

SUSTAINABILITY APPRAISAL

Dealing with comments that were specifically submitted in relation to the Sustainability Appraisal for Section 2 of the Local Plan.

Sustainability Appraisal

ID	Rep ID	Name. Organisation	Paragraph of the document comment relates to	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Proposed change to Sustainability Appraisal or the Local Plan	Council response	Contact details
Representations from Technical Stakeholders							
1022801	SA5	Natural England	5	Natural England broadly supports the methodology used in the Sustainability Appraisal for Part 2 of the Tendring Local Plan and is generally supportive of the proposed indicators for monitoring purposes. From the information provided, the allocations for development appear to be broadly located in areas which are likely to have the least impact on internationally and nationally designated sites and landscapes.	Whilst it is not Natural England's role to prescribe what indicators should be adopted, modification of your current indicators (pages 224-226) in light of the indicators suggested below is recommended: Biodiversity and geodiversity: <input type="checkbox"/> Number of planning approvals generating adverse impacts on sites of acknowledged biological and geological importance. <input type="checkbox"/> Percentage of major developments generating overall biodiversity/geodiversity enhancement/net gain. <input type="checkbox"/> Hectares of biodiversity habitat delivered through strategic site allocations. Landscape: <input type="checkbox"/> Number of planning approvals within/in the setting of AONBs, with commentary on likely impact. Access to nature/open space/green infrastructure networks: <input type="checkbox"/> Number of planning approvals leading to a loss of nature/open space/green infrastructure network access (quality and/or extent), including formal or informal footpaths. <input type="checkbox"/> Number of planning approvals leading to a gain in nature/open space/green infrastructure network access (quality and/or extent), including formal or informal footpaths. <input type="checkbox"/> Percentage of the local population having access to a natural greenspace within 400 metres of their home. <input type="checkbox"/> Hectares of accessible open space per 1000 population. Soils: <input type="checkbox"/> Number of planning approvals leading to loss of 'best and most versatile' (BMV) agricultural land (i.e. that classified as Grades 1, 2 and 3a land within the Agricultural Land Classification (ALC) system).	Comments noted. No change is proposed to the SA; however the proposed indicators within this representation will be included within the Monitoring section of the SA Adoption Statement at the relevant stage.	Details only available to the local authority and the Inspector's Programme Officer.
1021013	SA6	RSPB	4	In our letter of the 8 September 2016 we raised our concerns regarding the absence of an up to date HRA that assesses all the proposed policies and no recent evidence base. We note that the evidence base for recreational disturbance relies on information from 2012 and therefore question if this element of the plan has been positively prepared. Paragraph 4.15 highlights that nutrient enrichment and water abstraction are two key non-toxic contamination factors. Both of these are of particular concern with regards to the SPA features species (wintering waterbirds) of the Stour and Orwell estuaries, Hamford Water and Colne estuary SPAs. Nutrient enrichment from agricultural run-off may result an increase in algal blooms smothering mudflats, making them inaccessible as feeding areas for the designated species. Increased water abstraction may reduce the freshwater flows to estuaries via the numerous creeks and rills. These areas provide critical bathing and drinking areas for designated features of the SPA network such as dark-bellied brent geese, pintails and other waterbirds.	It is important that these three SPAs are screened in for Non-toxic Contamination and that the Summary of Screening Assumptions (Table 4.1, page 24), Screening Conclusions (Table 4.2, page 43) and the Screening matrix in Appendix 3 are revised accordingly.	Partly in response to RSPB's concerns, the Council commissioned consultants to update the Habitats Regulation Assessment for the Section 2 Local Plan and it is considered that this provides an adequate assessment of potential impacts on the internationally important wildlife sites.	Details only available to the local authority and the Inspector's Programme Officer.
Representations from Businesses, Landowners and Developers							
1105946	SA1	Trinity College, Cambridge (c/o Elizabeth Thoroughgood, Bidwells)	Paragraph 5.9.9 and Table 76	In paragraph 5.9.9 and Table 76, the assessment of the land at Brightlingsea Hall Farm is considered misleading in relation to assessment of the distance from primary school. The 'Home to school travel and transport guidance' (DfE, 2014) is statutory guidance in relation to home to school travel. Statutory walking distance is 2 miles and under for pupils under 8 & three miles and under for pupils ages 8-16. Site BR5 is 1.4 miles from the local primary school at its furthest point. The allocated site (off Robinson Road) is over 1 mile at its furthest point. Our	No specific changes suggested. It is noted that the objector is promoting land at Brightlingsea Hall for residential development.	The highlighted impact for the Brightlingsea Hall Farm site (BR5) is consistent with the assessment of all sites, with 'significantly negative impacts' indicated by those sites that are over 1.2 km from an existing primary school. Nevertheless, the SA is a strategic undertaking in reflecting the strategic nature of the Plan. Even the allocation of sites is a strategic undertaking and the SA identifies issues in the knowledge that they can be addressed later (i.e. at the	Details only available to the local authority and the Inspector's Programme Officer.

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			<p>site is well within the statutory walking distance and we dispute the view that residential development here would have a potentially significant negative impact. The route from our site is well paved, providing a safe route as required by the statutory guidance.</p> <p>We disagree with the reason for selection of the allocated site, particularly that it represents a proportional sized development. Policy SAMU5 is an allocation for mixed use development in Weeley including 280 new homes, 1ha of employment land & 2.1ha of land for a new primary school. Weeley is identified within the settlement hierarchy as a Rural Service Centre. It is therefore unclear why this location has been allocated to accommodate a significantly greater amount of growth than Brightlingsea, approximately 2.5 times greater than the provision proposed at Brightlingsea, which is defined as a Smaller Urban Settlement. This approach is unjustified and unsound.</p>		<p>planning application stage).</p> <p>It is important to note that the SA is a requirement for Local Plans however does not represent the sole mechanism for the selection and rejection of sites by the LPA. It informs the Council's process of allocating sites and assists in the identification of issues that can influence site selection or otherwise be dealt with within the process of formulating Plan policies.</p> <p>In the three years that has passed since the Local Plan was submitted for examination, both the land off Robinson Road, Brightlingsea (Colne Gardens Phase 2) and the land south of Thorpe Road, Weeley (Barleyfields), as referred to in the representations, have obtained planning permission with the Brightlingsea site being well under construction.</p> <p>The land at Brightlingsea Hall lies to the north of the town, considerably further from the town centre than the Robinson Road site and development would extend the town further north into sensitive landscape within the setting of the Conservation Area and the Listed Church. Whilst Brightlingsea is classified as a Smaller Urban Settlement, it is more sensitive to growth than other urban areas in Tendring both environmentally and in terms of its limited transport infrastructure with one road in and one road out and no rail services. The level of development proposed for Brightlingsea in the plan period reflects its limitations and no further allocations are considered necessary. The exclusion of the objector's land from the Local Plan does not represent a soundness issue.</p>	
1021851	LPPuD278 LPPuD280 LPPuD281 LPPuD286 LPPUD287	Ray Chapman c/o Strutt & Parker	<p>The Site CL9 – Land between London Road and Centenary Way for 175 dwellings is described as a 'Preferred Site Allocation' (Table 62; p.173 TDC SA Part 2 (August 2016)) and appears to have changed to CL10 in the recent update. Table 63 of the SA provides an appraisal of each of the Preferred and non-preferred sites, in which CL9 scores well.</p> <p>The fact that CL9 is a Preferred Site highlights the unjustified removal of the site from the 2016 Reg.18 Consultation at a very late stage, and the failure of a corresponding re-assessment of the SA to establish whether the Plan still reflects the evidence prepared and the most sustainable option.</p> <p>Appendix 1 of the updated SA identifies the dwelling capacities of site allocations in the DLP. Importantly, SAMU2 – Hartley Gardens, was submitted for 800-1,000 new homes (Table 64). Table 66 identifies this site as 'CL43' which is assessed 'as per the submission for SAMU2', and 'The subsequent appraisal of these areas forms the rest of the section'. CL43 is an allocated site in the DLP, as Hartley Gardens and is proposed to deliver 1,700 dwellings. However, it is difficult to understand or identify whether there has been an assessment of the impact of a 1,700 dwellings development at this site, as distinct from the submitted quantum. Failure to fully consider the impact of development through an SA/SEA would fail the test of legal compliance. Further, it is not evident that the SA has guided the local plan process.</p> <p>It is interesting to note that the Centenary Way site is identified as CL10, for 675 dwellings. This is an earlier submission which has been updated to 175 dwellings through the recent submissions and consultation processes, since 2014. The failure to update this element of the SA assessment is concerning. Irrespective CL43 (allocated) and CL10 (not allocated) receive identical assessments, with one exception, for which CL10 scores more favourably: Distance to secondary school (CL43 (-); CL10 (+). Given this position in the SA Assessment, it is difficult to understand the Council's choice for allocating CL43 and not allocating CL10.</p> <p>Site CL10 was identified as a preferred site in earlier stages of the Local Plan preparation and was removed only following the refusal of application 15/01720/OUT by the Planning Committee. That decision is the subject of an appeal. Simultaneously, the site was removed from the preferred allocations of the Local Plan.</p> <p>The removal of the site (along with others) as the result of refusal of a specific application is considered to highlight the flawed approach with the Local Plan process. CL10 was demonstrated through the SA/SEA to be a sustainable location for development in both the Council's evidence and the supporting reports of a planning application. Its removal is problematic</p>	<p>It is noted that the landowner's agent is promoting land to the south of Centenary Way in Clacton and would wish to see this site allocated for development in the Local Plan. They also made representations seeking an increase in objectively assessed housing need for Tendring.</p>	<p>Since these representations were submitted, there have been decisions both in regard to the appropriate housing requirement for Tendring through the Section 1 Local Plan examination and in regard to the planning application for development south of Centenary Way.</p> <p>The Inspector for the Section 1 Local Plan has concluded, twice, that the objectively assessed housing need of 550 dwellings per annum is based on sound evidence.</p> <p>The Centenary Way was the subject of a planning application 15/01720/OUT for up to 175 dwellings. That application was refused by the Council in June 2016. It was allowed on appeal, but that decision was quashed following a legal challenge by the Council and the appeal had to be re-determined. At the second appeal, the scheme was dismissed by the Planning Inspector and a subsequent legal challenge from the applicants was rejected. The site's position within the green gap between Clacton and Little Clacton and the impact of development on the retention of that gap was the main reason for dismissal, and the ultimate reason why the site was not included in the publication draft of the Local Plan.</p> <p>Notwithstanding the objector's comments, it is important to note that the SA is a requirement for Local Plans however does not represent the sole mechanism for the selection and rejection of sites by the LPA. It informs the Council's process of allocating sites and assists in the identification of issues that can influence site selection or otherwise be dealt with within the process of formulating Plan policies. The Centenary Way site's position within the narrowest part of the strategic green gap is the main reason for its exclusion from the plan, as upheld in the final appeal decision.</p> <p>The objector (or more surprising, the objector's agent) has picked on the assessment of Hartley Gardens to raise concerns about the selection of sites. This is despite the fact that Strutt & Parker are also the agents for the Greenwich Hospital i.e. the principal landowner at the Hartley Garden site.</p>	<p>Details only available to the local authority and the Inspector's Programme Officer.</p>

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				<p>for the justification of the Plan.</p> <p>The SA Objectives are considered in section 4.8 of the SA. SA1 seeks to provide decent and affordable homes for all concludes that, for LP1: Policy LP1 Reason for Selection – The Policy has been selected as it responds to the recommended housing supply figure emanating from the OAN Report (2015). In addition, the figure represents the most appropriate quantum for development in regard to the most suitable, available, deliverable and developable sites that were explored within the plan-making process.</p> <p>Given the significant concerns with the OAHN, and the date of the OAN report assessed within the SA, the assessment of LP1 in the SA is considered to be unsuitable for understanding the impact of the policy on the district. The Plan is considered to be unjustified in relation to allocation and distribution of sites as it has not following the most appropriate strategy in relation to the conclusions of the SA/SEA and reasonable alternatives.</p>		<p>As will be explained in the Council's Topic Papers and the schedules of responses to representations, the Council will be suggesting that Hartley Gardens is designated as a broad location for growth, the strategic green gaps will continue to be defended and the plan now identifies more than sufficient land to meet the objectively assessed housing requirement of 550 homes a year without the need for any of the allocations in the plan, let alone any alternative sites.</p>	
1022779	LPPuD298	Greenwich Hospital c/o Strutt & Parker		<p>The SA/SEA assessment of the site identifies no significant negative impacts as a result of Policy SAMU2, and only two minor negative impacts. The two minor negative impacts identified are the protection and enhancement of listed buildings and sites of archaeological importance; and surface water flooding. In the case of both of these, it is considered that any potential negative impacts can be mitigated. In the case of the former, through appropriate design and delivery of the development; and through the implementation of an appropriate drainage strategy, in respect of the latter.</p> <p>The SA/SEA clearly considers policy SAMU2 against potential alternatives, and find that it is an appropriate and sustainable option. Furthermore, the reasons for the selection of the policy – and its inclusion within the PDLP – is set out within the SA/SEA, as required.</p> <p>Accordingly, Policy SAMU2 is considered justified.</p>	No changes requested.	<p>Naturally, these comments are welcomed and the Council still maintains that the inclusion of Hartley Gardens in the Local Plan is justified by the evidence.</p> <p>It is notable however that planning agents from the same agency are advocating completely opposite views on the robustness of the SA depending on which site is being promoted.</p> <p>The Council is comfortable that it has selected the right sites for the Local Plan having taken into account both the findings of the SA and other relevant planning factors including strategic green gaps.</p>	<p>Details only available to the local authority and the Inspector's Programme Officer.</p>
1106151	SA2	Gladman – Phil Bamford	5.3.1	<p>The Council need to ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</p> <p>The Sustainability Assessment for Tendring only explores a settlement hierarchy approach to the spatial distribution of housing and there is no evidence to suggest that this is the most sustainable approach to development in Tendring.</p> <p>On top of this, nowhere in the SA is the appropriate level of development for each settlement in the hierarchy established and therefore it is completely unknown if this is the most sustainable level that could be achieved. There is also no clarity as to why strategic housing allocations have been chosen in the areas they have been and why those in other locations have been excluded.</p> <p>On the whole, these factors set out that there is a distinct lack of information supporting any of the conclusions made on housing distribution and site allocations and therefore they cannot be relied upon within this Sustainability Appraisal to allow the Local Plan to be found sound.</p>	No specific changes suggested.	<p>Section One of the TDC Local Plan, in Policy SP2 establishes a Spatial Strategy for North Essex. It includes that, 'Each local authority will identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs.' The SA of Section One, at Section 5.5.1 states that, 'In Tendring District the spatial hierarchy promotes growth in settlements that are the most accessible to the strategic road network, public transport and offer a range of services.'</p> <p>Policy SPL1 within Section Two of the Plan responds to this notion of managing growth in line with a Settlement Hierarchy that focuses on this notion of directing growth to those existing settlements that are the most sustainable. The SA within the assessment of Policy SPL1 states that, 'It is felt that the hierarchy reflects existing settlement size and proportionate growth across them. For this reason, no other alternatives have been considered reasonable for introduction at this stage. It is considered that alternatives regarding the Garden Community at the Colchester fringe are better explored across the North Essex Authorities Strategic Area commensurate to the scope of the Section One Local Plan SA.'</p> <p>It should be noted that the SA assesses all reasonable alternative sites on a site by site basis and to the same level of detail. It also addresses cumulative impacts in specific areas resulting from the Plan's allocations. Procedurally, it is not the role of the SA to establish what represents an appropriate level of growth for each settlement as the SA is similarly not the sole mechanism to determine what should and should not be allocated within the Local Plan in order for the Council to meet objectively assessed needs. The SA identifies issues to be addressed within the Plan as a result of the sites selected for allocation.</p> <p>The reasons for the Council selecting strategic housing allocations in light of reasonable alternative options are included within Section 6.9 of the SA Environmental Report.</p>	<p>Details only available to the local authority and the Inspector's Programme Officer.</p>

Representations from Community Representatives

None received.

Representations from Members of the Public

1007238	SA3	Carol Bannister	5.5	<p>In my opinion, the Sustainability Appraisal was not unbiased and independent. The Place Services Team at Essex County Council conducted the appraisal despite the fact that Essex County Council was one of the main objectors of the previous Draft Local Plan, which was abandoned in 2014. Since that time Essex County Council has continued to be one of the statutory consultees throughout the process. So the appraisal has been conducted in-house, with preferred options being set up by Tendring District Council to be analysed in a predominantly non-technical manner by the Place Services team.</p> <p>Although 19 'sites' have been compared on Pages 310 (127) to 313 (1273) they are not all different ones. Some are repeated with slightly different descriptions or slightly different totals. For example WE10 is described as 'Development South of Thorpe Road, Weeley as per SAMU5' in the Allocations Section with Policy SAMUS having quoted a figure of at least 280 dwellings. Whereas, WE14 is described in the alternatives as 'Land forming part of Ash Farm and Brokhowse, Thorpe Road, Weeley' with an indicative dwelling yield of 280 dwellings. Furthermore, relatively few of the quoted sites are NEW and many of them have appeared in past documents, some even going back to before 2014.</p> <p>I remain concerned that Tendring District Council intends selling the Council Office and its land at Weeley simply to provide a further 24 dwellings. The Town Hall in Clacton is of insufficient size to cope with the large amount of extra administrative work and meetings that are currently conducted at Weeley. I notice that as a brownfield site it scores highly in that area of the Sustainability Appraisal, but the harm that will be done to the district by the demolition of such a striking building (not listed) resulting in the loss of this important centralised area of specific Local Council activities far outweighs any financial benefit that Tendring District Council might eventually achieve from the sale.</p> <p>Bus and rail services are limited in our rural village so I am surprised that any of the sites have been labelled as having a significantly positive impact regarding accessibility by public transport. Furthermore, I fail to understand why the land south of Thorpe Road, Weeley (WEID) is the only proposed site to be labelled as having a minor positive impact under 'rural economy' whilst all other sites, even the one that is virtually the same, are labelled with a zero. Some of the others, including the Car Boot Field incorrectly labelled as 'Land at Hawk Farm (WE7)', also propose some employment/retail space.</p> <p>There is no justification for labelling WEID as having an uncertain impact regarding the historic environment when it is well-known that the land forms part of the historic rural landscape for the listed St Andrew's Church - the 'church in the fields'- and of the listed farmhouses at Ash Farm and Brook Farm. That has been recognised for site WE14 which really represents the same land. The area also forms part of the historic landscape that can be traced back to Napoleonic times and artifacts from that era are still ploughed up to the surface from time to time.</p> <p>Due to the impermeability of the clay soil and the high water table, ever present sewage and surface water drainage issues in various areas of the village remain a constant concern. Consequently, I fail to understand why some of the sites are labelled as having a considerably positive impact, others an uncertain impact and just one, 'Land west of Clacton Road, Weeley' (WE12), a minor positive impact. I have personally watched water roll off like a raging river from the land labelled WE12, after heavy rainfall.</p> <p>The results shown in this Sustainability Appraisal appear to be skewed artificially in favour of the preferred allocations. The impression I have formed is that it appears yet again that, initially, scenarios were set up by TDC and then examined by the Place Services Team mainly using a qualitative that is subjective, approach in order to favour the previously chosen allocations. This Sustainability Appraisal has used little objective thinking based on truly empirical evidence and fails to form a sound basis of genuine appraisal.</p> <p>The vast majority of residents in Weeley, who know the area so well, have fought constantly to save the area that epitomises its historic, rural character and we know that the land south of Thorpe Road between Ash</p>	<p>Deletion of Policy SAMU5 and the allocation of land for development south of Thorpe Road, Weeley and at the Council Offices.</p>	<p>The reasons for the selection and rejection of policy options are outlined throughout the SA within the individual assessment of each policy.</p> <p>The assessment of sites within the SA has not been considered per settlement, with an appraisal framework utilised consistently across all sites. This approach allows considerations of sites within different settlements. Within the SA, sites are grouped into settlements to add a level of structure to the appraisal and for reference purposes. Information as to site size is outlined within the SA for comparison purposes. A separate section within the SA explores site options per size, as 'Strategic Mixed Use' development opportunities. The SA also explores the principle of allocating Strategic Mixed Use developments in a number of broad areas. These are outlined in Appendix 1 of the SA.</p> <p>See also comments in relation to Policy SAMU5 where it is explained that the site in question has, since the submission of the Local Plan, obtained planning permission. The Council's consideration of the various representations received and the various planning issues raised is set out, in detail, in the relevant schedule.</p> <p>Turning to the matter of the Council Offices in Weeley, the Council still plans to migrate all staff to its premises in Clacton and has confirmed that adequate space can be made to undertake the authorities' business. This matter has been put to the test in recent months with the Coronavirus pandemic requiring the majority of staff to work from home.</p>	<p>Details only available to the local authority and the Inspector's Programme Officer.</p>
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				Farmhouse and Brokhowse is the area least suitable for further development if we are to retain the true identity of our village.			
1007178	SA4	David Wendon	5.51 Policy LP 1 Housing Supply	<p>Under Sites Explored in Rural Service Centres Page 282 preferred allocations in rural service centres, Alresford sites are listed. All those sites were rejected but AL1, AL2 and AL3 sites, plus others not recorded in these documents, have received outline approval on appeal.</p> <p>The way that sites A4, AL5 and AL6 are included in this table without any reference to the 300 new houses already planned in the main District Plan document, it could be taken as 3 suitable sites in Alresford to provide another 366 homes thus increasing the growth of the village by 79% rather than the already insensitive increase of 36%.</p> <p>Alresford and other Tendring villages are being overwhelmed with houses already approved and will be totally destroyed without appropriate recording of the documents to show the houses already with planning permission in those localities. There should be no further large scale development beyond that already with planning permission until additional medical facilities, schools, road and public transport schemes are undertaken.</p>	No change required, but Mr. Wendon's concerns about the levels of development taking place in Alresford are well understood.	<p>The SA assesses the impacts of the Plan as published, and does not assess the impacts of any planning applications that have been granted in areas. The Plan does not include any allocations within Alresford; however numerous sites were submitted to the Council for this consideration. These have been assessed within the SA as alternatives to the allocations that have been included within the Plan.</p> <p>In the three years that have passed since the Local Plan was submitted for examination, development in Alresford has progressed following the grant of planning permission on land south of Cockaynes Lane (Staunton Gate) where development is nearing completion and land north of Cockaynes Lane and south of St. Andrew's Road where development is now underway. No other sites are proposed for allocation in the Alresford area and the parish is now the subject of an emerging Neighbourhood Plan which has reached examination stage in its own right.</p>	Details only available to the local authority and the Inspector's Programme Officer.

Many of the comments on the Sustainability Appraisal relate either to the promotion of alternative sites, objections to allocated sites or concerns about the Habitats Regulation Assessment. All matters have been resolved one way or another in the time elapsed since the publication and submission of the Local Plan in 2017. This includes an updated HRA, grants of planning permission on land in Weeley and Brightlingsea and changes in the overall housing and employment land situations in Tendring, partly as a result of appeal decisions, which mean that the Council can identify more than enough land to deliver objectively assessed housing and employment requirements without the need for any sites to be allocated for new development. The Council will consider the need to update the Sustainability Appraisal in light of the most up to date information and will seek the Inspectors' advice in doing so.

Sustainability Appraisal Addendum

ID	Rep ID	Name. Organisation	paragraph of the document comment relates to	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Proposed change to Local Plan	Council response	Contact details
Representations from Technical Stakeholders							
1007311	SAA2	Chelmsford City Council	1.1	This addendum does not alter Chelmsford City Council's response to the Regulation 19 consultation.	N/A	Comments noted.	Details only available to the local authority and the Inspector's Programme Officer.
714889	SAA3	Essex Wildlife Trust	7.1.6 Sustainability Objective 6: Protect and enhance natural, historic and environmental assets	<p>We note that the Tendring Local Wildlife Sites Review was published in 2009. A new review needs to be undertaken in order that the local plan is supported by a robust, up-to-date evidence base.</p> <p>The Local Wildlife Site network should not be regarded as a static system; since 2008 there have been continuing changes in the agricultural environment, in the extent of built development, and in the quantity and quality of information regarding the species and habitats present in the county. Local Wildlife Site policy in respect of site selection criteria has also evolved in response to national guidance. This process is likely to continue with further agricultural changes looming as a result of Brexit, and other less certain impacts due to climate change.</p> <p>In addition, further potential Local Wildlife Sites are likely to have arisen since 2008, through habitat creation or as a result of new information or improved access, and these sites will need to be assessed against the site selection criteria. As the criteria have been updated there is a need to review the status of the existing sites as well.</p> <p>As a minimum standard, all grassland sites should be reviewed every 5 years and woodlands reviewed every 10 years (as a reflection of their slower rate of change unless actively managed).</p>	N/A	This is not considered a comment directed at the SA. The Council does not consider it necessary to undertake a further review of Local Wildlife sites at this point in time, but believes it might be appropriate in the run up to the next Local Plan review. If the Inspectors consider otherwise, the Council would be open to commissioning a review – but does not consider the content of the Local Plan to be unsound. .	Details only available to the local authority and the Inspector's Programme Officer.
714889	SAA4	Essex Wildlife Trust	Overall	<p>Essex Wildlife Trust has submitted comments in response to the recent Draft Local Plan consultation which ended on 28th July. However, the online consultation response form did not provide an opportunity to comment on the local plan evidence base.</p> <p>We note that the Tendring Local Wildlife Sites Review was conducted by EECOS in 2008 and the report was published in 2009. We have previously advised yourselves that this review should now be considered out of date and a new review needs to be undertaken in order that the local plan is supported by a robust, up-to-date evidence base.</p> <p>The National Planning Policy Framework (NPPF) states that:</p> <p>Para. 158 Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>Para 165 Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks.</p> <p>The Local Wildlife Site network should not be regarded as a static system; since 2008 there have been continuing changes in the agricultural environment, in the extent of built development, and in the quantity and quality of information regarding the species and habitats present in the county. Local Wildlife Site policy in respect of site selection criteria has also evolved in response to national guidance. This process is likely to continue with further agricultural changes looming as a result of Brexit, and other less certain impacts due to climate change.</p> <p>In addition, further potential Local Wildlife Sites are likely to have arisen since 2008, through habitat creation or as a result of new information or improved access, and these sites will need to be assessed against the site selection criteria. As the criteria have been updated there is a need to review the status of the existing sites as well.</p> <p>As a minimum standard, all grassland sites should be reviewed every 5 years and woodlands reviewed every 10 years (as a reflection of their slower rate of change unless actively managed). We strongly recommend that Tendring DC undertakes the necessary review of local wildlife sites in the district to ensure that the local plan evidence base is fully up to date and fit for purpose. This will avoid the risk of the draft new plan being rejected by the planning inspector as unsound.</p> <p>We have submitted a summary of the above comments in response to the current Sustainability Appraisal Addendum consultation.</p>	N/A	This is not considered a comment directed at the SA. The Council does not consider it necessary to undertake a further review of Local Wildlife sites at this point in time, but believes it might be appropriate in the run up to the next Local Plan review. If the Inspectors consider otherwise, the Council would be open to commissioning an earlier review – but does not consider the content of the Local Plan to be unsound.	Details only available to the local authority and the Inspector's Programme Officer.

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1117146	SAA12	Babergh District Council	7.1.6	When preparing the RAMS - We recommend the North Essex Authorities mitigation measures take note of and are consistent with the HRA RAMS for Ipswich Borough, Babergh District and Suffolk Coastal District Councils with regards to impact upon the Stour and Orwell SPA	N/A	This is not considered a comment directed at the SA. It can be noted that a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has now been undertaken for Essex.	Details only available to the local authority and the Inspector's Programme Officer.
Representations from Businesses, Landowners and Developers							
1022789	SAA15	Martin Robeson Planning Practice	2	<p>We consider that the sustainability appraisal of new Policy HP4 has been positively prepared than consistent national policy and that the sustainability appraisal fully assess the objectives of Policy HP4 in relation to the short medium to long term policy impacts.</p> <p>We agree that the policy will have positive impact on relevant sustainability objects including the effect use of land in so far as it seeks to safeguard green space but does not restrict the principle of development on green spaces should the policy of criteria be met.</p> <p>We support the Local Plans sustainability objectives and preference for a number of strategic mixed use developments, particularly within the Clacton area to enable growth to develop in line with the social and economic sustainability objectives to deliver a suitable mix of types in 10 years sustainable locations.</p>	N/A	Noted.	Details only available to the local authority and the Inspector's Programme Officer.
Representations from Community Representatives							
None received.							
Representations from Members of the Public							
1105026	SAA1	Alan Valantine	Policy HP4	Safeguarded spaces. This policy is already breached by allowing Cockaynes Lane, Alresford to be significantly changed by the granting development permission South side & possible development on the North side. Note, it is a lane, with preserved natural surroundings and no equal green space provided by these developments (ref.7.1.6). So no confidence. The tables presented are confusing and do not provide information. The original Garden City/Town term has been hi-jacked and renamed Garden Community. They are not the same thing! I agree with properly planned Garden Cities/Towns with planned infrastructure and services, but this so called Garden Community project between Elmstead Market and Greenstead Est is a blatant tack-on with problematic infrastructure issues. Ref7.1.4.So4 you seem to think there will be Significant positive cumulative impacts for this area. What about those wishing to access Colchester from the East? I foresee nothing but more misery for those traveling into the bottleneck Clingoe Hill A133.What is your plan to deal with this? Good place for a Park & Ride? 7.1.8 Sewerage is already inadequate on the East side of Colchester at Colne River. Strong smells are frequently experienced and I believe there is a history of raw discharge. This needs attention.I would only support a properly planned Garden Town well away from Colchester. Eg North of the A120 fairly close to Harwich to help develop jobs and the economy in general with good opportunities for trade.	No change required but the concerns about major development in the west of the district are noted.	<p>Development at Cockaynes Lane is not an allocation within the Plan and has been assessed as an alternative within the SA. It has however received planning permission on appeal and development is well advanced now.</p> <p>Furthermore the Tendring Colchester Garden Community has been confirmed as sound following the examination of Section 1 of the Local Plan.</p> <p>The tables (of site assessments) presented show the impacts as identified in Table 8: The SA site pro forma / framework – Site options included within the SA on page 60. This pro forma / framework provides context to the identified impacts.</p> <p>The impacts highlighted at 7.1.4, relevant to whole plan sustainability, have not been identified as significantly positive. A range of impacts have been identified for different elements of the Plan, including uncertainty surrounding the A133 / Colchester Road. At 7.1.8, uncertain impacts have been identified regarding sewerage capacity.</p>	Details only available to the local authority and the Inspector's Programme Officer.
1116227	SAA5	Mrs Margaret Merrill	housing needs	I don't begin to understand most of the document but must comment on the amount of housing being built in the area, a lot of it on farmland. I think this is a very shortsighted policy as we will need to grow more of our food in future after leaving the EU. No provision is made for the extra people Dr's, Schools and Roads, we already have problems in the area and this will just add to them, Where will all these extra people work?	N/A	This is not considered a comment directed at the SA. The Council is required to plan for a dwelling stock increase of 11,000 in the period 2013 to 2033 to meet with the requirements of national planning policy and the Local Plan contains policies and proposals to that end.	Details only available to the local authority and the Inspector's Programme Officer.
1021103	SAA6	Mr Peter Cannons	7.1.2	There is no Significantly Positive Impact likely to arise from the allocation of agricultural land for housing development (98 dwellings) in Landermere Road Thorpe-le-Soken in relation to the Sustainable use of Land	No change required.	Negative impacts are highlighted within the SA for the alternative at Landermere Road regarding the sustainable use of land (page 304). The site has since obtained planning permission and is now well under construction (Henderson Park).	Details only available to the local authority and the Inspector's Programme Officer.
1021103	SAA7	Mr Peter Cannons	7.1.3	There is no Significantly Positive Impact likely to arise in relation to minimising the need for travel in respect of the Landermere Road Site which is remote from the Village Centre and Railway Station.	No change required.	No significantly positive impacts are highlighted within the SA for the alternative at Landermere Road regarding Sustainability Objective 3 (page 304). he site has since obtained planning permission and is now well under construction (Henderson Park).	Details only available to the local authority and the Inspector's Programme Officer.
1021103	SAA8	Mr Peter Cannons	7.1.4	There are Uncertain Cumulative Impacts in relation to traffic flow in both the High Street (already a bottleneck) and in Landermere Road Thorpe-le-Soken, where traffic is becoming increasingly busy due through traffic arising from current developments in surrounding towns and villages.	No change required	Negative impacts are highlighted within the SA for the alternative at Landermere Road regarding accessibility (page 304). he site has since obtained planning permission and is now well under construction (Henderson Park).	Details only available to the local authority and the Inspector's Programme Officer.
1021103	SAA9	Mr Peter Cannons	7.1.6	The inclusion of a development site in Landermere Road, Thorpe-le-Soken can only result in a potentially adverse impact on the Hamford Water SPA/Ramsar site, as the Urban Sprawl edges recklessly close to Tendring's greatest environmental asset.	No change required	No impact has been highlighted within the SA for the alternative at Landermere Road regarding impacts on the Hamford Water SPA / Ramsar site (page 306). he site has since obtained planning permission and is now well under construction (Henderson Park).	Details only available to the local authority and the Inspector's Programme Officer.

Tendring District Local Plan 2013-2033 and Beyond; Publication Draft – Schedules of representations and responses – Sustainability Appraisal

1007178	SAA10	Mr Dave Wendon		<p>Thank you for notifying me of the Tendring District Council Local Plan Section Two: Draft Publication (Regulation 19) Sustainability Appraisal (SA) Addendum: Appraisal of New Policy HP4 - June 2017. It is a sure thing that TDC has to sell their plan to get it authorised but as a member of the public I see little value in this document.</p> <p>However the statement that 'the Garden Community at Tendring / Colchester Borders (assessed in Section One) will have significantly positive impacts associated with the provision of new infrastructure in line with the scale proposed' prompted me to search for information on North Essex Garden Communities and found the Movement and Access Study PT6 re Central Colchester Terminal Bus Capacity.</p> <p>I was interested to see in that document that 'Essex County Council are currently developing a 'Bus Blue Print' for Colchester town centre given the shortage of terminal capacity at Osborne Street for additional services. Officers are working with the Operators and looking at alternative routing options. Additional services for the Garden Community in West Marks Tey and West Tendring provide an added impetus for this Blue Print to provide passive provision for future growth.</p> <p>At Alresford our most frequent bus services are to Colchester and concur with the shortage of bus capacity. A series of bus stops on a street corner does not create a bus station and the move from the old Queen Street site has been a disaster. If the will was there a section of the remaining old site could still serve as purposeful bus station. What Colchester, as a principal north Essex town, has in Stanwell Street is a disgrace and insult to the term 'bus station' and needs sorting now not in however many years time when the Colchester/Tendring Garden community is built.</p>	No change required	<p>The 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 'Healthy Places' Policy HP4, regarding the safeguarding of green space in the District.</p> <p>This is not considered a comment directed at the SA.</p>	Details only available to the local authority and the Inspector's Programme Officer.
1104613	SAA11	Dr Josie Close	7.1.2 & 7.1.6 & 7.1.7 & 7.1.8	<p>Make efficient use of land by increasing the density of development and allow common land (rather than large private gardens) to be used for play and communal recreation. This would increase the social cohesion of the community.</p> <p>The value of historic and heritage sites and buildings needs to be reinforced. It is becoming too easy to lose the smaller buildings, of definite local character and historic relevance in the pressure to stretch the slashed budget. Once gone these modest buildings cannot be replaced and the townscape and built environment is changed forever. Additionally, the new-build development needs to be much more ambitious in its design and sustainability goals to create the new character of the twenty-first century. Presently new development is a pastiche of quasi-rural style with no real response to climate-change - using the sun/wind(ventilation)/rainwater to good effect - or making use of modern materials and building techniques..</p> <p>Tendring with the support of ECC and the nation generally is looking to cleaner transport. Hybrid and natural gas buses are already in use in other towns - around the world! . We should not be accepting worse air quality through additional transport but setting up policies that ensure the transport itself is clean. Highways England, ECC and Tendring need to be thinking ahead about electric vehicle charging points including fast-charging provision.</p> <p>UK is far behind other European countries (Germany/Denmark) in applying recycling treatment methods to grey water. Apart from sophisticated membranes simple 'constructed wetland' methods have been used for centuries in rural areas with great effect.</p>	No change required.	<p>Noted. This is not considered a comment directed at the SA but the comments are noted.</p> <p>In early 2020 the Council adopted a new Heritage Strategy which promoted the use of 'local lists' to assess and designate non designated heritage assets. Whilst this project has yet to formally commence, a number of conservation area appraisals have been commissioned which highlight a large number of proposed non designated heritage assets.</p>	Details only available to the local authority and the Inspector's Programme Officer.
1007238	SAA13	Carol Bannister	2	<p>Re: Sustainability Appraisal (SA) Addendum: Appraisal of New Policy HP4 - June 2017</p> <p>Given that Weeley is the smallest of the Rural Service Centres it is vitally important that the character and identity of this village is retained and that the existing vibrant community does not become 'swallowed up' by inappropriate, disproportionate development. Consequently, I support wholeheartedly Section (d) of Policy HP4 - Safeguarded Green Spaces which stresses that development on Safeguarded Local Green Spaces will not be permitted unless development of the site would not result in the loss of an area important to visual amenity.</p> <p>Weeley's main recreation area, adjacent to the Village Hall and St Andrew's Primary School, has a distinctive rural backdrop in the form of The Spinney and its safeguarded status is vitally important to ensure our rural environment is maintained. Of equal importance are the small areas of Spencer Way and Loop Green, which also contribute to the rural nature of our village.</p>	N/A	<p>Noted. This is not considered a comment directed at the SA but the comments are noted.</p> <p>See comments above regarding the grant of planning permission at land south of Thorpe Road, Weeley and see comments in relation to Policy SAMU5.</p>	Details only available to the local authority and the Inspector's Programme Officer.
1007238	SAA14	Carol Bannister	2	<p>However, I read with concern in Section 7.1.3 Sustainability Objective 3: Harness the District's Economic Strengths that Tendring District Council continues to suggest that the main focus of growth for the District should be not only in the existing Strategic Urban Settlements and Smaller Urban Settlements but also in the Rural Service Centre of Weeley.</p>	N/A	<p>Noted. This is not considered a comment directed at the SA but the comments are noted.</p> <p>See comments above regarding the grant of planning permission at land south of Thorpe Road, Weeley and see comments in relation to Policy SAMU5.</p>	Details only available to the local authority and the Inspector's Programme Officer.

Again, the majority of comments are not aimed at the methodology or findings of the Sustainability Appraisal addendum itself, but refer to concerns about a number of developments, many of which have now obtained planning permission since the Local Plan was submitted in 2017.