

Braintree District Council

Core Strategy – Submission Draft

**Sustainability Appraisal
and
Strategic Environmental Assessment**

**Environmental Report
Non-Technical Summary**

April 2010



The information contained in this document can be made available in alternative formats: large print, braille, audio tape or on disc.

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1 INTRODUCTION

1.1 Background

In 2005 Essex County Council was commissioned by Braintree District Council to undertake the Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment Directive (SA/SEA), for Braintree District Council's Core Strategy. This report is the Non-Technical Summary of the Environmental Report, which sets out the SA/SEA undertaken for the Core Strategy.

The SEA Directive requires that a non-technical summary of the information provided in accordance with Annex I (a-i) is produced alongside the Environmental Report. For clarity, the SEA Directive requirements are outlined in a text box at the start of each section.

1.2 The Core Strategy

SEA Directive requires: 'An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.' Annex I (a)

The Core Strategy is a Development Plan Document (DPD) forming part of the Local Development Framework (LDF). It sets out the spatial vision, spatial objectives and strategy for the development of the District. It should give a clear message about the ways in which the area will change by its end date providing a clear spatial expression of the relevant aspects of the Sustainable Community Strategy (SCS). The Core Strategy will cover the whole of the Braintree District and must be consistent with national policy and the East of England Plan. The plan should draw together policy strands at a district, town or neighbourhood level.

1.3 Plans and Programmes

SEA Directive requires: 'The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation. Annex I (e)'

Table 1 outlines those plans and programmes viewed as being the 'key list of plans and programmes'. The Plans and Programmes in bold are those supported for inclusion by the Statutory Consultees in response to the Scoping Report consultations.

TABLE 1: LIST OF PLANS AND PROGRAMMES

National
Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners (June 2004)
PPS23: Planning and Pollution Control – Annex 1: Pollution Control, Air and Water Quality (November 2004)
PPS23: Planning and Pollution Control (November 2004)

PPS1: Delivering Sustainable Development (February 2005)
PPS9: Biodiversity and Geological Conservation (August 2005)
PPS3: Housing (December 2006)
Planning and Climate Change (Supplement to PPS1) (December 2007)
PPS25: Development and Flood Risk – Practice Guide (December 2009)
PPS4: Planning for Sustainable Economic Growth (December 2009)
PPS25: Development and Flood Risk (March 2010)
PPS5: Planning for the Historic Environment (March 2010)

Regional
The East of England Plan, the Revision to the Regional Spatial Strategy for the East of England (RSS14) (May 2008)
Sustainable Futures – The Integrated Regional Strategy for the East of England (2005)
UKCIP Climate Change Scenarios (2002 and 2009)
Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A revision to the Regional Spatial Strategy for the East of England (March 2009)

County
The Essex Local Area Agreement 2008-2011 (April 2009 Refresh)
Essex Police Authority Three Year Strategy Plan 2009 – 2012
(draft) Essex School Organisational Plan 2009 – 2014
Essex Rural Strategy: Partnership Priorities for the future of Rural Essex (2005)
Essex Local Transport Plan 2006/2011
Essex Minerals Plan (1996)
Essex and Southend on Sea Waste Local Plan (2001)
Essex Biodiversity Action Plan (1999)
Essex Biodiversity Action Plan Review (2006)
Essex Wide Gypsy and Travellers Accommodation Needs Assessment (2006)

District
Braintree District Local Plan Review (adopted July 2005)
Mid Essex Economic Futures (March 2006)
North Essex Authority Retail Study Stage 1 Report and Stage 2 (2006)
Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (2006)

District
Braintree Settlement Fringe Study (November 2007)
Non Residential Land Availability (March 2009)
Residential Land Availability (2007)
Braintree Strategic Housing Market Assessment (Feb 2008 + 2009 Update)
Urban Capacity Study (October 2007)
Employment Land Review (November 2007)
Braintree District, Haverhill and Clare Water Cycle Study (November 2008)
Strategic Housing Land Availability Assessment (SHLAA) (2009)
Habitat Regulations Appropriate Assessment (2009)
Braintree Strategic Flood Risk Assessment (October 2007)
Going for Growth, Investing in your future (June 2009)
Braintree District Futures 2025 (2006)
Rural Services Survey (2008)
Braintree Town Centre Preliminary Development Analysis Report (April 2009)
Assessment of Impact of Potential LDF Sites on Existing Junctions - Braintree and Witham LDF Allocations (2008)
Assessment of Impact of Potential LDF Sites on Existing Junctions - Braintree and Witham LDF Allocations (2010 draft)
Affordable Housing Provision and Developer Contributions in the District of Braintree (2009)
A Strategy for People and Places in the Braintree District to 2026 (2009)

1.4 Baseline Information

SEA Directive requires: 'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.' Annex I (b)

'The environmental characteristics of areas likely to be significantly affected.' Annex I (c)

'Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.' Annex I (d)

Annex B of the Environmental Report details the complete Baseline Information profile for Braintree District, and is based on the information which was highlighted as relevant through the Scoping Reports, together with relevant new data sources which have become available since the consultation on the last Scoping Report.

Table 2 outlines the stages which led to the formulation of the Sustainability Objectives, which were based on the key issues for the district. The Sustainability Objectives have been derived from the review of plans and programmes and a strategic analysis of the baseline information. Objectives are based on policy advice and guidance and related to the assessment of the current state of the District. The appraisal is then able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the plan's proposed policies.

TABLE 2: KEY ISSUES FOR BRAINTREE CORE STRATEGY

Plans and Programmes	Baseline Information	Sustainability Objective
PPS 1 – Delivering Sustainable Development (2005) ODPM	Braintree has an ageing population. It is ranked within the 40% least deprived nationally.	1) Create Safe Environments which do not undermine the quality of life or community cohesion
PPS 3 – Housing (2006) ODPM	In 2008/09 there were the lowest number of net additional dwellings completed within the time period studied. Dwelling prices are lower than the county, regional and national equivalents, and mean dwelling price has remained below the county average since 2001. Social housing within the district is provided predominantly by RSLs rather than by the Local Authority. In 2008/09 the district recorded the joint third highest number of homeless acceptances in priority need within Essex.	2) To provide everyone with the opportunity to live in a decent home
PPS 1 – Delivering Sustainable Development (2005) ODPM	The health of the population in Braintree is generally better than the England average; however road injuries and deaths, together with physical activity and obesity are worse than average.	3) To improve the health of the Districts residents and mitigate/reduce potential health inequalities.
PPS 4 – Planning for Sustainable Economic Growth (2009) CLG	The district has the smallest proportion of retail and non-commercial office floorspace at county, regional and national levels.	4) To promote town centre vitality and viability

Plans and Programmes	Baseline Information	Sustainability Objective
<p>PPS 1 – Delivering Sustainable Development (2005) ODPM</p> <p>PPS4 – Planning for Sustainable Economic Growth (2009) CLG</p>	<p>Braintree has a fairly even split of VAT and/or PAYE based local units located in rural and urban areas, as opposed to the national picture where almost 75% of these are located within the latter. The district also has a higher than average proportion of businesses employing 0-4 persons. The largest numbers of businesses are within the construction sector, which employs an above average proportion of people. Process plant and machine operatives are employed within the district at levels above the regional and national averages.</p> <p>There are levels of outcommuting to work in higher paid jobs than those available within the district. Braintree has a higher level of unemployment than the county as a whole, and from February 2008 to 2009 the number of residents claiming job seekers allowance nearly doubled. For those in work, weekly wages are above the regional and national levels.</p>	<p>5) To achieve sustainable levels of prosperity and economic growth</p>
<p>PPS 9 – Biological and Geological Conservation (2005) ODPM</p>	<p>There are four SSSIs within the district, the majority of Glemsford Pits SSSI is not currently complying with PSA targets.</p> <p>There are six Local Nature Reserves and 251 Local Wildlife Sites distributed across the district.</p>	<p>6) To conserve and enhance the biological and geological diversity of the environment</p>
<p>PPG 13 - Transport (2001) ODPM</p>	<p>Braintree has above average car ownership, with above average numbers of households owning two vehicles or more. In accordance with this over 40% of residents drive to get to work, while fewer residents than the national and regional average cycle or use buses for their commute. A comparatively large proportion of residents in the district work from home.</p>	<p>7) To promote more sustainable transport choices.</p>
<p>PPS 1 – Delivering Sustainable Development (2005) ODPM</p>	<p>Areas in the north of Braintree are over 90 minutes by public transport or walking to employment and retail centres and secondary schools.</p>	<p>8) Promote accessibility.</p>
<p>Braintree District Council – Community Strategy (A Strategy for People and Places in the Braintree District to 2026)</p>	<p>GCSE attainment is lower than regional and national levels.</p>	<p>9) To improve the education and skills of the population</p>

Plans and Programmes	Baseline Information	Sustainability Objective
PPS 5 – Planning for the Historic Environment (March 2010) CLG	<p>There are 3,190 listed buildings, 2939 of which are Grade II.</p> <p>There are 40 Scheduled Monuments, and 39 Conservation Areas.</p> <p>Essex Historic Environment Record contains approximately 3,252 archaeological records relating to Braintree.</p>	10) To maintain and enhance cultural heritage and assets within Braintree
Planning Policy Statement: Planning and Climate Change - Supplement to PPS 1 (December 2007) CLG	<p>Scenarios suggest there will be warmer wetter winters, and warmer drier summers in the East of England.</p> <p>Braintree has been consuming more energy in total than the Essex average, but achieved a per capita reduction in CO2 emissions. The majority of energy is consumed by the transport sector, closely followed by the domestic sector.</p>	11) To reduce contributions to climatic change
PPS 23 – Planning and Pollution Control and Annex 1. (2004) ODPM	<p>Water Resource Management Units in Braintree are over-abstracted or classified as having no water available.</p> <p>The majority of water bodies within Braintree are given a moderate overall potential. However the River Blackwater and the River Chelmer are both given a poor current status.</p>	12) To improve water quality
PPS 25 – Development and Flood Risk (March 2010) CLG	<p>Consideration to flooding from overland flow should be given for developments occurring throughout the district, but with particular regard to Bocking, Braintree, Witham and Coggleshall.</p>	13) To reduce the risk of flooding
PPS 23 – Planning and Pollution Control and Annex 1 (2004) ODPM	<p>Air and Noise quality issues all related to the major road network within the district.</p>	14) To improve air quality
Sustainable Futures: Integrated Sustainability Framework for the East of England (January 2009)	<p>In 2008/09 over 77% of completions were on PDL.</p> <p>The majority of agricultural land in Braintree is Grades 2 and 3.</p> <p>The district contains Special Landscape Areas and was subject to Landscape Character Assessments</p>	15) To maintain and enhance the quality of landscapes and townscapes

Annex C of the Environmental Report sets out how these Sustainability Objectives are incorporated into a Sustainability Framework. A Sustainability Framework is an important tool in the SA/SEA process that is developed during the scoping phase in line with the Planning Advisory Service's best practice guidance for Sustainability Appraisals. It provides the context against which the emerging Core Strategy options and policies can be assessed and sets out the sustainability objectives; the key questions that should be asked to decipher whether the Strategy adheres to the principles of sustainability; and indicators which can monitor the impact of the Strategy.

The Sustainability Framework was first included in the Scoping Report which was submitted to the three statutory consultees, the Environment Agency, English Heritage and Natural England for consultation. The comments and recommendations received have been incorporated within the Sustainability Framework.

2 APPRAISAL OF PLAN AIMS AND OBJECTIVES

2.1 Introduction

SEA Directive requires: 'The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, 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 issues.' Annex I (f)

'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. Annex I (g)'

SEA Directive requires: 'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.' Annex I (h)

This section sets out the appraisal of the Core Strategy Aims and Objectives as outlined within the Submission Draft document.

2.2 Core Strategy Aims

Section 3 of the Submission Draft Core Strategy contains the aims of the Core Strategy which reflect those of the Sustainable Community Strategy as follows:

- 1. Promoting accessibility for all
- 2. Creating a clean and green environment and addressing climate change
- 3. Achieving a prosperous local economy
- 4. Enabling everyone to enjoy a safe and healthy lifestyle

In terms of compatibility, the Sustainability Objective relating to Cultural Heritage is not highlighted as being either compatible or incompatible with any of the Core Strategy Aims.

There are a number of uncertainties relating to the Core Strategy Aims and the Sustainability Objectives.

- Promoting accessibility for all has uncertain compatibility with Biological and Geological diversity (SO6), contributions to climate change (SO11) and Air Quality (SO14) where the promotion of accessibility could potentially be to the detriment of these objectives through increased transportation.
- Creating a clean and green environment and addressing climate change has uncertain compatibility with Economic Growth (SO5) and Town Centres (SO4) where incompatible businesses may be negatively impacted. Landscapes and Townscapes (SO15) may also suffer as a result of renewable technologies impact on both.
- Achieving a prosperous local economy has potential incompatibilities with contributions to climate change (SO11) and air quality (SO14) where business practices have the potential to negatively or positively effect both.

- Enabling everyone to a safe and healthy lifestyle has potential incompatibilities with biodiversity and geodiversity (SO6) through increased human activity in areas of biological interest.

Finally, the Sustainability Objective relating to Cultural Heritage (SO10) is not compatible or incompatible with any of the Core Strategy Aims.

2.3 Core Strategy Key Objectives

The Submission Draft Core Strategy sets out thirteen key objectives which have been developed to reflect and underpin the vision and aims for Braintree District. These objectives and their compatibility with the Sustainability Objectives are set out in Table 3.

TABLE 3: COMPATIBILITY OF THE CORE STRATEGY OBJECTIVES AND SUSTAINABILITY OBJECTIVES

Sustainability Objective	Core Strategy Objective
1 – Safe Environment	Accessibility, Infrastructure, Housing, Built Environment, Leisure
2 – Decent Homes	Accessibility, Infrastructure, Housing, Employment, Rural Areas, Built Environment, Environment, Leisure
3 – Health	Accessibility, Infrastructure, Transport, Environment, Leisure
4 – Town centres	Accessibility, Employment, Transport, Town Centres, Key Service Villages, Rural Areas, Built Environment
5 – Economic Growth	Accessibility, Employment, Transport, Town Centres, Key Service Villages, Rural Areas,
6 – Biological & Geological Diversity	Sustainability, Environment
7 – Sustainable Transport Choices	Sustainability, Accessibility, Infrastructure, Employment, Transport, Town Centres, Key Service Villages, Rural Areas, Leisure
8 – Accessibility	Sustainability, Accessibility, Infrastructure, Housing, Employment, Transport, Town Centres, Key Service Villages, Rural Areas, Leisure
9 – Education & Skills	Accessibility, Infrastructure, Employment,
10 – Cultural Heritage	Built Environment
11 – Contributions to Climate Change	Sustainability, Accessibility, Transport, Environment, Leisure
12 – Water Quality	Flood Risk and Water Supply
13 – Flooding	Flood Risk and Water Supply
14 – Air Quality	
15 – Landscapes and Townscapes	Sustainability, Accessibility

The majority of the Core Strategy Objectives correspond well with the Sustainability Objectives. However issues relating to air quality may not be adequately addressed by the objectives contained within the Core Strategy.

3 STRATEGIC LOCATIONS

3.1 Introduction

SEA Directive requires: 'The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, 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 issues.' Annex I (f)

'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. Annex I (g)'

SEA Directive requires: 'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.' Annex I (h)

Development and growth as set out within the Core Strategy is directed towards the three main towns (Braintree, Witham and Halstead), to a lesser extent to the key service villages as defined within the Core Strategy, with development within the other villages restricted to a response to local need.

Allocations within the urban areas and on previously developed land (PDL) are supported by evidence from the SHLAA, the Urban Capacity Study and the SHMA, all forming part of the District's Core Strategy Evidence Base. The Rural Services Study has been utilised to determine the classification of 'Key Service Villages' as locations to support potential new housing growth and the subsequent allocation of 450 new dwellings within these defined areas.

These studies have identified capacity for approximately 3,400 dwellings; however this still leaves a deficit of approximately 1,400 dwellings which cannot be provided within the existing urban areas. This deficit provides the justification for the need for Greenfield allocations within Core Strategy.

Options for the strategic location of growth areas were explored in the One-District – One Vision consultation document in October 2008. Annex D of the Environmental Report outlines the SA/SEA appraisal of each of these locations for growth.

Growth Locations

Table 4 outlines the appraisal of the four growth locations which are proposed within the Submission Draft Core Strategy. The first column contains the Sustainability Objective, while the second column outlines the detailed indicators used to appraise each location. Locations were appraised in accordance with the following criteria:






	In conformity with the criterion		Not relevant to the criterion
	In conflict with the criterion		Insufficient information available
	Partially meets the criterion / some constraints identified		

TABLE 4: APPRAISAL OF GROWTH LOCATIONS

SA/SEA Objective	Indicator	Land off Panfield Lane	SW of Gt. Notley	Lodge Farm	East of Forest Road
1) Create Safe Environments which do not undermine the quality of life or community cohesion	Will the site concentrate development near or within LSOAs in the most deprived 20% to 40% in the country?	+	0	+	0
2) To provide everyone with the opportunity to live in a decent home	Is the site proposal over the relevant thresholds for the application of the affordable housing policy?	+	?	?	+
3) To improve the health of the Districts residents and mitigate/reduce potential health inequalities.	Is it within 30 mins of a GP by walking or public transport?	+	+	+	+
	Will it lead to a direct loss of public open space or recreational facility?	-	?	+	+
4) To promote town centre vitality and viability	Is it within 30 mins a retail centre by walking or public transport?	+	+	+	+
5) To achieve sustainable levels of prosperity and economic growth	Will it increase employment land availability?	+	?	?	+
	Is the site proposed for mixed use development or employment?	+	?	?	+
	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	/	-	-	-
6) To conserve and enhance the biological and geological diversity of the environment	Is the site in close proximity (within 200m) to a SPA, SAC or Ramsar site?	+	+	+	+
	Is the site on or in close proximity (within 200m) to a SSSI, or National Nature Reserve?	+	+	+	+
	Is the site on or in close proximity (within 200m) to a Local Wildlife Site, Local nature Reserve or an area of Ancient Woodland?	+	+	+	/
	Is the site safeguarded within the minerals local plan?	0	0	0	0
7) To promote more sustainable transport choices.	Is the site proposed in close proximity (within 200m) to existing public transport route?	+	+	+	+
8) Promote accessibility.	Is it within 30 mins of a retail centre by walking or public transport?	+	+	+	+
	Is the site proposed in a location with accessible natural green space or recreational facilities?	+	+	+	+
9) To improve the education and skills of the population	Is it within 30 mins of a primary school by walking or public transport?	+	+	+	+
	Is it within 30 mins of a secondary school by walking or public transport?	+	+	+	+
10) To maintain and enhance cultural heritage	Are there any listed buildings on or adjacent to the site?	/	+	+	+

SA/SEA Objective	Indicator	Land off Panfield Lane	SW of Gt. Notley	Lodge Farm	East of Forest Road
and assets within Braintree	Is the site in or adjacent to a Conservation Area?	+	+	+	+
	Is the site in or adjacent to a Historic Park and Garden?	+	+	+	+
	Is the site in or adjacent to a Scheduled Monument?	+	+	+	+
11) To reduce contributions to climatic change	Will the scale of new development (greater than 10 dwellings or 1000m ² of non-residential floorspace) require the 10% of its energy supply to be met by decentralised, low-carbon or renewable sources?	+	?	?	?
12) To improve water quality	Is the site proposed within a groundwater source protection zone?	+	+	+	+
	Is the site proposed within a water abstraction management area?	-	-	-	-
13) To reduce the risk of flooding	Does the site lie within Flood Risk Zones 2, 3a or 3b?	+	+	+	+
14) To improve air quality	Is the site proposed within an Air Quality Management Area (AQMA)?	+	+	+	+
15) To maintain and enhance the quality of landscapes and townscapes	Will the site lead to coalescence of urban extensions with nearby villages?	+	+	+	+

As can be seen, the Strategic Growth Locations accord well with the majority of Sustainability Objectives.

Braintree as a district contains a high proportion of Grades 2 and 3 agricultural land which is viewed as amongst the best and most versatile agricultural land. All of the growth locations appraised resulted in a loss of Grades 2 or Grade 3 agricultural land, which is likely to be an unavoidable impact of Greenfield development within the district.

Water resources within Braintree and Essex as a whole are stretched. As a County the water resource availability does not meet demand, and Essex is a net importer of water from outside of the County. Any additional demand for water through development will compound the existing issues relating to water supply within Braintree.

4 APPRAISAL OF THE CORE STRATEGY POLICIES

4.1 Introduction

SEA Directive requires: 'The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, 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 issues.' Annex I (f)

'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. Annex I (g)'

SEA Directive requires: 'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.' Annex I (h)

This section explains the background to the policies, reviews their significant impacts, discusses any alternatives considered through the preparation of the emerging Core Strategy and highlights any proposed mitigation measures.

4.2 CS1: Housing Provision and Delivery

4.2.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	+	+	+	+	+	/	/	+	+	/	/	/	/	/	/
Medium Term	+	++	/	+	+	/	/	+	+	/	/	/	/	/	/
Long Term	+	++	/	+	+	/	/	+	+	/	/	/	/	/	/

Significant Effects

The provision of a decent home for everybody (SO2) is strongly supported through the provision of housing in accordance with RSS allocations for the District.

The focus of housing delivery in Braintree and Witham responds well to providing housing growth in accessible locations with transport links (SO8), jobs (SO5), services, (SO1), commercial areas (SO4), schools (SO9) and leisure services (SO3).

There is uncertainty in the medium to long term where the capacity of current health facilities (SO3) is unknown and the pressures of new development including the impact of the growth locations may have negative effects. The development of housing in the Remaining Villages may have negative impacts on health where open space is not often accessible to the public and dwellings are not in accessible locations for health services. Without site specific information the impacts of Policy CS1 are uncertain on biodiversity (SO6), especially in the long term with development of the growth locations.

Similarly without site specific information the impacts on maintaining cultural heritage and assets (SO10), contributions to climate change (SO11), improving water quality (SO12), reducing the risk of flooding (SO13), improving air quality (SO14) and improving the townscape (SO15) are uncertain.

Temporal Effects

The impacts on providing the opportunity to live in a decent home are likely to become more positive in the long term as the Growth Locations are developed.

Secondary, Cumulative and Synergistic Effects

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan may collectively eliminate the uncertainty of the implementation of Policy CS1. In brief these are:

- Policy CS8 may reduce uncertainty with regard to reducing the risk of flooding (SO13) and improving water quality (SO12) by application of the sequential test to all new development and the encouragement of SUDs.
- Policy CS8 may also ensure that development proposals protect and enhance the natural environment, habitats and biodiversity (SO6).
- Policy CS9 with regard to contributions to climatic change (SO11) where the maximum possible use of renewable energy and energy efficient materials will be secured in all new development.
- Policy CS11 should reduce uncertainty relating to health provision (SO3) through the delivery of infrastructure to provide for the future needs of communities.

In addition to these, there are also a number of Policies which result in a cumulative strengthening of the positive effects of CS1. In brief these include:

- The focus of housing delivery in the Main Towns and Key Service Villages has a positive impact with regard to health through the delivery of open space provision as supported by Policy CS10 and SANG targets within the supporting text for Policy CS8.
- The location of the majority of housing development in the Main Towns will be supported by employment provision identified in Policy CS4.
- Due to the phasing regimes of the Growth Locations, the impacts on town centres may become more positive in the long term where regeneration and the improvement of the town centres can be secured as specified in Policy CS6. It is important that housing delivery is supplied in line with the regeneration of town centres as specified in Policy CS6.

4.2.2 Progress through SA process

Policy CS1 was previously part of CS8 in the previous Core Strategy Consultation Document and was appraised in the SA/SEA for that document. The policy has developed through adopting the recommendations set out in the previous SA/SEA Environmental Report in so far as:

- The need to set out how the regional allocation is to be distributed throughout the District, including phasing details
- Including an order of priority with reference to previously developed land.

These details have been included within Policy CS1 of the Submission Document, including a breakdown of provision by settlement and new strategic Growth Location, as well as the provision in the Key Service Villages and Remaining Villages. An order of priority is effectively included through the inclusion of phasing details, and an additional focus for previously developed land to be utilised for development on all sites excluding the new Growth Locations.

4.2.3 Alternatives considered

Other options for the level of housing provision were not investigated because the policy responds directly to provision set out in the revised East of England Plan.

Settlement Strategy Options were considered at the earliest stage of the SA/SEA process. The April 2007 SA/SEA Environmental Report considered various options including:

- Existing commitments and site within Existing Built up areas;
- Urban Concentration – New Development at Braintree, Halstead and Witham;
- Dispersal – New Developments spread more widely across the district,
- New Settlement
- New development to be located to assist with the provision of new infrastructure.

The outcome of the April 2007 work informed the emerging strategy and assisted in the selection of the locations for growth within the Submission Core Strategy.

Alternative locations for the new mixed-use Growth Locations (including their housing provision element) were investigated throughout the Core Strategy preparation process and the appraisal of these sites can be found in the Annex D of the Environmental Report.

4.2.4 Impact on indicators

The implementation of Policy CS1 is most likely to impact on the following SA indicators:

- Indices of Multiple Deprivation Score (Housing and Services domain and the Living Environment domain).
- Type of housing stock.
- Population projections and forecasts.
- Access to sustainable transport links and services.
- Residents' opinions of and access to open space provision.
- Incidences of development on PDL.
- Incidences of residential flooding.

4.2.5 Proposed mitigation measures

The majority of new housing development is focussed on Brownfield land within existing settlements; therefore the Site Allocations DPD should reflect this in terms of allocating land and providing phasing details.

The development of housing in the Remaining Villages may have negative impacts on health where open space is not often publicly accessible and dwellings are not in accessible locations for health services. It is recommended that specific proposals are appraised with regard to open space and health care provision prior to allocation.

The delivery of housing in the Key Service Villages and the Remaining Villages (as defined) should be delivered in conjunction with rural employment proposals that may come forward. In addition housing delivery should be supplied in line with the regeneration of town centres through the implementation of Policy CS6.

4.3 CS2: Affordable Housing

4.3.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	/	++	+	+	0	0	/	+	+	0	0	0	0	/	/
Medium Term	/	++	+	+	0	0	/	+	+	0	0	0	0	/	/
Long Term	/	++	/	/	0	0	/	/	/	0	0	0	0	/	/

Significant Effects

The major significant effect of the implementation of Policy CS2 responds to the development of affordable housing within the Growth Locations supporting the opportunity to live in a decent home (SO2). The policy is likely to promote development of Affordable Housing in urban areas in the short and medium term, whilst providing for Affordable Housing within the Growth Locations in the Long Term.

Affordable Housing located within the urban areas in accordance with the distribution of development specified in Policy CS1, should be in accessible locations to services and facilities (SO3, 4, 8 and 9). However the location of Affordable Housing within the growth locations will need to be carefully managed to ensure access to services and facilities is adequate for these units.

Temporal Effects

Uncertainty with regard to the long term impacts relate to details of development within the Growth Locations being unknown at present. These will need to be carefully planned and managed to ensure that Affordable Housing within the Growth Locations is located appropriately. The impacts on providing the opportunity to live in a decent home and education through the relocation of Braintree College are likely to become more positive in the long term as the Growth Locations are developed yielding their affordable housing element.

Secondary, Cumulative and Synergistic Effects

In the rural areas an identified need for affordable housing in line with National Trends, justifies a higher target together with a lower threshold in these areas. Policy CS1 states that 250 dwellings will be located in the Remaining Villages. These rural areas of the District generally do not have an appropriate level of sustainable transport links and are in less accessible locations. The impact of this with regard to minimising traffic movements are largely dependant on the delivery of local employment opportunities, and the level of services in each locality as identified in the Rural Services Survey as part of the District's CS Evidence Base.

4.3.2 Progress through SA process

Policy CS2 previously formed part of Policy CS8 in the previous consultation version of the Core Strategy. At that stage the affordable housing policy was included within a wider housing policy and stated a target of 40% Affordable Housing provision on a threshold of 0.2ha for the entire District, to be provided by the developer. The Affordable Housing element of Policy CS8 was appraised as follows:

'The policy responds to the need for inclusive access to housing which in combination with the District's Affordable Housing target will provide a larger proportion of the population an opportunity to live in the District.' (p23)

The policy has developed in line with evidence coming forward from the Affordable Housing Viability Study and the SHMA, forming part of the District's Core Strategy Evidence Base.

4.3.3 Alternatives considered

A reasonable alternative for affordable housing delivery on a threshold of 5 dwellings or 0.2ha at 40% across the whole District was investigated within the 'One District – One Vision' preferred options document. This target was subject to SA/SEA within that document.

The change in target and threshold does not impact on the sustainability appraisal.

4.3.4 Impact on indicators

Implementation of Policy CS2 is likely to impact the following SA indicators:

- Number of affordable houses delivered and as a percentage of housing stock
- House Prices
- IMD Score – Housing and Services Domain
- Access to sustainable transport links
- Population projections and forecasts
- Development occurring on PDL

4.3.5 Proposed mitigation measures

In order to differentiate between the differing levels of sustainability regarding housing delivery in the Key Service Villages and those Remaining Villages, it is important to ensure that rural affordable housing is delivered in conjunction with

The district will need to ensure that the design criteria of housing are suitable for the character of the area in which the Affordable Housing is proposed, this would have to be on a site-by-site basis.

4.4 CS3: Gypsy and Travellers and Travelling Showpersons Accommodation

4.4.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0
Medium Term	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0
Long Term	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0

Significant Effects

The number of pitches identified for delivery responds to Policies H3 and H4 of the East of England Plan revision and conform to the requirements of the Essex Gypsy and Traveller Accommodation Assessment 2009, thus having a positive impact on providing decent homes for all (SO2).

The impacts of this policy on the creation of safe environments and social cohesion (SO1) are uncertain, as this will be largely dependant on the specific location of sites. There is further uncertainty with regard to sustainable transport choices (SO7) and air quality (SO14) which again would be largely dependant on the location of sites, and means of transportation available.

The inclusion of criterion within Policy CS3 ensures that whilst exact locations of sites are not known at present, a number of sustainability credentials will need to be adhered to in order for a site to be in conformity with the Core Strategy once adopted.

Criterion 1 of Policy CS3 advises that future sites should be located within reasonable distance to services and amenities, impacting positively on health (SO3) accessibility (SO8) and education (SO9). Criterion 4 ensures that sites are not located within areas at risk of flooding (SO13). Criterion 5 protects water quality by ensuring that sites are capable of being provided with drainage and a water supply. However the use of the word 'should' allows an element of uncertainty as to how effective the policy will be in practice, therefore none of these elements have been awarded a significant positive.

Temporal Effects

There are no temporal effects identified at this stage where much depends on the specific scale and location of allocations to be identified in the Site Allocations DPD.

Secondary, Cumulative and Synergistic Effects

There are no secondary, cumulative and synergistic effects identified at this stage where much depends on the specific scale and location of allocations to be identified in the Site Allocations DPD, and how specific sites interact with development proposals and requirements identified in the wider strategy.

4.4.2 Progress through SA process

Policy CS3 previously formed part of Policy CS8 in the previous consultation version of the Core Strategy. At that stage the Gypsy, Traveller and Travelling Showpeople requirements of the strategy were included within the wider housing provision policy and appraised as follows:

‘Provision for gypsies and travellers and for travelling showpeople should be in accordance with the outcome of the current review of the Regional Spatial Strategy.’ (p3)

The policy has developed to provide a single issue policy relating to housing provision for the gypsy, traveller and travelling showpersons community. The policy has also developed to provide a criterion based policy to assess sites which may come forward prior to adoption of the Site Allocations DPD.

4.4.3 Alternatives considered

Other options for the gypsy, traveller and travelling showpeople policy were not investigated. The policy responds to government guidance which requires that the Core Strategy set out criteria, and the site provision responds to the requirements of the East of England Plan single issue revision document.

4.4.4 Impact on indicators

Implementation of Policy CS3 could impact on the following SA indicators:

- Indices of Multiple Deprivation
- Accessibility to GPs and Schools

4.4.5 Proposed mitigation measures

There are no proposed mitigation measures recommended at this stage. Specific measures will be made on a site-by-site basis in the Site Allocations DPD.

4.5 CS4: Distribution of Employment

4.5.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	+	0	0	+	++	/	/	/	/	/	/	/	/	/	/
Medium Term	+	0	0	+	++	/	/	/	/	/	/	/	/	/	/

Long Term	+	/	0	+	++	/	/	/	+	/	/	/	/	/
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Significant Effects

The provision of employment land throughout the district in accordance with Policy CS4 should contribute to maintaining the economy of the District (SO5) and achieving a better balance between homes and jobs which would have positive impacts on the quality of life of residents (SO1). Furthermore retention of existing employment sites, and promotion of employment sites within the urban area should have a positive impact on footfall within the town centres (SO4).

There is however a great deal of uncertainty with regard to a high number of the sustainability objectives. Without site specific information the impacts of Policy CS4 are uncertain on biodiversity (SO6), especially in the long term with development of the growth locations. Similarly without site specific information the impacts on sustainable transport choices (SO7), accessibility (SO8), contributions to climate change (SO11), improving water quality (SO12), reducing the risk of flooding (SO13), improving air quality (SO14) and improving the townscape (SO15) are uncertain. These issues would need to be dealt with through individual site assessments or as part of any site allocations DPD or planning application.

There is also uncertainty relating to the historic environment (SO10). Policy CS4 includes the re-use of the historic factory buildings and retention of the Critall powerhouse as a museum in Silver End as part of the site’s regeneration. Despite this, until the specific design of sites is known, the impacts will be uncertain.

There is further uncertainty with regard to education and skills, where Policy CS4 does not elude to the types of jobs which are to be created in the district and the opportunity for improving skills within the workforce.

Temporal Effects

The impacts on providing the opportunity to live in a decent home, economic growth and improving the education and skills of the population are likely to become positive in the long term as the Growth Locations are scheduled to be developed with employment in specific sectors, this is based on an assumption that phasing will be in line with the housing element specified in Policy CS1.

Secondary, Cumulative and Synergistic Effects

Many of the sustainability objectives may be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan collectively eliminate the uncertainty of the implementation of Policy CS4. In brief these are:

- Policy CS8 reduces uncertainty with regard to reducing the risk of flooding (SO13) and improving water quality (SO12) by application of the sequential test to all new development and the encouragement of SUDs.
- Policy CS8 will also ensure that development proposals protect and enhance the natural environment, habitats and biodiversity (SO6).
- Policy CS9 with regard to contributions to climatic change (SO11) where the maximum possible use of renewable energy and energy efficient materials will be secured in all new development.

4.5.2 Progress through SA process

Policy CS4 has progressed from Policies CS4 and CS5 which were contained within the previous consultation on the Core Strategy.

The policy has developed into a single issue policy for employment in the District outlining the approach for existing allocations and the distribution of new employment development as an element of the new mixed-use Growth Locations.

The detailed appraisal of the previous Policy CS4, specified a need for a coordinated programme to link progress in economic and other development with sustainable transport initiatives to ensure appropriate transport facilities were available upon first use of development. The Submission Document responds positively to this recommendation through Policy CS7, which specifies key transport projects for the District to include a link road at Panfield Lane, Quality Bus Partnership and pedestrian and cycle link improvements between town centres and the Growth Locations, as well as junction and crossing improvements.

The detailed appraisal of previous Policy CS5, recommended that the policy wording could be improved to clarify that a total of 66 hectares of employment land will be available (including 32.5 hectares of existing vacant/allocated employment land) and that it is this total that will be phased to ensure a continuous 7-year supply, not just the additional provision of 33.5 hectares. The policy wording of CS4 in the Submission Document does not include this, and details of the specific phasing of employment development are absent.

4.5.3 Alternatives considered

The initial April 2007 document considered the following options for employment locations:

- Existing and Vacant Employment Sites
- New strategic Employment Location
- Rural Employment

The outcome of the April 2007 consultation was used to inform the preparation of the next stage of Core Strategy consultation.

Alternative policy approaches were considered for the development of the economy in the District in the 'On District – One Vision' document. These included a lower annual level of development at 3ha per year through the plan period, reducing the level to 57ha (CS4ALT1). Other options were to seek a higher level of job growth to match the East of England requirements for Chelmsford and Colchester (CS4ALT2).

An additional site allocation for employment uses was considered in Policy CS5 of the 'One District – One Vision' document for the provision of general employment on a 6ha site in Witham on land to the north-east of Eastways (within Rivenhall). This corresponded to a smaller site for the business park at Great Notley by 6ha (and no landscaping element) to reach the figure of 33.5ha. Further alternatives were discounted within in this document looking at 'significantly different locations' (CS5ALT1), an alternative location for the business park north of the A120 in Braintree (CS5ALT2), the land requirements for a higher annual level of employment development (CS5SLT1), and an alternative reducing the proposed level of employment development by either reducing the Braintree provision by 9 hectares, or

by removing the proposed additional provision of 6ha north of Witham at Rivenhall and reducing the Braintree provision by 3ha.

The likely and potential impacts arising from Policy CS4 within the Submission Draft are significantly more positive than the corresponding relevant alternatives included within the 'One District – One Vision' document. This is due to the successful inclusion of sustainable transport projects relating specifically to employment development and those of the mixed-use Growth Locations within the strategy in Policy CS7. From a social perspective, the removal of a strategic employment site at Eastways in Witham/Rivenhall responds to a need to address the imbalance between population and employment opportunities.

4.5.4 Impact on indicators

The implementation of Policy CS4 could impact the following SA indicators:

- Travel to work methods and flows
- Number of VAT registered businesses in the area
- Employment status of residents
- Average gross weekly pay
- Amount of vacant industrial floorspace
- Standard occupational classification
- Percentage of energy supplied from renewable sources

4.5.5 Proposed mitigation measures

The Policy could be further improved by inclusion of the phasing details of new employment development over the plan period. This is especially important in line with the phasing of the housing element within the Growth Locations that are included within Policy CS1.

The policy wording could be improved to clarify that a total of 66 hectares of employment land will be available (including 32.5 hectares of existing vacant/allocated employment land) and the phasing details of this total as well as the additional proposed 33.5ha.

Renewable energy use can be maximised in new employment development and should be incorporated into development proposals within the forthcoming Site Allocation DPD and relevant SPDs for specific areas. All proposals will need to be carefully assessed for their impact on the natural and built environment.

The amount of available employment land will need to be monitored to ensure that adequate supply is available, and conversely, allocations may need to be reviewed if there is no demand.

4.6 CS5: The Countryside

4.6.1 Impact on SA objectives

	Sustainability Objectives
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	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+
Medium Term	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+
Long Term	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+

Significant Effects

The policy will have a small positive impact on achieving sustainable levels of prosperity and economic growth (SO5) through appropriate development occurring in the countryside where necessary.

There will be a positive impact on conserving the biological and geological diversity of the environment (SO6) resulting from this policy. Impacts are limited however where it is uncertain how these features will be enhanced by any new development coming forward.

There will be an indirect positive impact on maintaining and enhancing cultural heritage and assets (SO10). Much of the rural District has a tradition of existing medieval field boundaries that will be protected through the policy. There will also be a positive impact on maintaining the quality of landscapes (SO15) as a result of this policy through a strict control of development. Despite this, the policy could include reference to the built environment in the countryside, particularly in regards to cultural heritage and the re-use of existing buildings to support rural diversification, or include the issue within the Development Management Policy DPD.

Temporal Effects

There are no temporal effects identified at this stage.

Secondary, Cumulative and Synergistic Effects

Some of the sustainability objectives may be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan collectively eliminate instances of no impact with the implementation of Policy CS5. In brief these are:

- There will be a positive indirect impact on promoting more sustainable transport choices (SO7) where development is focused in more sustainable locations as a result of this policy in synergy with Policy CS7.
- There will be a small positive indirect impact on promoting accessibility (SO8) where development is focused in more sustainable accessible locations as a result of this policy in synergy with Policy CS7.
- The impacts of this policy on cultural heritage (SO10) will be strengthened in synergy with Policy CS9 where development responds to local context, in recognition of the cultural value of much of the Districts rural buildings.

4.6.2 Progress through SA process

Policy CS5 was proposed as Policy CS6 in the previous consultation document and was specific to the rural economy. At that stage the policy was appraised as follows:

‘The proposed policy supports economic sustainability objectives, but potentially conflicts with environmental objectives, especially those which are related to the use of private motor vehicles. The policy would benefit from a strategy to deal with the potential re-location of operations which increase in scale to more sustainable locations. Similarly attention should be paid to the cumulative impact of small developments.’

The policy has evolved through the plan making process to focus on all small scale development in the countryside in the Submission Draft and, in light of sustainable transport concerns, further to the policy as it now exists.

4.6.3 Alternatives considered

The initial April 2007 document considered the following options for the rural economy:

- A more or less strict policy (CS6ALT1).
- The rural economy element to be included within the main Provision of Employment policy (CS6ALT2).

These alternatives were subject to appraisal within that document and were found to be less sustainable alternatives.

4.6.4 Impact on indicators

The implementation of Policy CS5 could impact the following SA indicators:

- Indices of Multiple Deprivation – Barriers to Housing and Services domain
- Number of listed buildings
- Additions/subtractions to the Historic Buildings at Risk Register

4.6.5 Proposed mitigation measures

The policy could include reference to the built environment in the countryside, particularly with regard to cultural heritage and the re-use of existing buildings to support rural diversification, or include the issue within the Development Management Policy DPD.

4.7 CS6: Town Centre Regeneration and Retail

4.7.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	0	++	+	/	/	+	0	/	/	0	0	/	/
Medium Term	0	0	0	++	+	/	/	+	0	/	/	0	0	/	/

Long Term	0	0	0	++	+	/	+	+	0	/	/	0	0	/	/
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Significant Effects

The impact on promoting the vitality and viability of the District’s town centres (SO4) should be a major positive in response to Policy CS6. Achieving sustainable levels of prosperity and economic growth (SO5) and promoting accessibility should also be positively impacted through the implementation of this policy.

There is however a degree of uncertainty with regard to the impacts of this policy on biodiversity (SO6), more sustainable transport choices (SO7) and contributions to climate change (SO11) where the specific details of the regeneration proposals are unknown at this stage. The impacts of this policy on maintaining and enhancing cultural heritage and assets (SO10) and the quality of townscapes (SO15) are uncertain where the specific details of the regeneration proposals are unknown at this stage. The issue of cultural heritage is of key importance with regard to the historic element of the District’s Town Centres.

It is uncertain whether the policy will improve air quality (SO14) in the District’s Town Centres. Potentially significant junctions, each with a recorded daily flow of more than 10,000 vehicles in 2004 are located at Newland Street and Cressing Road in Witham, Head Street in Halstead, and Railway Street and Rayne Road in Braintree, and it will be important to ensure that town centre regeneration and development does not compound the air quality issues at these locations.

Temporal Effects

The provision of facilities for local residents will have a positive impact on promoting more sustainable transport choices (SO7) in the long term in line with the development of the Growth Locations. This element of the policy enables walking and cycling to become more viable for convenience shopping in these developments.

Secondary, Cumulative and Synergistic Effects

In synergy with the proposed capacity improvements of the A12 and A120 as outlined within Table 2 of the Submission Draft Core Strategy, it is possible that there will be positive or negative impacts on promoting the vitality and viability of the District’s town centres (SO4), associated economic growth in these centres (SO5), promoting sustainable transport choices (SO7) and promoting accessibility to the centres (SO8) depending on town centre regeneration proposals being implemented at an appropriate time with regard to those of the infrastructure requirements of the wider strategy. If not, this could make the town and district centres of neighbouring District’s and Boroughs more accessible and attractive by private car.

There are likely to be positive impacts regarding reducing contributions to climate change (SO11) in synergy with Policy CS9.

4.7.2 Progress through SA process

Policy CS6 was proposed as Policy CS7 in the previous consultation document. At that stage the policy was appraised as follows: ‘The strategy proposed locates regeneration and development in the most sustainable locations.’ ‘Detailed sustainability appraisals will be required for site specific proposals when they are known.’

The policy has developed to include a focus on sites within the three Main Towns that would be appropriate for town centre regeneration. There is also a wider focus to improve retail in the District Centre of Great Notley Neighbourhood Centre and the District's Local Centres.

4.7.3 Alternatives considered

Other options for Town Centres and Regeneration were “to promote the development of the Innovation / Business Park ahead of town centre regeneration, or to promote the redevelopment of unsuitable employment sites ahead of other priorities” (CS7ALT1) and “to set out more detailed policies for these priorities in the Strategy rather than leaving them to the later plans” (CS7ALT2). However the former alternative was not deemed to be a reasonable alternative as it runs contrary to national policy as set out within PPS4.

4.7.4 Impact on indicators

Implementation of Policy CS6 is likely to impact on the following SA indicators:

- Indices of Multiple Deprivation – Barriers to Housing and Services domain
- Floorspace data
- Employment status of residents and job type
- Access to town centre data

4.7.5 Proposed mitigation measures

It is recommended that the incorporation of SUDS and elements of landscaping are investigated within proposals where relevant to alleviate surface water flooding and associated water quality issues, enhance biodiversity, improve the quality of townscapes and provide amenity benefit.

4.8 CS7: Promoting Accessibility for All

4.8.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0
Medium Term	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0
Long Term	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0

Significant Effects

Policy CS7 seeks to promote more sustainable transport choices (SO7) however is not viewed as likely to provide a significant positive impact, as implementation and enforcement of CS7 may be difficult in practice.

The fourth sentence within Policy CS7 includes provision for cycling and walking which could have positive impacts on health (SO3), however the impact has been viewed as uncertain due to uncertainty as to who would provide these contributions.

Similarly the second sentence within Policy CS7 states that future development will be provided in accessible locations, however the Core Strategy would benefit from a definition as to what would be acceptable as an 'accessible location' in order for the policy to be implemented effectively to improve accessibility (SO8).

The impacts on climate change (SO8) and air quality (SO11) are both viewed as uncertain due to a lack of full clarification as to how policy CS7 could be implemented in practice.

Temporal Effects

The link road between Springwood Drive and Panfield Lane as part of the Panfield Lane Growth Location will have a positive objective on safety (SO1) and will alleviate potential congestion pressures in Braintree Town Centre and improve air quality (SO14) at a Potentially Significant Junction along Rayne Road. Cycle and pedestrian interconnectivity between the relocated Braintree College and the Town Centre along this route will be important, particularly in relation to the Railway Station in the Town and is further supported in the Policy.

The current position in Witham is that those wishing to head southbound on the A12 from the north of the town, and those wishing to access the south of the town from the A12, are directed through the town centre and a Potentially Significant Junction on Newland Street. Negative impacts may be exacerbated in light of the new proposed Growth Location at Hatfield Road in south Witham. However, an increase in walking and cycling opportunities as a result of this policy would alleviate the majority of additional traffic due to the site's close proximity to the town, the development of a local centre at Maltings Lane and existing public transport links along this route.

Secondary, Cumulative and Synergistic Effects

This Policy will have positive impacts on townscapes (SO15) in conjunction with Policy CS9 through the highest possible standards of design and layout for new public realm schemes.

4.8.2 Progress through SA process

Policy CS7 was included within the previous consultation version of the Core Strategy. At that stage the policy was appraised as follows: 'The proposed policy supports sustainability objectives relating to transport and environmental protection. However the mechanisms for delivery and implementation of the strategy would benefit from further elaboration.'

The policy has developed from aspirational aims to a more focussed series of projects to support the development proposals of the wider Strategy in conjunction with the recommendations of the 'One District – One Vision' SA/SEA Environmental Report.

4.8.3 Alternatives considered

Other options for promoting accessibility were included although not taken forward in the 'One District – One Vision' document. These were an alternative to do nothing

(CS1ALT1), to make public transport, walking and cycling less of a priority (CS1ALT2), to locate developments in less accessible locations (CS1ALT3), to not support improvements to the main trunk road and rail networks (CS1ALT4), and to include more detail within the policy to address issues and layouts in different and specific areas of the District (CS1ALT5). These alternatives were subject to appraisal within that document and were found to be less sustainable alternatives.

4.8.4 Impact on indicators

Implementation of Policy CS7 is likely to impact the following SA indicators:

- Indices of Multiple Deprivation Score – Barriers to Housing and Services domain
- Travel to work methods and flows
- Public transport punctuality
- Journey time reliability
- CO2 emissions at Potentially Significant Junctions
- PM10 emissions at Potentially Significant Junctions
- Car ownership
- Access to services

4.8.5 Proposed mitigation measures

Safety issues should be addressed through broad design requirements highlighted in the policy or for specific proposals. This is especially relevant in light of improvements for walking and cycling and with regard to the design of car parking facilities.

Through the specific development of pedestrian and cycle routes as a result of this policy, green corridors and features of a biodiversity value could be integrated into proposals. This is also likely to increase their use through the creation of an attractive public realm. The implementation of SUDS in new public realm schemes to minimise any surface water implications are encouraged and help to enhance biodiversity.

4.9 CS8: Natural Environment and Biodiversity

4.9.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+
Medium Term	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+
Long Term	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+

Significant Effects

Policy CS8 is likely to have positive impacts on improving the health of the Districts residents (SO3) through the minimisation of pollution. The policy will positively impact on conserving and enhancing the biological and geological diversity of the environment (SO6).

Braintree contains a largely ancient fieldscape of irregular medieval fields. The policy, in avoiding the loss of the best and most versatile agricultural land, as well as enhancing and managing the natural environment, may have a positive impact on the maintenance of this cultural asset (SO10). However the policy could respond more directly to the heritage value of certain areas of the District's natural environment.

The impacts of this policy on reducing contributions to climatic change (SO11) are uncertain. Whilst not sited within the policy the impact of implementation could provide for green infrastructure, particularly in locations where it will assist in reducing the impacts of climate change by providing flood water storage areas, sustainable drainage systems, urban cooling and local access to shady outdoor space.

There will be positive impacts on water quality (SO12) where measures will be taken to prevent the deterioration in current water quality standards and promote the use of water efficiency measures. There will be positive impacts on reducing the risk of flooding (SO13) resulting from this policy where the Council will minimise exposure of people and property to the risks of flooding through the sequential test and the encouragement of Sustainable Drainage Systems (SUDS). The impacts of this policy on improving air quality (SO14) are likely to be positive. The policy specifies that all development proposals will ensure the protection and enhancement of the natural environment, habitats and biodiversity and geo-diversity of the District from air pollution.

There will be positive impacts on maintaining and enhancing the quality of landscapes (SO15) where new development must mitigate any negative impacts it may have, with regard to the character of the landscape and its sensitivity to change and where development is permitted it will need to enhance the locally distinctive character of the landscape in accordance with the Landscape Character Assessment.

Temporal Effects

It is unlikely that the impacts of the policy will be strengthened over time. The delivery of the Growth locations will increase pressures on the natural environment, however the policy seeks to ensure that any negative impacts are mitigated, resulting in no net gains or losses.

Secondary, Cumulative and Synergistic Effects

There may be indirect positive synergistic effects on the creation of safe environments and community cohesion (SO1) in conjunction with Policy CS9 through the delivery of public realm improvements incorporating new green infrastructure, however any specific requirements from this are not included within the policy.

There will be indirect positive impacts on the health (SO3) of the District's residents in accumulation with the positive impacts resulting from minimising the exposure of people and property to the risks of flooding.

There may be positive impacts on town centre vitality and viability (SO4) through maximising opportunities for the creation of new green infrastructure and networks in sites allocated for development in synergy with the potential town centre regeneration

schemes in Policy CS6. Despite this, development has not been secured for town centre regeneration at this stage and due to this, it is uncertain when any positive impacts will become apparent.

Through maximising opportunities for the creation of new green infrastructure and networks in sites allocated for development and creating green networks to link urban areas to the countryside, there may be positive impacts on promoting walking and cycling (SO7) in synergy with Policy CS9 and CS7.

There are likely to be positive synergistic effects on the quality of townscapes (SO15) in conjunction with Policies CS6 and CS9.

4.9.2 Progress through SA process

Policy CS8 was previously labelled as CS2 in the 'One District – One Vision' consultation document. At that stage the policy was appraised as follows:

'The policy addresses the protection of the natural environment, and supports sustainability objectives especially with regard to quality of life, biodiversity and landscape. The policy could be enhanced to incorporate minimisation of flood risk, surface water run-off and the incorporation of sustainable drainage systems, the extent to which there are impacts on the management of the natural environment will also depend on the detail of other DPDs that should be subject to separate SA/SEA.'

The policy has developed to include specific mention to biodiversity and sustainable drainage systems in the District. The policy has also included broad opportunities/standards as to how the natural environment can be enhanced in the District as a result of the previous appraisal. The supporting text for the Submission Document Policy makes reference to the Habitats Regulation Assessment's forecasted impacts on the Colne and Blackwater Estuaries as a result of a population increase in the District, and the Council states it will assist in funding monitoring surveys on the two estuaries.

4.9.3 Alternatives considered

An alternative policy was considered in the 'One District – One Vision' document to make the Core Planning Policy more or less prescriptive. Reasoning as to why this alternative was not explored further was: "National and regional policies cover many environmental matters and could be felt to be adequate. However the importance of our natural environment and local landscapes, built heritage and the District's desire to lead in sustainable development techniques, suggest that these matters should be given special local policy support and emphasis – possibly even being more prescriptive about the planning requirements."

4.9.4 Impact on indicators

The Natural Environment and Biodiversity policy could affect the following SA indicators:

- Condition of SSSIs
- Achievement of EBAP targets
- Water quality
- Access to open space

4.9.5 Proposed mitigation measures

Positive impacts on the sustainability objectives are limited where it is unclear from the policy how enhancements to the natural environment and biodiversity will be delivered, especially through new development. Measures to improve biodiversity and enhance the natural environment could be more specific to development proposals in order to mitigate any negative impacts resulting from them.

The SANG targets highlighted in the supporting text could be included within Core Planning Policy, either within this policy or CS10.

The Policy could respond more directly to the heritage value of certain areas of the District's natural environment. The policy could also be more specific as to what opportunities there are for new development to improve water quality in all watercourses and waterbodies and have regard to the SFRA in terms of minimising flood risk.

4.10CS9: Built and Historic Environment

4.10.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/
Medium Term	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/
Long Term	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/

Significant Effects

The impact on safety and community cohesion (SO1) are positive in response to the third criterion within policy CS9 which requires safe and accessible environments. The policy states that development will be capable of meeting the changing future of occupiers, especially in housing developments and therefore should be positive in terms of providing decent homes (SO2) however the supporting text does not address what will be delivered and why there is a need in the District.

The creation of a safe and accessible public realm, and pedestrian and cycleways to link town centres with housing growth and employment development will see a positive impact on town centre vitality and viability (SO4).

In securing the maximum use of renewable energy and recycled and/or energy efficient building materials, the District aims to positively contribute to reducing Carbon Dioxide emissions (SO11). Despite this, it is uncertain what will be delivered and at what level due to a lack of requirements and targets for new development.

There is uncertainty with regard to how environments will be accessible (SO8) and the protection of the heritage element of the District's towns and historic centres (SO10), and how new development will respond to it.

This policy will have an uncertain impact on the maintenance and enhancement of townscapes within the District. The policy states that development affects the setting of historic or important buildings, conservation areas and areas of highest landscape sensitivity. This can be read to imply that no development in these areas will be acceptable in order to respect and respond to local context.

The policy will have an uncertain impact on the landscape of the District. It is not clear whether development will (through respecting and responding to local context) or will not be permitted in areas of highest landscape sensitivity. Also, renewable energy proposals will be supported where impacts on the landscape are acceptable. The policy does not specify any criteria on which decisions might be based or regard the Landscape Character Assessment forming part of their evidence base.

Temporal Effects

The impacts of this policy on SO2, SO3, SO4, SO7 and SO8 are likely to become positive in the long term through the delivery of the new proposed Growth Locations.

The impacts of this policy on (SO2) are likely to become positive in the long term through the delivery of the mixed use nature of the new proposed Growth Locations

that incorporate a housing element, in synergy with phasing details in Policy CS1 and specific transport projects within Policy CS7.

Secondary, Cumulative and Synergistic Effects

This policy may have an indirect impact on promoting accessibility (SO8) by providing safe and accessible environments in conjunction with public realm improvements to support the development proposals of the wider Strategy. This can be achieved through the delivery of good standards of design in line with pedestrian and cycle movements as specified in Policy CS7.

4.10.2 Progress through SA process

Policy CS3 in the 'One District – One Vision' consultation document on The Built Environment was appraised in the SA/SEA for that document. At that stage the policy was appraised as follows:

'The proposed policy positively addresses sustainability objectives. However there is no reference to flood risk, and the management of surface water runoff. Furthermore the policy as worded lacks specificity to Braintree District Council which could be addressed as the policy is refined through the plan preparation process.' (p3)

The policy is broadly similar to the corresponding policy in the 'One District – One Vision' document, although has developed to respond to the public realm requirements of the residential, commercial and economic development proposals within the wider Strategy.

4.10.3 Alternatives considered

Other options for the Built Environment in the 'One District- One Vision' document were an option for the wording of the policy to take account of the regeneration initiatives in the main towns and villages (CS3ALT1) and an option to make the Core Planning Policies more or less prescriptive (CS3ALT2). Alternative CS3ALT2 states that "national and regional policies cover many environmental matters and could be felt to be adequate. However the importance of our natural environment and local landscapes, built heritage and the District's desire to lead in sustainable development techniques, suggest that these matters should be given special local policy support and emphasis – possibly even being more prescriptive about the planning requirements.

This may particularly be the case in areas such as sustainable design and construction where market forces may not address them adequately."

The policy at preferred options stage was deemed to be more positive than the policy emerging from the Draft Submission Document, mainly due to a more comprehensible and direct wording of the policies aims.

All reasonable alternatives have been subject to appraisal in the SA/SEA of the 'One District – One Vision' document. The exploration of including the detailed approach of alternative CS3ALT2 was recommended to respond better to the particular circumstances of Braintree District, with the identification of indicators and targets.

4.10.4 Impact on indicators

The Built Environment policy could affect the following SA indicators:

- Perception or fear of crime
- Crime rates
- Listed Buildings at Risk Register
- Development on PDL
- Percentage of energy supplied from renewable energy sources
- Waste recycling data
- Incidences of residential flooding

4.10.5 Proposed mitigation measures

Policy CS9 could have a larger focus on the historic environment in the District, responding more directly to the local circumstances of Braintree District rather than reiterating national policy guidance.

Links should be made between this Policy and Policy CS8 to ensure that flood risk, the requirements of developers, green corridors, features of a biodiversity value, and the integration of SUDS is integrated into consideration of the built environment policy as well as the Natural Environment.

It is recommended that the policy includes details on how safety features might be implemented, whether in reference to layouts or specific design features that will be required. This is of key importance in light of the proposals within Policy CS7 and the levels of public realm improvements required emanating from proposals in policies CS1 and CS4.

It is recommended that the renewable energy element of this policy responds to the Built Environment surrounding design, particularly in designated areas, and what will be required of development. Where renewable energy proposals will be supported where impacts on the landscape are acceptable, it is recommended that the policy specify any criteria on which such decisions might be based.

The policy implies that new development and the historic value of the built environment is mutually exclusive. In light of this the policy should elaborate on what will be acceptable in order to respect and respond to local context. It is recommended that the policy has a larger focus on the historic environment in the District, responding more directly to local circumstances rather than reiterating national policy guidance.

4.11 CS10: Provision for Open Space, Sport and Recreation

4.11.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/
Medium Term	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/
Long Term	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/

Significant Effects

The impacts of this policy on landscapes and townscales (SO15) on the whole may be positive in line with new provision; despite this it is uncertain what the impacts will be in the short to medium term as new development opportunities are not identified in the strategy and therefore it is unknown what level of new open space provision will be required. In the long term, the development of the Growth locations may have a positive impact on this objective through the provision of new sport and recreational opportunities for new residents, however at a loss of open space that may impact on landscape.

Temporal Effects

The impacts on providing decent homes (SO2), promoting healthy lifestyles (SO3), and promoting walking and cycling (SO7) are likely to become more positive in the long term with the development of the Growth Locations and more land becoming publicly accessible for the wider population.

Secondary, Cumulative and Synergistic Effects

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together. Further policies within the plan collectively eliminate those instances of 'no impact' from the implementation of Policy CS10. In brief these are:

- Where Policy CS9 aims to deliver a good quality public realm in developments, there may be positive impacts resulting from Policy CS10 in regards to safety and inclusive access to open space provision.

In addition to these, there are also a number of Policies which result in a cumulative strengthening of the positive effects of CS10. In brief these include:

- The enhancement of biodiversity will be supported through the expansion of green corridors in conjunction with Policy CS8.

4.11.2 Progress through SA process

Policy CS2 in the 'One District – One Vision' consultation document stated an aim to 'meet the local recreational needs of the community by identifying, protecting, enhancing and managing the natural and informal open spaces across the District'.

The policy has developed into a single policy approach on the requirement for open space, sport and recreation provision focussing on the requirements of paragraph 9.6 of the East of England Plan Revision to 2031 and supporting the District's Open Space SPD.

4.11.3 Alternatives considered

Another option for open space provision was included in the 'One District – One Vision' document to make the policy more or less prescriptive to address, "special local policy support and emphasis – possibly even being more prescriptive about the planning requirements."

4.11.4 Impact on indicators

The Provision for Open Space, Sport and Recreation policy could affect the following SA indicators:

- Availability of open space/ leisure facilities
- Indices of Multiple Deprivation – Barriers to housing and services domain
- Access to open space
- Residents opinions on the quality and availability of open space
- Population of wild birds

4.11.5 Proposed mitigation measures

There is scope for this policy to be more specific to the District and the development proposals in the Core Strategy, particularly where housing trajectories and the scale of some individual developments are defined elsewhere in the Strategy, and amendments to the Open Space SPD have not been made at this stage.

In regards to the adoption of the Open Space SPD, it is recommended that the policy makes reference to the requirement of provision being within certain distances of housing as per the SPD.

There is the potential for uncertainty through any windfall sites coming forward where existing provision is no longer required to meet identified needs in the long term, however the impacts will be dependant on the type of development proposed and on a site-by-site basis.

It is uncertain how decisions will be made and impacts weighted in regard to the replacement of provision where current provision will not be required in the long term, in light of the restriction of access and usage in order to conserve an areas biodiversity value as specified in Policy CS8.

4.12CS11: Infrastructure

4.12.1 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medium Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Long Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Significant Effects

Where the policy specifies the funding of infrastructure, services and facilities provision, there will be no significant effects resulting directly from the policy. As a vehicle to provide infrastructure, services and facilities, the policy's impacts will only be apparent in synergy with the delivery of proposed development coming forward from the individual and combined policies stated within the wider strategy.

Temporal Effects

Where the policy specifies the funding of infrastructure, services and facilities provision, there will be no direct temporal effects resulting directly from the policy, however benefits will be provided in association with the implementation of growth in accordance with other Policies within the Core Strategy.

Secondary, Cumulative and Synergistic Effects

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan collectively eliminate those instances of 'no impact' from the implementation of Policy CS11. In brief these are:

- Positive impacts on the creation of safe environments and social cohesion in synergy with Policy CS9 and the public realm improvements specified in Table 2 -Infrastructure.
- The extension of GP surgeries for the Growth Locations and the creation of a new one at Sible Hedingham to support new housing growth will have a small positive impact on improving the health of the District's residents in synergy with specific development proposals within the plan (as appraised in the 'Strategic Locations' section of this Environmental Report). The provision of open space, sport and recreational facilities further supports this objective; however the impacts on the wider existing population of the District will be minimal, responding to accessibility and public transport improvements throughout the District.
- There will be positive synergistic effects on sustainable levels of prosperity and economic growth with Policy CS4 and the delivery of supporting infrastructure as a result of this policy.
- There may be indirect positive impacts in synergy with SUDS flood prevention/relief measures and open space provision to be provided through developed contributions throughout the District where required.
- There are uncertain impacts on the promotion of sustainable transport choices in the District in synergy with Policy CS7. The delivery of footpath and cycleway provision and public transport improvements throughout the District will have positive impacts. There may be secondary negative impacts on the District's town centres however, through capacity improvements and safety enhancements to the A12 and A120, making private car travel more viable.
- There will be positive impacts on accessibility in synergy with Policy CS7 regarding capacity improvements and safety enhancements to the A12, A120 and improvements to the Braintree Branch Line as specified in Table 2 Infrastructure.
- The provision and expansion of specific primary schools in the District to support new housing development will have a small positive impact on improving the education and skills of the population in synergy with specific development proposals in the 'Strategic Locations' section of this Environmental Report.

- A requirement for the delivery of flood prevention/relief measures and/or SUDS in new development, and the indirect associated impacts on water quality, will positively impact on this objective in synergy with Policy CS8.
- In synergy with Policy CS7, the delivery of public transport and pedestrian and cycleway improvements will impact positively on air quality in the District. These impacts are further supported by improvements to the public realm as specified in the policy and in synergy with Policy CS9.
- There will be positive impacts on the quality of landscapes and townscapes resulting from this policy in synergy with Policies CS6, CS9 and CS10.

In addition to these, there are also a number of Policies which result in a cumulative strengthening of the positive effects of CS11. In brief these include:

- There will be positive impacts on providing everyone with the opportunity to live in a decent home in synergy with Policy CS1 and the secondary cumulative impacts of CS2 (affordable housing delivery), CS4 (the delivery of employment development infrastructure), CS7 (the delivery of transport infrastructure improvements), CS9 (the delivery of public realm improvements) and CS10 (the provision of open space, sport and recreational facilities).
- There will be a secondary positive impact on the District's town centres through the delivery of infrastructure improvements specified in Table 2 Infrastructure, regarding public realm improvements and the transport improvements required for the Growth Locations. There may be secondary negative impacts on the District's town centres however, through capacity improvements and safety enhancements to the A12, A120 and improvements to the Braintree Branch Line, making the town and regional centres of neighbouring District's more accessible.

4.12.2 Progress through SA process

The previous consultation document contained Policy CS9 on infrastructure. At that stage the policy was appraised as follows:

'The proposed approach accords well with the sustainability objectives. However, further assessment of individual sites would be required to ensure that at the site specific level, the policy delivers sustainability objectives.' (p3)

The policy has developed in line with the recommendations made within the detailed appraisal of Policy CS9 within the 'One District – One Vision' document. The policy now specifically includes transport infrastructure requirements in a non exhaustive list. The policy is also supported by a list of key facilities and infrastructure that will be required to support development up to 2026.

4.12.3 Alternatives considered

Other options for developer contributions were not investigated because government guidance requires that LDF's set out the criteria where developer contributions will be sought.

4.12.4 Impact on indicators

Implementation of Policy CS11 is likely to impact on the following SA indicators:

- Availability of open space/ leisure facilities
- Travel to work flows
- Travel to work methods
- Educational achievements
- Indices of multiple deprivation

4.12.5 Proposed mitigation measures

The capacity of local infrastructure will need to be carefully assessed when looking at proposals, and relevant bodies, such as the Environment Agency, consulted to ensure that proposals can either be carried out without detriment to the environment and capacity of the area or that appropriate mitigation measures are put in place.

The growth proposed is to be phased in accordance with capacity issues, and further details are provided in list of key facilities and infrastructure that will be required to support development up to 2026 is set out within the Core Strategy.

5 CONCLUSIONS

5.1 Significant Effects

Overall the Core Strategy should have significant positive impacts on providing decent homes (SO2), promoting town centre vitality and viability (SO4) and achieving sustainable levels of prosperity and growth (SO5). The combined long term effect of each Policy within the Core Strategy across the sustainability framework is highlighted in Figure 1 below:

FIGURE 1: LONG TERM EFFECTS OF THE CORE STRATEGY POLICIES

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
CS1	+	++	/	+	+	/	/	+	+	/	/	/	/	/	/
CS2	/	++	/	/	0	0	/	/	/	0	0	0	0	/	/
CS3	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0
CS4	+	0	0	+	++	/	/	/	/	/	/	/	/	/	/
CS5	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+
CS6	0	0	0	++	+	/	/	+	0	/	/	0	0	/	/
CS7	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0
CS8	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+
CS9	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/
CS10	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/
CS11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

There is one objective which does not appear to be particularly well addressed by the provisions made within the document. The maintenance and enhancement of cultural heritage (SO10) is largely uncertain. Whilst there are provisions within Policy CS9, it is unclear as to how the 'protection and enhancement of the historic environment' will be implemented at the District level.

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

The combined effects of policies within the plan may collectively eliminate the uncertainty associated with the implementation of other policies. For example the implementation of Policy CS8 in conjunction with CS1 and CS4 may reduce uncertainty with regard to reducing the risk of flooding (SO13) and improving water quality (SO12) by application of the sequential test to all new development and the encouragement of SUDs.

There are also a number of policies which result in a cumulative strengthening of the positive effects of other policies. For example Policy CS1 and the location of the majority of housing development in the Main Towns will further support the positive impacts associated with employment provision identified in Policy CS4.

5.2 Monitoring

*SEA Directive requires: A description of the measures envisaged concerning monitoring.
Annex I (i)*

The significant sustainability effects of implementing a Local Development Document must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. Annex C of the Environmental Report contains suggested indicators in order to monitor each of the SA objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Appendix 14 of the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' guidance (ODPM), provides further details on the implementation and monitoring of LDFs. It states that it is not necessary to monitor everything, 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.

