



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

## **Sustainability Appraisal (SA): Non-Technical Summary - June 2017**







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## Glossary of Acronyms

AA	Appropriate Assessment
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BDC	Braintree District Council
CA	Conservation Area
CAUSE	Campaign Against Urban Sprawl in Essex
CBC	Colchester Borough Council
CCC	Chelmsford City Council
CO2	Carbon Dioxide
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
ECC	Essex County Council
EEFM	East of England Forecasting Model
EHHER	Essex Historic Environment Record
EU	European Union
GC	Garden Community
GCP	Garden City Principle
GTAA	Gypsy & Traveller Accommodation Assessment
Ha	Hectare
HE	Historic England
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
I&O	Issues and Options
IWMP	Integrated Water Management Plan
JNCC	Joint Nature Conservation Committee
KS4	Key Stage 4
LB	Listed Building
LCA	Landscape Character Assessment
LEP	Local Enterprise Partnership



LPA	Local Planning Authority
LNP	Local Nature Partnership
MSA	Minerals Safeguarding Area
NE	Natural England
NEGC	North Essex Garden Communities
NHS	National Health Service
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
OAN	Objectively Assessed Need
ONS	Office of National Statistics
PDL	Previously Developed Land
PO	Preferred Options
PPG	Planning Practice Guidance
PRoW	Public Right of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SELEP	South East Local Enterprise Partnership
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHELA	Strategic Housing and Employment Land Availability
SLAA	Strategic Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SM	Scheduled Monument
SNPP	Sub National Population Projections
SO	Sustainability Objective
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
Sqm	Square Metre
SSSI	Site of Specific Scientific Interest
STW/WRC	Sewage Treatment Works / Water Recycling Centres
SuDS	Sustainable Drainage System
TCPA	Town and Country Planning Association
TDC	Tendring District Council
UK	United Kingdom
WCS	Water Cycle Study
WPA	Waste Planning Authority



# 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.

## 1.2 The Local Plan

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The Tendring Local Plan (referred to hereafter as the Plan) responds to a national requirement that Local Planning Authorities (LPAs) must set planning policies in a local authority area. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. The Local Plan contains:

- The Council's vision, objectives and the spatial strategy for the future development of the district.
- Strategic Policies – policies which provide the overarching framework for planning decisions within the district
- Site Allocations – covering detailed aspects of site delivery
- Development Management Policies – detailed policies against which planning applications will be considered.
- Gypsy and Traveller site allocations policies – specific policies covering the sites needed to deliver the required pitches and include e.g. access, design principles, landscaping.
- Policies Map and Key Diagram - The policies map will show all the policies and proposals and identify areas of protection on an Ordnance Survey base. The key diagram will illustrate the proposals.

In line with the National Planning Policy Framework, the Local Plan should be clear in setting out the strategic priorities for the area and the policies that address these, and which also provide the strategic framework within which any neighbourhood plans may be prepared to shape development at the community level.

The Local Plan forms part of a suite of planning documents relevant to the area, including county-wide and more local Plans such as:

- ECC Minerals Local Plan (2014);
- ECC Waste Local Plan (emerging);
- ECC Development Management Policies (2011); and
- Neighbourhood Plans

Other relevant plans and programmes are identified in Annex of the SA. Annex A also includes the description of other environmental protection objectives which are relevant to Section One including Council Directive 79/409/EEC on the conservation of wild birds (a) and the Habitats Directive.



## 2. Sustainability Appraisal / Strategic Environmental Assessment

### 2.1 The Requirement for Sustainability Appraisal

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The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

*‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’*

This definition is consistent with the themes of the NPPF, which draws upon The UK Sustainable Development Strategy Securing the Future’s five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development.

The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the ‘SEA Regulation’) which requires an SEA to be carried out for plans or programmes,

*‘subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions’.*

This includes Local Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as *‘biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors’* as specified in Annex 1(f) of the Directive. SA examines the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. It is mandatory for Local Plans to undergo a Sustainability Appraisal in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, and in accordance with paragraph 165 of the NPPF.

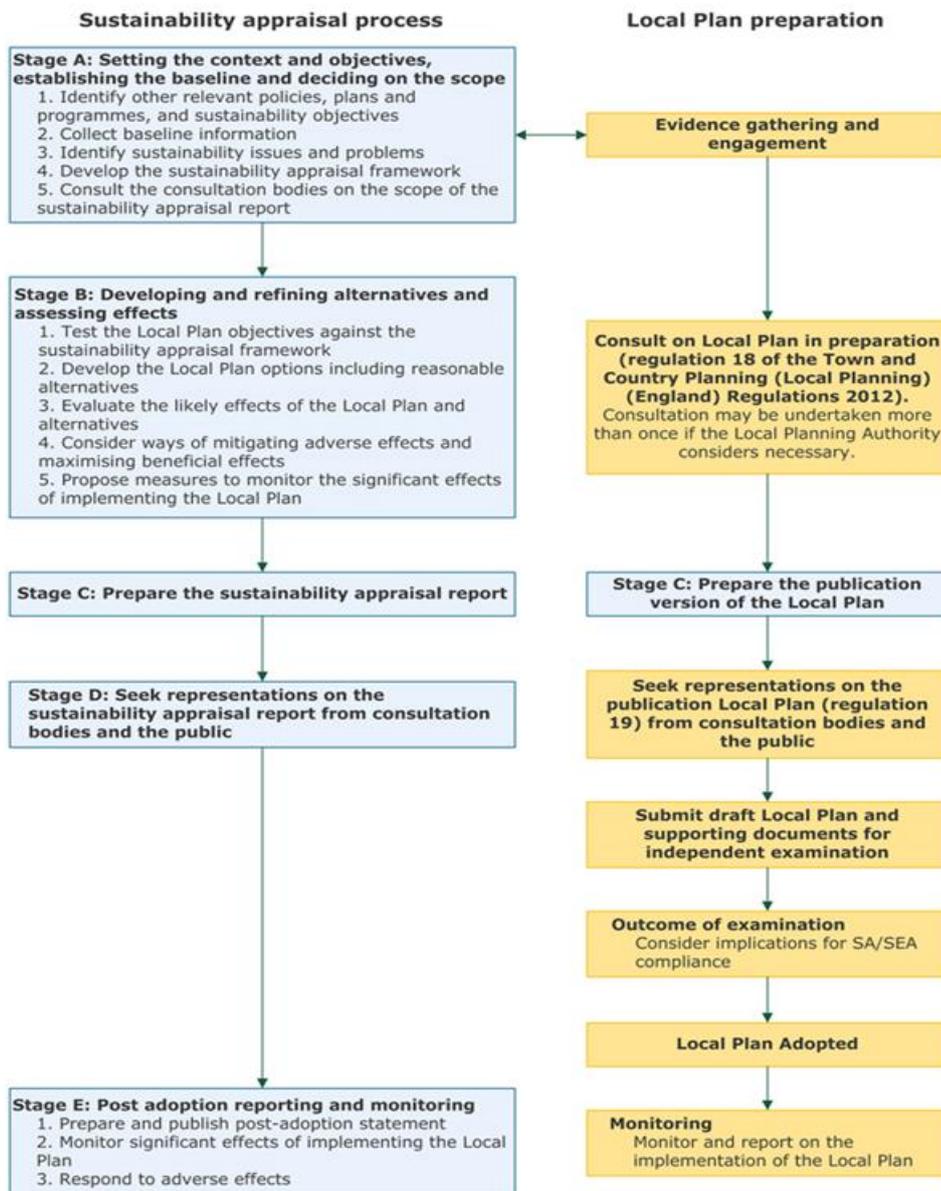
Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met. This integrated appraisal process will hereafter be referred to as SA.



## 2.2 The Sustainability Appraisal Process

The SA of the Tendring Local Plan follows that of the Sustainability Appraisal process as iterated in National Planning Practice Guidance on Sustainability Appraisal requirements for local plans. The following 5 sequential stages are documented below.

Figure 1: Stages in the Sustainability Appraisal Process and Local Plan Preparation



Source: Planning Practice Guidance – Sustainability appraisal requirements for local plans (Paragraph: 013 Reference ID: 11-013-20140306 Revision date: 06 03 2014)



## 2.3 The Aim and Structure of this Non-Technical Summary

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This Non-Technical Summary responds to Stage C in the SA process above; including those requirements of Stage B: assessing strategic options including reasonable alternatives, evaluating the likely effects of the strategic options and alternatives, and considering ways of mitigating adverse effects and maximising beneficial effects.

The production of a Sustainability Appraisal (Environmental) Report is a statutory requirement at this stage, and this SA Report has been produced to accompany the Draft Publication Local Plan consultation for Tendring District Council.

Following the finalisation of this Report, Stage D in the above SA process requires consultation. There are three statutory consultees or 'environmental authorities' that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

In addition to these, consultation will seek to engage the wider community in order to encompass comprehensive public engagement. Tendring District Council may additionally wish to invite comments from focussed groups, relevant stakeholders and interested parties. The detailed arrangements for consultation are to be determined by Tendring District Council.

The environmental authorities and public are to be given 'an early and effective opportunity' within appropriate timeframes to express their opinion. This includes the specific notification of the consultation documents and timeframes to those persons or bodies on the 'consultation databases' of the LPA. This reflects those persons or bodies who have commented on the SA in previous consultation stages.



### 3. Sustainability Context and Objectives

#### 4.4 Environmental Characteristics and Objectives

The following table outlines the stages which led to the formulation of the Sustainability Objectives for the Local Plan, which were based on key sustainability issues and considerations for the whole Strategic Area. The state of the environment in absence of the Section One is derived from the Baseline Information addressed in Annex B accompanying this report and the wider benefits that can be expected of growth over a large strategic area.

Table 1: Key Sustainability Issues and Problems and the state of the environment in the absence of the Local Plan Section Two

Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
Social integration	Some of the highest increases in populations county-wide are forecast to be in Tendring District and there is a need to integrate new communities with existing ones.	Social integration is an important issue to ensure through Local Planning policies and sensitive and appropriate housing allocations within the District. A plan-led system is able to ensure proportionate growth is allocated to the most sustainable areas, or with a focus on regeneration, rather than being led by market forces alone as can be expected in the absence of a Local Plan	1.To provide decent and affordable homes for all
Quality of life	Tendring has the highest level of deprivation for a local authority within Greater Essex.		
Population growth	The area’s population has been projected to increase (ONS, 2014) to 2021. Some of the highest increases in populations county-wide are forecast to be in Tendring District.		
The need for specific housing types	There is an identified need for more starter homes and housing for older people.		
Affordable	In 2014/15, 3.8% of the net		



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
housing	dwelling completions, which accounts for 10 dwellings, were affordable within Tendring; this data indicates that affordable housing is an issue.		
Ageing population	Tendring has a high population of people aged over 65. This age group is also predicted to increase over the Local Plan period.		
Gypsy and Traveller requirements	Tendring has seen no increase in Gypsy and Traveller provisions since January 2014.		
Agricultural land and soil quality	There are significant areas of Grade 1 agricultural land within Tendring.	A strategic approach to growth in the District has the ability to protect such areas through exploring options outside Grade 1 agricultural land. Without such plan-led approach, Tendring District Council could see planning applications come forward on such land and be under pressure to permit such development proposals in order to meet OAN requirements and demonstrate a 5 year housing land supply.	2.To ensure that development is located sustainably and makes efficient use of land
Preserving mineral deposits	The area has extensive deposits of sand and gravel. The sand and gravel resources in Essex are significant in national, sub-national and local terms - Essex is one of the largest producers in the UK; most geographically extensive	The consideration of land within Minerals Safeguarding Areas (MSAs) is best done at the plan level. Without a plan-led approach regarding the allocation of land to meet development needs, development proposals are likely to come forward without such regard.	



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
	and significantly mixed within the centre and north of Essex – namely the districts of Uttlesford, Braintree, Chelmsford, Colchester and Tendring.		
Rural transport	The Plan Area is largely rural in nature and rural public transport services and interconnectivity is poor.	A plan-led approach to allocating sites for development enables rural transport issues to be taken fully into account and improved where possible through enhancements to such infrastructure. In the absence of the plan, it is possible that isolated and individual proposals would come forward in rural areas with no scope for such improvements and policy considerations.	
Jobs	A total of 68.6% of the working population in Tendring District are in employment which is lower than sub-national and national employment levels. The proportion of Tendring District's working population who are economically active but unemployed is 5.4% which is above sub-national and national unemployment figures.	The link between homes and jobs is a key tenet of sustainability, as is ensuring progressive growth in employment opportunities across a range of sectors and in sustainable locations. This is best addressed at the plan level, and cannot be ensured through a reliance on suitable proposals coming forward. Without a plan-led approach it can be expected that out commuting will continue and the location of new housing and employment opportunities would remain disparate.	3.Harness the District's economic strengths
Rural employment	Tendring District is predominantly rural in nature; however the majority of businesses are located in an urban location.		
Commuting	The District registers		



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
patterns	significant proportions of residents travelling outside to other local authority areas to find employment.		
Employment sectors	Significant elements of the District's employment are in the tourism and agricultural sectors.		
Car ownership	Trending is above the regional and national averages for households owning 1 or more cars.	Car ownership can be expected to increase without the development of solutions that deliver truly sustainable options at a strategic level and that ensure a range of employment opportunities and services are accessible by sustainable means.	4.Minimise transport growth whilst capturing the economic benefits of international gateways
Congestion Air quality	Congestion is common on specific sections of the Council-managed network.		
Congestion and interconnectivity	There are network efficiency issues on a number of strategic inter-urban routes which are operating at or near to capacity. The Government-managed A12 has recognised issues with poor reliability and delays.		
Rural transport	The Plan Area is largely rural in nature, and rural public transport services and interconnectivity is poor.		
Social integration	Some of the highest increases in populations county-wide are forecast to be in Tendring District and there is a need to integrate new communities with existing ones.	The absence of a strategic approach within the District is likely to lead to the allocation of development that can be considered comparatively more piecemeal and not directed in order to stimulate wider infrastructure benefits, and ancillary development	5.To build stronger more resilient sustainable communities with better education and social outcomes



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
Quality of life	Tendring has the highest level of deprivation for a local authority within Greater Essex.	requirements, that can be of wider benefit to new and existing communities.	
Healthcare services	Health services in the Plan Area are either underprovided or otherwise oversubscribed. Life expectancy of residents within Tendring District is lower than the regional and national averages with men living for an average of 78.7 years and women on average living 82.0 years.	In exploring options for strategic level growth, the opportunity to integrate adequate health service and recreation provision into developments, or can otherwise ensure that accessibility to healthcare facilities is improved. In the absence of this approach, it is likely that current trends will continue and negative implications be exacerbated.	
Participation in sport and obesity	Participation in sport has seen a reduction in Tendring. In addition, obesity in Tendring is more prevalent than the region and the nation.		
Educational achievement	Tendring on average has low proportions of students achieving KS4 results across all measures. This trend extends to adult qualifications.	The consideration of school capacities is best addressed through a plan-led approach that explores the cumulative impacts of sites within school catchments. In the absence of a Local Plan it is likely that individual proposals would be permitted on their own merits and lead to cumulative capacity issues.	
School capacity	School capacities are forecast to be in deficit, when adjusted for new housing requirements		
International and European wildlife designations	In the Plan Area there are a number of Ramsar sites which include parts of the Colne estuary and coastal	The exploration of strategic growth in a plan led system at an early stage enables the results and recommendations of HRA and AA to be factored into plan making at the	



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
	<p>areas.</p> <p>There is also one 1 SAC in the area: a large coastal area known as Essex Estuaries</p>	<p>strategic level. Without looking at the cumulative impacts of development, it is likely that individual proposals are permitted that in unison would have significant negative effects on International and European wildlife designations.</p>	
National and local wildlife designations	<p>There are 15 SSSIs, Local Wildlife Sites and Local nature Reserves in the Plan Area.</p>	<p>The exploration of strategic growth in a plan led system at an early stage, enables the green infrastructure of the strategic area to be interconnected and enhanced through a joined-up approach to proposals and associated economies of scale that could otherwise not be expected.</p>	
Heritage assets at risk	<p>According to the Heritage at Risk Register (2016), there are 15 assets listed as being at risk in Tendring. This consists of 7 Scheduled Monuments, 4 Listed Buildings and 4 Conservation Areas.</p>	<p>A plan-led approach over the wider strategic area ensures that housing and employment needs can be met in more suitable areas regarding the protection of the historic environment; in the absence of this approach district wide needs would be met more independently and development pressures could lead to the allocation of less suitable land or urban concentration / expansion at higher densities which could impact on Conservation Areas and historic cores.</p>	
Conservation Areas	<p>There are 22 Conservation Areas within the Plan Area.</p>		
AONB pressures	<p>There is one AONB, Dedham Vale, which lies on the border of Suffolk and Essex in Colchester and Tendring covering an area of 90 sq km. It has been designated such because it is an exceptional example of a lowland river valley and plans are being explored to</p>	<p>A plan-led approach to growth has the ability to preserve and enhance designations through exploring options outside of such areas. Without such an approach, development pressures could exist regarding the Dedham Vale AONB which affect its integrity or its future enhancement.</p>	



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
	extend this designation westward.		
Renewable energy use	Tendring District consumes more energy from non-renewable sources as a percentage of their consumption compared to the East of England as a whole	Solutions to address this issue can be considered to be viable only through a plan-led at the strategic level that can incorporate and stimulate the provision for renewable energy and energy efficiency aspirations through economies of scale.	7.Reduce contributions to climate change
Water scarcity and management	Water management is challenging given the combination of high development growth and it being one of the driest counties in England. In respect of water quantity a significant portion of the resource is considered to be ‘water stressed’; the resource availability status of rivers and aquifers show that they are generally over abstracted; and not self-sufficient in relation to local sources of water supply and needs to import substantial quantities of water to satisfy existing demand.	A plan-led approach enables water management issues to be addressed over the entire district in response to development allocations in unison. This enables service providers to consult on the Plan and determine whether capacity improvements are required. In the absence of a plan-led approach it is likely that development could be permitted on their own merits that contribute to water scarcity and management issues.	8.To conserve and enhance natural resources and reduce climate change impacts
Fluvial flood risk	Although flooding cannot be completely prevented, its impacts can be avoided and reduced through effective planning and land management. The National Planning Policy Framework seeks to avoid inappropriate development in areas at risk of flooding, but where	A plan-led approach over the plan area ensures that housing and employment needs can be met in areas that are less susceptible to flooding; in the absence of this approach district wide needs would be met more independently and development pressures could lead to the allocation of less suitable land or urban concentration / expansion at	



Local Plans and Programmes	Description / Supporting Evidence	State of environment in the absence of the Local Plan Section Two	Sustainability Objective (SO)
	development is necessary, to ensure that it is safe and does not increase flood risk elsewhere.	higher densities which would exacerbate surface water flood risk.	
Surface water flood risk	Surface water flood risk is relatively high with all main settlements assessed being ranked in the top 1,000 settlements most susceptible to surface water flooding.		
Coastal flood risk	Significant levels of flood risk have been identified along the Essex coast and inland along river stretches.		



## 4. The Approach to Assessing the Local Plan

The SA is required to assess the environmental, social and economic impacts of the Local Plan.

The assessment was undertaken by exploring the sustainability implications of the Plan in so far as it will meet the objectives highlighted in the previous table. These Objectives are expanded on in the form of a 'sustainability framework' which sets additional criteria against which to appraise the Plan.

Table 2: The Sustainability Framework

Sustainability Objective	Assessment Criteria	Indicator	SEA Themes
1.To provide decent and affordable homes for all	- Will it provide the homes needed to support the existing and growing population?	The number of net additional dwellings	Material Assets
	- Will it provide more affordable homes across the District?	Affordable housing completions	
	- Will it deliver a mix of housing types to meet the diverse needs of the District?	% of residential completions that are two or three bedroom	
	- Will it deliver well designed housing?	Achieving minimum space standards for all housing types	
2.To ensure that development is located sustainably and makes efficient use of land	- Will it promote regeneration?	Losses of industrial land in key business and regeneration areas Amount of completed retail, office and leisure development delivered	Material Assets Climatic Factors Landscape
	- Will it reduce the need for development on greenfield land?	% of new and converted dwellings on previously developed land	
	- Will it provide good accessibility by a range of modes of transport?	% of new development within 30 minutes of community facilities	



Sustainability Objective	Assessment Criteria	Indicator	SEA Themes
	- Will densities make efficient use of land?	Amount of development > 30 dwellings per hectare	
3.Harness the District's economic strengths	- Will it improve the delivery of a range of employment opportunities to support the growing population?	Amount of floorspace developed for employment	Material Assets Population Cultural Heritage
	- Will it contribute to the Cultural, Visitor and Tourism sector?	Money the sector brings to the local economy % of jobs related to this sector	
	- Will it enhance the vitality and viability of town centres?	Total amount of floorspace generated for town centre uses	
	- Will it sustain the rural economy?	Location of new residential and employment development	
4.Minimise transport growth whilst capturing the economic benefits of international gateways	- Will it reduce the need to travel?	% of new dwellings within 30 minutes public transport time of local services	Population Climatic Factors Air Human Health
	- Will sustainable modes of transport increase?	% of journeys to work by private car % of journeys to work by public transport, walking and cycling	
	- Will it promote development of the ports?	Number of applications permitted for non-port related development within the port designated areas	
5.To build stronger more resilient sustainable communities with better education and social	- Will it provide access to education, recreation and community facilities?	Provision of social infrastructure and services on allocated sites Contributions received towards community facilities	Population Human Health Landscape
	- Will it ensure healthier lifestyles and access to	GP waiting times and capacities Walking / cycling modes of transport	



Sustainability Objective	Assessment Criteria	Indicator	SEA Themes
outcomes	healthcare facilities?	uptake New healthcare facility provision through growth Health related statistics	
	- Will existing open spaces be protected and new open space be created?	Open space provision ha/1000 population Contributions received towards open space provision	
	- Will levels of educational attainment improve?	% of total working age population educated to Level4 and above % of total working age population with no qualifications	
	- Will it reduce actual crime and the fear of crime?	Number of offences per 100,000 population	
6.Protect and enhance natural, historic and environmental assets	- Will heritage assets and sites of potential archaeological importance be protected or enhanced?	Number of listed buildings, scheduled Monuments and Registered Parks and Gardens at risk (and removed from risk register through repair / adaptive reuse) Archaeological evaluation undertaken prior to development	Cultural Heritage Landscape Biodiversity Geodiversity Flora, Fauna
	- Will Conservation Areas be protected or enhanced?	Number of Conservation Areas (and number and extent at risk)	
	- Does it provide areas of accessible green space to allow the dispersal of species?	Provision of suitable accessible natural greenspace identified through appropriate assessments	
	- Will it protect or enhance designated areas of the countryside (including landscape) and coastal	Amount of development affecting designated areas Number of SSSIs in favourable	



Sustainability Objective	Assessment Criteria	Indicator	SEA Themes
	environment?	condition Applications with landscape conditions.	
	- Will it protect Greenfield and high quality agricultural land?	% of new and converted dwellings on previously developed land	
7.Reduce contributions to climate change	- Will it reduce greenhouse gas emissions?	% reduction in Carbon Dioxide emissions	Climatic Factors Human Health
	- Will sustainable design and construction techniques be employed?	% of new dwellings built to at least level 3 of the Code for Sustainable Homes	Soil Air Water
	- Will it lead to an increased proportion of energy needs being met from renewable resources?	Renewable energy capacity installed by type	
	- Will it reduce pollution?	Number of Air Quality Management areas Number of Blue Flags and Quality Coast Awards Number of potentially contaminated sites	
8.To conserve and enhance natural resources and reduce climate change impacts	- Will water quality be maintained or improved?	Percentage length of estuary quality classed as Good	Human Health Water
	- Will it reduce the risk of flooding?	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality	Soil Waste Biodiversity
	- Does it minimise waste and increase rates of reuse and recycling?	% of household waste recycled	



Sustainability Objective	Assessment Criteria	Indicator	SEA Themes
	- Will it deliver SuDS and improve drainage?	Number of SuDS schemes approved	

Where the content of the Plan has been appraised against the Sustainability Objectives, the basis for making judgements within this report is identified within the following key:

Possible impact	Basis for judgement
++	Strong prospect of there being significant positive impacts
+	Strong prospect of there being minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty
0	No impact
N/A	The sustainability objective is not applicable to the scope or context of the appraised content
-	Strong prospect of there being minor negative impacts and mitigation would be possible
--	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation)



# 5. The Appraisal of the Tendring District Council Local Plan Section Two

## 7.1 Whole Plan Sustainability

This Section summarises the impacts raised in the assessment of each element of the Plan. The table below shows the impacts highlighted in this Report and the Section One SA, with the corresponding sub-sections summarising the impacts on a thematic ‘sustainability objective’ basis.

Table 3: The 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 (including 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 (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, giving 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 those strategic allocations) and cumulatively.



## 6.9 The Impacts of the Plan's Allocations including the Tendring Colchester Borders Garden Community

This section explores the secondary, cumulative and synergistic impacts of the Plan's Site Allocations. It explores:

- The Tendring / Colchester Borders Garden Community;
- The Plan's Strategic Mixed Use, Housing and Employment allocations; and
- The plan's non-strategic (medium sized) site allocations.

The sites have been looked at per Sustainability Objective topic. In addition, impacts per broad area are also identified within the commentary. The definitive list of the Plan's Site Allocations is included within the following table, with commentary amounting to the reasons for their selection in light of reasonable alternatives (See Appendix 2 of the main report for the detailed site appraisals).

**Table 4: The Plan's Site Allocations, including the reasons for their selection in light of reasonable alternatives**

Preferred Site	Use and Yield
<b>Tendring Colchester Borders Garden Community</b>	
Tendring Colchester Borders Garden Community	7,000-9,000 dwellings in total, with 2,500 in the Plan period to 2033
Reason for Selection: See Section One SA.	
<b>Allocated Strategic Mixed Use, Housing and Employment Allocations</b>	
Policy SAMU1 – Development at Edme Maltings, Mistley	150 homes, 0.13 ha employment land
Reason for Selection: The selection of this site for mixed use development responds to the redevelopment of brownfield land that will become vacant in the plan period. The site is within close proximity to the rail station and the future of such a sustainable site in this regard is best ensured through a plan led approach which can ensure additional policy criteria to ensure the most sustainable outcomes. The development of site can also offer key enhancements to the Conservation Area that might otherwise not be forthcoming without specific appropriate site policy criteria.	
Policy SAMU2 – Development at Hartley Gardens, Clacton	800-1,000 homes within plan period (up to an additional 700 beyond), 7ha employment
Reason for Selection: The site forms a sustainable extension of Clacton, with the ability to meet infrastructure thresholds for new education and healthcare provision. The allocation supports the Spatial Strategies of both Sections One and Two of the Plan in focusing proportionate growth to existing settlements in order to meet OAN requirements and supporting employment opportunities, and is suitable in response to the lack of available brownfield land within Clacton and the wider plan area.	
Policy SAMU3 – Development at Oakwood Park, Clacton	500 homes, non-employment uses
Reason for Selection: The site forms a sustainable extension of Clacton, with the ability to meet infrastructure thresholds for new education and healthcare provision. The allocation supports the Spatial Strategies of both Sections One and Two of the Plan in focusing proportionate growth to existing settlements in order to meet OAN requirements and supporting employment opportunities, and is suitable	



Preferred Site	Use and Yield
in response to the lack of available brownfield land within Clacton and the wider plan area.	
Policy SAMU4 – Development at Rouses Farm, Jaywick Lane, Clacton	850 homes, non-employment uses
Reason for Selection: The site forms a sustainable extension of Clacton, with the ability to meet infrastructure thresholds for new education and healthcare provision. The allocation supports the Spatial Strategies of both Sections One and Two of the Plan in focusing proportionate growth to existing settlements in order to meet OAN requirements and supporting employment opportunities, and is suitable in response to the lack of available brownfield land within Clacton and the wider plan area.	
Policy SAMU5 – Development South of Thorpe Road, Weeley	280 homes, 1.0ha employment
Reason for Selection: Weeley is a broadly sustainable location, with both strategic road and rail links in a central district location with ease of access to the main town of Clacton. Located within a rural service centre, the allocation makes a meaningful contribution toward addressing local housing and associated development needs, supports the village economy and assists with the overall housing growth proposed for the District.	
Policy SAH1 – Development at Greenfield Farm, Dovercourt	164 homes
Reason for Selection: Harwich and Dovercourt represents a Strategic Urban Settlement within the District, and a primary focus of growth in regard to the Spatial Strategies of both Sections One and Two of the Local Plan. The site has good access to the B1352, is in close proximity to services and represents a logical extension to the built up area.	
Policy SAH2 – Development at Low Road, Dovercourt	300 homes
Reason for Selection: Harwich and Dovercourt represents a Strategic Urban Settlement within the District, and a primary focus of growth in regard to the Spatial Strategies of both Sections One and Two of the Local Plan. The site has good access to the B1414, is in close proximity to services and represents a logical extension to the built up area.	
Policy SAH3 – Development at Robinson Road, Brightlingsea	115 homes
Reason for Selection: Brightlingsea represents a Smaller Urban Settlement within the District, and a focus of growth in regard to the Spatial Strategies of both Sections One and Two of the Local Plan and the settlement hierarchy (Policy SP1). The principle of growth established, the site represents a proportional sized development within the area, and preferable in this regard to the larger strategic sites proposed (alternative sites BR4, BR5, BR6 and BR7 in this SA – see Appendix 2), or a combination of smaller piecemeal developments within the settlement.	
Policy SAE1 – Carless Extension, Harwich	4.5ha employment (extension to existing refinery)
Reason for Selection: The proposal as allocated within the Plan represents a modest expansion of the existing refinery. The expansion of an existing employment site ensures that the principle of development for such uses, and supporting infrastructure are largely established. The proposed site represents a logical extension in terms of the built form of the area.	
Policy SAE2 – Land South of Long Road, Mistley	2.0ha employment (B1, B2, B8)
Reason for Selection: This employment site development is expected to be delivered within this Plan period and is envisaged to include warehousing, distribution yard and office development to accommodate an industrial use. The site benefits from planning permission to	



Preferred Site	Use and Yield
include financial and professional services, restaurants and cafes, non-residential institutions and business space (A2, A3, D1 and B1).	
Policy SAE3 – Lanswood Park, Elmstead Market	1.2ha (non-specific employment uses)
Reason for Selection: Lanswood Park is an existing high quality, semi-rural commercial development situated to the south of the A133 between Elmstead Market and Frating, five miles west of Colchester. Phases 1 and 2 form a business centre offering commercial and office floorspace which has attracted a wide range of occupiers. The third phase has been completed and let. Phases four and five remain to be developed. Given the on-going success of employment development at this site, it is proposed to extend the existing extent of employment land by way of a further allocation.	
Policy SAE4 – Mercedes Site, Bathside Bay	7.4ha (port related development)
Reason for Selection: Planning permission has already been granted for open air storage and distribution, an office, welfare facilities in the form of porta cabins and the instillation of perimeter and lighting towers on the site. The Mercedes site is included within the larger boundary of the proposed Bathside Bay development. The wider Bathside Bay project has secured planning permission which is subject to a condition that development must be commenced before 2021 (10/0202/FUL). It is considered that the Mercedes site will aid the enabling of this permission by providing a site for the relocation of an existing small boat quay, as well as further facilities.	
Policy SAE5 – Development at Mistley Port	Safeguarded port related development
Reason for Selection: Mistley Quay is currently occupied by Mistley Port, a commercial port handling a range of cargoes, including the transshipment of bulk malts. These operations provide a source of local employment within the warehousing and distribution sectors. The industrial character of the quayside is an important part of the character of the wider Manningtree and Mistley Conservation Area and contributes to Mistley's unique sense of place. As such, the Council is safeguarding this land for port-related development only. The port has the potential to achieve modest growth to meet future demands by developing value-added processing and dredging the channel adjacent to Mistley Quay to allow larger shipping.	
Policy SAE6 – Development at Mistley Marine	Safeguarded marine related employment
Reason for Selection: Mistley Quay is currently occupied by Mistley Port, a commercial port handling a range of cargoes, including the transshipment of bulk malts. These operations provide a source of local employment within the warehousing and distribution sectors. The industrial character of the quayside is an important part of the character of the wider Manningtree and Mistley Conservation Area and contributes to Mistley's unique sense of place. As such, the Council is safeguarding this land for port-related development only. The port has the potential to achieve modest growth to meet future demands by developing value-added processing and dredging the channel adjacent to Mistley Quay to allow larger shipping.	
Policy SAE7 – Stanton Europark	2-4ha (B2/B8, A1, D2)
Reason for Selection: Stanton Europark is a brownfield site in single ownership located near to Harwich Port. The site already benefits from an outline planning permission granted in March 2012 for 1.6 hectares of employment uses. Development has already taken place on either side of the proposed site access road. Development at Stanton Europark has the ability to provide higher value retail and leisure development.	
Other Allocations in Clacton	
Former Tendring 100 Waterworks Site, Clacton-on-Sea, CO16 8AW	Total: 90



Preferred Site	Use and Yield
Reason for Selection: The site responds to the allocation of brownfield land for development within the District's main settlement / town.	
522-524 St. John's Road, Clacton-on-Sea, CO16 8DY.	Total: 43
Reason for Selection: The allocation responds to the redevelopment of a number of existing dwellings for wider housing gains (brownfield land) within the District's main settlement / town.	
Orchard Works, r/o London Road, Clacton-on-Sea, Essex CO15 3SY.	Total: 20
Reason for Selection: The site responds to the allocation of brownfield land for development within the District's main settlement / town.	
Land off Cotswold Road, Clacton-on-Sea	Total: 12
Reason for Selection: The site responds to the allocation of brownfield land for development within the District's main settlement / town.	
Station Gateway Development, Clacton-on-Sea	Total: 60
Reason for Selection: The site responds to the allocation of brownfield land for development within the District's main settlement / town in an accessible location for public transport links.	
<b>Other Allocations in Harwich and Dovercourt</b>	
Harwich & Parkeston Football Club, Main Road, Harwich	Total: 89
Reason for Selection: The site responds to the allocation of brownfield land for development within a Strategic Urban Settlement in an accessible location for a range of existing services.	
Part of Mayflower Primary School, Main Road, Harwich	Total: 15
Reason for Selection: The site responds to the allocation of brownfield land for development within a Strategic Urban Settlement in an accessible location for a range of existing services.	
<b>Other Allocations in Walton</b>	
Southcliffe Trailer Park, Woodberry Way, Walton-on-Naze	Total: 15
Reason for Selection: The site responds to the allocation of brownfield land for development within a Smaller Urban Settlement in an accessible location for a range of existing services.	
Land at the Farm, Kirby Road, Walton-on-Naze CO14 8QS	Total: 47
Reason for Selection: The site represents a modest development and logical extension of the settlement. The represents the most suitable greenfield proposal for development at this scale, and is preferable to the allocation of a larger amount of smaller piecemeal options.	
Station Yard and Former Avon Works, Walton-on-Naze	Total: 40
Reason for Selection: The site responds to the allocation of brownfield land for development within a Smaller Urban Settlement in an	



Preferred Site	Use and Yield
accessible location for a range of existing services.	
Old Town Hall Site, Mill Lane, Walton-on-Naze	Total: 15
Reason for Selection: The allocation responds to the allocation of brownfield land for development within a Smaller Urban Settlement in an accessible location for a range of existing services.	
Other Allocations in Manningtree / Mistley	
Land south of Pound Corner	Total: 25
Reason for Selection: The site responds to the allocation of brownfield land for development within a Smaller Urban Settlement in an accessible location.	
Other Allocations in Rural Service Centres	
Land at Montana Roundabout, Little Clacton	Total: 35
Reason for Selection: The site responds to a modest amount of growth proportionate to Little Clacton, and is the most sustainable option considered in the area regarding access to services.	
Land at Weeley Council Offices	Total: 24
Reason for Selection: The site responds to the allocation of brownfield land for development within a Rural District Centre in an accessible location for a range of existing services.	

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

The Plan’s allocations can be seen to be suitably distributed throughout the plan area, in accordance with Policy LP1: Housing Supply and the Spatial Strategies of both Sections One and Two of the Plan, to deliver housing needs to both existing and also future communities. Housing growth is focused on the District’s main settlements in Section Two, with the highest existing populations, offering significant positive benefits in these areas particularly regarding affordable housing delivery. The Plan’s preference for a number of Strategic Mixed Use developments, 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 without putting pressure on existing communities in regard to integration and social inclusion.

**Significant positive impacts**

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

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

**Significant positive**



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; particularly where policies exist that ensure the availability of land for educational and healthcare facilities. Specifically in Clacton the allocation of three such sites for strategic development will significant positive impacts in regard to infrastructure provision, and employment provision in Clacton, an identified regeneration area. The majority of the Plan's housing allocations across the Plan area can be seen to have 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.

### impacts

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

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 employment allocations cumulatively ensure that a range of new employment opportunities will be forthcoming throughout the Plan area, within a range of sectors. These policies also seek to safeguard port related employment, where possible and relevant to / in accordance with the presumption of sustainable development. The main focus of growth in Strategic Urban Settlements, Smaller Urban Settlements and Rural Service Centres 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. These positive impacts, particularly in the Clacton area are significant.

### Significant positive impacts

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

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. Positive transport impacts have been assessed in response to direct or nearby access to strategic roads in the District and minor positive impacts have been assessed as relevant for those Preferred Options that have direct access to the District's B-Roads. In addition, positive impacts are likely to occur regarding sustainable transport uptake; however it should be acknowledged that the cumulative impact 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.

### Positive impacts



This is also considered the case surrounding the Plan's allocations in Dovercourt.

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

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. This responds to the level of provision that can be expected from each allocation's dwelling yield and policy requirements; ensuring that thresholds are met for new school provision. regarding wider infrastructure, these allocations (and related policies) ensure significant improvements in green infrastructure, open space provision and supporting new healthcare provision subject to verification and further discussions with the NHS. In line with this, the delivery of the SAMUs can ensure the significant long-term improvement in infrastructure to support the plan's non-strategic site allocations which cumulatively could be expected to give rise to issues surrounding existing infrastructure capacities; this is in response to the majority of non-strategic allocations which can all be expected to create individual and cumulative primary school capacity issues. 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. Overall however, minor positive impacts are highlighted for the Plan's allocations.

Positive  
impacts

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

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. It is also in close proximity to rail links and other transport interchanges. Despite this, Clacton is an identified regeneration area and inward investment in the town and the resultant improvements to the vitality and viability of the centre can contribute to ensuring that the Conservation Area is enhanced. The scale and location of growth at both the strategic and non-strategic within the Plan area and wider North Essex Authorities area is likely to create some degree of cumulative pressure on international designations associated with coastal and estuarine locations within Tendring. 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

Uncertain  
impacts



result of recreation.’ This includes the whole Tending District Local Plan. In the current absence of a RAMS, uncertain impacts are highlighted for the Plan area. It is inevitable, giving the amount of agricultural land within the District that there would be losses associated with growth that requires the development of Greenfield land. Nevertheless, it is not considered that this loss is significant at the locations allocated, especially in light of the reasonable alternatives considered. The Plan seeks to allocate brownfield sites within the first instance, with losses of agricultural land only associated with strategic allocations. The Strategic sites are predominantly within Grade 3 ALC (good-moderate), with the exception of Rouses Farm which is in Grade 2 ALC (very good). It should be noted that significant areas of Grade 1 (Excellent) and 2 ALC exist within the District, and with that in mind, the allocations represent an avoidance of the best and most versatile land through the majority of the allocations. Regarding landscape, the SAMU allocation at Rouses Farm has been assessed as having a negative impact on landscape, due to potential coalescence with Jaywick however mitigation is sought within the relevant SAMU policy. 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.

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

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. 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, and this alleviates any possible air quality deterioration within the town centre, due both to the town centre effectively being bypassed for movements in and out of Clacton and also in line with short trips being in walking / cycling distance and utilising existing public transport links.

Uncertain  
impacts

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

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, which can have secondary positive impacts on biodiversity. Despite this, a number of the strategic allocations have some element of flood risk on site. The Oakland and Rouses Farm SAMUs have no significant fluvial flood risk, and in the case of Oakland Park SAMU, only small areas of high risk from surface water flooding; however again these can be factored into any proposal of this scale. There are however potential cumulative negative impacts associated with groundwater protection at SAE5 and SAE6 at Mistley, leading to an uncertain impact at this stage. The Hartley Gardens SAMU has more significant fluvial and surface water flood risk, and these will also have to be factored into any

Uncertain  
impacts



masterplan. 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.' 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 those strategic allocations) and cumulatively.





## 7.2 Recommendations and Those Factored into the Plan throughout the SA Process

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- Strategic Objectives - At the Preferred Options SA stage, it was recommended that specific mention is made to archaeology within Objective 7 – Cultural Heritage. This recommendation has since been factored into the policy with the inclusion of the 'historic environment' which in planning terms is strongly related to archaeology and the Essex Historic Environment Record (HER). There are no new proposed mitigation measures or recommendations made at this stage.
- Policy HP2: Community Facilities - At the Preferred Options stage the SA recommended that for completeness the Policy make reference to how such provision will be secured, whether through Section 106 contributions or CiL as appropriate and where Council procedures / schedules are in place or may be within the Plan period. This recommendation has taken forward in the current iteration of the policy through ensuring that the Council will work with the development industry to deliver such facilities on site, rather than seek to secure new community facilities through other means. No new proposed mitigation measures or recommendations are proposed at this stage.
- Policy LP2: Housing Choice - At the Preferred Options stage, the SA recommended that 'the Policy could make reference to the protection of the historic built environment as a physical reason why a housing mix cannot be achieved in some instances related to the protection and enhancement of specific designations.' Although not included within the policy, other policies adequately address this issue. The recommendation is no longer considered valid.
- Policy PP2: Retail Hierarchy - At the Preferred Options (2016) stage, the SA recommended that 'commentary is included within the Policy or supporting text that addresses the position of the proposed Colchester fringe Garden Community in regard to the retail hierarchy in line with the allocation's eventual size and function within and beyond the Plan period.' This recommendation is not considered appropriate at this stage due to the need to protect Major, Town and District Centres as defined in the Policy and supporting text from inappropriate retail uses outside these centres. There are no new recommendations made at this stage.
- Policy PP11: Holiday Parks - At the Preferred Options stage, the SA recommended that the Policy ensure a criterion that regards the impacts on biodiversity and designated sites that development proposals for holiday parks could have, and that measures are included to ensure their investigation and mitigation. This recommendation has been appropriately factored into the Policy. There are no new recommendations made at this stage.
- Policy PPL4: Biodiversity and Geodiversity - At the Preferred Options (2016) the SA stated that, 'although Natural England are a statutory consultee on all planning applications that meet the criteria for consultation as identified through the location and type of development within a SSSI Impact Risk Zone (which also includes Natura 2000 sites), the Policy and supporting text could be clearer on what supporting information is needed to accompany planning applications in the first instance.' In line with the findings and recommendations of the HRA Screening Assessment and Appropriate Assessment (AA), the policy has been significantly expanded to make it clear that impacts and mitigation will be included in Recreational Disturbance Avoidance and Mitigation Strategies and that Ecological Appraisals will be required where a proposal might harm biodiversity on a site. This recommendation is affectively incorporated into the policy and supporting text, and does not apply at this stage. No new recommendations are made for the Policy at



this stage.

- Policy PPL10: Renewable Energy Generation - Within the Preferred Options SA, it was recommended that although issues are specifically addressed in other thematic policies, the Policy could be expanded to consider the effects of biodiversity / wildlife designations, the historic environment and landscape as appropriate. Although this policy has incorporated the need for consideration of cumulative impacts in this Draft Publication iteration, it is considered that the original SA recommendation is still applicable and relevant at this stage.
- Policy SAE2: Land South of Long Road, Mistley - It is recommended that the policy is expanded to address the potential for negative impacts on a SSSI through the requirements for an assessment of the potential impacts to accompany any planning application.
- Policy SAE3: Lanswood Park, Elmstead Market - It is recommended that the Policy make reference to the fact that the site is within a Minerals Safeguarding Area as consistent with other Delivering Places policies.
- Policy SAE4: Mercedes Site, Bathside Bay - It is recommended that the policy is expanded to address potential issues surrounding fluvial flood risk as consistent with other Delivering Places policies.
- Policy SAE5: Development at Mistley Port & Policy SAE6: Development at Mistley Marine - These sites have negative impacts associated with being within a groundwater protection zone associated with historic uses in the wider area. It is recommended that the policy addresses the requirement for suitable conditions or exemptions from applications within these sites
- Policy SAE7: Stanton Europark - It is recommended that the policy is expanded to address potential issues surrounding impacts on sites designated for wildlife conservation as consistent with other Delivering Places policies
- 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 recommended that these are undertaken as part of any plan review.



## 6. Next Steps & Monitoring

### 8.1 Consultation

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This Environmental Report will be subject to consultation alongside the Local Plans of the three Local Planning Authorities. There are three statutory consultees or 'environmental authorities' that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

In addition to these, consultation will seek to engage the wider community in order to encompass comprehensive public engagement. Tendring District Council may additionally wish to invite comments from focussed groups, relevant stakeholders and interested parties. The detailed arrangements for consultation are to be determined by Tendring District Council. The environmental authorities and public are to be given 'an early and effective opportunity' within appropriate time-frames to express their opinion. This includes the specific notification of the consultation documents and timeframes to those persons or bodies on the 'consultation database' of the LPA. This reflects those persons or bodies who have commented on the SA in previous consultation stages.

Please check the following link for more information, and direction to relevant consultation portals:

<http://www.tendringdc.gov.uk/consultation>

### 8.2 Adoption Statement

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Upon adoption Local Plans will be accompanied by an Adoption Statement which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004. In accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004, an Adoption Statement is required to addresses each of the following issues:

- How sustainability considerations have been integrated into the development plan document (Local Plan);
- How the options and consultation responses received on the development plan document (Local Plan) and sustainability appraisal reports have been taken into account;
- The reasons for choosing the development plan document (Local Plan) in light of other reasonable alternatives; and
- Monitoring measures.

### 8.3 Monitoring

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The significant sustainability effects of implementing a Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The Sustainability Framework contained in this



report includes suggested indicators in order to monitor each of the Sustainability Objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the Sustainability Framework, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

Sustainability Objective	Indicator
1.To provide decent and affordable homes for all	The number of net additional dwellings
	Affordable housing completions
	% of residential completions that are two or three bedroom
	Achieving minimum space standards for all housing types
2.To ensure that development is located sustainably and makes efficient use of land	Losses of industrial land in key business and regeneration areas
	Amount of completed retail, office and leisure development delivered
	% of new and converted dwellings on previously developed land
	% of new development within 30 minutes of community facilities
	Amount of development > 30 dwellings per hectare
3.Harness the District's economic strengths	Amount of floorspace developed for employment
	Money the sector brings to the local economy & % of jobs related to each sector
	Total amount of floorspace generated for town centre uses
	Location of new residential and employment development
4.Minimise transport growth whilst capturing the economic benefits of	% of new dwellings within 30 minutes public transport time of local services
	% of journeys to work by private car



Sustainability Objective	Indicator
international gateways	% of journeys to work by public transport, walking and cycling
	Number of applications permitted for non-port related development within the port designated areas
5.To build stronger more resilient sustainable communities with better education and social outcomes	Provision of social infrastructure and services on allocated sites
	Contributions received towards community facilities
	GP waiting times and capacities
	Walking / cycling modes of transport uptake
	New healthcare facility provision through growth
	Health related statistics
	Open space provision ha/1000 population
	Contributions received towards open space provision
	% of total working age population educated to Level4 and above
	% of total working age population with no qualifications
6.Protect and enhance natural, historic and environmental assets	Number of listed buildings, scheduled Monuments and Registered Parks and Gardens at risk (and removed from risk register through repair / adaptive reuse)
	Archaeological evaluation undertaken prior to development



Sustainability Objective	Indicator
	Number of Conservation Areas (and number and extent at risk)
	Provision of suitable accessible natural greenspace identified through appropriate assessments
	Amount of development affecting designated areas
	Applications with landscape conditions.
	Number of SSSIs in favourable condition
	% of new and converted dwellings on previously developed land
7.Reduce contributions to climate change	% reduction in Carbon Dioxide emissions
	% of new dwellings built to at least level 3 of the Code for Sustainable Homes
	Renewable energy capacity installed by type
	Number of Air Quality Management areas
	Number of Blue Flags and Quality Coast Awards
	Number of potentially contaminated sites
8.To conserve and enhance natural resources and reduce climate change impacts	Percentage length of estuary quality classed as Good
	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality
	% of household waste recycled
	Number of SuDS schemes approved





# Place Services

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Essex County Council