

Braintree District Council

Core Strategy

**Addendum to the Braintree District Core Strategy
Submission Draft**

**Sustainability Appraisal
and
Strategic Environmental Assessment**

Environmental Report

October 2010



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CONTENTS

1	Introduction and Methodology	1
1.1	Background.....	1
1.2	The Core Strategy	1
1.2.1	Pre-production - Development of the Evidence Base	1
1.2.2	Production - Preparation of Preferred Options, Regulation 25	1
1.2.3	'One District - One Vision' Document	1
1.2.4	'Core Strategy Submission Draft' Document	2
1.3	Focused Changes.....	2
1.4	The Aim and Structure of this Report.....	2
2	Appraisal Of Focused and Minor Changes.....	4
2.1	Focused Changes.....	4
2.2	Schedule of Minor Changes.....	4
3	Non Technical Summary	5
3.1	Focused Changes Proposed for the Executive Summary.....	5
3.1.1	Spatial Strategy – final bullet point	5
3.2	Focused Changes Proposed for Chapter 5 Housing	5
3.2.1	Paragraph 5.17, new wording.....	5
3.2.2	Paragraphs 5.27 – 5.31	6
3.2.3	Policy CS3, 1 st line	7
3.3	Focused Changes Proposed for Chapter 6 Economy.....	8
3.3.1	Paragraphs 6.7 and 6.8	8
3.3.2	Paragraph 6.10, 3 rd bullet point	9
3.3.3	Paragraph 6.14, final line.....	9
3.3.4	Paragraph 6.18.....	10
3.3.5	Policy CS4, Table, row 2, column 2.....	11
3.3.6	Policy CS4, Table, row 3, column 2.....	11
3.4	Focused Changes Proposed for Chapter 8 Environment	13
3.4.1	Paragraph 8.12, first 2 sentences.....	13
3.4.2	Policy CS8, 6 th bullet point.....	14
3.4.3	Policy CS8, 5 th paragraph, 2 nd line	14
3.4.4	Policy CS9, after 1 st bullet point.....	14
4	Conclusions	16
4.1	Significant Effects	16
4.2	Minor Changes	16
4.3	Monitoring	16

4.4 Next Steps 17

4.4.1 Consultation 17

4.4.2 SEA Statement..... 17

1 INTRODUCTION AND METHODOLOGY

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, the Environmental Report, sets out the SA/SEA undertaken for the Addendum to the Braintree District Core Strategy Submission Draft.

1.2 The Core Strategy

The Core Strategy is a 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 Communities Strategy (SCS). The Core Strategy will cover the whole of the Braintree District and must be consistent with national policy and the District's Sustainable Communities Strategy. The plan should draw together policy strands at a district, town or neighbourhood level.

For reference, previous stages of the Core Strategy preparation are outlined below:

1.2.1 Pre-production - Development of the Evidence Base

A number of preliminary workshops were held with local organisations and schools, and a 'Contact' questionnaire was delivered to every property in the District in October 2006. In addition to this, a number of studies were commissioned to help inform the Core Strategy. The results of both of these activities were used to inform the Issues and Options document.

1.2.2 Production - Preparation of Preferred Options, Regulation 25

The Issues and Options document built on the work carried out at the pre-production stage by setting out a series of options for the future of the area on which views were invited. Consultation was undertaken in respect of the document for a period of six weeks commencing in April 2007. An April 2007 SA/SEA Report was prepared in response to the Issues and Options Document.

1.2.3 'One District - One Vision' Document

The 'People and Places Consultation' on the 'One District - One Vision' - A Draft Strategy for People and Places in the Braintree District to 2025 document took place from November to December 2008. The document combined the Council's Sustainable Community Strategy and Core Strategy. The document built on the Issues and Options Consultation that was held in 2007 and set out the Council's preferred locations for future development. An SA/SEA Report was prepared in response to the One District – One Vision Document.

1.2.4 'Core Strategy Submission Draft' Document

The Braintree District Council published its Core Strategy Submission Draft Development Plan Document in May 2010. The document built on the 'One District – One Vision' Consultation that was held in 2008 and set out the Council's preferred locations for future development. An SA/SEA Report was prepared in response to the Core Strategy Submission Draft Document.

1.3 Focused Changes

Extract from the CLG Plan-Making Manual:

A focused change would usually be a change that affects either a specific part of the development plan document, such as:

- One of the chapters or topics, like affordable housing*
- A limited area of the plan, for example an urban extension*

A focused change should cover only two or so subject areas, or a limited part of the plan area. It should involve only a relatively small proportion of a development plan document's text.

If the changes to the original published development plan document (which is submitted for examination) has extensive track changes to it, then this indicates that the changes are likely to fall into the 'extensive' change category. If the local authority wished to make a focused change it would need to:

- Prepare an addendum to the published plan setting out the proposed change, review the sustainability appraisal and implications of the proposed changes*
- Consult people and organisations on the addendum and publish the changes to allow representation to be made on the amended draft plan.*

At the close of this consultation the local authority would submit the original development plan document, the first representations, the addendum and the responses to the addendum to the Secretary of State.

The Addendum to the Braintree Core Strategy Submission Draft document provides a schedule of focused and minor changes to the Regulation 27 Core Strategy DPD as part of Braintree District Council's LDF. This schedule has been prepared to address issues raised in representations at the Regulation 27 Core Strategy DPD stage which was published in May 2010.

Representations on the Core Strategy Submission Draft were considered by the Council's LDF Panel, who agreed to recommend focused changes to the Core Strategy.

1.4 The Aim and Structure of this Report

A combined Sustainability Assessment /Strategic Environmental Assessment (SA / SEA) was previously undertaken on the Core Strategy Submission Draft to assess and predict the economic, social and environmental effects that are likely to arise from its implementation. This was in accordance with the Planning and Compulsory Purchase Act 2004, the SEA Directive 2001/42/EC and Government guidance. The

SA/SEA has been produced by the Spatial Planning Group of Essex County Council acting as consultants to Braintree District Council. The content of the report should not be interpreted or otherwise represented as the formal view of Essex County Council.

This report sets out the SA/SEA that has been undertaken for the Addendum to the Braintree District Core Strategy Submission Draft consultation document. The purpose of undertaking the SA/SEA at this stage of the process is to identify potential significant sustainability effects arising from the content of the consultation document and represents the requirement for additional appraisal before adoption, to take account of proposals and amendments that have arisen from the consultation and previous appraisal of the Core Strategy Submission Draft.

This report highlights the key matters arising from the appraisal. It should be read alongside:

- Braintree District Council Local Development Framework Core Strategy Submission Draft (May 2010),
- Core Strategy – Submission Draft Sustainability Appraisal and Strategic Environmental Assessment Environmental Report (April 2008),
- ‘One District – One Vision’ A Draft Strategy for People and Places in the Braintree District 2025 (October 2008) Sustainability Appraisal and Strategic Environmental Assessment.

2 APPRAISAL OF FOCUSED AND MINOR CHANGES

2.1 Focused Changes

The Addendum includes a schedule of focused changes that have been made to the Regulation 27 Core Strategy DPD. These are required to be subject to additional Sustainability Appraisal, considering the potential sustainability implications of each change in the schedule.

After a process of review (see Annex B – SA/SEA Review), the appraisal of those focused changes that could potentially give rise to additional impacts on sustainability have been conducted, and form the content of this Environmental Report as detailed in the Non-Technical Summary. This has been documented with reference to the proposed focused change, the reason for each change as it is identified in the Addendum, and the impact each change has in terms of sustainability.

The appraisals of these changes were undertaken chronologically as they appear and have been documented in the Addendum for cross reference. The specific changes are shown in the Addendum and this SA/SEA report in the following ways:

- Where deletions of the existing text have been made, the text has been crossed out, for example ~~This text has been deleted~~, and
- Where text has been inserted it is highlighted, for example **This text has been added.**

In reference to the focused changes of the Addendum that are not included within this Environmental Report, it is the view of the SA/SEA team that none of the remaining focused changes are so substantive as to affect the conclusions of the SA/SEA as published in the Environmental Report of the Core Strategy at the Draft Submission stage.

2.2 Schedule of Minor Changes

In addition, a schedule of minor post publication changes and editing changes were included in Appendix 1 of the Addendum. These changes are to improve legibility or to ensure the document is up to date. Minor changes would not normally require public consultation and after review (see Annex B – SA/SEA Review) it has been deemed that neither do they require additional appraisal.

3 NON TECHNICAL SUMMARY

The content of the Non-Technical Summary of this report represents the SA/SEA of the Addendum, focusing only on incidences where potential impacts may occur and thus additional appraisal has been required. For the SA/SEA team's definitive response to each chronological change, please refer to Annex A – Appraisal Matrices.

3.1 Focused Changes Proposed for the Executive Summary

3.1.1 Spatial Strategy – final bullet point

Proposed Amendment	Reason
There is also a proposal for a business and innovation park at land to the west of the A131 at Great Notley which will contain 18.5ha of B1, B2, B8 and C1 uses.	To reflect current position

3.1.1.1 Additional Appraisal

To avoid duplication, please refer to the appraisal of Policy CS4, Table, row 3, column 2 (paragraph 3.3.6, page 11 of this report).

3.2 Focused Changes Proposed for Chapter 5 Housing

3.2.1 Paragraph 5.17, new wording

Proposed Amendment	Reason
Planning Policy Statement 3 Housing defines affordable housing as: 'Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should: – Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. – Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'.	Clarity

3.2.1.1 Additional Appraisal

As represented in the Core Strategy Submission Draft SA/SEA Environmental Report, the original appraisal of Policy CS1 referred to the since revoked Regional Spatial Strategy (RSS) in the justification of the Core Strategy's housing provision in regards to overall plan and annual targets. These targets were also backed up by other material in the existing Core Strategy evidence base (namely the SHLAA, SHMA and Urban Capacity Study) available when the SA/SEA was undertaken (January 2010). Therefore the impacts of Policy CS1 on the SA/SEA Sustainability Objectives will not change.

In regards to alternatives considered, the SA/SEA states that "options for the level of housing provision were not investigated because the policy responds directly to the revised East of England Plan." This relates to the RSS targets having already been subjected to SA/SEA at the regional level. In terms of alternatives to the preferred Core Strategy housing allocations, any deviations from those regionally allocated (and backed up by the Core Strategy's independent localised evidence base in regards to housing provision) can be seen to have either negative social impacts (where lower than regional targets) or negative environmental impacts (higher than regional targets).

3.2.2 Paragraphs 5.27 – 5.31

Proposed Amendment	Reason
5.27 There is a need for additional sites to meet the needs of gypsies and travellers in the District and in the East of England at present. 5.28 A revision to the Regional Spatial Strategy for the East of England, entitled 'Accommodation for Gypsy and Traveller and Travelling Showpeople in the East of England' was published in July 2009. 5.29 This set out policies requiring local authorities to make provision for additional residential and transit pitches for gypsies and travellers and plots for travelling showpeople. (A pitch normally accommodates two caravans.) 5.30 Policy H3 set out a requirement for a minimum of 50 gypsy and traveller pitches for Braintree District by 2011. As 5.27 There were already 27 authorised gypsy and traveller pitches within Braintree District in 2008. (A pitch normally accommodates two caravans). This meant that there was a requirement to provide an additional 23 authorised pitches by 2011. The Regional Strategy also	To delete reference to the regional strategy.

<p>required a minimum of 67 pitches for Braintree District by 2021.</p> <p>5.31 As 5.28 An assessment of need in Essex was published in 2009-(Essex Gypsy and Traveller-Accommodation Assessment), which identified a very similar requirement (for 66 residential pitches) for 59 authorised residential pitches in Braintree District between 2008 and 2021.</p>	
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3.2.2.1 Additional Appraisal

To avoid duplication, please refer to the appraisal of Policy CS3, 1st line below.

3.2.3 Policy CS3, 1st line

Proposed Amendment	Reason
<p>Provision will be made for a minimum of 50 59 authorised residential pitches for gypsies and travellers caravans by 2011 and a minimum of 67 authorised residential pitches by 2021. This will require an additional provision of 23 32 authorised pitches by 2011 and a further 17 authorised pitches by 2021</p>	<p>To amend figures following revocation of the RSS</p>

3.2.3.1 Additional Appraisal

Where the Core Strategy Submission Draft figures for required additional Gypsy, Traveller and Travelling Showpeople pitches in the District have been deleted to reflect the revocation of the RSS (as previously specified in the 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England' document, July 2009), new figures have been adopted from the 'Essex Gypsy and Traveller Accommodation Assessment' (November 2009) forming part of the District's LDF Evidence Base. These figures did not affect the impacts predicted in the appraisal of Policy CS3 in the Core Strategy Submission Draft, where sustainability impacts are more appropriate to specific sites within the District. Where these are not required of a Core Strategy, the impacts of this policy on the Sustainability Objectives will remain as stated in the Core Strategy Submission Draft SA/SEA Environmental Report.

3.3 Focused Changes Proposed for Chapter 6 Economy

3.3.1 Paragraphs 6.7 and 6.8

Proposed Amendment	Reason
<p>6.7 The East of England Plan sets out the following main economic requirements:-</p> <p>An indicative target of 56,000 net growth in jobs (ie additional jobs minus jobs lost) for the period 2001-2021 to be delivered in the 'Rest of Essex' which is defined as Braintree, Brentwood, Chelmsford, Epping Forest, Harlow, Maldon and Uttlesford.</p> <p>Local Development Documents should ensure an adequate range of sites and premises is allocated to achieve indicative job growth targets and needs of the local economy, revealed by employment land reviews. These should be at locations which minimise commuting and promote sustainable communities, achieve a closer relationship between jobs and homes, maximise the use of public transport and provide for skills training and education. Preference should often be given to the re-use of previously developed land and intensification of existing sites over the release of greenfield land. Local Development Documents should identify a network of town centres, district centres, neighbourhood centres and village centres.</p> <p>6.8 The local authorities in the 'Rest of Essex' (Braintree, Brentwood, Chelmsford, Epping Forest, Harlow, Maldon, Uttlesford) have a net growth in jobs target of 56,000 and a net growth in dwellings target of 57,100 over the period 2001-2021 which is a ratio of just under 1 job per dwelling. This ratio of one job per dwelling, would provide an indicative target of 7,700 net job growth in Braintree District between 2001 to 2021 and a further 1,925 net job growth from 2021 to 2026, giving an overall</p>	<p>To delete reference to Regional Spatial Strategy</p>

target of 9,625 net job growth between 2001-2026.	
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3.3.1.1 Additional Appraisal

In response to the deletion of supporting text for Policy CS4 in light of the revocation of the RSS (and subsequent indicative targets for net job growth), there will be no change to the impacts predicted for the appraisal of Policy CS4 in the Core Strategy Submission Draft SA/SEA Environmental Report. The policy's identified targets are based on an independent study, 'Braintree District Futures 2025' commissioned by Cambridge Econometrics as part of the District Council's LDF Evidence Base and exceed the indicative targets of the RSS. The appraisal of Policy CS4 focuses on specific proposed locations in terms of accommodating the scale within the Policy and determined by the Cambridge Econometrics study, without undue negative impact.

3.3.2 Paragraph 6.10, 3rd bullet point

Proposed Amendment	Reason
Consideration should be given to the designation of a new business park close to the A120, in the vicinity of Braintree, to provide for new demand generated by airport related expansion at the proximity to Stansted and by the recent dualled A120 between the M11 and Braintree.	Update for the current situation.

3.3.2.1 Additional Appraisal

The focused change does not affect the predicted impacts in the original appraisal of Policy CS4 in the SA/SEA of the Draft Submission Core Strategy, which states that "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." The removal of text referring to airport related expansion will not affect any of the predicted impacts of the Policy CS4 appraisal where it was and is viewed that sustainable development is more specifically focused on the relationship between jobs and homes in an area's locality.

3.3.3 Paragraph 6.14, final line

Proposed Amendment	Reason
Uses to include employment, housing and the reuse of historic factory buildings, including the re-use of the powerhouse as a museum.	To allow for flexibility

3.3.3.1 Additional Appraisal

The appraisal of Policy CS4 in the Core Strategy Submission Draft SA/SEA Environmental Report highlighted uncertain impacts in regards to cultural assets in the District. Although the presence of a museum in the re-use of the powerhouse in Silver End was highlighted as having the potential for positive impacts on this objective, it was and remains the view that “until the specific design of sites is known, the impacts will be uncertain.”

3.3.4 Paragraph 6.18

Proposed Amendment	Reason
<p>The first strategic employment site is an 18.5hectare Innovation and Enterprise Business Park at Great Notley, close to the A120, as recommended in the Employment Land Review. This is a sustainable location for employment, accessible by footpaths and cycleways and public transport and close to a potential workforce at Great Notley and Braintree. Uses will be restricted to B1 and B2 Use Classes (light industrial, business and general industrial uses), B8 (storage and distribution) and hotel development. The uses will exclude B8 (storage and distribution) warehousing for the following reasons: – Provision has been made for warehousing on other industrial areas in Braintree, including the Skyline Development, adjacent to the A120. Further B8 uses will be permitted as part of the employment allocation proposed at the north-east Braintree growth location. Warehousing would be unlikely to provide a high density of jobs per floorspace Warehousing would be inappropriate in this growth location adjacent to the Country Park. (The Council intends to ensure that the visual attractiveness of the Country Park is protected and is therefore opposed to the provision of warehousing on the southern side of the Country Park.)</p> <p>In order to ensure a mix of uses on the site, the overall quantum of B8 use on the site should be restricted to no more than 40% of the total floor area and the largest unit size to 7,500 sq m’.</p>	<p>To reflect current position</p>

3.3.4.1 Additional Appraisal

To avoid duplication, please refer to the appraisal of Policy CS4, Table, row 3, column 2 (paragraph 3.3.6, page 11 of this report).

3.3.5 Policy CS4, Table, row 2, column 2

Proposed Amendment	Reason
Site for housing, football stadium, college campus, educational provision, health care provision, services and community uses.	A reference to housing and health care provision recognises the mix of uses proposed on the site. Since the publication of the document the College at Braintree have confirmed they have no money to fund relocation.

3.3.5.1 Additional Appraisal

As a result of the focused change, there may be a weakening of impacts on education and skills as previously appraised in the Core Strategy Submission Draft SA/SEA Environmental Report. Despite this, any impacts will only be marginal as Braintree College will still exist at its current location and any positive impacts resulting from its re-location to Panfield Lane would only result through any modernisation of facilities. Where this is unknown at this stage, the impacts will remain uncertain as specified in the Core Strategy Submission Draft SA/SEA Environmental Report.

Impacts on health will become more positive as a result of the focused change, where health care provision is now included on site. These positive impacts will be seen in the long term in line with the timescale of development at the Panfield lane Growth Location.

3.3.6 Policy CS4, Table, row 3, column 2

Proposed Amendment	Reason
Innovation and Enterprise Business Park B1, B2, B8 and C2 C1 hotel use	To reflect current position and correct drafting error.

3.3.6.1 Additional Appraisal

The detailed appraisal for the Great Notley Innovation and Enterprise Park was conducted at the Issues and Options stage and published in the 'One District – One Vision' SA/SEA. The site was previously appraised without the inclusion of B8 (Storage and Distribution) on site and as follows:

"The development could increase the amount of inward investment at Braintree and provide additional employment opportunities within the District. The District experiences shortages in financial and business services, IT, transport and communications industries in comparison to regional and national models. The B1 and B2 use classes proposed for the business park could provide a more balanced employment structure."

The focused change to this particular site will change the impacts of Policy CS4 where it responds to the only single use Growth Location for employment throughout the Core Strategy. Paragraph 6.9 of the Core Strategy Submission Draft states that,

“The Cambridge Econometrics Study suggests that the jobs target for the District should be up to 14,000 new jobs between 2001 and 2026, to provide for future employment needs of the District and aim to reduce the high numbers of people commuting to work outside the District. The Council is adopting this target for the Core Strategy.”

The indicative target of 14,000 jobs to 2026 reflects that published in the ‘Braintree District Futures 2025’ document (Cambridge Econometrics, 2006) forming part of the District’s LDF evidence base. The document developed this target for the District through an economic scenario based on “a strong knowledge-driven economy with high-quality jobs and businesses located in the District and reduced levels of net out-commuting.” Regarding the economic structure of this scenario, the document states that, “By 2025, the District will have established itself as a specialised, high-quality manufacturing centre for regional innovations, building on its manufacturing heritage and knowledge as well as cementing its importance to the regional innovation economy. This economic shift will have been achieved both by encouraging the growth of this specialised sector and limiting the increase in the share of less specialised sectors such as distribution: ‘warehousing’ will be limited through strict planning policies, and the District will have promoted business parks linked to regional strengths in ideas generation as well as encouraging inward investment.”

The impacts of the focused change regarding sustainable levels of prosperity and economic growth are therefore negative where the total floor area potential for B1 and B2 employment uses on this site may be significantly reduced despite shortages in employment opportunities in these sectors throughout the District, and the smaller amount of jobs traditionally created through B8 uses. It is viewed that the presence of B8 uses at this site may hinder the achievement of 14,000 net job growth in the District by 2026 in line with the evidence given.

Depending on the total floorspace percentage of B8 uses on site, it could diminish the quality of development on the site (in terms of higher skilled and numbers of jobs) to the detriment of the recreational uses of the Country Park. The ‘One District – One Vision’ SA/SEA document also states that:

“The location is south of Great Notley Country Park, which potentially limits the type of employment uses that that would be suitable to operate. The Country Park is a valuable local asset and any development would be expected to have minimal impact on the site, both in terms of visual amenity through the use of border treatment and the preservation of natural habitats. A business park for B1 and B2 Use Classes, rather than more general employment, would be most appropriate for this location. The area has medium landscape character and visual sensitivity and a high landscape value due to the Country Park and the listed buildings at Slampsey’s Farm to the south.”

The focused change will have negative impacts on the landscapes through the presence of B8 development in such close proximity to a County Park. This is in line with the Landscape Character Assessment forming part of the LDF evidence base. There may also be negative impacts on both the recreational and biodiversity value of the County Park. Depending again on the level of B8 development on the site, the focused change may also negatively impact on three listed buildings at the southern edge of the growth location.

A positive impact arises from the focused change where traditionally B8 uses are likely to experience fewer transport movements as opposed to B1 and B2 uses.

The focused change responding to the inclusion of C1 Hotel use on site, rather than C2 Hotel use responds to a typographical error and will not affect the appraisal of the site further.

3.4 Focused Changes Proposed for Chapter 8 Environment

3.4.1 Paragraph 8.12, first 2 sentences

Proposed Amendment	Reason
The Habitat Regulation Assessment suggested a SANG provision rate of 4ha per 1000 increase in population. More recent advice from Natural England recommends 8ha per 1000 increase in population. Notwithstanding this change, the majority of SANGs in the Braintree District will be created from existing open space which at present does not have any public access, or has limited access, existing open space which is already accessible but could be changed in character and/or land in other uses which could be converted into SANGs.	To update the current advice position from Natural England

3.4.1.1 Additional Appraisal

The focused change increases the required amount of Standard Accessible Natural Greenspace per 1000 increase in population by 100%. This focused change may positively impact on either human health through recreation or biodiversity in the appraisal of Policy CS8. It is stated within the supporting text that “the majority of SANGs in the Braintree District will be created from existing open space which at present does not have any public access, or has limited access, existing open space which is already accessible but could be changed in character and/or land in other uses which could be converted into SANGs.” The impacts of this would have more positive impacts on human health through recreation than previously appraised in the Core Strategy Submission Draft SA/SEA Environmental Report, however possibly to the detriment of any biodiversity interest of natural green space areas; the impacts of which could become more negative through increased recreational use. Positive impacts on biodiversity would be limited to those SANGs that have been created as a result of new housing development.

This focused change will also affect Policy CS10 (Provision for Open Space, Sport and Recreation) as stated in the Core Strategy Submission Draft, where impacts are likely to be more positive on human health through recreation than appraised in the Core Strategy Submission Draft SA/SEA Environmental Report. An increase in the requirement of SANGs per 1000 increase in population may however be detrimental to any biodiversity interest of natural green space designated as a result of this focused change.

3.4.2 Policy CS8, 6th bullet point

Proposed Amendment	Reason
Creating and enhancing the biodiversity value of wildlife corridors.	To ensure that new wildlife corridors can be created.

3.4.2.1 Additional Appraisal

The impacts of Policy CS8 on biodiversity interest will become a major positive across all temporal periods where the focused change includes the creation of new wildlife corridors rather than just the enhancement of existing ones as per the policy in the Core Strategy Submission Draft. As a result of the change there are likely to be net gains in areas of biodiversity interest where previously, simply mitigation would lead to neither net gains nor losses.

3.4.3 Policy CS8, 5th paragraph, 2nd line

Proposed Amendment	Reason
Sustainable Drainage Systems (SUDS) will be encouraged used wherever possible to reduce flood risk, promote groundwater recharge, enhance biodiversity and provide amenity benefit, unless following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise.	Clarification as suggested by the Environment Agency.

3.4.3.1 Additional Appraisal

In conjunction with the focused change 'Policy CS8, 6th bullet point' and the positive impacts this will have on biodiversity due to the creation of new wildlife corridors; the statement that SUDS will be used wherever possible (changed from 'encouraged') could further strengthen the positive impacts on biodiversity resulting from Policy CS8. Also, in line with added policy, the emphasis on SUDS creation could increase the positive impact on minimising flood risk beyond those predicted in the Core Strategy Submission Draft SA/SEA Environmental Report.

3.4.4 Policy CS9, after 1st bullet point

Proposed Amendment	Reason
Add new bullet point which states: Promote and encourage the contribution that historical assets can make towards driving regeneration, economic development, tourism and leisure provision in the District.	To show consideration for the contribution that historical assets can make.

3.4.4.1 Additional Appraisal

In the Core Strategy Submission draft SA/SEA Environmental Report, Policy CS9 was appraised as having no impact on economic growth. In light of the focused

change the impact of this policy on economic growth should be uncertain where it is unclear how promotion and encouragement to drive regeneration, economic development, tourism and leisure provision in the District will be implemented either through new development or in the protection and enhancement of the historic environment.

4 CONCLUSIONS

4.1 Significant Effects

As a result of the focused changes to the Core Strategy Submission Draft as detailed in the Addendum, there will be:

- Positive impacts on health due to the inclusion of healthcare provision at the Panfield Lane growth location.
- Negative impacts on economic growth, landscapes and cultural heritage due to the potential for up to 40% B8 development at the Gt. Notley Enterprise Park growth location.
- Positive impacts on accessibility due to the potential for significant B8 development at Gt. Notley Enterprise Park growth location.
- Potential positive impacts on either health or biodiversity as a result of an increased SANG provision rate per 1000 increase in population.
- Positive impacts on biodiversity through the creation of new wildlife corridors.
- Positive impacts on minimising flood risk where SUDS will be used wherever possible
- Potential for positive impacts on biodiversity where SUDS will be used wherever possible through the creation of features of a biodiversity interest within specific proposals.

4.2 Minor Changes

It is the view of the SA/SEA that none of the remaining minor changes in the Addendum are so substantive as to affect the conclusions of the SA/SEA as published in the SA/SEA Environmental Report of the Draft Submission Core Strategy.

4.3 Monitoring

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 Core Strategy Submission Draft SA/SEA 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.

The CLG Plan Making Manual in accompaniment to the revised Planning Policy Statement 12 provides further details on the implementation and monitoring of LDFs. It states that sustainability appraisal requires arrangements to be set up for monitoring the significant effects of implementing the adopted development plan document. Details of these must be included in the sustainability appraisal report, and confirmed when the plan is adopted. Monitoring is intended to provide important feedback on the success of the plan and progress towards its objectives. It can be used to compile baseline information for future revisions of the plan, and can also provide information for sustainability appraisal of other plans.

Monitoring should be based on relevant objectives, indicators and targets. Some of these may be related to the sustainability objectives of the plan itself, or developed

from the earlier stages of the sustainability appraisal. However, additional objectives, targets and indicators may also be required. The appropriate level at which to monitor will depend on the type and scale of the plan. The annual monitoring report should be informed by any significant effects identified in sustainability monitoring

4.4 Next Steps

4.4.1 Consultation

To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of formal consultation on the Addendum to the Braintree District Core Strategy Submission Draft. This Environmental Report will be published for consultation alongside the Plan, so that it might facilitate more informed responses. It is also important that there is an opportunity for questions to be raised regarding any of the judgements made within this SA/SEA, and further evidence put forward that may help to consider sustainability effects.

Following consultation, the Core Strategy will be submitted to the Government for approval. The approval process involves a public examination held by a Planning Inspector. The Inspector has the power to approve the Document, with or without alteration, or reject it. The Inspector will be able to refer to responses and the recommendations set out in this SA Report, which will be made following this current consultation.

4.4.2 SEA Statement

Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it, in this case Braintree District Council, to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The Directive states that:

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public are informed and the following items are made available to those so informed:

(a) the plan or programme as adopted;

(b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and

(c) the measures decided concerning monitoring [of the plan]

Annex 9(1)

In light of this requirement, Braintree District Council should prepare an SA/SEA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

