included for assessment through the SA process where they were proposed to meet the yields explored for a 'Garden Community' (5,000 homes). These were 'Monks Wood' and a re-assessment of the 'Metro Plan' as a Garden Community alternative.



2.4.1 Spatial Strategy Options across the North Essex Area

Option		Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
The Spatial Strategy	<p>Existing settlements will be the principal focus for additional growth across North Essex. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.</p> <p>Three new garden communities will be developed as part of the sustainable strategy for growth. These new communities will provide strategic locations for 7,500 additional homes within the Plan period as well as accompanying employment development, with expectation that substantial additional development will be delivered beyond the current Local Plan periods.</p>	<p>The Spatial Strategy will have a large number of significant positive impacts on the Sustainability Objectives, most notably on those that correspond to housing delivery, the vitality and viability of centres, economic growth, sustainable transport and accessibility. Further long term significant positive impacts associated with Garden Communities can be expected to be realised on health. There will be additional positive impacts on social objectives. There will likely be uncertain impacts on climate change associated with the level of growth and the feasibility of identifying renewable energy schemes at this stage. Further uncertain impacts can be expected to arise from the principle of Garden Communities regarding the natural environment and landscapes.</p> <p>Areas of short to medium term uncertainty relate to the school capacity pressures and the preservation and enhancement of historic cores and areas. A focus on existing settlements can also be expected to exacerbate air quality issues associated with town centres.</p>	<p>The principles behind the Spatial Strategy will have a large number of significant positive impacts on the Sustainability Objectives. The short and medium term impacts of these are related to the notion that development will be accommodated within or adjoining settlements according to their scale and existing role both within each individual district; these correspond to the NPPF requirements of each LPA in the formulation of a Local Plan and offers a local distinctiveness to the strategic area relevant to local needs and communities. Significant long term impacts are different in that they correspond to the requirement for Garden Communities in the latter stages of the plan period to meet unmet or residual needs in a sustainable manner and in sustainable locations. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area.</p>
Alternative 1	<p>A focus on allocating all of the explored Garden Community options proposed in the Strategic Area at smaller individual scales</p>	<p>A re-appraisal of the alternative in light of the additional number of Garden Community options has led to a number of negative impacts. Although this alternative could offer some benefits in terms of a wider scope of infrastructure provision in principle related to the provision of new schools and open space /</p>	<p>The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area.</p>



Option		Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
		<p>recreational facilities, it would not respond to the need for a distribution of growth across existing settlements (i.e. the centres of largest population for each District/Borough). Should OAN targets remain the focus of growth in the plan period, then it can be considered that each Garden Community option would be required to come forward earlier than currently planned. This would either result in less sustainable outcomes associated with the likely absence of effective masterplanning due to the required timescales of commencement dates earlier in the plan period (particularly affecting the Garden Communities' 'infrastructure first' approach), or lead to difficulties in providing a five year housing land supply due to deliverability concerns. More generally, this alternative would lead to likely overprovision in the Colchester area, and would create housing and employment inequalities across the strategic area.</p>	
Alternative 2	The allocation of one Garden Community only	<p>Alternative 2 has been assessed as not meeting the North Essex Authorities' housing requirement in so far as no single proposal would be suitable or sustainable at the scale required. In addition, no single proposal has been submitted or identified throughout the plan-making process at the required scale. It can be seen that the geographic distribution and scales proposed for the allocated Garden Communities within the spatial strategy responds to ensuring benefits across all Councils in meeting their own long term needs in the plan period, as well as each being of a scale suitable that existing settlements remain resilient. Impacts have been predicted similarly for the preferred spatial strategy option in the short-medium term; however the notion of a single Garden</p>	<p>Although this alternative was considered a reasonable alternative within earlier stages of the plan-making process and explored primarily to determine its feasibility as part of the SA process, its inability to meet the strategic area's OAN requirements (or otherwise be at a scale that would likely result in significant negative impacts on landscape and inclusive access throughout the whole scheme) means that it can not now be considered a 'reasonable' alternative at this Publication Draft stage. The deliverability and sustainability of the Garden Communities was</p>



Option		Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
		Community that could meet the growth requirements of the three LPAs would likely have significant impacts on the natural and historic environment. It would also be unlikely that mitigation would be possible. This alternative has been rejected as it would not meet the North Essex Authorities' housing requirement and does not exist as a viable and available option.	considered to be best served by their location in three distinct areas of the strategic area. For this reason the alternative has been rejected.
Alternative 3	The allocation of two Garden Communities only	Alternative 3 has been assessed as not meeting the North Essex Authorities' housing requirement in so far as no combination of two proposals is considered suitable, appropriate or broadly sustainable (in regard to their required scale and impact on the environment) at the scale required. This alternative can be said to have negative effects on social criteria as a result, with a lack of distribution providing housing more widely across the strategic area. Impacts have been predicted similarly for the preferred spatial strategy option in the short-medium term, however the reliance on two Garden Communities would likely lead to them being required at a scale that would not be suitable in regard to natural or historic environmental conditions; it would be likely that impacts would be significant to the point that mitigation would be difficult.	This alternative has been rejected as it would not meet the North Essex Authorities' housing requirement. Although this alternative was considered a reasonable alternative within earlier stages of the plan-making process and explored primarily to determine its feasibility as part of the SA process, its inability to meet the strategic area's OAN requirements means that it can not now be considered a 'reasonable' alternative at this Publication Draft stage. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For this reason the alternative has been rejected.
Alternative 4	A focus on existing settlements only across the Strategic Area, commensurate to proportionate growth (exploring whether needs can be met without the allocation of Garden Communities).	This alternative essentially represents a 'business as usual / do nothing scenario' and explores whether the North Essex Area can feasibly meet identified growth needs without the allocation of Garden Communities. A re-assessment of the alternative at this Draft Publication stage has led to some revised conclusions surrounding the impacts of extending existing settlements in potential unsustainable areas in the latter stages of the plan period	This alternative was explored at an earlier stage of the plan-making process, with findings presented in the Preferred Options SA. Although this alternative was considered a reasonable alternative within earlier stages of the plan-making process and explored primarily to determine its feasibility as part of the SA process,



Option	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
	<p>and beyond. Notionally, over a wide Strategic Area this alternative would represent a sustainable option, however the presence of a Section One, including Garden Communities, is validated by the need to meet housing and employment needs that can not be met in the latter stages of the plan period by a focus on proportionate growth across the North Essex Authorities area's settlements alone. It should be acknowledged that the principle of this alternative exists as a fundamental part of the Section One Spatial Strategy in order to deliver sustainable growth in the short to medium term stages of plan period. This is also in accordance with the Section Two Spatial Strategies of the respective Councils and the allocation of sites for non-strategic level growth in order to demonstrate a five year housing land supply. In order to represent a 'reasonable' alternative, this alternative would require the formulation of a joint or combined settlement hierarchy. Proportionately this would lead to significant focus on Colchester. The appraisal of this alternative has been undertaken on the basis that existing settlements would have to respond to allowing higher densities and the development of more marginal peripheral land. There would be a significant amount of increasing impacts associated with this theoretical trend, culminating in a large amount of uncertain and negative impacts in the long term, when Garden Communities have been identified as required to come forward to meet unmet housing and employment needs. The alternative would not correspond to the Local Plan requirements of the NPPF on a LPA basis, and could lead to the overexpansion of some settlements through the possible development of unsuitable extensions with no wider sustainability benefits. Strategically, it</p>	<p>its inability to meet the strategic area's OAN requirements means that it can not now be considered a 'reasonable' alternative at this Publication Draft stage. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For this reason the alternative has been rejected.</p>



Option		Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
		would also not offer a sustainable distribution across the wider area, or reflect that some settlements within the Strategic Area serve an important function in terms of services despite not having a significant population.	
Alternative 5	A focus on stimulating infrastructure and investment opportunities across the Strategic Area	A re-appraisal of this alternative has led to a number of likely negative impacts, becoming more significant in the long term, associated with a possible unsustainable concentration of sites in certain areas where infrastructure improvements would be economically beneficial, and also the allocation of sites that are not done so with sustainability at the forefront of the selection process. The size threshold for Garden Communities is set at that which would require the delivery of a new secondary school in each instance, as determined in the ECC Developers' Guide to Infrastructure Contributions Update 2016. Despite this, to entirely focus on the premise of distributing growth to those areas in order to deliver additional secondary school capacity in the wider area would not be a sustainable one, in so far as it would not take into consideration the benefits and indicative impacts associated with other tenets of sustainability, in particular those that are environmental in nature and seek to protect such assets. To extend the premise further to other infrastructure requirements across the strategic area would not allocate Garden Communities in response their ability to meet Garden City principles. Infrastructure requirements in less marketable areas can be expected to warrant notions of housing and employment delivery unviable.	Although infrastructure considerations partly represent the case for their preferred status, it should be acknowledged that the preferred Garden Community options represent sustainable and developable options in their own right as well as in consideration of their distribution as part of a wider Spatial Strategy. The alternative has been rejected in line with the selection and allocation of Garden Communities based on the balance of opportunities and constraints and sustainability, rather than solely economic purposes. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For this reason the alternative has been rejected.
Alternative 6	CAUSE's Metro Plan	This alternative has been deemed as having likely negative	This alternative was explored at an earlier stage



Option	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
	<p>impacts due to the focus of growth in Tendring only, and not distributing growth throughout the North Essex Authorities area. It is unlikely that the geographic distribution will benefit from the economies of scale of a fewer amount of larger Garden Communities, this not only impacts on the ability of locations to stimulate infrastructure, such as schools, and also the ability to mitigate any negative environmental impacts. The Metro Plan, as a Spatial Strategy option, will have positive impacts associated with sustainable transport and air quality; however it should be acknowledged that accessibility is poor at each location regarding A-classified roads and additional public transport infrastructure choices. In consideration of the OAN Report, it could be considered that this distribution would not meet the existing needs of Colchester or Braintree District; in particular the requirements to ensure affordable housing and jobs in a range of sectors that could be expected from a wider distribution of growth, including the locations of the allocated Garden Communities. This is contrary to the NPPF, stating that local planning authorities should positively seek opportunities to meet the development needs of their area, to which the notion of the Section One covering the North Essex Authorities area is in response to. The alternative does not consider the lack of available land within the stated focal points for growth in Tendring. It also does not consider the suitability of land, especially in regard to alternative sites.</p>	<p>of the plan-making process, with findings presented in the Preferred Options SA. Although this alternative was considered a reasonable alternative within earlier stages of the plan-making process and explored primarily to determine its feasibility as part of the SA process, its inability to meet the strategic area's OAN requirements means that it can not now be considered a 'reasonable' spatial strategy alternative at this Publication Draft stage. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area. For this reason the alternative has been rejected.</p>



2.4.2 Garden Community Options

The following Garden Communities were explored for their individual impacts at this stage. Additional options were considered immediately prior to their identification through the Preferred Options consultation. The options were reassessed in line with emerging evidence on a comparable basis (see Appendix 1) and also the consultation responses later in this Annex. Additionally, the re-assessment focused more appropriately on a balance of on-site impacts with the possibility of adhering to Garden City principles, with an adapted approach to measuring these to better differentiate between options, particularly in broad areas.

Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
Tending / Colchester Borders	Option 1: Southern Land Focus	- 6,611 homes - 7 ha mixed use - 5 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Positive 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Significantly positive	The Tending / Colchester Borders Garden Community has more opportunities for sustainable travel links into Colchester than other options, a major regional centre. The Garden Community is also in close proximity to the University and high quality employment opportunities. As one of the major centres in the region, Colchester offers a full range of facilities including a hospital and is a major shopping and cultural destination. This would provide high order services not on the garden community within a closer proximity with the opportunities for public transport, walking and cycling links. Colchester is also a major employer in the region and provides a good level and mix of employment opportunities. There is the opportunity
	Option 2: A133 to Colchester -	- 8,834 homes - 10 ha mixed use	1) Physical limitations – Uncertain 2) Impacts – Uncertain	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
	Ipswich rail line	- 5 ha employment land	3) Environment Amenity – Positive 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Positive	to access these opportunities via public transport, walking and cycling.
	Option 3: North to South wrap	- 11,409 homes - 13 ha mixed use - 7 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain / Negative 3) Environment Amenity – Uncertain / Positive 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly positive 7) Employment – Significantly positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
North Colchester	Option 1: East of Langham Lane focus	- 6,606 homes - 7 ha mixed use - 7 ha employment land	1) Physical limitations – Uncertain / Negative 2) Impacts – Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain / Negative 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Positive	The discounting of the North Colchester site for a Garden Community was based on the negative environmental impacts of a large Garden Community on an area of significant landscape and environmental value. Additionally, the deliverability and sustainability of Garden Communities was considered to be best served by their location in two distinct areas of the Borough as opposed to adjacent communities such as North Colchester.
	Option 2: Maximum Land Take	- 10,132 homes - 10 ha mixed use - 10 ha employment land	1) Physical limitations – Uncertain / Negative 2) Impacts – Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain / Negative 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
			9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	
Colchester / Braintree Borders	Option 1: North and South of A12 / Rail Corridor Focus	- 16,861 homes - 9 ha mixed use - 10 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain / Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain 5) Resilience – Uncertain / Positive 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	<p>The Colchester Braintree borders site is in closer proximity to the mainline railway station at Marks Tey, which with upgraded facilities would give regular train links to London, Colchester and beyond within walking, cycling or bus rapid transport system to the station. There are also more opportunities for sustainable travel links into Colchester, a major regional centre of facilities and employment.</p> <p>The Colchester Braintree borders site is in closer proximity to Colchester. As one of the major centres in the region, Colchester offers a full range of facilities including a hospital and is a major shopping and cultural destination. This would provide high order services not on the garden community within a closer proximity with the opportunities for public transport, walking and cycling links.</p>
	Option 2: South of A120 and North of Marks Tey Existing Settlement	- 17,182 homes - 9 ha mixed use - 11 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain / Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain 5) Resilience – Uncertain / Positive	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
			6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	Colchester is also a major employer in the region and provides a good level and mix of employment opportunities. There is the opportunity to access these opportunities via public transport, walking and cycling.
	Option 3: South of A120 Focus	- 13,105 homes - 7 ha mixed use - 9 ha employment land	1) Physical limitations – Uncertain 2) Impacts – Uncertain 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain 5) Resilience – Uncertain / Positive 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	
	Option 4: Maximum Land Take	- 27,841 homes - 16 ha mixed use	1) Physical limitations – Uncertain 2) Impacts – Negative	



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
		- 15 ha employment land	3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain / Negative 5) Resilience – Uncertain 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	
West of Braintree	Option 1: Braintree DC only	- 9,665 homes - 12 ha mixed use - 10 ha employment land	1) Physical limitations – Uncertain / Negative 2) Impacts – Uncertain / Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain / Negative 5) Resilience – Uncertain / Positive 6) Housing – Significantly positive 7) Employment – Uncertain / Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	<p>The West of Braintree garden community is suitable and deliverable. Further work will continue to be undertaken with Uttlesford District Council who will be shortly deciding whether to take forward additional land within UDC. If UDC chose to take this option forward, then further evolutions of the proposals will take place, taking into account a wider development area.</p> <p>Officers have balanced the impacts of development, such as the loss of high quality agricultural land and the change in character of the</p>



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
	Option 2: Braintree DC and Uttlesford DC Land	<ul style="list-style-type: none"> - 12,949 homes - 16 ha mixed use - 13 ha employment land 	<ul style="list-style-type: none"> 1) Physical limitations – Uncertain / Negative 2) Impacts – Uncertain / Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Uncertain / Negative 5) Resilience – Uncertain / Positive 6) Housing – Significantly positive 7) Employment – Uncertain / Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain 	<p>area, with the benefits of the long term delivery of new homes, infrastructure and community facilities and consider that a new standalone garden community is suitable for West of Braintree and are recommending that this is taken forward in the Local Plan.</p>
CAUSE 'Colchester Metro Plan'	N/A - Option 1: Metro Plan submission	6,000 to 8,000 dwellings proposed by CAUSE	<ul style="list-style-type: none"> 1) Physical limitations – Negative 2) Impacts – Significantly negative 3) Environment Amenity – Significantly negative 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly negative 7) Employment – Uncertain 8) Mixed-use – Uncertain 	<p>The CAUSE option has been rejected due its inability to deliver the required growth, linked to deliverability / developability and the availability / lack of promotion of land within the model to the required scales. It is also not considered that a series of smaller developments can successfully combine to meet the requirements of sustainability / Garden City principles.</p>



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
			9) Environmental Quality & Sustainability – Negative 10) Developability / Deliverability – Significantly Negative	
Monks Wood	N/A - Option 1: Proposal as submitted	- Up to 15,000 homes (5,151 homes in plan period) - 245,300m ² of non-residential (mix of commercial / retail / leisure etc.)	1) Physical limitations – Uncertain 2) Impacts – Uncertain / Negative 3) Environment Amenity – Uncertain / Negative 4) Transport – Negative 5) Resilience – Uncertain / Negative 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability – Uncertain	Monks Wood is currently located on the highly trafficked and single carriageway section of the A120. The only other roads in the vicinity are very rural lanes in the vicinity and no opportunity to access a site of this size by other routes. If the A120 project is to go ahead, 1 of the 5 options could see the new A120 run through the site, the other 4 would be distant from the site. Whilst any upgrade option would provide capacity on the existing A120 network, there are no guarantees that the project will go forward. With the exception of option A travel to the strategic highway network would need to be via Marks Tey to the east or Braintree to the west. In addition the project is not due to complete until 2026, so completions would not be able to start until that date. The employment market in Braintree is less strong than Colchester and major new employment areas are proposed on the west side of Braintree which is in close



Option	Sub-Option	Indicative dwelling yield and amount of mixed use / employment land (ha)	Summary of sustainability impacts highlighted in the SA (note: the options were re-assessed at this stage in light of emerging evidence and in response to consultation comments)	Reasons for Selection / Rejection
				proximity to the West of Braintree garden community.

2.4.3 Different Permutations of Garden Community Options

The following Garden Communities permutations were explored for their cumulative impacts:

Scenario	Sites forming Permutation			Why considered a reasonable alternative?	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
Allocated GCs	Tendring / Colchester Borders	Braintree / Colchester Borders	West of Braintree	This is the preferred selection of Garden Communities, reflecting the most dispersed, distinct areas of the strategic area.	1) Physical limitations – No impact 2) Impacts – No impact 3) Environment Amenity – No impact 4) Transport – Uncertain 5) Resilience – Positive 6) Housing – Significantly positive 7) Employment – Positive 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - No impact	The preferred Garden Communities reflected deliverability considerations including the availability of sites, and an overall evaluation of the combination of allocations and policies that would produce the most sustainable pattern of growth. The deliverability and sustainability of Garden Communities was considered to be best served by their location in three distinct areas of the strategic area.



Scenario	Sites forming Permutation			Why considered a reasonable alternative?	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
1.	West of Braintree	Monks Wood	Tendring / Colchester Borders	This scenario has been identified in light of an assumption that A120 re-routing will either benefit (i.e. improve access to) one of Monks Wood or the Colchester / Tendring Borders Garden Community (based on the options currently being consulted upon at the time of writing). This views Monks Wood as a more direct alternative to the Colchester / Tendring Borders Garden Community than other options.	1) Physical limitations – No impact 2) Impacts – No impact 3) Environment Amenity – No impact 4) Transport – Uncertain 5) Resilience – Positive 6) Housing – Positive 7) Employment – Uncertain 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - No impact	Please see reasons for rejecting the Monks Wood option above.
2.	Metro Plan	Tendring / Colchester Borders	North of Colchester	This scenario represents an eastern focus of Garden Communities to address historical undersupply in Tendring (and the lack of an up to date development plan since 2011).	1) Physical limitations – Negative 2) Impacts – Negative 3) Environment Amenity – No impact 4) Transport – Positive 5) Resilience – Positive 6) Housing – Significantly negative 7) Employment – Negative 8) Mixed-use – Uncertain 9) Environmental Quality & Sustainability – Negative 10) Developability / Deliverability - No impact	Please see reasons for rejecting the Metro Plan and North of Colchester options above.



Scenario	Sites forming Permutation			Why considered a reasonable alternative?	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
3.	Metro Plan	Tendring / Colchester Borders	Colchester / Braintree Borders	This scenario was identified within the CAUSE 'Metro Plan' submission. It considers that the Metro Plan should be supplemented with a Garden Community at Tendring / Colchester Borders alongside a smaller amount of growth at the Colchester / Braintree Borders at a scale similar to Thorpe-le-Soken, Weeley, Great Bentley and Alresford, with development focused up to a 10minute walking distance from Marks Tey station.	1) Physical limitations – No impact 2) Impacts – Negative 3) Environment Amenity – No impact 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Significantly negative 7) Employment – Uncertain 8) Mixed-use – Uncertain 9) Environmental Quality & Sustainability – Negative 10) Developability / Deliverability - No impact	Please see reasons for rejecting the Metro Plan option above.
4.	North Colchester	Colchester / Braintree Borders	Tendring / Colchester Borders	This scenario has been identified based on Colchester being the largest, main settlement and 'regional centre' within the North Essex area, and focuses single development Garden Community options (i.e. not a series of expanded settlements as per the Metro Plan option) in this broad area.	1) Physical limitations – Negative 2) Impacts – Negative 3) Environment Amenity – Negative 4) Transport – Positive 5) Resilience – Uncertain 6) Housing – Negative 7) Employment – Negative 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - No impact	Please see reasons for rejecting the North of Colchester option above.



Scenario	Sites forming Permutation			Why considered a reasonable alternative?	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
5.	West of Braintree	Monks Wood	Colchester / Braintree Borders	This scenario represents a western focus of Garden Communities to address the fact that housing in Braintree is relatively unaffordable.	1) Physical limitations – Negative 2) Impacts – Negative 3) Environment Amenity – Negative 4) Transport – Uncertain 5) Resilience – Positive 6) Housing – Negative 7) Employment – Negative 8) Mixed-use – Significantly positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - No impact	Please see reasons for rejecting the Monks Wood option above.
6.	Monks Wood	West of Braintree	N/A	This scenario also represents a western focus to address the fact that housing in Braintree is relatively unaffordable, however with two Garden Communities only.	1) Physical limitations – No impact 2) Impacts – No impact 3) Environment Amenity – No impact 4) Transport – Negative 5) Resilience – Uncertain 6) Housing – Significantly negative 7) Employment – Significantly negative 8) Mixed-use – Positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - No impact	Please see reasons for rejecting the Monks Wood option above.
7.	West of	Colchester	Metro Plan	This scenario represents a	1) Physical limitations – No impact	Please see reasons for rejecting the Metro



Scenario	Sites forming Permutation			Why considered a reasonable alternative?	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
	Braintree	/ Braintree Borders		distribution that best responds to the notion of each LPA meeting their own identified needs in their administrative areas with no cross-boundary implications.	2) Impacts – No impact 3) Environment Amenity – No impact 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Negative 7) Employment – Positive 8) Mixed-use – Uncertain 9) Environmental Quality & Sustainability – Negative 10) Developability / Deliverability - No impact	Plan option above.
8.	Metro Plan	Tendring / Colchester Borders	West of Braintree	This scenario has been identified as it avoids the A120 re-routing uncertainty that exists at the current time. Under this scenario, three Garden Communities have been explored, to maximise the certainty of developability in the plan period.	1) Physical limitations – No impact 2) Impacts – Uncertain 3) Environment Amenity – No impact 4) Transport – Positive 5) Resilience – Significantly positive 6) Housing – Negative 7) Employment – Positive 8) Mixed-use – Uncertain 9) Environmental Quality & Sustainability – Negative 10) Developability / Deliverability - No impact	Please see reasons for rejecting the Metro Plan option above.
9.	Tendring / Colchester	West of Braintree	N/A	This scenario has been identified as it avoids the A120 re-routing	1) Physical limitations – No impact 2) Impacts – No impact	This alternative has been rejected as it would not meet the North Essex



Scenario	Sites forming Permutation			Why considered a reasonable alternative?	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
	Borders			uncertainty that exists at the current time. Under this scenario, two Garden Communities have been explored.	3) Environment Amenity – No impact 4) Transport – Positive 5) Resilience – Positive 6) Housing – Significantly negative 7) Employment – Uncertain 8) Mixed-use – Positive 9) Environmental Quality & Sustainability – Significantly positive 10) Developability / Deliverability - No impact	Authorities' housing requirement. The deliverability and sustainability of the Garden Communities was considered to be best served by their location in three distinct areas of the strategic area.

2.4.4 Different Approaches to Delivering Strategic Growth

This part of the SA explores whether Garden Communities are the most sustainable option for the strategic area through a high-level assessment on a broadly comparable basis. It explores the sustainability impacts of the following different approaches.

Option	Summary of sustainability impacts highlighted in the SA	Reasons for Selection / Rejection
1. Garden Communities	<p>There will be positive Impacts on the majority of the sustainability criteria.</p> <p>There will be uncertain Impacts on the following sustainability criteria: rural affordable housing / retail and other services in rural areas / locating development in close proximity to town</p>	Garden Communities can ensure that infrastructure is delivered prior or at the same time as the commencement of homes. The approach can adhere to the aspirations of Garden City Principles, as proposed through the Garden Community model by the North Essex Authorities taking an interventionist approach to strategic development.



	<p>centres / encourage the rural economy / impact on a national, international or European (Natura 2000) designated site / improve rural public transport / required improvements to utilities infrastructure / capacity in GP services / designations, features and areas of historical, archaeological and cultural value / greenhouse gases / renewable energy / water resources and sewerage capacity / air quality along the A12 or A120 / development outside development boundaries</p> <p>There will be negative Impacts on the following sustainability criteria: requiring significant supporting transport infrastructure / landscapes / the loss of high quality agricultural land.</p>	
<p>2. 'Traditional Approaches' to strategic growth (responding to expansions of existing urban areas and other settlements within the strategic area).</p>	<p>There will be positive Impacts on the majority of the sustainability criteria.</p> <p>There will be uncertain Impacts on the following sustainability criteria: meeting Gypsy and Traveller pitch requirements / access to health facilities / rural affordable housing / retail and other services in rural areas / locating development in close proximity to town centres / encourage the rural economy / easy public travelling distance to town centres / improve public transport networks to town centres / increase and/or improve the availability and usability of sustainable transport modes / integration of transport modes / concentrate development and facilities where access via sustainable travel is greatest / impact on a national, international or European (Natura 2000) designated site / improve rural public transport / required improvements to utilities infrastructure / capacity in GP services / designations, features and areas of historical, archaeological</p>	<p>There has been a lack of available, suitable options for urban extensions at the scale required submitted throughout the Local Plan process. In addition, 'traditional approaches' are unlikely to deliver 'infrastructure first' and adhere to the aspirations of Garden City Principles, as proposed through the Garden Community model by the North Essex Authorities taking an interventionist approach to strategic development.</p>



	<p>and cultural value / greenhouse gases / renewable energy / water resources and sewerage capacity / air quality along the A12 or A120 / development outside development boundaries</p> <p>There will be negative Impacts on the following sustainability criteria: requiring significant supporting transport infrastructure / landscapes / the loss of high quality agricultural land.</p>	
<p>3. New Towns (without the application of Garden City Principles in their development)</p>	<p>There will be positive Impacts on few of the sustainability criteria.</p> <p>There will be uncertain Impacts on the following sustainability criteria: community facilities / the range and affordability of housing / access to health facilities / access to sport and recreation facilities, open space and accessible green space / access by walking or cycling / locate development within easy public travelling distance to town centres / improve public transport networks / the delivery of a range of employment opportunities / employment opportunities / support business innovation / improve rural public transport / conserve and enhance species diversity / sustainable transport modes / required improvements to utilities infrastructure / capacity in GP services / greenhouse gases / renewable energy / water resources and sewerage capacity / air quality along the A12 or A120 / development outside development boundaries / access to jobs, shopping, services and leisure facilities / requiring significant supporting transport infrastructure / high quality design principles.</p> <p>There will be negative Impacts on the following sustainability criteria: social inclusion / rural affordable housing / well designed</p>	<p>There has been a lack of available, suitable options for New Towns submitted throughout the Local Plan process. In addition, New Towns are unlikely to deliver 'infrastructure first' and adhere to the aspirations of Garden City Principles, as proposed through the Garden Community model by the North Essex Authorities taking an interventionist approach to strategic development.</p>



and sustainable housing / meeting Gypsy and Traveller pitch requirements / improve existing training and learning facilities / potential impact on a national, international or European (Natura 2000) designated site / maintain and enhance sites otherwise designated for their nature conservation interest / conserve and enhance natural/semi natural habitats / integration of transport modes / requiring significant supporting transport infrastructure / landscapes / the loss of high quality agricultural land / minimise congestion at key destinations / school places / capacity in GP services / designations, features and areas of historical, archaeological and cultural value / open space / ability to mitigate / AQMAs.



3. History of Alternatives – The Section One Policies

3.1 Introduction

This Section sets out the history of the Section One policies. These have been developed from the Preferred Options stage onwards.

This section contains the following policies, and their appraisal throughout the Section One plan-making process covering the Preferred Options and Draft Publication stages.

- Vision for the Strategic Area
- Strategic Objectives
- Policy SP1 – Presumption in Favour of Sustainable Development
- Policy SP2 – Spatial Strategy for North Essex
- Policy SP3 – Meeting Housing Needs
- Policy SP4 – Providing for Employment and Retail
- Policy SP5 – Infrastructure and Connectivity
- Policy SP6 – Place Shaping Principles
- Policy SP7 – Development and Delivery of New Garden Communities in Essex
- Policy SP8 – Tendring / Colchester Borders Garden Community
- Policy SP9 – Colchester / Braintree Garden Community
- Policy SP10 – West of Braintree Garden Community



3.2 Section One Policies

Policy	Alternatives considered	Summary of sustainability impacts highlighted in the SA	Reasons for Selection in light of the alternatives
Vision for the Strategic Area	None considered reasonable	N/A	The Vision can be seen as a general summary of the content of the Strategic Section One for Local Plans. As such, the Vision as written was selected. The individual elements of the Vision are elaborated on in more detail within other policies of the document. Alternatives are explored in more detail within the assessment of these policies later within this SA, commensurate to their individual context.
Strategic Objectives	None considered reasonable	N/A	Similar to the Vision, the Strategic Objectives can be seen as a general summary of the content of the Strategic Section One for Local Plans. The Strategic Objectives reflect those of the strategic area and the requirements of local plans as espoused within the NPPF; as a result of this, the objectives were selected and no other alternatives can be considered reasonable. The individual elements of the Strategic Objectives are elaborated on in more detail within other policies of the document. Alternatives are explored in more detail within the assessment of these policies later within this SA, commensurate to their individual context.
Policy SP1 –	None considered reasonable	N/A	Comments received during the Preferred Options



Policy	Alternatives considered	Summary of sustainability impacts highlighted in the SA	Reasons for Selection in light of the alternatives
Presumption in Favour of Sustainable Development			consultation stage identified a possible approach that the policy insist upon an 'infrastructure first' qualification. The notion of 'infrastructure first' is established throughout the plan and included within the Section One at more relevant points. As such, no alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. As such the Policy was selected. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.
Policy SP2 – Spatial Strategy for North Essex	This Policy of Section one is dealt with earlier on in this Annex.		
Policy SP3 – Meeting Housing Needs	Alternative 1 – A lower uplift than the policy approach. This responds to 8% uplift over the HMA and represents an indicative split where Tendring still meets its SNPP provision and the uplift is reduced for the HMA partner authorities. This has been appraised as specific to the OAN alternative, and also of an 'indicative lower' level of growth. (Preferred Options SA 2016, Draft Publication SA 2017)	Uncertain impacts highlighted for housing and landscapes associated with growth levels that are still high in comparison to previous Local Plan targets, but do not meet the area's OAN as significantly.	Policy SP3 will have significantly positive impacts on housing and uncertain impacts on landscapes. The NPPF is clear that the HMA as whole should work to meet its OAN in full, provided that it has the sustainable capacity to do so consistent with the policies in the NPPF. How provision should be distributed between districts will depend on supply factors and policy objectives. In response to this, it should be noted that each authority has identified a justified and achievable indicative housing target in line with their work towards a Local Plan in each instance and these needs are reflected in the policy.



Policy	Alternatives considered	Summary of sustainability impacts highlighted in the SA	Reasons for Selection in light of the alternatives
	<p>Alternative 2 – A higher uplift than the policy approach. This responds to 17% uplift over the HMA and represents an approach where Tendring provides only enough homes to meet its projection before any uplift is applied. This has been appraised as specific to the OAN alternative, and also of an ‘indicative higher’ level of growth. (Preferred Options SA 2016, Draft Publication SA 2017)</p>	<p>Significantly positive impacts on housing due to growth higher than OAN, but with corresponding negative impacts on landscapes as a result. Uncertain impacts are also highlighted for biodiversity and water quality as the Appropriate Assessment does not explore whether mitigation is possible at this level of growth.</p>	
<p>Policy SP4 – Providing for Employment and Retail</p>	<p>Alternative 1 – Forecasts based on EEFM findings only (an indicative higher amount of jobs). (Preferred Options SA 2016, Draft Publication SA 2017)</p>	<p>Significantly positive impacts in the long term, with positive impacts in the short-medium term.</p>	<p>Policy SP4 will have significantly positive short-long term impacts on economic growth. The impacts of the alternative will be similar to the preferred policy methodology, with significant positive impacts on long term employment (SO5), in line with the ‘mixed use’ and sustainable transport infrastructure opportunities associated with Garden Communities. Impacts in the short to medium term are however less significant, due to the alternative primarily not initially factoring in commuting; this leads to forecasts showing a disparity between population growth and job growth. The OAN Report indicates that in Braintree and Colchester there would be a higher population than identified in the 2012</p>



Policy	Alternatives considered	Summary of sustainability impacts highlighted in the SA	Reasons for Selection in light of the alternatives
			<p>Sub National Population Projections (SNPP), suggesting that if population grows in line with the official projection it may not provide enough workers. This issue would rely on being resolved by changes in commuting. The OAN Report also adds that for Tendring the EEFM figure would be well below the SNPP, confirming that trend-based population growth would result in a labour surplus. For these reasons, the alternative has been rejected and the preferred policy approach selected.</p>
Policy SP5 – Infrastructure and Connectivity	None considered reasonable	N/A	<p>The infrastructure requirements are specific to the content of the Strategic Section One for Local Plans and no other alternatives can be considered reasonable. As such, the Policy was selected. It can be considered that alternatives could only regard different permutations of alternatives explored within the SA, in particular those related to Spatial Strategy and Garden Community options explored within this SA and considered in the plan-making process</p>
Policy SP6 – Place Shaping Principles	None considered reasonable	N/A	<p>In so far as the place shaping principles of the Policy reiterate sustainable land use requirements as espoused in the NPPF and PPG, it is considered that there are no reasonable alternative approaches that could be considered distinctively different yet still meet tests of soundness. As such the preferred policy approach has</p>



Policy	Alternatives considered	Summary of sustainability impacts highlighted in the SA	Reasons for Selection in light of the alternatives
			been selected.
Policy SP7 – Development and Delivery of New Garden Communities in Essex	None considered reasonable	N/A	The requirements are specific to the content of the Strategic Section One for Local Plans and no other alternatives can be considered reasonable. It can be considered that alternatives could only regard different permutations of alternatives explored, in particular those Spatial Strategies and Garden Communities explored within this SA and considered in the plan-making process. As such the preferred policy approach has been selected.
Policy SP8 – Tendring / Colchester Borders Garden Community	None considered reasonable	N/A	The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such no other alternatives can be considered reasonable and the preferred policy approach has been selected.
Policy SP9 – Colchester / Braintree Garden Community	None considered reasonable	N/A	The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable



Policy	Alternatives considered	Summary of sustainability impacts highlighted in the SA	Reasons for Selection in light of the alternatives
			<p>development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such no other alternatives can be considered reasonable and the preferred policy approach has been selected.</p>
Policy SP10 – West of Braintree Garden Community	None considered reasonable	N/A	<p>The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such, the Policy was selected and no other alternatives can be considered reasonable.</p>



4. Consultation Comments Received

4.1 Preferred Options Consultation Stage

Consultee	Comment	SA Response
CAUSE	<p>The Sustainability Appraisal contains a number of serious inconsistencies and omissions. This commentary focuses on :</p> <p>The erroneous inclusion of West Colchester Garden Community in the Preferred Options and the equally erroneous rejection of North Colchester Garden Community.</p> <p>The erroneous exclusion of CAUSE’s Metro Plan, prepared by CAUSE’s professional team. This alternative has received recognition in the wider planning community but has been misunderstood by the authors of the sustainability appraisal. It is a matter of regret that CAUSE has been unable to explain it to the appraisers, despite repeated requests to do so.</p>	<p>Noted. The SA assesses the preferred content of the Section One as it is presented, alongside the assessment of reasonable alternatives. Reasons for rejection and selection are included as per Planning Practice Guidance – Strategic environmental assessment and sustainability appraisal, which states, ‘the sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.’ All content of the Section One, as well as those reasonable alternatives including the Metro Plan option, have been re-assessed where necessary within the SA in light of updated evidence and consultation responses.</p>
	<p>The principal argument in favour of West Colchester GC appears to be that the location will ‘stimulate required infrastructure delivery’. This political argument is highly inappropriate in a sustainability appraisal. Garden settlements should be located in the most sustainable locations from the point of view of society as a whole, not with the intention of securing funding from other parts of the public sector.</p> <p>We conclude that the infrastructure requirements to ensure that West Colchester succeeds as a garden community are too high, both in terms of financial viability and practical deliverability. The location does not support the NPPF principle of reducing journeys and it appears that the</p>	<p>Noted. The Sustainability Appraisal has been amended to reflect these comments.</p>



Consultee	Comment	SA Response
	<p>sustainability appraisal favours it for political rather than economic reasons.</p>	
	<p>Severance.</p> <p>Marks Tey already suffers from severe severance by the A12, the A120 and the GEML. Shops are severed from the village hall which is itself is severed from the main residential area. The industrial area between road and railway has unsatisfactory and dangerous linkages to both A12 and A120.</p> <p>Without huge infrastructure investment these problems will be exacerbated in the expanded settlement. The Appraisal acknowledges the severance caused by the A12 and the GEML. It neglects to mention the additional severance caused by the current A120, the Sudbury line and the new A120 which will join the A12 in the area. Therefore, West Colchester will be a community severed in five directions. See map of Marks Tey, below.</p> <p>North Colchester is capable of forming a coherent community with its own centre and identity. The A12 forms a natural boundary which can be bridged to link the community to Severalls Industrial Park.</p> <p>There is no logic to why such extreme severance is considered acceptable at West Colchester yet the significantly lesser severance at North Colchester is not considered acceptable. The Appraisal should make more attempt to compare the search areas and analyse the differences.</p>	<p>Noted. The SA has re-assessed the options in regard to severance.</p>
	<p>Sustainability and accessibility.</p> <p>There are significant sustainable transport and accessibility issues at West Colchester GC highlighted by Place Services and by Aecom. The impact on the transport network will be exacerbated by the need for many residents to travel to work elsewhere. This is not highlighted sufficiently in the Appraisal.</p> <p>a. Road congestion. It is clear from the Appraisal that road infrastructure represents the main barrier to development at West Colchester GC. The Appraisal contradicts itself, stating, despite its own references to congestion, that the</p>	<p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>



Consultee	Comment	SA Response
	<p>A12 and A120 at West Colchester GC are 'beneficial'. Negative concerns that North Colchester GC will be reliant on the A12 and 'could' increase congestion are therefore also contradictory if the Appraisal believes that location on the A12 at Marks Tey is beneficial when it is considered a negative a few miles away.</p> <p>The Appraisal must compare like with like. The congestion effects on the A12 will be high at both North Colchester GC and West Colchester GC, arguably higher at West Colchester GC due to the larger settlement proposed and the distance from any of North Essex's designated strategic economic areas.</p> <p>b. Rail. It is extraordinary that the Appraisal neglects to discuss the capacity issues on the GEML. Aecom is clear in its assessment of the long term capacity constraints on the line, stating that Network Rail's own proposed interventions will be insufficient. West Colchester's location to encourage rail commuting is flawed.</p> <p>In addition, the accessibility issues at the station raised in the Appraisal 'limit any meaningful expansion'. Relocation of Marks Tey station is suggested, but only in the 'Maximum Land Take' option in the Aecom analysis - yet another illogical piece of analysis. The station must be central in any West Colchester GC option.</p> <p>The location of the station in the new community and the Anglia Route Study capacity forecasts make it clear that the station is not the advantage it is purported to be.</p> <p>c. Bus. The bus service from Little Tey & Marks Tey is cited as a clear advantage for developing a sustainable transport system and BRT, a clear sign that the appraisers have yet to appreciate the scale of development proposed or of infrastructure needed. This is not a location differentiator as there are bus services from all rural areas into the centre of Colchester. Nor does it form the basis for a BRT system, something which is a complex and expensive undertaking!</p> <p>By comparison, at North Colchester GC not only is there already a Park & Ride (referred to in the Appraisal) in place but already the planned provision of a dedicated bus corridor to support existing plans for 1,500 homes at Severalls Hospital (not mentioned in the Appraisal - why?).</p>	



Consultee	Comment	SA Response
	<p>Nor does the Appraisal refer to the Rapid Transit Option Appraisal being investigated to link the Severalls site, University and town centre, which would bring benefits to (and could be extended to) the North Colchester options.</p> <p>It is clear that public transport options under consideration in the north Colchester area are well advanced and would offer considerable benefits to the residents of North Colchester GC. Meanwhile proposals for the West of Colchester still range from heavy rail (cost £2bn), adapting existing rail (cost £500m) or developing a new Bus Rapid Transit system for £25m, which we suspect will do little other than further congest existing roads.</p> <p>d. Cycling & walking. Aecom notes that there are no external cycle and pedestrian ways near the West Colchester GC search area, and a quick glance at the map above makes it clear that retrospective provision will be difficult. The Appraisal neglects to mention this, nor does it refer to the distance of the settlement from Colchester and Braintree, which would discourage cycling and walking.</p> <p>With reference to North Colchester GC, the Appraisal does not cite the benefits of the 'well-established Colchester walking and cycling network linking the [North Colchester] site, the P&R, Stadium and importantly the employment and leisure area on the south side of the A12' (Aecom Garden Communities Concept & Evaluation).</p>	
	<p>e. Reducing journeys. West Colchester, as a new and stand-alone community, offers none of the benefits of existing employment which the North Colchester settlement offers. It is not a Strategic Economic Area and there is no focus for employment (Aecom refers to home-working and touch-down spaces as the employment strategy). Whilst land will be provided for employment, Aecom notes that residents of West Colchester will be attracted to Severalls and the Northern Gateway to work, which will require residents to travel by car on the A12.</p> <p>By contrast, Colchester GC will be adjacent to employment at Colchester's Strategic Economic Area of Severalls and the Northern Gateway. Aecom's schematic demonstrates this relationship.</p> <p>The Appraisal asserts that all Garden Community Options</p>	<p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>



Consultee	Comment	SA Response
	<p>will have broadly the same employment opportunities. This is clearly not the case and nor does the conclusion meet with the NPPF aim to reduce journeys to work and to locate houses for employment.</p> <p>Taking each of the three options:</p> <p>East Colchester benefits from and supports the growth of the University, the Knowledge Gateway (one of Colchester’s three Strategic Economic Areas), and the town centre.</p> <p>North Colchester benefits from and supports the Strategic Economic Area of the Northern Gateway, Severalls (and the town centre).</p> <p>West Braintree benefits from and supports the strategic employment zones of Skyline 120 and Panfield, and is on the ‘right side’ of town for employment at Stansted, where sustainable transport solutions are proposed.</p> <p>West Colchester GC is located far from any strategic employment zone and town centre.</p>	
	<p>Deliverability</p> <p>Place Services reminds us that the deliverability of West Colchester is directly linked to investment decisions by Highways England. There is no such constraint at North Colchester. Aecom and Place Services believe that the road network in its existing state must constrain development at West Colchester to between 500-900 homes.</p> <p>CAUSE believes that the GEML must be additionally considered as a constraint and questions why the Appraisal has not taken it into account.</p> <p>Finally, North Colchester GC carries a lower deliverability risk being entirely within Colchester’s boundaries.</p>	<p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>
	<p>Pollution.</p> <p>It is evident that West Colchester, situated between the A12, current A120 and new A120, will suffer from pollution and air quality issues as evidenced by the image below (Source www.airtext.info 14 September 2016). This topic is</p>	<p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>



Consultee	Comment	SA Response
	<p>not mentioned in the Appraisal's summary comparison between options although in the detail it does state that the main air quality issues for Braintree relate to traffic on the A12 and A120. Once again, the report contradicts itself, stating that cumulatively the garden communities will have a positive impact on air quality due to availability of sustainable transport but that there would be an A120 and A12 air pollution impact of North & East Colchester combined. Air quality issues need to be given far greater consideration and the inconsistencies ironed out.</p>	
	<p>Water.</p> <p>We challenge the assertion that there are major constraints on water delivery at North Colchester because Anglia Water's response to Colchester's Issues & Options consultation did not differentiate between locations (see table below). We have been unable to find the references in the Appraisal which refer to constraints at North Colchester GC.</p>	<p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>
	<p>Solar farm.</p> <p>We do not agree that a 26 hectare solar farm at North Colchester GC (within a total site of between 457ha and 681ha) prevents garden city principles being applied. This is something that could be addressed through masterplanning and exclusion zones (as required at West Colchester for underground and overhead power cables).</p>	<p>Noted. The SA has been amended.</p>
	<p>Impact on existing residents / protected zones.</p> <p>At North Colchester GC, protection could be afforded to the Dedham Vale AONB through masterplanning and green buffers, and the areas of importance at West Colchester can be protected in the same way. Too little thought is given to the entire villages (Marks Tey and Little Tey) which will be engulfed at West Colchester and the Appraisal simply states that this impact is not 'positive'. There needs to be greater consideration of the impact on the existing local residents of West Colchester.</p>	<p>Noted. The SA has been amended.</p>
	<p>Brownfield.</p>	<p>Noted.</p>



Consultee	Comment	SA Response
	<p>The plan states a preference for building on brownfield land as opposed to greenfield. But there is no mention of the brownfield element at North Colchester – the Boxted airfield. The whole CO4 5 postcode is treated as brownfield in the report from BPS Chartered surveyors. It is unclear why the SA favours West Colchester which is treated as greenfield by BPS.</p>	
	<p>Conclusion on North Colchester / West Colchester comparison</p> <p>The Sustainability Appraisal concludes that for North Colchester GC that there is limited scope for maximum sustainable benefits associated with adhering to Garden City principles. This is contradicted by much of the report's own evidence and the research prepared by Aecom and Colchester's Part 2.</p> <p>The conclusion for West Colchester GC that the location will 'stimulate required infrastructure delivery' is also flawed and makes the report look like a political attempt to secure funding rather than a genuine sustainability appraisal. A location for a garden settlement should not be chosen to stimulate infrastructure delivery, nor because it is proposed by land owners. The infrastructure requirements to ensure that West Colchester succeeds as a garden community are too high, both in terms of financial viability and practical deliverability. The location does not support the NPPF principle of reducing journeys. Planners are trying to fit a square peg to a round hole at West Colchester GC.</p>	<p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>
	<p>Assessment of CAUSE Metro Plan in the Sustainability Appraisal relating to North Essex authorities 'Part 1'</p> <p>The Sustainability Appraisal assessment of CAUSE's Metro Plan strategy is disappointing and inadequate. The absence of appropriate testing goes to the heart of soundness.</p> <p>The Appraisal takes a very narrow view of the Metro Plan, failing to acknowledge that this was part of a broader strategy which included not only the 'pearls' but also a garden community development to the East of Colchester focused on the fast employment growth zone of the University. It aims to make the area more self-supporting,</p>	<p>Noted. The SA has been amended. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options. The Metro Plan option is also included as a Garden Community Option in Appendix 1 of the Environmental Report.</p>



Consultee	Comment	SA Response
	<p>with a new rail 'halt' proposed as an early win.</p> <p>It is extraordinary that the Appraisal has "assessed" the CAUSE option as if it was intended to address the total growth through concentrated development around stations on the Colchester-Clacton/ Walton-on-the-Naze line, rather than as a contribution to growth, which could reduce the scale of development (and associated infrastructure requirements) which is being relied upon to meet growth requirements in less sustainable locations, including West Tey. The Metro Plan was never intended to address Braintree District's housing need and nor does the East of Colchester/West of Tendring garden community included in Tendring and Colchester's Preferred Options do so.</p> <p>The Sustainability Appraisal's conclusion regarding the Metro Plan is unsound and for this reason, we believe the Metro Plan option must be re-assessed.</p>	
Mike Lambert	<p>The Sustainability Appraisal in relation to Policy SP9 relies on the Aecom Report but fails to reach a conclusion on each of the options or indeed, to propose any criteria for how the preferred option for growth should be selected.</p> <p>The Sustainability Appraisal Part 1 fails to adequately test and examine the landscape impact of development north of the A120, especially the north east quadrant bounded by A120, Tey Road and the Sudbury-Marks Tey Branch Line. The Sustainability Appraisal gives inadequate weight to the quality and special character of this area, primarily because it has no designated protection under current planning policy.</p>	<p>Noted. Recommendations are included within the SA.</p> <p>Noted. The SA has re-assessed the options in light of new evidence where it is applicable and relevant to all options.</p>
Andrew Martin Planning on behalf of R F West Ltd, Livelihoods and David G Sherwood	On the west of Colchester/Marks Tey options. Unlike the AECOM report, that carries out a performance review of the site options (volume 3), the SA draws no conclusions on a preferred direction for growth within the broad area identified and as split into four options.	Noted. Recommendations are included within the SA.



Consultee	Comment	SA Response
Natural England	Marks Tey Brickpit Site of Special Scientific Interest (SSSI) is in close proximity to these proposals and ... We would expect the Sustainability Appraisal to identify any potential impacts and any mitigation measures which may be required.	The relevant plan policy includes criteria related to the Marks Tey Marks Tey Brickpit SSSI, and the SA assesses that this is an adequate inclusion.
	Landscapes – we recommend using the National Character Areas which divide England into 159 natural areas, each defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity. The new NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Colchester falls within NCA Profile: 86 South Suffolk and North Essex Clayland, NCA Profile:111 Northern Thames Basin, and NCA Profile: 81 Greater Thames Estuary.	Noted. These NCAs have been factored into the appraisal of the Garden Community options.
	Natural England is generally supportive of the Sustainability Objectives used in the SA of the Part 1 Local Plan.	Noted.
	The assessment of GCWC1 needs to acknowledge the proximity of Marks Tey Brickpit SSSI to the road and dualling proposals around Marks Tey and the potential for significant impacts on the SSSI.	Noted. The dualling implications are not subject to appraisal in the SA as a preferred route has not been identified by the relevant bodies.
	Infrastructure and Connectivity - has identified 0 for Sustainability Objective 5, however this has not taken into account the impacts to Marks Tey Brickpit SSSI.	Noted. The dualling implications are not subject to appraisal in the SA as a preferred route has not been identified by the relevant bodies.
	Policy SP9 states that, paragraph 6.11.2 Significant and Temporal Effects states that – ‘Despite requirements ensuring the protection and/or enhancement of biodiversity assets within and surrounding the site including the Domsey Brook and Roman River corridors, there will be	The assessment of SP9 has been amended to reflect the new policy wording / criteria.



Consultee	Comment	SA Response
	<p>only minor impacts associated with impacts on sites of nature conservation interest; this is due to no specific mention of Marks Tey Brickpit SSSI. Any site option explored in Policy SP6 would have some degree of impact on this designation, as indicated by being in the SSSI's Impact Risk Zone (IRZ) which requires consultation with Natural England.' Natural England disagrees with the assessment of only minor impacts, due to no specific mention of the Marks Tey Brickpit SSSI. The allocation has been located partially within/in very close proximity to the SSSI. This needs to be appropriately assessed.</p>	
	<p>Indicators – we would not recommend using SSSI condition as an indicator, a better indicator would be impacts (direct and indirect) on designated sites.</p>	<p>Noted. This has been amended.</p>
	<p>From the information provided the strategic locations for growth in Colchester appear to be broadly located in areas which are likely to have the least impact on nationally and internationally designated sites and landscapes.</p>	<p>Noted.</p>



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