North Essex Local Plan Section 1 Additional SA

Method Scoping Statement

Prepared by LUC
December 2018
**Project Title:** North Essex Local Plan Section 1 Additional Sustainability Appraisal

**Client:** North Essex Authorities

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1 Introduction

1.1 The North Essex Authorities, comprising Braintree District Council (BDC), Colchester Borough Council (CBC), and Tendring District Council (TDC), commissioned LUC in 2018 to carry out additional Sustainability Appraisal\(^1\) (SA) work with respect to Section 1 of the shared Publication Draft Local Plan (hereafter, ‘the Plan’). This commission was undertaken in response to the Inspector’s concerns\(^2\) regarding the SA work undertaken to date.

1.2 LUC consider it good practice and appropriate to carry out further consultation on the scope and level of detail of the additional work to be carried out, as set out in this ‘Method Scoping Statement’, in order to aid the SA process. Comments on the ‘Method Scoping Statement’ are therefore being invited from the consultation bodies\(^3\) and participants in the examination hearings\(^4\).

Background

1.3 The geographic and functional relationship between The North Essex Authorities – Braintree District Council (BDC), Colchester Borough Council (CBC), and Tendring District Council (TDC) – is demonstrated by the fact that, with Chelmsford City Council, they form a single Housing Market Area (HMA) for planning purposes. They are also a major part of the Haven Gateway, a distinct economic sub region within which member authorities have a long-established economic partnership. Within this context, the North Essex Authorities, with the support of Essex County Council, have been working together to plan strategically for growth across the North Essex area.

1.4 The result of this work is the preparation of a shared, strategic level plan which is intended to form part of the Local Plan for each of the North Essex Authorities. Specifically, the shared plan comprises ‘Section 1’ of each authority’s Local Plan. As a shared plan, this is a document which applies to each authority area, and although separate documents have been prepared for each local authority they include identical policies and justifying text. It is anticipated that ‘Section 2’ of each authority’s Local Plan will contain more specific and detailed policies and will be finalised, examined and adopted following the adoption of the Section 1 Local Plan.

1.5 The Draft Section 1 Local Plan was submitted to the Secretary of State for examination on 9th October 2017. The examination hearings took place between 16th January 2018 and 9th May 2018. Following the hearings the Inspector concluded that the Section 1 Local Plan was not sound in its current form. The Inspector wrote to the North Essex Authorities on 8 June 2018, advising them of the further steps required in order for the Section 1 Local Plan to be made sound and legally compliant. Several shortcomings were identified by the Inspector in relation to the SA of the Section 1 Local Plan, as discussed in the following section.

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1 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC). Therefore, it is a legal requirement for Section 1 of the shared Publication Draft Local Plan to be subject to SA and SEA throughout its preparation. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance), whereby users can comply with the requirements of the SEA Directive through a single integrated SA process – this is the process that is being undertaken in this case, and therefore within this report, the term ‘SA’ should be taken to mean ‘SA incorporating the requirements of the SEA Directive’.

2 Set out in his letter to the North Essex Authorities dated 8 June 2018

3 Natural England, the Environment Agency, Historic England

4 All those who took part in the hearing sessions held between 16 and 25 January 2018 and on 9 May 2018
The need for additional SA work

1.6 The Inspector’s concerns regarding the SA\textsuperscript{5} work undertaken prior to the submission of the Plan are with respect to three main ‘shortcomings’:

- **Objectivity of the SA**: the Inspector identified potential inconsistencies in the scoring of the alternative spatial strategies, and the use of evidence underpinning the SA scores, stating that "the authors of the SA report have generally made optimistic assumptions about the benefits of the GCs [Garden Communities], and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions. As a result these assessments lack the necessary degree of objectivity and are therefore unreliable”.

- **Clarity of the alternatives and reasons for selection**: the Inspector raised concerns regarding the difficulty of understanding the descriptions of the Garden Community options, the rationale for choosing particular alternatives, and the assumptions underpinning the rejection of the reasonable alternatives, including providing significant numbers of dwellings at or around existing settlements.

- **Selection of the Garden Communities and combinations for assessment**: the Inspector identified some confusion with respect to the basis upon which Monks Wood was assessed as a Garden Community option, and questioned the conclusions of the SA with respect to different scales of growth at this location. Similarly, the Inspector challenged the rationale behind the combinations of alternatives and the reasons for selecting the preferred combination and rejecting others. The Inspector is of the view that equivalent assessments of the combinations were not comprehensive.

1.7 The Inspector also draws attention to issues regarding the minimum size threshold of the Garden Communities assessed in the SA, but concludes that the SA provided adequate reasons for a 5,000 dwelling threshold.

1.8 The Inspector concluded that:

“It has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require”.

1.9 He suggests that the following two stages of SA work will be required to rectify the shortcomings:

1. **Carry out an objective comparison of individual Garden Community site options at a range of different sizes. In particular, if Monks Wood is to be included as an option, to assess it on the basis of both 7,000 dwellings (as now favoured by Lightwood) and 5,000 dwellings (as per the AECOM report), and to take into account the effects of over-flying aircraft and the impacts on Andrewsfield airfield of the West of Braintree Garden Community option. This stage of work will enable adequate reasons for taking forward or rejecting each of the Garden Community options.**

2. **Assess alternative spatial strategies for the Plan area, using a clear rationale of the alternative spatial strategies and descriptions of them. As a minimum the spatial strategy alternatives should include proportionate growth at and around existing settlements, CAUSE’s Metro Town proposal, and one, two or more Garden Communities, depending on the outcomes of the first stage assessment.**

1.10 Prior to embarking on the additional SA work, the Inspector recommends that the North Essex Authorities re-examine the evidence base for any Garden Community proposals they wish to assess, especially with regard to viability, the provision of transport infrastructure and employment opportunities. This is to ensure that they have a sound basis on which to score them against the SA objectives. The Inspector recommends that there should be liaison with CAUSE to ensure that their Metro Town proposal is fully understood and assessed appropriately, and similar liaison with the promoters of the Garden Community site options where necessary.

1.11 The Inspector goes on to state that, for the spatial strategy alternatives:

\textsuperscript{5} Place Services (June 2017) North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19) Sustainability Appraisal (SA)
• Explicit assumptions should be made about the amount of development each option would involve, both at Garden Communities and elsewhere, and the broad locations for that development.

• For the options involving Garden Communities, each of the individual site options that survive the first-stage assessment, and each feasible combination of those surviving site options, should be assessed.

• Options including one or two Garden Communities should also include appropriate corresponding levels of proportionate growth at existing settlements.

1.12 The Inspector concluded that, providing that the alternative spatial strategies are assessed objectively and with due regard to the evidence base, the second stage assessment should provide a sound basis for the selection of a preferred spatial strategy for the Plan (which may or may not include Garden Communities).

1.13 The Inspector makes it clear that it would be advisable if he were to agree the proposals for the SA before work is begun. A draft of this Method Statement has been provided to the Inspector for his review and it has been amended to reflect his comments and queries on the SA, as appropriate.

The need for further consultation

1.14 A significant amount of SA work has already been undertaken in relation to the Plan, and therefore consultation on the previous SA and the SA Framework has also, already been undertaken. As set out in the section below titled ‘Proposed method’, the additional SA work to be undertaken by LUC is designed to address the shortcomings of the previous SA work that have already been described, while retaining consistency with the SA objectives used to date in the SA.

1.15 Regulation 12(5) of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘SEA Regulations’), sets out that "when deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies". The consultation bodies are the Environment Agency, Historic England, and Natural England.

1.16 At an early stage in the Plan process, each of the NEA local planning authorities approached the consultation bodies in relation to the scope and level of detail of their then separate local plans. The NEAs then decided to combine the strategic sections of their Local Plans. An SA for the strategic section of the Local Plan was prepared, taking account of the responses from the consultation bodies. Although the additional SA being undertaken by LUC is unlikely to materially change the ‘scope and level of detail of the information’ that will be included in the SA, LUC considers it good practice and appropriate to carry out further consultation on the scope and level of detail of the additional SA work to be carried out in order to aid the SA process.

1.17 Although any member of the public may comment on the contents of this Method Scoping Statement, the consultation bodies and participants in the Examination hearings for the Section 1 Local Plan have been specifically invited to comment on the scope and level of detail of the additional SA work described within this document. This is to support their participation in the plan-making and SA process and flag potential concerns at an early stage. Comments should be limited to the scope and level of detail of the further SA work, as set out in this Method Scoping Statement.

1.18 After this consultation, representations will be reviewed and responded to as appropriate. A table of the comments received and responses to them will be prepared and appended to the report for the additional SA work at subsequent stages. The methodology of the additional SA work will be adapted if consultation responses warrant this.

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Structure of this document

1.19 This chapter (chapter 1) has set out the background to the Plan, the need for the additional SA work and the need for the additional consultation.

1.20 Chapter 2 of this report sets out the scope and level of detail of the additional SA work, the proposed methodology, including justification of approach and assumptions, and the timetable for the additional SA work. This is set out as a sequential methodology for undertaking the additional SA work.

1.21 Appendix 1 sets out site assessment criteria and how these relate to the framework of sustainability objectives that underpins both the SA work completed to date and the proposed additional SA work.
2 Proposed approach

Scope of the additional SA

2.1 As outlined in Chapter 1, the Inspector’s concerns relate to the assessment of alternative Garden Communities and of alternative spatial strategies including non-Garden Communities options. The additional SA work will therefore be limited to addressing these concerns and as such will form an addendum to, and will need to be read in conjunction with, the SA (June 2017) of the Plan as a whole.

2.2 For the avoidance of doubt, the additional SA work will replace all or parts of the following sections of the SA of the Plan (June 2017) as appropriate:

- Chapter 4, Section 4.5: Developing a Common Framework for Assessing Options: Garden Communities (pp 60-66).
- Chapter 5, Section 5.5: Appraisal of Policy SP2 Spatial Strategy for North Essex including reasonable alternatives (pp 76-84).
- Chapter 7, Section 7.3: Key Points from the Assessment of the Garden Community (GC) Options, Section 7.4: Key Points from the Cumulative Assessment of the Allocated Garden Communities, and Section 7.5: Recommendations, including those taken on board throughout the SA process (pp 156-163).
- Appendix 1: Appraisal of the Garden Community options and alternative permutations (pp 169-244).

- A non-technical summary of the above

2.3 It is possible that other parts of the SA report (June 2017) will need to be updated in light of the findings of the additional SA work, but this is not known at this stage.

Proposed method

2.4 The approach to the additional SA work set out within this document seeks to follow that provided by the Inspector in his advice on the next steps in the Examination. It also responds to comments made by the Inspector on a draft of the methodology.

2.5 The methodology below is set out in a task-by-task format to demonstrate the process and sequence of tasks to be undertaken. It should be noted that some of the tasks have been completed and where this is the case this is made clear in the text.

Task 1: Inception meeting

2.6 A meeting was held with the North Essex Authorities on 17th July 2018 to introduce the LUC team, and to ensure expectations of both parties are clearly understood from the outset and discuss further details of the additional SA work. This meeting provided an opportunity to:

- Discuss the background to the additional SA work to ensure that it is clearly understood.
- Reflect upon the SA process undertaken to date, and any lessons learned.
- Discuss the evidence sources that are available.
- Discuss the nature of the spatial strategy options requiring appraisal, including work awaited from consultants on reasonable options for each of the proposed Garden Communities and whether urban extensions need to be considered as a separate option.

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7 Set out in his letter to the North Essex Authorities dated 8 June 2018
8 Set out in his letter to the North Essex Authorities dated 21 November 2018
• Agree any changes to the LUC proposed method if necessary.
• Discuss stakeholder and public consultation arrangements.
• Confirm the project programme and initial deadlines and discuss risks to the timetable, including inputs to the SA and when these are required from other pieces of evidence.
• Confirm project management, contractual and invoicing arrangements.

2.7 This method statement reflects the outcomes of the inception meeting and subsequent discussion with the North Essex Authorities.

**Output from Task 1:**
Inception meeting note and agreed project programme
(Status: Task Complete)

**Task 2: Prepare draft Method Scoping Statement and SA assessment criteria**

2.8 The SA work undertaken to date on the Section 1 Local Plan is underpinned by an SA Framework (Table 5 of the June 2017 SA Report). This sets out 15 sustainability objectives and associated assessment criteria to guide the SA as reproduced in Table 2.1. These objectives will continue to be used to frame the additional SA work in order to maintain consistency.

**Table 2.1: SA Framework**

<table>
<thead>
<tr>
<th>SA objective</th>
<th>SA Criteria</th>
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| 1. Create safe environments which improve quality of life, community cohesion | • Does it seek to improve / supply community facilities for young people?  
• Does it seek to increase cultural activities or suitable development to stimulate them?  
• Does it seek to support cultural identity and social inclusion?  
• Will there be measures to increase the safety and security of new development and public realm? |
| 2. To ensure that everyone has the opportunity to live in a decent, safe home which meets their needs at a price they can afford | • Will it increase the range and affordability of housing to support the growing population and for all social groups?  
• Does it respond to the needs of an ageing population?  
• Does it seek to provide appropriate rural affordable housing?  
• Will it deliver well designed and sustainable housing?  
• Will it contribute to meeting Gypsy and Traveller pitch requirements of the GTAA? |
| 3. Improve health/reduce health inequalities                                 | • Will it ensure access to health facilities?  
• Will it ensure access to sport and recreation facilities, open space and accessible green space?  
• Will it encourage access by walking or cycling? |
| 4. To ensure and improve the vitality & viability of centres                 | • Does it seek to prevent loss of retail and other services in rural areas?  
• Does it promote and enhance the viability of existing centres by focusing development in such centres?  
• Does it seek to locate development in close proximity to town centres? |
<table>
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<tr>
<th>SA objective</th>
<th>SA Criteria</th>
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| **5. To achieve a prosperous and sustainable economy that creates new jobs, improves the vitality and viability of centres and captures the economic benefits of international gateways** | • Will it improve the delivery of a range of employment opportunities to support the growing population?  
• Will it tackle employment associated deprivation?  
• Will it enhance the area’s potential for tourism?  
• Will it promote development of the ports?  
• Will it encourage the rural economy and diversification of it?  
• Will it support business innovation, diversification, entrepreneurship and changing economies?  
• Does it seek to improve existing training and learning facilities and/or create more facilities?  
• Will the employment opportunities available be mixed to suit a varied employment skills base? |
| **6. To value, conserve and enhance the natural environment, natural resources, biodiversity and geological diversity** | • Will development have a potential impact on a national, international or European designated site (SPA, SAC, Ramsar, SSSI)?  
• Will it maintain and enhance sites otherwise designated for their nature conservation interest?  
• Will it conserve and enhance natural/semi natural habitats?  
• Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species? |
| **7. To achieve more sustainable travel behaviour, reduce the need to travel and reduce congestion** | • Will it increase and/or improve the availability and usability of sustainable transport modes?  
• Will it seek to encourage people to use alternative modes of transportation other than private vehicle?  
• Will it lead to the integration of transport modes?  
• Will it improve rural public transport?  
• Does it seek to increase the uptake or viability of walking and cycling as methods of transportation, through new infrastructure or integration? |
| **8. To promote accessibility, ensure that development is located sustainably and makes efficient use of land, and ensure the necessary infrastructure to support new development** | • Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all?  
• Does it seek to concentrate development and facilities where access via sustainable travel is greatest?  
• Does it seek to minimise congestion at key destinations / areas that witness a large amount of vehicle movements at peak times?  
• Would the scale of development require significant supporting transport infrastructure in an area of identified need?  
• Will it ensure adequate school places (through expansion / new facilities) and early years provision to support growth? |
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<tr>
<th>SA objective</th>
<th>SA Criteria</th>
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<tr>
<td>• Will it ensure the required improvements to utilities infrastructure?</td>
<td></td>
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<tr>
<td>• Will it ensure the required improvements in capacity to GP services?</td>
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<tr>
<td>• Will it provide a suitable amount of sports, recreational, leisure and open space facilities?</td>
<td></td>
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<tr>
<td>9. To conserve and enhance historic and cultural heritage and assets and townscape character?</td>
<td>• Will it protect and enhance designations, features and areas of historical, archaeological and cultural value in both urban and rural areas?</td>
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<tr>
<td>• Will it have a negative impact on the significance of a designated historic environment asset or its setting?</td>
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<tr>
<td>• Does it seek to enhance the range and quality of the public realm and open spaces?</td>
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<tr>
<td>• Will it reduce the amount of derelict, degraded and underused land?</td>
<td></td>
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<tr>
<td>• Does it encourage the use of high quality design principles to respect local character?</td>
<td></td>
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<tr>
<td>• Will / can any perceived adverse impacts be reduced through adequate mitigation?</td>
<td></td>
</tr>
<tr>
<td>10. To make efficient use of energy and reduce contributions to climatic change through mitigation and adaptation.</td>
<td>• Will it reduce emissions of greenhouse gases by reducing energy consumption?</td>
</tr>
<tr>
<td>• Will it lead to an increased generation of energy from renewable sources?</td>
<td></td>
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<tr>
<td>• Will it encourage greater energy efficiency?</td>
<td></td>
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<tr>
<td>• Will it improve the efficient use of natural resources, minimising waste and promoting recycling?</td>
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<td>11. To improve water quality and address water scarcity and sewerage capacity</td>
<td>• Will it lead to no deterioration on the quality of water bodies?</td>
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<td>• Will water resources and sewerage capacity be able to accommodate growth?</td>
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<tr>
<td>12. To reduce the risk of fluvial, coastal and surface water flooding</td>
<td>• Does it promote the inclusion of Sustainable Drainage Systems (SuDS) in new developments and will their integration be viable?</td>
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<tr>
<td>• Does it seek to avoid development in areas at risk of flooding (fluvial, coastal, surface water)?</td>
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<tr>
<td>• Does it seek to avoid increasing flood risk (fluvial, surface water, groundwater) in areas away from initial development?</td>
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<td>13. To improve air quality</td>
<td>• Will it improve, or not detrimentally affect air quality along the A12 or A120?</td>
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<td>• Does it direct growth away from AQMAs?</td>
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<tr>
<td>• Does it seek to improve or avoid increasing traffic flows generally?</td>
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<tr>
<td>14. To conserve and enhance the quality of landscapes</td>
<td>• Will landscapes sensitive to development be protected?</td>
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<tr>
<td>• Will it lead to rural expansion or development outside development boundaries/limits that increases coalescence with neighbouring settlements?</td>
<td></td>
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<tr>
<td>• Is the scale / density of development in keeping with important and valued features of the local landscape?</td>
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<tr>
<td>SA objective</td>
<td>SA Criteria</td>
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<tr>
<td>15. To safeguard and enhance the quality of soil and mineral deposits?</td>
<td>• Will it avoid the loss of high quality agricultural land?</td>
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<td></td>
<td>• Will it avoid the sterilisation of mineral deposits / is the site within a</td>
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<tr>
<td></td>
<td>Minerals Safeguarding Area (MSA)?</td>
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<td></td>
<td>• Will it support or lead to the remediation of contaminated land,</td>
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<td></td>
<td>avoiding environmental pollution or exposure of occupiers or</td>
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<tr>
<td></td>
<td>neighbouring land uses to unacceptable health risk?</td>
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2.9 In addition to the 15 SA objectives, the June 2017 SA Report set out a different set of assessment criteria for assessing Garden Community options (Table 7 of the June 2017 SA Report). The explanation for the development of this framework is as follows:

"The following framework sets out the amalgamation of each authority’s Local Plan SA Site Assessment Framework with the additional incorporation of TCPA Garden Community Principles for the assessment of options regarding Garden Communities. It has been developed in conjunction with the Local Plan SA Objectives from each authority. The framework shows each amalgamated objective in turn alongside corresponding relevant TCPA Garden Community Principles and any other considerations required. This framework has been developed in order to capture each principle of a successful Garden Community, with evidence of local considerations in the area of the three authorities."

2.10 While the rationale for the Garden Community framework is understood, it is not clear to LUC how this relates to the SA objectives set out in the SA framework for the rest of the Local Plan Section 1, nor how the criteria have been applied. Similarly, it is not clear how it can be used to compare the sustainability of the Garden Community options with other development options such as urban extensions or dispersed development. In some respects, it appears to have blurred the distinction between carrying out an SA (to identify significant effects in order to inform site selection, spatial strategy, and mitigation measures) with the application of Garden Community principles (which would normally be addressed in assessment of viability and the wording of policies in a Local Plan to deliver the development proposed).

2.11 Due to these shortcomings, LUC does not intend to use the Garden Community framework in the additional SA work. Instead, it is proposed that the assessment of alternative locations for strategic development is guided by a new set of assessment criteria that are clearly linked to the SA Framework. These criteria are set out in Appendix 1.

2.12 The Inspector recommended in paragraph 123 of his letter of 8th June 2018 that if the West of Braintree Garden Community (WoBGC) is included, account should be taken of the effects of overlying aircraft to and from Stansted Airport. However, having reviewed the public safety zone and noise envelope for Stansted, it is clear that the WoBGC is outside the affected area. For this reason, the effects of Stansted Airport have not been taken into account, as they are not considered significant enough to require assessment.

2.13 Furthermore, in discussion with the North Essex Authorities, LUC understands that policy protection will be provided to existing uses of Andrewsfield airfield and therefore no criteria are included to assess the potential for strategic development to lead to loss of these uses. Instead, where the authorities anticipate that a development option could threaten existing uses, the description of the likely components of the relevant development options (see Stage 1(b) below) will clearly state the protection of existing uses that would be required if the site were allocated and this protection will be reflected in the assessment results.

2.14 As described more fully in the following methodological tasks, the additional SA work will use the new criteria as a basis for considering the sustainability of alternative locations for strategic development within the three North Essex Local Planning Authority areas. This will allow an objective, consistent and transparent assessment of the sustainability of the alternative locations.

**Output from Task 2:**

An agreed set of SA objectives and draft assessment criteria.
Task 3: Gathering evidence and data

2.15 Once the draft assessment criteria were agreed by officers of the NEAs, the data gathering process was begun. This required the three NEAs to provide GIS based information to inform Stage 1a of the assessment (see the ‘Task 7: Stage 1 assessment of alternative locations for strategic development’ section below).

2.16 The collection and refinement of data is ongoing, and it may be possible that it is refined further as the SA is undertaken should any data gaps, errors or clarifications arise.

Output from Task 3:
GIS based interactive mapping database setting including the site location boundaries and information relevant to the draft assessment criteria
(Status: Ongoing)

Task 4: Identify alternative locations for strategic development to be subject to the additional SA work

Garden Community alternatives

2.17 In his letter of 8th June 2018, the Inspector suggests a two-stage assessment process. The first stage is to comprise “an objective comparison of individual GC site options at a range of different sizes”. He further states that there should be liaison with promoters of the Garden Community site options, where necessary, to ensure that their proposals are fully understood and therefore assessed appropriately.

2.18 The NEAs have corresponded with the promoters of the Garden Communities and following this, believe that the strategic development Garden Community alternatives listed in Table 2.2 reflect what is being promoted and are reasonable. They therefore propose that these are subject to the additional SA work. These alternatives are also illustrated in Figure 2.1 to Figure 2.3.

Non-Garden Community options

2.19 The Inspector does not refer to the need to carry out the equivalent Stage 1 SA work for non-Garden Community options, referring instead to testing “proportionate growth at and around existing settlements” and “CAUSE’s Metro Town proposal” as spatial strategy alternatives during a second stage of the additional SA work. However, in order to inform the subsequent spatial strategy options appraisal, and for consistency purposes to enable comparisons to the same level of detail, LUC proposes to carry out SA of these non-Garden Community options so that an equivalent level of detail is available to inform combinations of alternative locations for strategic development for all the spatial strategy options to be tested.

2.20 In defining the non-Garden Community options to be assessed, the role that the ‘Section 2’ documents of the Local Plans play in deciding where non-strategic development should be located at the local authority level is recognised. As such the additional SA work will focus only on development locations that are ‘strategic’ in scale (i.e. appropriate for inclusion in the Section 1 Local Plans).

2.21 The scale of the largest sites to be allocated by the Section 2 documents of the Local Plans is 1,000 dwellings in Braintree, 1,106 dwellings in Colchester, and 1,700 dwellings in Tendring. As set out above, these are considered non-strategic in scale due to their inclusion in the Section 2 Local Plans rather than the Section 1 Local Plan. In accordance with this logic, the ‘strategic’ developments which are suitable for designation in the Section 1 Local Plan are taken to be those with capacity for approximately 2,000 dwellings or more. This is consistent with evidence provided by the Campaign Against Urban Sprawl in Essex (CAUSE), which contends that viability decreases at sizes greater than about 2,000 dwellings\(^9\). For these reasons, the additional SA

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work will consider non-Garden Community growth options that have capacity for at least 2,000 dwellings.

2.22 In identifying alternative strategic sites to be subject to the additional SA, the NEAs only considered sites which were identified during the call for sites processes in each local planning authority. These sites, which have been promoted by owners or developers, are considered to be available for development within the plan period and therefore more likely to be deliverable, as required by the tests of soundness.

2.23 Furthermore, the NEAs have identified that the Section 1 Local Plan must provide for approximately 7,500 new dwellings in addition to that already proposed to be allocated by the Section 2 Local Plans to ensure that, together, they provide for the required amount of housing across North Essex. In identifying alternative strategic sites to be subject to the additional SA, the NEAs therefore excluded sites which are proposed to be allocated in the emerging Section 2 Local Plans or which have already been granted planning permission.

2.24 To summarise, the following criteria were applied by the NEAs in identifying the potential sites for non-Garden Community options:

- The site has capacity for 2,000 or more dwellings;
- The site was promoted through the ‘call for sites’ submissions;
- The site is not allocated within the draft Section 2 Local Plans of each local planning authority;
- The site does not already have planning permission.

2.25 The result of this is the sites identified in Table 2.2. The North Essex Authorities believe that the sites listed within this table are reasonable and propose that these are subject to SA. These sites are also identified in Figure 2.1 to Figure 2.3.

CAUSE Metro Town alternative

2.26 The Inspector suggested that there should be liaison with CAUSE to ensure that their Metro Town proposal is fully understood and assessed appropriately. The North Essex Authorities arranged a technical meeting between planning policy officers, LUC and a representative of CAUSE to ensure that the Metro Town proposal is fully understood. Following the meeting, a document setting out the scope of the CAUSE Metro Town proposal was prepared by LUC, and sent to CAUSE for their confirmation that this comprises a true representation of their proposals. Once agreement from CAUSE is obtained, the proposals outlined within that document will be assessed as part of the additional SA work. Since the components of the CAUSE Metro Town alternative have not yet been fully defined, they are not shown in Figure 2.1 to Figure 2.3.

2.27 The CAUSE Metro Town proposal will complete the suite of reasonable alternative strategic sites to be tested at Stage 1 of the further SA.

Output from Task 4:
Identified locations to be assessed in Stage 1.
(Task Status: Ongoing)

Figure 2.1 to Figure 2.3 below set out the locations of the Garden Community options and non-Garden Community options which are to be assessed by the additional SA work. These do not include the CAUSE Metro Town proposal as this had not been fully agreed with CAUSE at the time of writing. CAUSE had however confirmed that land within a 10 minute walking catchment of four stations on the Colchester-Clacton railway line should provide the starting point for identifying locations to be tested by the SA and these broad areas of search are indicated on the figures. Further information about the sites shown in these figures is provided in Table 2.2.

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10 Tests of soundness for local plans are set out in paragraph 35 of the NPPF.
Figure 2.1: Braintree District strategic sites to be assessed

Source: BDC

Map Scale @ A4: 1:212,000

Contains Ordnance Survey data ©
Crown copyright and database right 2018
Figure 2.2: Colchester Borough strategic sites to be assessed

Colchester Borough Local authority
Strategic site
Broad area of search for CAUSE Metro Plan strategic sites
Broad area of search for new university station

Source: BDC

North Essex Local Plan
Section 1 Additional Sustainability Appraisal

Figure 2.2: Colchester Borough strategic sites to be assessed

Map Scale @ A4: 1:155,000

Contains Ordnance Survey data ©
Crown copyright and database right 2018
Figure 2.3: Tendring District strategic sites to be assessed

Tendring District Local authority
Strategic site
Broad area of search for CAUSE Metro Plan strategic sites
Broad area of search for new university station

Source: BDC

Map Scale @ A4: 1:175,000
### Table 2.2 Strategic sites to be tested at first stage of further SA

<table>
<thead>
<tr>
<th>Map Ref</th>
<th>Option Name</th>
<th>District</th>
<th>Description</th>
<th>Area</th>
<th>Site ref and fully built out housing numbers</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>NEAGC 1</td>
<td>West of Braintree</td>
<td>Bra/Utt</td>
<td>As already proposed in the Local Plan. Updates to the boundary indicate the site can deliver between 7,000 and 7,500 homes. Based on the concept framework. Site is &gt;5km from a railway station and town centre.</td>
<td>496</td>
<td>NEAGC 1a 7,000 NEAGC 1b 7,500</td>
<td>Section 1 Local Plan (Policy SP10)</td>
</tr>
<tr>
<td>NEAGC 2</td>
<td>Colchester Braintree Borders Garden Community (Marks Tey)</td>
<td>Col/Bra</td>
<td>As already proposed in the Local Plan. Updates to the boundary indicate the site can deliver between 15,000 and 27,000 homes. Based on the concept framework. Marks Tey railway station is &lt;5km from the site. The site is &gt;5km from Colchester and Braintree town centres.</td>
<td>1,285</td>
<td>NEAGC 2a 15,000 NEAGC 2b 27,000</td>
<td>Section 1 Local Plan (Policy SP9)</td>
</tr>
<tr>
<td>NEAGC 3</td>
<td>Tendring Colchester Borders Garden Community</td>
<td>Col/Ten</td>
<td>As already proposed in the Local Plan. Updates to the boundary indicate the site can deliver between 7,000 and 8,000 homes. Based on the concept framework. Size option of up to 2,000 homes proposed by CAUSE. Wivenhoe and Hythe railway stations are &lt;5km from the site. The site is &lt;5km from Colchester town centre.</td>
<td>519</td>
<td>NEAGC 3a 7,000 NEAGC 3b 8,000 NEAGC 3c 2,000</td>
<td>Section 1 Local Plan (Policy SP8)</td>
</tr>
<tr>
<td>ALTGC 1</td>
<td>Land West of Braintree</td>
<td>Bra/Utt</td>
<td>The part of the West Braintree Garden Community within Braintree district. Site is &gt;5km from a railway station and town centre.</td>
<td>496</td>
<td>ALTGC 1a 2,000</td>
<td>RAY7</td>
</tr>
<tr>
<td>ALTGC 2</td>
<td>Land east of Silver End</td>
<td>Bra</td>
<td>The site is located to the north-east of Silver End. Site is &gt;5km from a railway station and town centre.</td>
<td>165</td>
<td>ALTGC 2a 2,500 ALTGC 2b 1,800</td>
<td>SILV 704</td>
</tr>
<tr>
<td>ALTGC 3</td>
<td>North West Coggeshall (Monks Wood)</td>
<td>Bra</td>
<td>The Inspector requested in his post hearing letter that this site is appraised for 5,000 dwellings and commented that the promoters of the site state that the maximum capacity of the site</td>
<td>534</td>
<td>ALTGC 3a 2,000 ALTGC 3b 5,500</td>
<td>COGG 641</td>
</tr>
<tr>
<td>Map Ref</td>
<td>Option Name</td>
<td>District</td>
<td>Description</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 4</td>
<td>Land at Marks Tey Option One</td>
<td>Col/Bra</td>
<td>The site is located directly to the north of Marks Tey. The site is known to have the constraint of the brick works and therefore could not be developed in full. Marks Tey railway station is &lt;5km from the site. The site is &gt;5km from Colchester and Braintree town centres.</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>211 ha</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 4</td>
<td></td>
<td></td>
<td>ALTGC 4a 2,000, ALTGC 4b 4,500</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sites: Northeast of WST05, WST17, WST06</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 5</td>
<td>Land at Marks Tey Option Two</td>
<td>Col/Bra</td>
<td>The site lies directly to the Southwest of Marks Tey Village. Marks Tey railway station is &lt;5km from the site. The site is &gt;5km from Colchester and Braintree town centres.</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>139 ha</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 5</td>
<td></td>
<td></td>
<td>ALTGC 5a 2,000, ALTGC 5b 3,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sites: Southeast part of WST05,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 6</td>
<td>Land at Marks Tey Option Three</td>
<td>Col/Bra</td>
<td>Marks Tey railway station is &lt;5km from the site. The site is &gt;5km from Colchester and Braintree town centres.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>246 ha</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 6</td>
<td></td>
<td></td>
<td>ALTGC 6a 2,000, ALTGC 6b 3,500, ALTGC 6c 5,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sites: WST08</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 7</td>
<td>Land at East of Colchester Option One</td>
<td>Col/Ten</td>
<td>The site is located to the north-east of Colchester, adjacent to Bullock Wood SSSI. The southern edge of the site is just less than 5km from</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>124 ha</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALTGC 7</td>
<td></td>
<td></td>
<td>ALTGC 7a 2,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sites: EST01, EST04, EST08</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The site promoters submitted a Site Promotion document to the NEAs in August 2018, promoting the site for 5,500 dwellings. The site options for Monks Wood therefore represent: the minimum of 2,000, 5,500 as promoted by the site promoter and 8,000 which is the figure from the site capacity calculation to ensure consistency with all site options.

It is considered that 7,000 and 8,000 are too similar to compare and so the higher dwellings figure for this site option is 8,000 rather than 7,000. This is consistent with the dwellings figures for the alternative sites. Lightwood Strategic will be advised of the three planned housing numbers and regard will be had to any response received.

Site is >5km from a railway station and town centre.
<table>
<thead>
<tr>
<th>Map Ref</th>
<th>Option Name</th>
<th>District</th>
<th>Description</th>
<th>Area</th>
<th>Site ref and fully built out housing numbers</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALTGC 8</td>
<td>Land at East of Colchester Option Two</td>
<td>Col/Ten</td>
<td>The site is located to the north of the Parsons Heath area of Colchester. The southern edge of the site is just less than 5km from Colchester railway station. The site is &lt;5km from Colchester town centre.</td>
<td>151 ha</td>
<td>ALTGC 8a 2,000  ALTGC 8b 2,500</td>
<td>Sites: EST01, EST05, EST07</td>
</tr>
<tr>
<td>ALTGC 9</td>
<td>Land at East of Colchester Option Three</td>
<td>Ten</td>
<td>The site is located in Tendring district and includes a gap between the urban edge of Colchester. The edge of the site is &lt; 5km from Hythe and Wivenhoe railway stations, but &gt;5km from Colchester railway station. The site is &lt;5km from Colchester town centre.</td>
<td>213 ha</td>
<td>ALTGC 9a 2,000  ALTGC 9b 4,000</td>
<td>Sites: EST06</td>
</tr>
<tr>
<td>ALTGC 10</td>
<td>Land at East of Colchester Option Four</td>
<td>Col/Ten</td>
<td>The site is located east of the Greenstead area of Colchester and includes an area of land south of the A133. The eastern edge of the site is &lt; 5km from Colchester, Hythe and Wivenhoe railway stations. The site is &lt;5km from Colchester town centre.</td>
<td>289 ha</td>
<td>ALTGC 10a 2,000  ALTGC 10b 5,000</td>
<td>Sites: EST02, EST06, EST09</td>
</tr>
<tr>
<td>ALTGC 11</td>
<td>Langham Garden Village</td>
<td>Col</td>
<td>Langham is over 5km from Colchester town centre and Colchester railway station.</td>
<td>347 ha</td>
<td>ALTGC 11a 2,000  ALTGC 11b 5,000</td>
<td>Sites: RNE08, RNE22, RNE60, RNE11</td>
</tr>
<tr>
<td>SUE 1</td>
<td>Land at Halstead</td>
<td>Bra</td>
<td>Portion of site is in flood zone 2/3 and not assumed to be developable. The site is &lt;5km from Halstead town centre but &gt;5km from a railway station.</td>
<td>348 ha</td>
<td>SUE 1a 2,000  SUE 1b 8,500</td>
<td>HATR 297, HATR 306, GGHR 430, GGHR 284, GGHR 639</td>
</tr>
<tr>
<td>Map Ref</td>
<td>Option Name</td>
<td>District</td>
<td>Description</td>
<td>Area</td>
<td>Site ref and fully built out housing numbers</td>
<td>Source</td>
</tr>
<tr>
<td>---------</td>
<td>------------------------------------</td>
<td>----------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------</td>
<td>---------------------------------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>SUE 2</td>
<td>Land East of Braintree (including Temple Border)</td>
<td>Bra</td>
<td>Sustainable urban extension could potentially have to account for the route of the new A120.</td>
<td>197 ha</td>
<td>SUE 2a 2,000 SUE2b 5,000</td>
<td>Sites: CRESS 212, STIS 396, STIS 397, STIS 600</td>
</tr>
<tr>
<td>SUE 3</td>
<td>Land south east of Braintree</td>
<td>Bra</td>
<td>Sustainable urban extension with access to the strategic highway at Galley’s Corner.</td>
<td>166 ha</td>
<td>SUE 3a 2,000 SUE 3b 5,000</td>
<td>Sites: CRESS 209 and others</td>
</tr>
<tr>
<td>VE 1</td>
<td>Land at Kelvedon</td>
<td>Bra</td>
<td>Expansion of Kelvedon in north, west and south directions. Site is close to Mainline rail station and the A12 Kelvedon south junction. The site is &lt;5km from Kelvedon railway station and &gt;5km from a town centre. Existing local centre at Kelvedon village would provide some services.</td>
<td>146 ha</td>
<td>VE 1a 2,000 VE 1b 3,000</td>
<td>KELV331, KELV338, KELV333, KELV 605, KELV 615</td>
</tr>
<tr>
<td>VE 2</td>
<td>Land at Coggeshall</td>
<td>Bra</td>
<td>Residential expansion of Coggeshall to the north, west and east to make Coggeshall Garden Village.</td>
<td>91 ha</td>
<td>VE 2a 2,000</td>
<td>COGG171, COGG177, COGG178, COGG179, COGG175, COGG180, COGG182,</td>
</tr>
<tr>
<td>VE 3</td>
<td>Metro Plan</td>
<td>Ten</td>
<td>This is an alternative proposal put forward by campaigners CAUSE which proposes growth around railway stations along the Colchester to Clacton/Walton line and their corresponding villages. The relevant villages are Alresford, Great Bentley, Weeley and Thorpe le Soken. All sites that form part of the Metro Town will be &lt;5km from railway stations. All sites will be &gt;5km from a town centre.</td>
<td>TBC</td>
<td>VE 3a 2,000 VE 3b 4,000 VE 3c 8,000</td>
<td>TBC</td>
</tr>
<tr>
<td>Map Ref</td>
<td>Option Name</td>
<td>District</td>
<td>Description</td>
<td>Area</td>
<td>Site ref and fully built out housing numbers</td>
<td>Source</td>
</tr>
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<td>---------</td>
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<td>-------------</td>
<td>------</td>
<td>---------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>VE4</td>
<td>Weeley Garden Village</td>
<td>Ten</td>
<td>Greenfield sites that either are or have been promoted for inclusion in the Local Plan which, together, could deliver 2,000 homes. Site is &lt;5km from Weeley railway station and &gt;5km from a town centre.</td>
<td>72 ha</td>
<td>VE 4a 2,000</td>
<td></td>
</tr>
<tr>
<td>VE 5</td>
<td>Tendring Central Garden Village</td>
<td>Ten</td>
<td>A proposal for strategic growth at Frating, comprising land between Frating, Hare Green and Balls Green has been promoted for inclusion in the Local Plan in recognition of the location’s strategic position at the junction of the A120 and the A133 and the cluster of businesses around Manheim Auctions and the Book Service. The concept involves residential and community facilities on approximately 77 hectares of land (west of the A120/A133 slip road), with employment use on approximately 40 hectares (east of the slip road). The site could potentially deliver 2,000 homes. Option VE5b assumes the whole of the site is developed for housing. Site is &gt;5km from a railway station and &gt;5km from a town centre.</td>
<td>221 ha</td>
<td>VE 5a 2,000 VE 5b 4,500</td>
<td></td>
</tr>
</tbody>
</table>

however all will be <5km from the relevant village’s local centres.

In addition, Essex University and its Knowledge Gateway could provide the focus for an eastward urban extension to Colchester, delivering a significant number of dwellings (see NEAGC 3c above). This would support a high quality 10-minute express bus service linking to the town centre and a new railway station serving the university. Growth around the four villages on the Colchester to Clacton/Walton line will be tested both with and without this additional element.
Task 5: Agree approach to further SA with the Inspector

2.28 Having agreed the proposed approach to the additional SA with the NEAs and identified with them the reasonable alternative sites to be tested through the additional SA work, it was considered appropriate to consult the Inspector directly on these in line with his advice. On 19 October 2018 a draft Method Scoping Statement for the additional SA work (version 7.0 of this document) was therefore sent to the Inspector for his review and comment. This was subsequently updated, taking into account the Inspector’s comments and queries, and other updates including a refined understanding of the CAUSE Metro Town proposals (following the meeting between the NEAs and CAUSE) and updated site development boundaries and capacities. The current version has also been updated to clarify the SA scope and methodology.

Output from Task 5:
Method statement (including options to be assessed) reviewed by the Inspector.
(Task Status: Complete)

Task 6: Focussed consultation and engagement on SA method and scope

2.29 As described earlier in the methodology, while the SA objectives that will be used to frame the additional SA work remain the same as in the original SA, the site assessment criteria and the strategic sites to be assessed have changed to reflect the discussions at the Examination, the evidence and the Inspector’s concerns. LUC considers it good practice and appropriate to carry out further consultation on the scope and level of detail of the additional SA work, as described in ‘The need for further consultation’ section above.

Output from Task 6:
Engagement response table on the scope and level of detail of the further SA.
(Task Status: Ongoing)

Task 7: Stage 1 assessment of alternative locations for strategic development

2.30 Once the SA objectives, criteria and assumptions, and the alternative locations to be subject to SA have been agreed, we will carry out the first stage of additional SA work, which is to appraise individual alternative development locations.

2.31 The Stage 1 appraisal of alternative locations for development will be carried out in two steps:
- Stage 1(a) will comprise an appraisal of the principle of housing-led development at each potential development location on its own merits, i.e. an appraisal of the geographical location in relation to existing key services, facilities, employment locations, transport links, and environmental assets and constraints without considering what the development itself might deliver.
- Stage 1(b) will then take into account how the potential effects identified by Stage 1(a) could be modified by any significant new services, facilities, employment locations, and transport links likely to be provided as part of development coming forward at that location.

Stage 1(a): Appraising strategic locations on their own merits

2.32 In Stage 1(a), LUC will appraise the identified site options against the objectives in the SA Framework. This process will use a GIS-based approach to apply the SA criteria set out in Appendix 1, resulting in a score being awarded to each site option in relation to each assessment criterion. The scores indicating how each site performs against each of the criteria will be summed to give an aggregate contribution to each relevant SA objective (see ‘Linkage to the SA framework’ section in Appendix 1).

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11 Paragraph 120 of his letter dated 8 June 2018
12 Set out in his letter to the North Essex Authorities dated 21 November 2018
13 Set out in his letter to the North Essex Authorities dated 8 June 2018
2.33 As set out in Table 2.2, strategic sites will be tested at different reasonable alternative housing capacities. A single site boundary will be tested for each site, large enough to accommodate the largest capacity option for that site. Since options for smaller housing numbers are likely to be accommodated on a smaller footprint within the strategic site, this is likely to give more flexibility to avoid negative effects (for example by avoiding development on a sensitive environmental asset) and improve positive ones (for example, by locating housing development in an urban extension on the side of the site closest to nearby services, facilities and transport links). This effect will be noted in the SA narrative, where relevant, but will not affect the SA scores since the site layouts are not known at this time.

2.34 The selection of particular strategic development locations is judged unlikely to affect the performance of the Plan in relation to achieving a small number of sustainability objectives, as set out in Table 2.3. These objectives have therefore been scoped out from the site-based SA work in Stage 1(a). Consideration will be given to potential effects on all SA objectives when considering the services and facilities likely to be provided at each location at Stage 1(b) and when carrying out qualitative assessment of the spatial strategy alternatives at Stage 2.

Table 2.3: SA objectives scoped out from Stage 1(a) assessment

<table>
<thead>
<tr>
<th>SA objective</th>
<th>Reason for scoping out from Stage 1(a) of SA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Create safe environments which improve quality of life, community cohesion</td>
<td>The effects of new development on safety and security will depend on design factors such surveillance of public spaces and use of appropriate lighting rather than the location of development sites. Any differences in the ability of different spatial strategies to support provision of community facilities will be considered at Stage 1(b) and Stage 2 of the SA.</td>
</tr>
<tr>
<td>2. To ensure that everyone has the opportunity to live in a decent, safe home which meets their needs at a price they can afford</td>
<td>All strategic sites will contribute to meeting housing need but the effects of the Local Plan Section 1 in relation to this SA objective will not depend on the locations of individual sites but rather on the policies determining the total amounts, types and tenures of houses to be provided. Quality of housing will be determined by policies on design and sustainability.</td>
</tr>
</tbody>
</table>

2.35 Once the assessment has been carried out, LUC will prepare colour-coded tables of the scores assigned for each location option against each site assessment criterion and SA objective. These will be used to highlight any anomalies and thereby ‘sense check’ the findings. LUC will also prepare a series of colour-coded maps showing how all of the locations perform against each SA objective. We will prepare a short narrative to accompany the maps and score tables, highlighting significant effects and the comparative performance of the options against the SA objectives.

2.36 We will hold a progress tele-conference with North Essex Authorities at the end of Stage 1(a) to discuss the findings and how to respond to them in Stage 1(b) of the SA process.

**Stage 1(b): Appraising locations taking into account new services and employment**

2.37 Having appraised the inherent sustainability merits or otherwise of each development location in relation to existing services, facilities, and infrastructure, LUC will then consider whether new provision is likely as part of the development proposals, depending upon their scale. Care will need to be taken to ensure that a consistent approach is adopted as many of the measures (e.g. inclusion of community facilities or open space) may be achievable at most if not all of the locations. LUC therefore requested that the North Essex Authorities provide assumptions to inform this stage of the SA about which services, facilities and infrastructure each development option would, in-principle, be required to provide as follows:14

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- **Early years:** 9 children per 100 dwellings (0.09 per dwelling). Standard setting = 56 places. So, a site for 2,000 dwellings would require 3.2 early years settings. The SA will assume that all strategic sites will make sufficient provision for the additional need they generate.

- **Primary schools:** 30 pupils per 100 dwellings (0.3 per dwelling). 700 new houses will generate demand for a single form entry primary school. So, a site for 2,000 dwellings would require 2.8 single form schools. However, the Guide states that the minimum size for any new mainstream provision will be two forms of entry (420 places). The SA will assume that all strategic sites will make sufficient provision for the additional need they generate.

- **Secondary schools:** 20 pupils per 100 dwellings (0.2 per dwelling). Six forms of entry is the minimum secondary school size that would normally be considered financially viable. This equates to 4,500 houses using ECC’s formula. Stage 1(b) of the SA will assume that strategic sites with capacity for 4,500 houses or more will make sufficient provision for the additional need they generate; the potential for new secondary school provision to serve combinations of sites will be considered at Stage 2 of the SA.

- **Youth provision:** the minimum size of development requiring a bespoke youth centre or dedicated youth space is around 1,200 dwellings and so the SA will assume that all strategic sites will make sufficient provision for the additional need they generate.

- **Open space:** at least 10% of the gross site area will be provided as open space and up to 50% of garden communities will be green infrastructure in accordance with TCPA garden city principles. For all of the site options this will include at least one strategic area of open space. The SA will assume that all strategic sites will make sufficient provision for the additional need they generate.

- **Rapid transit:** as the development of one site on its own is highly unlikely to deliver a rapid transit corridor the assumption at Stage 1 of the SA is that none of the sites will deliver rapid transit. The NEAs will advise if rapid transit could form part of any of the spatial strategy alternatives as part of Stage 2 of the SA.

- **Railway stations:** no new railway stations are assumed as part of any of the options.

- **Bus services:** With the exception of Weeley and Tendring Central Garden Village all site options are assumed to deliver a frequent bus service as there is potential to connect to existing bus services within the urban areas. However there is potential to improve connectivity as a result of new bus services to be delivered as part of the development.

- **Strategic roads:** funding is committed (RIS1) to widen the A12 to three lanes from Chelmsford to junction 25 (Marks Tey).

- **Employment space:** at this stage of the appraisal it has not been possible to identify the amount of employment space or predicted jobs for each site option. The NEAs have commissioned consultants to provide an indicative employment floorspace figure for the preferred garden communities and the SA this is expected to be available in time to inform Stage 2 of the additional SA. The first stage of the SA will assume uncertain effects in relation to provision of new employment space unless such provision is explicitly identified in Table 2.2. The second stage of the SA, the appraisal of spatial strategy alternatives, will consider the distribution of employment for each spatial strategy option, based on the indicative employment floorspace figure.

- **Primary health care:** the North Essex Clinical Commissioning Group (CCG) has not provided the NEAs with a formula for calculating the need for primary health care. It is understood that the CCG are reviewing future models of care and as such the CCG comment on planning applications where they consider there to be likely impacts. The SA will assume that no strategic sites provide new primary health care facilities.

2.38 The assessment at Stage 1(b) and Stage 2 will also make explicit that the NEAs intend to protect existing uses of Andrewsfield airfield, where this is relevant to the strategic development location.

2.39 Large developments can take many years to fully build out and in some cases it may be that a significant proportion would remain to be built at the end of the Plan period. To ensure a consistent approach to the assessment of the effects of development expected to take place beyond the end of the Plan period, all locations will be assessed in their entirety (taking account
of all development, including that to be delivered beyond the end of the plan period) during Stage 1(b). The housing numbers provided by the NEAs in Table 2.2 are therefore the total amounts expected to be provided at each site, including provision beyond the end of the Plan period. As described below, the Stage 2 assessment will also consider what is likely to be delivered within the plan period.

2.40 Development at some of the individual development locations assessed at this stage, for example a 2,000 dwelling urban extension, is unlikely to be able to support provision of more significant new infrastructure such as higher order transport facilities. While this may result in the individual location achieving a less positive sustainability score at Stage 1 of the SA, the North Essex Authorities will also be asked to provide assumptions about any additional infrastructure provision that could be supported by each of the spatial strategy options considered in Stage 2 of the SA, both to the end of the Plan period and on a fully built out basis. The potential for combinations of locations to support additional infrastructure should therefore be borne in mind by the Authorities when deciding which of the development locations to incorporate into spatial strategy options for assessment at Stage 2.

2.41 Having modified the SA of alternative locations in light of the services and facilities assumed to be provided at each, LUC will prepare a narrative summary of findings to accompany the summary table of scores, showing how scores changed taking into account mitigation, plus maps showing how each of the locations performs against each of the SA objectives.

Output from Task 7:
Appraisal scores of development locations in two parts: Stage (1a) locations on their own merits and Stage 1(b) locations taking into account potential new services and facilities, plus summary of findings.
(Status: Task yet to commence)

Task 8: Identify alternative spatial strategies to be subject to Stage 2 assessment

2.42 Drawing on the findings of the Stage 1 SA of alternative development locations and other evidence including viability, the North Essex Authorities will decide which of the development locations to include in the spatial strategy alternatives, and which to discount, providing clear justification of the reasons why for inclusion in the SA report.

2.43 As the Inspector recommends, the alternative spatial strategies will be developed with a clear rationale and will be given clear descriptions, including how much development will be delivered in each location under each option.

2.44 The Inspector makes it clear that the spatial strategy alternatives should include:

- Proportionate growth at and around existing settlements.
- CAUSE’s Metro Town proposal.
- One, two or more Garden Communities (depending upon the outcome of the first stage assessment), and that such options should also include appropriate corresponding levels of proportionate growth at existing settlements.

2.45 At this stage, the North Essex Authorities will draw on viability and other evidence to describe any facilities and infrastructure, additional to that already described for individual development locations, that is expected to be supported by combining the individual locations into coherent spatial strategies, for example a new guided busway or railway station serving multiple locations.

Output from Task 8:
Narrative and mapped descriptions of alternative spatial strategies; reasons for taking forward some development locations and rejecting others.
(Status: Task yet to commence)
Task 9: Stage 2 assessment of alternative spatial strategies and ‘check and challenge’ workshop

2.46 The second stage of the additional SA work will be to appraise the alternative spatial strategies drawing on the Stage 1 appraisal of the alternative spatial strategy options. Particular focuses for this stage of work will be:

- How the development locations under each option relate to one another and to the existing pattern of development, including the potential effects of such development on, for example, existing town centres and travel patterns.
- The mitigation/benefits provided by new facilities and infrastructure enabled by combining individual development locations into a coherent spatial strategy.

2.47 LUC will use whatever evidence is available to come to conclusions but the Stage 2 assessment is likely to require greater exercise of professional judgement than the Stage 1 assessment.

2.48 At Stage 2, LUC will appraise options both in their entirety (fully built out) and on the basis of what is expected in the plan period, with differences identified as medium and long term impacts. This will take into account the NEA’s views, informed by the emerging evidence base, on what will be delivered within the plan period and on a fully built out basis in terms of housing and supporting infrastructure, services and facilities.

2.49 LUC will come to views on how each of the spatial strategy alternatives performs against each of the SA objectives and provide an overall conclusion on their relative performance.

2.50 LUC will test the Stage 2 findings via a ‘check and challenge’ workshop with officers from the three North Essex Authorities plus invited stakeholders with interests and expertise in environmental, social and economic issues to make sure that the findings appear reasonable.

2.51 The findings of the SA of alternative spatial strategies, incorporating any amendments arising from the workshop will be provided to officers to help inform selection of the preferred spatial strategy.

Output from Task 9:
SA of reasonable alternative spatial strategies.
(Status: Task yet to commence)

Task 10: Reporting

2.52 Following the workshop, LUC will prepare a report documenting the additional SA work carried out in relation to the Local Plan Section 1 Spatial Strategy alternatives, making clear how the recommendations of the Inspector have been met.

2.53 The report will include clear descriptions (prepared by the North Essex Authorities) of the reasons for selecting the alternatives dealt with and of the reasons for choosing the preferred spatial strategy in light of the alternatives.

2.54 The report will not be a full SA Report for the Local Plan Section 1 but an addendum to that report, intended to replace those parts of the original report that assess the chosen spatial strategy in light of the alternatives.

Output from Task 10:
SA addendum report for consultation.
(Status: Task yet to commence)

Task 11: Consultation followed by finalisation of SA

2.55 At this point LUC recommends that the North Essex Authorities carry out a final formal round of consultation on the Section 1 Local Plan and SA, as amended by the additional SA work, prior to resuming the Examination hearings. This would ensure that the requirement of SEA Regulation 13(3) to give the statutory consultees and the public “an effective opportunity” to express their
opinion on the draft plan and SA report prior to adoption is met, particularly if the additional SA work gives rise to a refined or alternative spatial strategy.

2.56 Following consultation LUC would analyse and respond to consultation responses and finalise the additional SA work.

**Output from Task 11:**
Final SA addendum for submission to Examination.
(Status: Task yet to commence)
Appendix 1
Assessment criteria and the linkage to the SA framework
Assessment criteria

Each alternative location for strategic development will be assessed against the criteria below relating to:

- access to services, facilities, transport and centres of employment; and
- environmental harm.

The scores achieved by alternative development locations against the individual assessment criteria indicate whether development for housing use in the proposed location would be consistent with achievement of the related sustainability objectives (see 'Linkage to the SA framework' section below).

The size/development capacity of individual development locations is not taken into account in scoring them against the criteria since it is assumed that all spatial strategy alternatives put forward will seek to deliver the same amount of housing in total during the Plan period.

Access to services, facilities, transport and centres of employment

Access to services and facilities is assessed on the assumption that residents will travel on foot rather than by vehicle, reflecting national policy objectives to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to increase activity levels, and to reduce vehicle emissions. Various pieces of research provide a variety of recommended guidance distances for walking. Those used in the SA are based on 'desired', 'acceptable' and preferred maximum' walking distances described in the publication 'Guidelines for Providing for Journeys on Foot (Institution of Highways and Transport, 2000). This suggests, for example, an acceptable walking distance of 800 m to most destinations, 1,000 m to work or school, and 400 m to town centres. Professional judgement has been used to vary this standard distance in relation to certain services and facilities. For example, the standard distance of 800 m has been used for railway stations but a shorter distance of 400 m has been used for bus stops, reflecting the fact that individuals are likely to be prepared to walk greater distances to transport facilities providing a faster or longer distance service. Similarly, secondary schools have been assigned a longer walking distance than primary schools reflecting the fact that older children should be capable of walking a longer distance and secondary schools are generally larger institutions with larger catchment areas than primary schools.

In assessing the accessibility of services, facilities and transport from strategic sites, reference was made both to specific, selected services and facilities (such as individual education and healthcare facilities) and to service centres (town centres and local centres).

Access to local centres

Information and GIS data were provided by the individual NEAs. For the purposes of identifying a local centre, the following factors were taken into account:

**Braintree**

Local centres have been identified in accordance with policy LPP12 'District Centres' of the emerging Section 2 Local Plan for Braintree. Specifically, the 'district and local centres' set out in the justification text (para 6.47) and as set out on the emerging proposals maps have been used for this assessment. As such, the local centres for the purposes of the SA are:

- Coggeshall
- Earls Colne
- Hatfield Peverel
- Kelvedon with Feering
- Sible Hedingham, and
- Great Notley
- Maltings Lane

In addition, the new Garden Community options within Braintree are also likely to contain a local centre, or centres, given that it is intended that these will include some services and facilities. These cannot be mapped for the SA, as their location is dependent upon the layout and design of the communities, however, it is assumed that local service centres will be provided within these communities and this will
be taken into account in the Stage 1b and 2 assessments. The specific communities to which these relate are:

- West of Braintree Garden Community, and
- Colchester Braintree Borders Garden Community

The geographic extent of the existing local centres is based on the shopping areas identified within these settlements in the emerging proposals map. Although the local centres may extend beyond these areas, these do represent the most concentrated areas of service provision within these local centres.

**Colchester**

Local centres have been identified in accordance with Policy SG5 of the emerging Section 2 Local Plan for Colchester. As such, the local centres for the purposes of the SA are:

- St Christopher Road, St Johns
- Hawthorne Avenue, Greenstead
- Iceni Way, Shrub End
- William Harris Way, Garrison
- Homefield Road, Garrison
- Monkwick and Mersea Road
- The Willows
- Old Heath Road
- Hythe Quay
- London Road, Stanway
- Villa Road, Stanway
- Blackberry Road, Stanway
- The Commons, Prettygate
- Dedham
- London Road, Marks Tey
- Vine Road, Wivenhoe

In addition, the new Garden Community options within Colchester are also likely to contain a local centre, or centres, given that it is intended that these will include some services and facilities. These cannot be mapped, as their location is dependent upon the layout and design of the communities, however, it is assumed that local service centres will be provided within these communities and this will be taken into account in the Stage 1b and 2 assessments. The specific communities to which these relate are:

- Colchester Braintree Borders Garden Community
- Tendring Colchester Borders Garden Community

The geographic extent of the existing local centres is based on the extent of the defined centres on the emerging proposals map.

**Tendring**

Local centres have been identified in accordance with Policies PP2 and PP3 of the emerging Section 2 Local Plan for Tendring. Specifically the ‘district centres within policy PP2 and ‘village centres’ within policy PP3 have been used. As such, the local centres for the purposes of the SA are:

- Harwich
- Old Road, Clacton
- The Triangle, Frinton on Sea
- Great Clacton,
- Frinton Road, Holland on Sea
- Alresford Village Centre
- Elmstead Market Village Centre
- Great Bentley Village Centre
- Little Clacton Village Centre
- St. Osyth Village Centre
- Thorpe le Soken Village Centre

In addition, for the Stage 1b and 2 assessments, the new Garden Community option within Tendring has also been considered to include a local centre, or centres, given that it is intended that this will include some services and facilities. This includes:

- Tendring Colchester Borders Garden Community

The geographic extent of the existing local centres is based on the shopping areas identified within these settlements in the emerging proposals maps. Although the local centres may extend beyond these areas, these do represent the most concentrated areas of service provision within these local centres.

**Access to town centres**

Information and GIS data were provided by the individual NEAs. For the purposes of identifying a town centre, the following factors were taken into account:

**Braintree**

Town centres have been identified in accordance with policy LPP10 ‘Retailing and Regeneration’ of the emerging Section 2 Local Plan for Braintree. Specifically, the ‘town centres’ set out on the emerging proposals maps have been used for this assessment. As such, the town centres for the purposes of the SA are:

- Braintree
- Witham
- Halstead

In addition, for the Stage 1b and 2 assessments, the new Garden Community options within Braintree have also been considered to include town centres, given that it is intended that these will include some services and facilities. These therefore are:

- West of Braintree Garden Community, and
- Colchester Braintree Borders Garden Community

**Colchester**

Town centres have been identified in accordance with Policy SG5 of the emerging Section 2 Local Plan for Colchester. Specifically the ‘town centre’ set out under this policy in table SG5a, which is Colchester Town Centre. No other town centres are identified.

In addition, for the Stage 1b and 2 assessments, the new Garden Community options within Colchester have also been considered to include town centres, given that it is intended that these will include some services and facilities. These therefore are:

- Colchester Braintree Borders Garden Community
- Tendring Colchester Borders Garden Community

**Tendring**

Town centres have been identified in accordance with Policy PP2 of the emerging Section 2 Local Plan for Tendring. Specifically the ‘town centres’ within policy PP2 have been used. As such, the town centres for the purposes of the SA are:

- Clacton
- Dovercourt
In addition, for the Stage 1b and 2 assessments, the new Garden Community option within Tendring has also been considered to include a town centre, given that it is intended that this will include some services and facilities. This includes:

- Tendring Colchester Borders Garden Community

The geographic extent of the existing town centres is based on the shopping areas identified within these settlements in the emerging proposals maps. Although the town centres may extend beyond these areas, these do represent the most concentrated areas of service provision within these town centres.

### Access to centres of employment

In assessing the accessibility of centres of employment from strategic sites, individually significant employers (such as general hospitals and universities), employment areas (such as industrial parks), and town centres (as set out above) will be considered. Mapping data for the employment sites was provided by the individual NEAs.

<table>
<thead>
<tr>
<th>Site assessment criterion</th>
<th>Acceptability of walking distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proximity to services, facilities and employment: GP surgeries/health centres</td>
<td>Desirable</td>
</tr>
<tr>
<td>&lt;= 400 m</td>
<td>401-800 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: primary or middle schools</td>
<td>&lt;= 400 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: secondary schools</td>
<td>&lt;= 500 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: further and higher education facilities</td>
<td>&lt;= 500 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: local centres</td>
<td>&lt;= 200 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: town centres</td>
<td>&lt;= 400 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: railway stations</td>
<td>&lt;= 500 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: bus stops</td>
<td>&lt;= 200 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: cycle paths</td>
<td>&lt;= 200 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: open spaces and sports centres</td>
<td>&lt;= 400 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: public rights of way (PRoW)</td>
<td>&lt;= 200 m</td>
</tr>
<tr>
<td>Proximity to services, facilities and employment: centres of employment including employment</td>
<td>&lt;= 500 m</td>
</tr>
</tbody>
</table>
### Environmental harm

Scores assigned to individual locations on the basis of intersection with areas of environmental constraint such as flood zones or areas of ecological value are independent of the proportion of the site intersecting with the constrained area; as such the assessment scores are designed to highlight potential adverse effects and flag these for closer examination by the authorities before inclusion in a preferred spatial strategy.

The appraisal results will also indicate the proportion of each location subject to the constraint, helping to highlight those where it is more likely to be possible to avoid the potential effect identified by the SA by an appropriate development layout/masterplan. For the Stage 2 AS of spatial strategy options, discussion of the significance of the effects of the strategy will be informed by analysis of the total area of sites falling within areas of environmental constraint.

<table>
<thead>
<tr>
<th>Environmental criteria</th>
<th>Likelihood of harm</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site assessment criterion</strong></td>
<td><strong>Low</strong></td>
</tr>
<tr>
<td>Proximity to heritage assets: allocations within existing settlements</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to heritage assets: allocations outside of existing settlements</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: internationally or nationally designated wildlife sites - allocations within existing settlements</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: internationally or nationally designated site - allocations outside existing settlements</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: locally designated wildlife sites and ancient woodland</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: Priority Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to designated landscapes: allocations within existing settlements</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to designated landscapes: allocations outside of existing settlements</td>
<td>All other sites</td>
</tr>
<tr>
<td>Intersection with Source Protection Zones (SPZs)</td>
<td>All other sites</td>
</tr>
<tr>
<td>Intersection with flood risk areas</td>
<td>All other sites</td>
</tr>
<tr>
<td>Likely contribution to road traffic within areas</td>
<td>All other sites</td>
</tr>
<tr>
<td>Environmental criteria</td>
<td>Site assessment criterion</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>Suffering from traffic-related air pollution</td>
<td>All other sites</td>
</tr>
<tr>
<td>Proximity to sources of air pollution</td>
<td>All other sites</td>
</tr>
<tr>
<td>Exposure to noise pollution from roads and railways</td>
<td>All other sites</td>
</tr>
<tr>
<td>Intersection with mineral resources</td>
<td>All other sites</td>
</tr>
<tr>
<td>Intersection with agricultural land</td>
<td>All other sites</td>
</tr>
</tbody>
</table>
**Linkage to the SA framework**

There is not a one-to-one relationship between the site assessment criteria and the sustainability objectives of the SA framework. Instead, one site assessment criterion may be relevant to the Plan’s effects in relation to achievement of a number of sustainability objectives, as indicated in the following table. As explained in paragraph 2.34, SA objectives 1 and 2 were scoped out for the purposes of applying the site assessment criteria in Stage 1 of the SA.

<table>
<thead>
<tr>
<th>Site assessment criterion</th>
<th>SA objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proximity to services and facilities: GP surgeries/ health centres</td>
<td>Yes</td>
</tr>
<tr>
<td>Proximity to services and facilities: primary or middle schools</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to services and facilities: secondary schools</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to services and facilities: local centres</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to services and facilities: town centres</td>
<td>No</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>Proximity to services and facilities: railway stations</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to services and facilities: bus stops</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to services and facilities: cycle paths</td>
<td>Yes</td>
</tr>
<tr>
<td>Proximity to services and facilities: open spaces and sports centres</td>
<td>Yes</td>
</tr>
<tr>
<td>Proximity to services and facilities: public rights of way (PRoW)</td>
<td>Yes</td>
</tr>
<tr>
<td>Proximity to services and facilities: centres of employment</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to heritage assets: allocations within existing settlements</td>
<td>No</td>
</tr>
<tr>
<td>Site assessment criterion</td>
<td>SA objective</td>
</tr>
<tr>
<td>---------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Proximity of residential development to wildlife or geological sites: internationally or nationally designated wildlife sites - allocations within existing settlements</td>
<td>No No No No No No Yes No No No No No No</td>
</tr>
<tr>
<td>Proximity of residential development to wildlife or geological sites: internationally or nationally designated site - allocations outside existing settlements</td>
<td>No No No Yes No No No No No No No No No</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: locally designated wildlife sites and ancient woodland</td>
<td>No No No Yes No No No No No No No No No</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: Priority Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat</td>
<td>No</td>
</tr>
<tr>
<td>Proximity to designated landscapes</td>
<td>No</td>
</tr>
<tr>
<td>Intersection with Source Protection Zones (SPZs)</td>
<td>Yes</td>
</tr>
<tr>
<td>Intersection with flood risk areas</td>
<td>Yes</td>
</tr>
<tr>
<td>Likely contribution to road traffic within areas suffering from traffic-related air pollution</td>
<td>Yes</td>
</tr>
<tr>
<td>Proximity to sources of air pollution</td>
<td>Yes</td>
</tr>
<tr>
<td>Proximity to sources of traffic</td>
<td>Yes</td>
</tr>
<tr>
<td>--------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Intersection with mineral resources</td>
<td></td>
</tr>
<tr>
<td>Intersection with agricultural land</td>
<td>No</td>
</tr>
</tbody>
</table>