



# Tendring District Council Local Plan Section Two: Draft Publication (Regulation 19)

## **Sustainability Appraisal (SA) Addendum: Appraisal of New Policy HP4 - June 2017**







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# 1. Introduction

## 1.1 Background

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Tendring District Council commissioned Place Services of Essex County Council to undertake an independent Sustainability Appraisal (SA) on the Tendring Local Plan.

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 Addendum to the Regulation 19 Draft Publication SA of the Tendring District Council Local Plan addresses an erroneously omitted policy from the original Draft Publication Local Plan and accompanying SA; that of 'Health Places' Policy HP4, regarding the safeguarding of green space in the District.



## 2. Policy HP4: Safeguarded Green Space

### 2.1 The Appraisal of Policy HP4: Safeguarded Green Space

#### 2.1.1 Policy HP4: Safeguarded Green Space

The policy is as follows:

##### Policy HP4 – Safeguarded Green Space

Development that would result in the loss of the whole or part of areas designated as Safeguarded Local Greenspaces, as defined on the Policies Map and Local Maps will not be permitted unless the following criteria are met:

- a. The site is replaced by the provision of new site at least equal in quality and size and accessible to the community, which the existing site serves;
- b. It is demonstrated that there is no longer a demand for the existing site;
- c. The site is not appropriate for other open space functions; and
- d. The development of the site would not result in the loss of an area important to visual amenity.

Land is also allocated for the future expansion of the Weeley Crematorium, the Burrs Road Cemetery (Clacton), Dovercourt Cemetery and the Kirby Cross Cemetery as shown on the various Policies Maps and Local Maps for these areas. New cemeteries and other burial places may be permitted on existing private land providing that relevant Local Plan policies are satisfied.

#### Significant, Temporal and Secondary Effects

Table 1: Impact on Sustainability Objectives: Policy HP4

Temporal Impacts	Sustainability Objectives (SO)							
	1	2	3	4	5	6	7	8
Short	N/A	+	N/A	N/A	++	+	N/A	N/A
Medium	N/A	+	N/A	N/A	++	+	N/A	N/A
Long	N/A	+	N/A	N/A	++	+	N/A	N/A

The policy will have positive impacts on relevant sustainability objectives. This includes an efficient use of land, in so far as the policy seeks to ensure that green space is safeguarded in the first instance, but also does not restrict the principle of development on such green spaces should the policy criteria be met. This ensures the most efficient use of land. Through the approach to safeguarding and the policy criteria, there may be positive secondary impacts on environmental assets in some instances.



The Policy will have significant positive impacts on health and social outcomes through the safeguarding of green space, and replacement where necessary of equal size and quality. The Policy is flexible and supports the NPPF's presumption on favour of sustainable development through an approach that allows proposals that would see the loss of green space to be determined on the balance of their merits and only where existing open space is either not in demand as such.

### **Alternatives Considered**

It is considered that no alternative approaches could be considered reasonable in light of the requirements to seek the retention of green spaces for positive health purposes and outcomes, but also in consideration of a flexible approach to development on such land should replacement green space be secured and delivered. Any deviations from the approach could be considered unreasonable in line with the requirements of the NPPF.

### **Proposed Mitigation Measures / Recommendations**

No mitigation measures or recommendations are proposed.



# 3. Updated Cumulative and Synergistic Impacts of the Healthy Places Policies

## 3.1 Introduction

This section explores the revised cumulative and synergistic impacts of the Local Plan’s Healthy Places policies as a result of the introduction of the new Policy HP4: Safeguarded Green Spaces. The policies have been grouped as they appear in the Plan. Cumulative impacts are identified per sustainability objective, with each option exploring whether any exist on a thematic basis.

## 3.2 Cumulative Impacts of the Healthy Places Policies

Policy	Sustainability Objectives (SO)							
	1	2	3	4	5	6	7	8
Policy HP1	N/A	N/A	N/A	N/A	++	+	N/A	N/A
Policy HP2	N/A	N/A	N/A	+	++	N/A	N/A	N/A
Policy HP3	N/A	N/A	N/A	N/A	++	++	N/A	N/A
Policy HP4	N/A	+	N/A	N/A	++	+	N/A	N/A
Policy HP5	N/A	N/A	+	N/A	++	+	N/A	N/A
Cumulative Impact	0	0	0	0	++	+	0	0

There will be no additional cumulative impacts regarding the Plan’s Healthy Places policies as a result of the introduction of Policy HP4. As such, the impacts highlighted within the Local Plan’s Regulation 19 Draft Publication SA remain unchanged. These are re-iterated below:

‘The Plan’s Healthy Places policies can be seen to have no cumulative impacts on any of the Sustainability Objectives to which the policies are not directly related; however there will be significant positive cumulative impacts associated with the principle focus of these policies, that being building communities with better social outcomes related to health. There can also be expected to be additional positive impacts on the enhancement of biodiversity through multi-purpose Green Infrastructure provision in accumulation with quality standards for Natural and Semi-Natural Greenspace, Green Corridors and general park and garden amenity space. Although there are likely to be pressures between human use and biodiversity interest on individual sites, there can still be expected to be positive outcomes for biodiversity cumulatively through the integration of a multitude of recreation and non-recreation based open space provision throughout the Plan area.’



## 4. Updated Conclusions and Recommendations

### 7.1 Conclusions: Whole Plan Sustainability

This Section summarises the revised impacts raised in the assessment of each element of the Plan as a result of the introduction of Policy HP4: Safeguarded Green Spaces. The table below shows the impacts highlighted in the SA and the Section One SA.

There will be no change to those overall impacts highlighted for the Plan's Health Places Policies within the Local Plan's Regulation 19 Draft Publication SA as a result of the introduction of Policy HP4. As such, the impacts highlighted within the Local Plan's Regulation 19 Draft Publication SA remain unchanged. These are re-iterated below:

**Table 2: The Cumulative and Synergistic Effects of the Plan**

Policy	Sustainability Objectives (SO)							
	1	2	3	4	5	6	7	8
Sustainable Places Policies	++	++	++	++	++	++	+	+
Healthy Places Policies	0	0	0	0	++	+	0	0
Living Places Policies	++	++	0	+	++	0	0	0
Prosperous Places Policies	0	++	++	++	++	+	0	0
Protected Places Policies	0	+	+	0	0	++	0	++
Connected Places Policies	0	++	++	++	0	0	+	0
Delivering Places Policies	++	++	++	++	++	+	0	0
Site Allocations (inc. the Garden Community)	++	++	++	+	+	?	?	?



## 7.1.1 Sustainability Objective 1: To provide decent and affordable homes for all

### Significantly Positive Impacts

The Plan's Living Places Policies can be seen to have **significant positive impacts** on both housing delivery, including housing of a range of types and tenures to meet identified needs, and development that represents an efficient use of land by way of accessibility and ensuring suitable densities.

Housing growth is focused on the District's main settlements in Section Two, in accordance with the Spatial Strategies of both Sections One and Two. This focuses growth proportionately to the settlements within the settlement hierarchy with the highest existing populations, offering **significant positive benefits** in these areas particularly regarding affordable housing delivery.

## 7.1.2 Sustainability Objective 2: To ensure that development is located sustainably and makes efficient use of land

### Significantly Positive Impacts

The Plan's policies seek to effectively deliver housing in line with the Settlement Hierarchy; primarily to Strategic Urban Settlements, Smaller Urban Settlements and Rural Service Centres. These locations have existing services, jobs and public transport infrastructure.

The Plan's preference for a number of Strategic Mixed Use developments in line with the above, particularly within the Clacton area, enables growth to develop in line with the social and economic sustainability objectives to deliver a suitable mix of types and tenures in sustainable locations. In the long term, the development of the Garden Community will ensure similar aspirations elsewhere in the District.

The Garden Community at Tending / Colchester Borders (assessed in Section One) will have **significantly positive impacts** associated with the provision of new infrastructure in line with the scale proposed. These impacts are strengthened in further consideration of such infrastructure provision in the broad location within the District, which can serve the existing and wider rural communities in an accessible location. Section Two of the Plan focuses on the allocation of a number of Strategic Mixed Use and Housing sites in few locations commensurate to the Settlement Hierarchy. This gives rise to a number of positive impacts in regard to the sustainable use of land.

The majority of the Plan's housing allocations across the Plan area can be seen to have **significantly positive impacts** regarding the re-use of previously developed land in accessible locations and in close proximity to the service centre. This approach is preferable in sustainability terms to the allocation of a larger number of smaller sites on a more piecemeal basis. This not only represents a sustainable and efficient use of land but also ensures positive impacts on the quality of the townscape and landscape, particularly in accordance with the Plan's site specific policies that ensure masterplanning, and also the specific thematic policy content relevant to design and amenity.



### 7.1.3 Sustainability Objective 3: Harness the District's economic strengths

#### Significantly Positive Impacts

The Plan's Prosperous Places Policies will have **significant positive cumulative impacts** on the economy and employment growth across a range of sectors as per the general focus of such policies. In addition there will also be a cumulative strengthening of ensuring that development makes an efficient use of land by being focused sustainably and assimilated in areas that will support the regeneration of identified areas.

There will also be **significant positive cumulative impacts** on minimising the need to travel and the general locational requirements of the policies and allocations for different types of employment development suitable for different parts of the District. As a result of this, the policies and allocations within the Prosperous Places Policies will ensure that development is located in reflection of and in response to skills within the District, notably those of urban and rural areas.

The Plan's allocated Garden Community (Section One) and Strategic Mixed Use development allocations will ensure **positive effects** regarding access to a range of employment opportunities in commuting distance. This ensures that homes are supported by employment opportunities, a key tenet of social and economic sustainability.

The Plan's strategic mixed use and employment allocations cumulatively ensure that a range of new employment opportunities will be forthcoming throughout the Plan area, across a range of sectors. The Plan also seeks to safeguard port related development.

The main focus of growth in Strategic Urban Settlements, Smaller Urban Settlements and the Rural Service Centre of Weeley can be expected to have **significant positive impacts** on the vitality and viability of the Plan's town centres, with the aspiration that increased growth will stimulate improvements and investment.

### 7.1.4 Sustainability Objective 4: Minimise transport growth whilst capturing the economic benefits of international gateways

#### Positive Impacts

**Positive impacts** will be realised regarding aspirations to minimise transport growth through the general focus of the Plan's housing allocations to existing towns and the locational criteria for future housing proposals.

The Connected Places Policies will have **significant positive cumulative impacts** on the primary aspirations of the Policies: that being ensuring accessibility and public transport opportunities and uptake are maximised from new development, and also ensuring economic and business growth in the District. These impacts will then have a synergistic positive impact on reducing transport emissions.

Through the Garden Community (Section One) and the Section Two strategic allocations, there is a focus on dispersing growth to those areas with existing strategic transport links (both A-roads, B-roads and rail links) in the plan area.

In addition, **positive impacts** are likely to occur regarding sustainable transport uptake; however it should be acknowledged that there are **uncertain cumulative impacts** on the transport infrastructure around Clacton and Weeley may require further investigation through masterplanning of the SAMU allocations, particularly regarding the A133 / Colchester Road as the main strategic road into and out of Clacton. Similar **uncertain impacts** are considered relevant to highlight case surrounding the cumulative impact of the Plan's allocations in Dovercourt.



## 7.1.5 Sustainability Objective 5: To build stronger more resilient sustainable communities with better education and social outcomes

### Positive Impacts

The Plan's Section Two Strategic Policies, Vision and Objectives will ensure **significant positive cumulative impacts** on social and economic criteria, largely related to ensuring housing and employment needs are met whilst simultaneously ensuring that new development is located in sustainable locations with wider benefits for new and existing communities through new infrastructure delivery.

There will be **significant positive individual and cumulative impacts** regarding social infrastructure provision arising from the Garden Community (Section One) and Strategic Mixed Use development allocations, which will deliver secondary and primary education facilities respectively as well as ensuring the availability of land for healthcare facilities.

The preferred sites within the Frinton, Walton, Kirby-le-Soken and Kirby Cross area are likely to have cumulative negative impacts on primary school capacity however additionally the cumulative numbers of Local Plan allocations and existing permissions are likely to ensure that the threshold for the expansion of primary capacity can be met. This is also the case for the allocations within the Mistley / Manningtree area in accumulation with existing permissions. Despite this, the Plan's policy content seeks contributions in each instance of significant new development, and generally, to seek to address these impacts. For this reason, **uncertain impacts** are highlighted overall existing regarding school capacities.

## 7.1.6 Sustainability Objective 6: Protect and enhance natural, historic and environmental assets

### Positive / Negative Impacts

The high level elements of the Plan suitably aim that natural, historic and environmental assets are protected and enhanced.

The findings of the Appropriate Assessment (AA) (2017), regarding recreational pressures associated with the increase in growth across the wider North Essex Authorities area concludes that 'providing that the North Essex Authorities continue to collaborate and prepare the necessary Recreation Avoidance and Mitigation Strategies (RAMS) ... in close consultation with Natural England, and the RAMS are ready for implementation prior to adoption of the Section 1 and Section 2 Local Plans, the Strategic Section 1 Local Plans is not predicted to result in adverse effects on the integrity of the Stour and Orwell Estuaries SPA/Ramsar, Hamford Water SPA/Ramsar, Essex Estuaries SAC, Colne Estuary SPA/Ramsar, or Blackwater Estuary SPA/Ramsar, either alone or in-combination with other plans and projects as a result of recreation.' This includes the whole Tending District Local Plan

There can also be expected to be additional **positive impacts** on the enhancement of biodiversity through multi-purpose Green Infrastructure provision in accumulation with quality standards for Natural and Semi-Natural Greenspace, Green Corridors and general park and garden amenity space. Although there are likely to be pressures between human use and biodiversity interest on individual sites, there can still be expected to be positive outcomes for biodiversity cumulatively through the integration of a multitude of recreation and non-recreation based open space provision throughout the Plan area.

It is possible that the scale of growth within Clacton could affect the Conservation Area, representing as it does the town's historic core and focus for town centre services, although **uncertain impacts** are raised at this time in advance of any newly commissioned Conservation Area Management Plans in addition to updates to the existing Conservation Area



## Character Appraisals.

It is inevitable, given the amount of agricultural land within the District that there would be losses associated with growth that requires the development of Greenfield land, and this will lead to **negative impacts**. Nevertheless, it is not considered that this loss is significant at the locations allocated, especially in light of the reasonable alternatives considered.

Regarding landscape, the SAMU allocation at Rouses Farm has been assessed as having a **negative impact** on landscape due to coalescence with Jaywick; however the relevant SAMU policy will require effective landscape mitigation on site from any forthcoming application. Historic assets are largely protected through policy and the supporting text of the Plan, and there are not considered to be any cumulative impacts on any one asset as a result of the Plan's allocations.

## 7.1.7 Sustainability Objective 7: Reduce contributions to climate change

### Positive / Negative Impacts

The Plan's Protected Places Policies will ensure significant positive impacts on their primary aim: to protect and enhance natural, historic and environmental assets. This in turn will also see cumulative **positive impacts** on the conservation and enhancement of natural resources and the reduction of climate change impacts.

In reflection of the cumulative concerns associated with transport in Clacton, there can be expected to be some level of deterioration in air quality associated with development at the cumulative scale proposed surrounding the A133 / Colchester Road resulting in **uncertain impacts**. Despite this, the majority of development is not directly located on this road and any forthcoming masterplanning can ensure that such impacts are suitably mitigated. It should additionally be acknowledged that the SAMU allocations around Clacton are within peripheral locations that benefit from access to strategic roads, or otherwise link roads are proposed

## 7.1.8 Sustainability Objective 8: To conserve and enhance natural resources and reduce climate change impacts

### Positive / Negative Impacts

Regarding water quality (SO11), the Appropriate Assessment concludes the following, 'the measures provided in the Section 2 Local Plan will (also) provide sufficient certainty that the overall strategic growth proposed in North Essex as part of the Section 1 for Local Plans will not result in significant adverse effects on the Stour and Orwell Estuaries SPA/Ramsar, Colne Estuary SPA/Ramsar, or Essex Estuaries SAC as a result of changes in water quality.'

It has been assessed that there will be no cumulative impacts regarding flood risk associated with the Plan's allocations, in line with findings of the Sequential Testing of sites forming part of the Plan's evidence base. In addition, policy exists to ensure that SuDS be integrated into new schemes.

Regarding sewerage capacity, the Plan states that, 'major new developments may require upgrades to existing sewage treatment works, known as Water Recycling Centres, which may be funded by Anglian Water. Such works will need to be planned and funded through Anglian Water's 5-year business plans and approved by the regulator (OFWAT).' Policy PPL5 states that, 'proposals for development must demonstrate that adequate provision exists, or can be made available, for sewage disposal to a public sewer and water recycling centre (sewage treatment works).' In response to this, **uncertain impacts** must be highlighted for the Plan's site allocations individually (in regard to strategic allocations) and cumulatively.



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