



Braintree District Council Pre-Submission Site Allocation and Development Management Plan

Sustainability Appraisal and Strategic Environmental Assessment

**Environmental Report – Non-Technical Summary** 

February 2014

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# **Glossary of Acronyms**

ANGSt	Accessible Natural Greenspace Standard
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BARR	Buildings At Risk Register
CAMS	Catchment Abstraction Management Strategies
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DETR	Department of the Environment, Transport and the Regions
DPD	Development Plan Document
DSCF	Department for Schools, Children and Families
EA	Environment Agency
EC	European Community
ECC	Essex County Council
EEC	European Economic Community
EU	European Union
IMD	Index of Multiple Deprivations
JSA	Jobseekers Allowance
KSI	Killed or Seriously Injured
LCA	Landscape Character Assessment
LDD	Local Development Document
LDF	Local Development Framework
LoWS	Local Wildlife Sites
NAQS	National Air Quality Standards
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PAS	Planning Advisory Service
PDL	Previously Developed Land
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
PSA	Public Service Agreement
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal incorporating the Strategic Environmental Assessment
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
4 Place Servic	es at Essex County Council

- SPD Supplementary Planning Document
- SSSI Site of Special Scientific Interest

# 1 Introduction and Methodology

#### 1.1 Background

Braintree District Council commissioned Place Services (formerly part of Essex County Council's Spatial Planning Group) to undertake a Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/SEA), on the proposed Pre-Submission Site Allocation and Development Management Plan.

Place Services are acting as consultants for this work; therefore the content of the SA/SEA should not be interpreted or otherwise represented as the formal view of Essex County Council.

This Report sets out the SA/SEA undertaken for the preparation to date on the Pre-Submission Site Allocation and Development Management Plan.

#### **1.2** The Pre-Submission Site Allocation and Development Management Plan

The Pre-Submission Site Allocation and Development Management Plan (SADMP) is a combined Development Plan Document (DPD), which will form part of the Braintree District Council's Local Development Framework (LDF). The LDF is a suite of documents which will guide future planning decisions in the District and will replace the Local Plan Review 2005.

In September 2011, the Core Strategy DPD was adopted by Braintree District Council. The Core Strategy is the principal document within the LDF, which sets out the overall spatial vision and objectives, spatial strategy, strategic policies and how the strategy will be implemented and monitored.

The Council is currently preparing the Site Allocation and Development Management Plan, which will support and deliver the Core Strategy.

The role of the Pre-Submission Site Allocation and Development Management Plan is:-

- To allocate non-strategic sites to meet the requirements set out in the Core Strategy for development needs of Braintree District.
- To provide non- strategic policies to manage change, which will be used to assess and determine planning applications, in conjunction with the Core Strategy strategic policies.

The content of the Plan has been and will be guided by:

- The NPPF;
- Delivering the spatial strategy and strategic policies of the adopted Core Strategy;
- The evidence used to produce the allocations and policies in this document
- The assessment of the suitability of development sites submitted during the call for sites between July 2007 to August 2010 and sites subsequently submitted during public consultation in 2013;
- Consultation with Parish and Town Councils, local residents and Ward Members on Local Issues affecting their Parishes and Neighbourhoods;
- Co-operation with adjoining authorities and statutory consultees;
- Sustainability Appraisal;
- Consideration of infrastructure requirements;
- Viability Assessment of the Plan proposals; and
- Equality Impact Assessment

# 1.3 Sustainability Appraisal and Strategic Environmental Assessment

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

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

The European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') was adopted in June 2001 with a view to increase the level of protection for the environment, integrate environmental considerations into the preparation and adoption of plans and programmes and to promote sustainable development.

It requires a Strategic Environmental Assessment to be carried out for all plans and programmes which are:

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

The few exceptions are detailed in Article 3 (8, 9) of the SEA Directive. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as

*'biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'* 

as specified in Annex 1(f) of the Directive. The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, which came into force on 21 July 2004.

Sustainability Appraisals examine the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. They are mandatory for all Development Plan Documents in accordance with the Planning and Compulsory Purchase Act 2004 as amended.

Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met.

#### 1.4 Progress to Date

Work on the Pre Submission Site Allocation and Development Management Plan regarding SA/SEA has been underway since the start of the process, and the SA/SEA process has been an integral part of the production.

Previous documents produced as part of the SA/SEA process include:

- Original Scoping Report, 2012
- Draft Site Allocations and Development Management Plan SA/SEA Environmental Report, January 2013

These documents have been made publically available and have been published on the Braintree District Council website.

# 1.5 Methodology

The methodology adopted for the SA/SEA of the Pre-Submission Site Allocation and Development Management Plan seeks to meet the requirements for both SA and SEA. It has been prepared in accordance with the following documents,

- The European Directive 2001/42/EC (EC, 2001)
- A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM, 2005)
- Local Development Frameworks Guidance on Sustainability Appraisal (PAS, 2007)
- The Plan Making Manual (PAS online guidance available at: <u>www.pas.gov.uk</u>)

The appraisal of the document has been conducted in accordance with the guidance as part of a five stage process as outlined in Figure 1 below.

#### Figure 1: Stages of the Sustainability Appraisal and Outputs



#### 1.6 The Aim and Structure of this Report

This report sets out the SA/SEA that has been undertaken for the Pre-Submission Site Allocation and Development Management Plan. This document summarises the entire SA/SEA process to date, and is intended to be a stand alone document.

Table 1 signposts the relevant sections of this report that represent the required content of an Environmental Report as outlined within the SEA Directive.

# 2 Sustainability Context, Baseline and Objectives

#### 2.1 Introduction

The following section outlines an updated version of the key findings of the Scoping Stage and published Scoping Report which includes an outline of the plans and programmes, the baseline information profile for the plan area, together with the Sustainability Objectives formulated as a result of the Scoping Stage.

## 2.2 Plans & Programmes

Annex A details the full list of plans and programmes which were included within the 2012 Scoping Report. The original list has been updated in the light of changes in legislation and updates to publications, the key change relates to the implementation of the National Planning Policy Framework and subsequent replacement of PPGs and PPSs.

Table 1 outlines the key list of plans and programmes.

#### Table 1: Plans and Programmes

National
National Planning Policy Framework (March 2012)
Technical Guidance to the National Planning Policy Framework, March 2012
Building a Greener Future: Policy Statement (July 2007)
The Plan for Growth, HM Treasury/BIS (March 2011)
Written Ministerial Statement on 'Planning for Growth', Rt Hon Greg Clark (23rd March 2011)
Community Infrastructure Levy An Overview, DCLG (9th May 2011)
Underground, Under Threat - Groundwater protection: policy and practice (GP3)
Model Procedures for the Management of Land Contamination – Contaminated Land Report 11 (September 2004)
Localism Act 2011
Natural Environment and Rural Communities Act 2006
Countryside and Rights of Way Act 2000
Code for Sustainable Homes (December 2006)
The Conservation of Habitats and Species Regulations, 2010
Sub-National
Local Transport Plan 2011
2011 Essex Biodiversity Action Plan
Commissioning School Places in Essex 2011/16

Water for life and livelihoods River Basin Management Plan Anglian River Basin District (December 2009)

Essex Design Guide (2005)

ECC Joint Municipal Waste Management Strategy 2007-2032 (June 2008)

ECC Development Management Policies Adopted by BDC (February 2011)

ECC Parking Standards: Design and Good Practice Adopted by BDC (September 2009)

Essex Wildlife Trust Living Landscapes plans

Local

BDC Local Development Scheme January 2013 – December 2015

BDC Statement of Community Involvement Supplement (January 2013)

BDC Core Strategy DPD (September 2011)

BDC Local Plan Review (July 2005)

BDC Affordable Housing SPD (May 2006)

BDC External Artificial Lighting SPD (September 2009)

The Braintree Green Spaces Strategy (September 2008)

BDC Open Space SPD (November 2009)

Village Design Statements – Great Bardfield (July 2005), Rivenhall (July 2005), Earls Colne (October 2007), Rayne (November 2007), Castle Hedingham(May 2009), Middleton (August 2009), White Colne (September 2010), Sible Hedingham (October 2010), Gestingthorpe (August 2011), Bulmer (August 2011)

BDC 'One District - One Vision' - A Strategy for People and Places in the Braintree District to 2026 (June 2009)

Local Reports and Assessments

BDC Urban Capacity Study (October 2007)

BDC SHLAA Final Version (November 2010)

BDC SHMA Update Summer 2010

BDC Affordable Housing Provision and Developer Contribution in the District of Braintree (November 2009)

Accommodation for Gypsy and Traveller and Travelling Showpeople in the East of England. A Revision to the Regional Spatial Strategy for the East of England (July 2009)

Essex Gypsy and Traveller Accommodation Assessment 2009 (November 2009)

Mid Essex Economic Futures (March 2006)

Going for Growth, Investing in Your Future. Economic Development Strategy Braintree District

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Council (June 2009)

Braintree District Futures 2025 (October 2006)

Employment land Review (November 2007)

Viability Review of Employment Sites in Braintree District (October 2012)

BDC Rural Services Study 2008

The North Essex Authority Retail Study Stage 1 Report: Strategic Overview (2006) & Retail Study Stage 2 Report (2006)

Braintree Town Centre Preliminary Development Analysis Report (April 2009)

Retail Study Update (October 2012)

Assessment of Impact of Potential LDF Sites on Existing Junctions – Braintree and Witham LDF Allocations (July 2008)

Assessment of Impact of Potential Core Strategy Sites on Existing Junctions (April 2010)

Mid Essex SFRA for Braintree, Chelmsford, Colchester and Maldon (October 2007)

SFRA Appendix A Braintree Supplementary Report (July 2008)

Braintree District, Haverhill and Clare Water Cycle Study (November 2008)

Braintree District Stage 2 Water Cycle Study (January 2011)

Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (September 2006)

Landscape Character Assessment Frings Studies of Braintree, Coggeshall, Earls Colne, Halstead, Hatfield Peverel, Kelvedon, Silver End and Witham (November 2007)

Habitats Regulation Assessment (2009) & Amendment to HRA (November 2009)

Suitable Accessible Natural Greenspace (SANG) Report (April 2010)

Open Spaces Action Plan (as of February 2011)

Climate Change Strategy and Action Plan (2009)

Braintree Protected Lanes (July 2013)

# 2.3 Baseline Information / Key Sustainability Issues

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

The following section summarises that information contained in Annex B.

#### 2.3.1 Biodiversity

- There are no international biodiversity designations (Ramsar, SPAs, SACs of cSACs) in Braintree District. However a Habitat Regulations Assessment (HRA) is currently being undertaken.
- There are four SSSIs in Braintree District at: Belcher's and Broadfield Woods; Bovingdon Hall Woods; Chalkney Wood and Glemsford Pits. Chalkney Wood, Belcher's and Broadfield Woods and Bovingdon Hall Woods are currently complying with the PSA target of 95% of all nationally important wildlife sites to be brought into a favourable condition. Of those, Chalkney Wood has 100% of its area in a favourable condition while the other two have 100% of their areas in unfavourable recovering conditions. The majority of Glemsford Pits SSSI is also currently complying with the PSA target but 6.7% remain in a condition classed as unfavourable no change.
- There are seven National Nature Reserves located in Essex; none of these are in Braintree District. Braintree District has a total of seven Local Nature Reserves at: Bocking Blackwater; Brickfields / Long Meadow, Earls Colne; Brockwell Meadows, Kelvedon; Colne Valley (dismantled Railway); Cuckoo Wood, Great Notley; Sandpits, Gosfield; Whetmead, Witham. There are three further LNRs located on the border between Essex and Suffolk; Rodbridge Picnic Site, Borley; The Railway Walks from Sudbury to Long Melford where the former railway crosses through Borley parish and the Haverhill Railway Walks on the border of Sturmer parish, all three are part of the Suffolk County Council LNR.
- There are 251 LoWSs scattered throughout Braintree District, with many concentrated in the centre of the District.

#### 2.3.2 Landscape

- The majority of agricultural land in Braintree District is classified as Grades 2 and 3, with 65.8% (40,243 hectares) of agricultural land classified as Grade 2 and 29.9% (18,304 hectares) as Grade 3. Strips of Grade 3 soils follow the path of the rivers Brian, Ter, Blackwater and Colne as they flow through the district.
- The number of Protected Lanes in Braintree has decreased since they were originally designated mostly due to changes in Agricultural practise but also because of road improvements.

Special Verges are currently under review.

#### 2.3.3 Air Quality

- Air Quality in Essex is generally good. There are no AQMAs located in Braintree District. The main air quality issues in the district were found to be nitrogen dioxide and particulate emissions from vehicles travelling on the A12 and A120.
- There are currently 5 potentially significant junctions which had daily flows of more than 10,000 vehicles in 2004. They are Newland Street, Witham; Cressing road, Witham; Head Street, Halstead; Railway Street, Braintree; and Rayne Road, Braintree.
- Of the 12 passive diffusion NO2 monitoring tubes located in the district, 5 did exceed the annual mean NO2 objective concentration of 40 g/m3 but relevant exposure levels did not. Three of these were sited along the A12 at Hatfield Peverel, Rivenhall Hotel, and Foxden in Rivenhall while the other two were sited at Bradwell on the A120 and at Chipping Hill in Witham.

#### 2.3.4 Climatic Factors

• Key findings for the East of England for the 2080s based on medium (current) emissions scenarios are for an increase in winter mean temperature of approximately 3°C and an

increase in summer mean temperature of approximately 3.6°C. The central estimate of change in winter mean precipitation is 20%; whilst the central estimate of change in summer mean precipitation is –20%.

- In 2011 Braintree District consumed more energy than the county average and was the 5th highest consumers amongst all local authorities in the county. A total of 1,245.5 of the District's total 3,092.3GWh energy consumption were from transport related petroleum products. In contrast only 5GWh of energy consumed is generated from renewable sources, however this is a higher amount that the local authority average for Essex at 2.46GWh and the 2nd highest amount amongst all local authorities in the county.
- Industry, domestic and road transport each produced roughly 1/3 of the total CO2 emissions within the District in 2008. The industrial and commercial sector produces the smallest amount at 30.29% while road transport produces the most at 36.61%. When compared to the county average of 35.80%, proportionately more emissions of CO2 were produced by road transport in the District. Domestic production is proportionally less in the District at 33.09% than the county average of 34.47%.
- At 6.7 tonnes in 2010, residents of Braintree District emitted a slightly higher amount of CO2 per capita than the Essex average, which itself reported a return of 6.6 tonnes, Road transport in Braintree District produces the 4th highest amount of CO2 per capita across the county's Districts/Boroughs at 2.5 tonnes, which is only just higher than the countywide average of 2.4 tonnes.
- Braintree consumed 0.14% of its total energy from renewable sources in 2010, the 2nd highest amount amongst Essex Districts/Boroughs and higher than the District/Borough average of 0.09%.
- Up to Sept 2013 Braintree District had issued 847 certificates related to the Code for Sustainable Homes, the fifth highest amongst local authorities in Essex and above the local authority average of 608. Of these, 511 certificates were issued at the design stage and 336 post construction.

#### 2.3.5 Water Quality

- The main water courses running through Braintree District are the rivers Blackwater, Colne, Brain, Pant, Stour and Ter. Braintree contains Source Protection Zones and major aquifers within the northern half of the district, together with scattered minor aquifers in the south of the district.
- Following a national review of CAMS boundaries, water resources in the South Essex CAMS (excluding the Mardyke catchment) are now incorporated with the North Essex CAMS into the Combined Essex CAMS. The Combined Essex CAMS document sets out the issues for the whole of Essex. The document splits the county into Water Resource Management Units (WRMU), of which 2 relate to areas which include watercourses within Braintree District. There are WRMU1 and WRMU2.
- The integrated WRMU status for WRMU 1 was 'over-abstracted' and for WRMU 2 it was 'no water available' at February 2007. The Combined Essex CAMs Annual Update (March 2008) noted that the availability of water within the Roman River / Layer Brook catchment had changed, however the water availability and restrictions for the remainder of WRMU 1 have not changed since the publication of the CAMS in February 2007.
- Essex falls within the Anglian River Basin District. The Anglian River Basin District is subdivided into catchment areas and the Essex Rivers catchment area lies within the counties of Essex and Suffolk as well as a small part of Cambridgeshire.
- The Combined Essex catchment area is further subdivided into water body catchment areas. The water bodies which are associated with Braintree District are: R1, Doomsey Brook; R4, Ter; R16, River Chelmer; R23, Blackwater Pant; R91, Brain, R102, Boreham Tributary; and R115, River Blackwater.

• The majority of water bodies within Braintree are given a 'moderate' current overall potential. However the River Blackwater and the River Chelmer are both given a 'poor' current status.

#### 2.3.6 Flooding

- The areas which are most susceptible to flooding are mainly located next to the major waterways within Braintree District: the Blackwater, Stour and Colne.
- Between April 2011 and March 2012 the Environment Agency objected to four planning applications on flood risk grounds, one was granted. Two applications were refused on the grounds of flood risk on site and one application was withdrawn.
- The Mid Essex Strategic Flood Risk Assessment which includes Braintree District was published in October 2007. Area specific strategies identified within the SFRA are outlined below.
- Flood Risk
  - Consideration to flooding from overland flow should be given for developments occurring throughout the District, but with particular regard to Bocking, Braintree, Witham and Coggeshall.
- Sustainable Drainage Systems (SuDS)
  - Runoff rates should be restricted for both greenfield and brownfield developments in Bocking, Braintree, Witham and Coggeshall in particular, this is also likely to be appropriate within other settlements to ease surface water flooding and drainage capacity exceedence;
  - Infiltration techniques are unlikely to be appropriate where the site is underlain by London Clay, such as in Bocking, Braintree, Witham, Halstead, Coggeshall and Kelvedon. Attenuation techniques should be imposed in these circumstances.
- Water Environment

There is a need for sensitivity near watercourses stating development would not be permitted that would harm the open character, nature conservation importance or recreational importance of the floodplains of the River Stour, Colne, Brain, Pent, Blackwater, Ter Valley and their tributaries and the Chelmer and Blackwater Navigation.

Where appropriate, development proposals adjoining the rivers will be required to incorporate riverside paths and open spaces.

Any proposals requiring the provision of a new bridge shall ensure a minimum of 2.3 metres headroom above normal water level to allow for river use and provide fauna passages suitable as wildlife corridors.

#### 2.3.7 Cultural Heritage & Townscape

- There are 3,190 listed buildings within Braintree District, the majority of which (2,940) are Grade II followed by 183 Grade II\* and 67 Grade I listed. The distribution of listed buildings within the district is fairly widely spread. Clusters of listed buildings can be found in the historic settlements such as Coggeshall and linear patterns are identifiable along historic transport routes. In 2011 there were 22 listed buildings on the 'at risk' register which is a slight increase from previous year total of 19.
- The Essex Historic Environment Record (EHER) contains approximately 3,459 archaeological records relating to Braintree District out of a total of 24,699 for the county. There are 40 Scheduled Monuments within the district. There are 217 designated Conservation Areas within the county of Essex, 39 of which are within Braintree District.

#### 2.3.8 Health

- Life expectancy is increasing and residents in Braintree District have higher life expectancies at birth than the national averages with men living for an average of 79.6 years and women on average living 82.8 years. The health of the population in Braintree is generally better than the England average, but is significantly worse than the England average in respect of road injuries and deaths and hip fractures in the over 65s.
- Obesity in Year 6 children increased from 7.0% to 15.6% between 2008/09 and 2010/11, which reflected similar changes to the national average. The level of adult obesity at 25.9% is higher than the national average of 24.2% for the period 2006-2008.
- Participation in sports and active recreation in Braintree District declined between the first Active People Survey from 16.3% to only 13.0% in Active People Survey 3; however the latest period corresponding to Active People Survey 4 saw a rise in sports participation and active recreation in the District above the county, region and national averages for the first time. The most recent survey also ranks Braintree District as having the 3rd highest rate of sports participation in the county.
- As of Nov 2011, 3.2% of the working age population of Braintree District claimed benefits. This is a smaller proportion than those claiming benefits in the East of England and in England which were recorded as being 3.4% and 4.3% respectively. Of those receiving benefits in Braintree the majority were seeking incapacity benefits accounting for 80.5% of total claimants however the district did receive a higher proportion of residents claiming severe disablement at 19.5% compared to 14.4% of total claimants in the region and 12.6% in England.
- As of 2010, Braintree met and exceeded its target to reduce all KSI casualties by 40% of the baseline figure; a reduction of 43.7% was achieved.

#### 2.3.9 Population & Social

- As of 2011 the estimated population for the district of Braintree was 147,514 which accounts for approximately 10% of the county's estimated population.
- Braintree District has experienced a higher population growth at 11.33% than the county, the region and England as a whole with 6.39%, 8.55% and 7.39% respectively.
- In 2011, the largest proportion of the population in Braintree District was aged 25-49. There was approximately the same number of under 16 year olds to those aged 65 plus (males) and 60 plus (females).
- The projected population is predicted to increase annually within the district. In 2026 the population is predicted to be 171,800.
- In 2010, Braintree was ranked as the 212th out of the 354 Local Authorities (LAs) in England (1 being most deprived). This shows a worse level of comparative deprivation across LAs in England than the 2007 rankings.
- Across Essex, serious deprivation is most prevalent in terms of 'Barriers to housing and services' and 'Education, skills and training'. In Braintree District 25.72 of 84 small areas are seriously deprived with regards to 'Barriers to housing and services', and 22.73 are seriously deprived with regards to 'Education, skills and training', however both of these levels of deprivation show an improvement on 2007 figures.
- All crime in the District has increased. The worst icrease is in Domestic Burglary which has increased by 47.2%. All figures are worse than the County figures which generally show a decrease although burglary has increased countywide by 11.2%.
- In 2011, 73.9% of pupils in Braintree District achieved 5 or more A\* to C GCSE grades or equivalent. This is a 14.8% points difference to the 2008 figure indicating improvements in education during this period. However the proportion achieving at least 5 A\* to C grades or

equivalent in Braintree is lower than the county, regional and national levels of 79.9%, 78% and 80.8% respectively. In contrast the percentage of pupils in the district achieving 5 or more A\*-G grades in 2009 was higher at 95.6% than the county, regional and national levels.

- The population of Braintree District has in general more qualifications than the overall subnational and national populations. 87.9% of the working age population of Braintree District which accounts for 80,300 people are qualified to at least level 1 or higher compared to 82.8% across the UK. Level 1 represents foundation GNVQ, NVQ 1 or up to 5 GCSEs at grades A\*-C.
- Braintree has a slightly larger proportion of the population qualified at Level 2 and Level 3 than the county average and a slightly lower percentage than the county at Level 4. However compared to the region and the UK the percentage of qualifications in Braintree District at Level 2 and above is lower than average.

#### 2.3.10 Economy

- At 60.08% of the total population, the percentage of the District population that is of working age is higher than the Essex average. The percentage is in line with the region however lower than that of the country.
- The percentage of the District's population that are economically active at 83.1% is higher than the regional and British average. The percentage of the District's population that are in employment is higher at 76.1% than both the British and the regional average.
- There are fewer available jobs per single person in the district at 0.60 than the regional average of 0.76 and Great Britain at 0.78.
- In a survey of 2008 the largest proportion of people work in the 'Services' industry for all geographical areas. The proportion is the lowest in Braintree at 76.7%, compared to 82.5% in the East of England and 83.5% in Great Britain.
- The general proportion of full-time to part time jobs, at approximately 2:1, is in line with regional and national averages.
- There were 690 business births in the District in 2012, the 4th highest amongst the Essex districts. The business formation rate in Braintree is consistently above the Essex average...
- Factories and warehouses accounted for the majority of industrial and commercial floorspace. Factory floorspace accounted for a higher proportion in the District that the average for the region and for England, whereas retail and offices accounted for a lower proportion in Braintree than the regional and national averages.

#### 2.3.11 Housing

- In 2012/2013 there were 178 net additional dwellings (taking into account losses/demolitions) within the district. As at April 2013 the Managed Delivery Target for the district is 169 additional dwelling per annum to meet their minimum total housing requirement of 9,625 dwellings between 2001 and 2026, as set out in the Core Strategy. The most recent annual completion figure is above the annual target.
- The current trajectory shows that by 2026 there will be 9,625 completions across the plan period (since 2001). Projected annual completion figures will be generally lower than the completion rates reported between 2001 and 2011 but Braintree District will still exceed their minimum housing requirement by 816 dwellings or 108% for the whole plan period. This is due to supply up to 2012 substantially exceeding the annual average required to meet the overall housing requirement.
- Current national policy requires local planning authorities to provide a 5-year land supply of deliverable sites which excludes the current reporting year.

- A total of 1,584 dwellings have been identified on deliverable sites over the next five years starting from 2013/14. This value increases to 1,755 when the current year is also included. This equates to an average annual completion rate of 292 which is above the current published target of 247.
- In 2012/13, 35% of the net dwelling completions, which accounts for 63 dwellings, were affordable within the district. To date, the highest proportion of affordable housing achieved within the district was in 2009/2010 at 36.7% which accounted for 157 of the total number of dwellings completed.
- Of the 322 new gross dwellings built during 2011/12, 206 were built on previously developed land (PDL). Proportionately this is the smallest number of dwellings built on PDL since 2009/10. PDL figures no longer include dwellings built on gardens of exisiting dwellings following a change of definition by the Government in June 2010. The previous figures for PDL are therefore not comparable with the adjusted figures from 2009/10.
- In 2011/12 this accounted for 63.98% of the total dwelling provision while the previous year dwelling completed on PDL represented 71.25% of the total provision. Under the old definition this would have been 75.78% and 77.29% respectively.
- The number of homeless people accepted in priority need in Braintree District in 2012/13 was 164. Although this is the fourth lowest figure across the study period with the lowest being the three previous years (2009/10, 2010/11 and 2011/12) at 103, 104 and 137 homeless acceptances. Prior to this, numbers were either near to 200 or significantly more. The latest figure does show a rise in homeless acceptances of 19.7%.
- In July 2013 there were a total of 106 caravans sited within the district, of which 78 were located on authorised sites and 28 on unauthorised sites. All caravans on the unauthorised sites were situated on land owned by gypsies and these were not tolerated. Of the 78 caravans on authorised sites, 40 were private while the remaining 38 caravans were socially rented.
- The total number of caravans in Braintree District represents 10% of the total amount within the county and less than 1% of those within England.
- As of July 2013 there were 26 Gypsy, Traveller and Travelling Showpersons pitches on 2 authorised sites in the District. The total number of caravans in the district was 106, of which 78 were located on authorised sites and 28 on unauthorised sites.

#### 2.3.12 Transport

- Braintree District has a proportionately higher private vehicle ownership compared to the county and England as a whole. Ownership of a single car or van per household is the most common occurrence with 40.3% of households within Braintree District falling within this category. However a greater proportion of households in the district own two or more cars or vans compared to the county or national figures.
- More than 45% of residents of Braintree drive a car or van to get to work. This is higher than the regional and national figures of 41.4% and 36.9% of the population. Private vehicle use is the most popular travel to work method in all three hierarchies. Larger proportions of Braintree's population commute as a passenger in a car or van, by train or on foot than at regional and national levels while fewer Braintree residents' cycle or use buses, minibuses or coaches compared to regional and national levels. A comparatively larger proportion of residents of Braintree work mainly at or from home than both the regional and national proportions.
- Accessibility by public transport or walking to key services and educational facilities is improved considerably within and in close proximity to the town of Braintree, Halstead and Witham. Over four fifths of the population of Braintree District live within 30 minutes of each of the 5 highlighted services. Over three-quarters of the population of Braintree District live within 15 minutes access of a primary school. This proportion drops when

accessibility to the remaining four services are analysed. With respect to secondary schools, just 41% of residents live within 15 minutes access time.

#### 2.3.13 Data Limitations

Not all the relevant information was available at the local level and as a result there are some gaps within the data set but it is believed that the available information shows a comprehensive view on sustainability within the plan area. In collating the baseline data, Place Services noted the following problems:

- the accessibility of census data updates;
- it was difficult to obtain ward level data consistently; and
- for some areas it was difficult to identify trends.

#### 2.4 Sustainability Objectives

The Sustainability Objectives (SO) were derived from the review of plans and programmes and a strategic analysis of the baseline information. Objectives were based on policy advice and guidance and related to the assessment of the environmental state of the plan area. The appraisal was then able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects were likely to emerge from the plan's proposed policies. The table below outlines the Sustainability Objectives which together form the Sustainability Framework and were used to inform the appraisal of the Pre Submission Site Allocation and Development Management Plan.

# Table 2: Sustainability Objectives for SA/SEA of the Pre Submission Site Allocation andDevelopment Management Plan

Sustainability Objectives
1) Create safe environments which improve quality of life and community cohesion
2) To provide everyone with the opportunity to live in a decent home
3) To improve the health of the Districts' residents and mitigate/reduce potential health inequalities
4) To promote the vitality and viability of all service centres throughout the District
5) To achieve sustainable levels of prosperity and economic growth
6) To conserve and enhance the biological and geological diversity of the environment
7) To promote more sustainable transport choices and uptake
<ol> <li>Promote accessibility and ensure the necessary transport infrastructure to support new development</li> </ol>
9) To improve the education and skills of the population
10) To maintain and enhance cultural heritage and assets within the District
11) To reduce contributions to climatic change
12) To improve water quality and address water scarcity and sewerage
13) To reduce the risk of flooding
14) To improve air quality
15) To maintain and enhance the quality of landscapes and townscapes

# 2.5 Appraisal of Policies

For clarity, within this non-technical summary, appraisals are set out in the same format as shown in Table 3.

#### Table 3: Example of Appraisal Format

	Sustainability Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Short Term																
Medium Term																
Long Term																

In addition to this, the appraisal of each policy or element of the Plan likely to have an environmental, social or economic effect is supported with additional information as described in the following sub-sections:

#### 2.5.1 Description of 'Significant Effects'

The strength of impacts can vary dependant on the relevance of the policy content to certain sustainability objectives or themes. Where the Development Management Policies have been appraised against the SA/SEA Sustainability Objectives the following key has been used to illustrate a range of possible impacts:

++ Where there will be significant positive impacts
 + Where there will be positive impacts
 / Where there will be uncertain impacts
 0 Where there will be no direct impacts
 -- Where there will be negative impacts

Commentary is included to describe the significant effects of the policy on the sustainability objectives under the heading 'Significant Effects'.

# 3 Appraisal of Pre-Submission Site Allocation and Development Management Plan Policies and Site Allocations

## 3.1 Introduction

This section sets out the appraisal of the Development Management Policies and Site Allocations as set out in the Pre-Submission Site Allocation and Development Management Plan.

#### 3.2 Development Management Policies

The Development Management Policies have been grouped thematically to show their impacts during the plan period. The conclusions of the policies are outlined below.

#### 3.2.1 Sustainable Development Policies

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ADM2	+	0	0	0	0	+	0	0	0	+	0	0	0	0	++

The Sustainable Development policies will have significant positive impacts on:

• Landscape and townscape

There will be further positive impacts on:

- Communities
- Biodiversity
- Cultural heritage

# 3.2.2 Housing Policies

	Sust	tainab	ility O	bjectiv	ves										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ADM4	+	++	0	0	0	0	0	+	0	+	+	0	0	0	+
ADM5	0	+	++	0	0	0	+	+	0	+	0	0	0	0	+
ADM6	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
ADM7	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
ADM8	+	++	+	0	0	0	0	0	0	+	0	0	0	0	+
ADM9	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+
ADM10	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+

ADM11	0	+	0	0	0	0	0	0	0	+	0	0	+	0	+
ADM12	0	+	0	0	+	0	0	0	0	0	0	0	0	0	+
ADM13	0	+	0	0	0	0	0	0	0	0	0	0	0	0	+
ADM13a	0	+	0	0	0	0	0	0	0	0	0	0	0	0	+
ADM14	+	0	+	0	0	+	0	0	0	0	0	0	0	0	+

The Housing policies will have significant positive impacts on:

- Housing
- Health

There will be further positive impacts on:

- Communities
- Economic growth
- Biodiversity
- Sustainable Transport
- Accessibility
- Cultural heritage
- Climate change
- Flood risk
- Landscape and townscape

# 3.2.3 Employment Policies

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM15	0	0	0	0	++	0	0	+	+	0	0	0	0	0	0
ADM16	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
ADM17	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
ADM18	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
ADM19	0	0	0	0	+	0	+	+	0	0	0	+	0	0	+
ADM21	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0

The Employment policies will have significant positive impacts on:

• Economic growth.

There will be further positive impacts on:

Housing

- Sustainable Transport
- Accessibility
- Education and skills
- Water quality
- Landscape and townscape

# 3.2.4 Retail Policies

	Sust	tainab	ility O	bjectiv	ves										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM24	0	+	0	++	+	0	+	+	0	0	0	0	0	0	0
ADM25	0	+	0	++	+	0	+	+	0	0	0	0	0	0	0
ADM26	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0
ADM27	0	0	0	++	+	0	+	+	0	+	0	0	0	0	++
ADM28	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0
ADM30	0	0	0	+	+	0	0	+	0	0	0	0	0	0	0
ADM31	0	0	0	+	0	0	0	+	0	0	0	0	0	0	0
ADM32	0	0	0	+	++	0	+	+	0	0	0	0	0	0	0
ADM33	0	0	0	++	+	0	0	0	0	0	0	0	0	0	0
ADM34	0	+	0	+	+	0	+	+	0	+	0	0	0	0	+
ADM35	+	+	0	+	+	0	0	+	0	0	0	0	0	0	0
ADM36	+	+	+	+	+	+	+	+	0	/	0	0	0	0	+
ADM37	0	+	0	0	+	0	+	+	0	0	0	0	0	0	0
ADM37A	0	0	0	+	+	0	0	+	0	0	0	0	0	0	0

The Retail policies will have significant positive impacts on:

- The vitality and viability of service centres
- Economic growth
- Landscape and townscape

There will be further positive impacts on:

- Communities and safety
- Housing
- Health

- Biodiversity
- Sustainable Transport
- Accessibility
- Cultural heritage

There will however be uncertain impacts on:

• Cultural heritage

# 3.2.5 Community Facilities Policies

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM38	0	0	0	0	0	0	0	0	++	0	0	0	0	0	/
ADM39	+	0	+	0	0	0	0	0	++	0	0	0	0	0	0
ADM40	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ADM41	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0
ADM42	+	0	+	0	0	0	+	+	0	0	0	0	0	0	+
ADM43	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0
ADM43a	0	/	++	0	0	0	0	0	0	0	0	0	0	0	0
ADM44	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0

The Community facilities policies will have significant positive impacts on:

- Health
- Education and skills

There will be further positive impacts on:

- Communities and safety
- Sustainable Transport
- Accessibility
- Landscape and townscape

There will however be uncertain impacts on:

- Housing
- Landscape and townscape

# 3.2.6 Transport Policies

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM45	+	0	0	0	0	0	++	++	0	0	+	0	0	+	0

ADM46	0	0	+	0	0	0	++	++	0	0	0	0	0	0	0
ADM47	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0
ADM48	0	0	0	0	0	0	+	0	0	0	+	0	0	0	+
ADM49	0	0	0	0	0	0	+	+	0	0	0	0	0	0	/

The Transport policies will have significant positive impacts on:

- Sustainable Transport
- Accessibility

There will be further positive impacts on:

- Communities and safety
- Health
- Climate change
- Air quality
- Landscape and townscape

There will however be uncertain impacts on:

• Landscape and townscape

## 3.2.7 Environment Policies

	Sus	tainab	oility O	bjecti	ves										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM50	0	0	0	0	0	+	0	0	0	+	0	0	0	0	++
ADM51	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0
ADM52	/	/	0	0	+	+	-	+	0	+	0	0	0	0	+
ADM53	0	0	0	0	+	/	-	+	0	0	0	0	0	0	+
ADM53A	0	0	0	0	+	/	/	+	0	/	0	0	0	0	+
ADM54	0	0	0	0	0	+	0	0	0	+	0	0	0	0	+
ADM55	0	0	0	0	0	0	0	0	0	+	++	+	0	0	0
ADM56	0	0	+	0	0	/	0	0	0	/	++	+	+	0	/
ADM57	0	0	+	0	0	+	0	0	0	+	0	+	0	0	0
ADM58	+	0	+	0	0	+	0	0	0	0	0	+	0	+	0
ADM59	+	0	0	0	0	+	0	0	0	+	0	0	0	0	0

The Environment policies will have significant positive impacts on:

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- Biodiversity
- Climate change
- Landscape and townscape

There will be further positive impacts on:

- Communities and safety
- Health
- Economic growth
- Accessibility
- Cultural heritage
- Water quality
- Flood risk
- Air quality

There will however be uncertain impacts on:

- Communities and safety
- Housing
- Biodiversity
- Sustainable transport uptake
- Cultural heritage
- Landscape and townscape

There will be negative impacts on:

• Sustainable transport

# 3.2.8 Design, Conservation and Listed Buildings Policies

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM60	+	0	0	0	0	+	+	+	0	+	+	+	+	0	+
ADM61	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ADM62	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+
ADM63	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+
ADM64	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+
ADM65	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+
ADM66	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+
ADM67	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+
ADM68	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0

Place Services at Essex County Council

ADM69 0 0 0 0	0 0	0 0 0	+ 0 0	0 0 0
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The Design, Conservation and Listed Buildings policies will have positive impacts on:

- Communities and safety
- Biodiversity
- Sustainable transport
- Accessibility
- Cultural heritage
- Climate change
- Water quality
- Landscape and townscape

#### 3.2.9 Sport and Recreation Policies

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADM70	+	0	+	+	0	0	+	+	0	0	0	0	0	0	/
ADM71	0	0	/	0	0	+	0	+	0	0	0	0	0	0	+
ADM72	0	0	+	0	0	0	0	+	0	0	0	0	0	0	0
ADM73	0	0	+	0	0	/	+	0	0	/	0	0	0	0	0
ADM74	+	0	++	0	0	+	0	0	0	0	0	0	0	0	+
ADM75	0	0	0	0	+	/	+	+	0	0	0	+	0	0	+
ADM75a	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0

The Sport and Recreation policies will have significant positive impacts on:

• Health

There will be further positive impacts on:

- Communities
- The vitality and viability of service centres
- Economic growth
- Biodiversity
- Sustainable transport
- Accessibility
- Water quality
- Landscapes and townscapes

There will however be uncertain impacts on:

- Health
- 26 Place Services at Essex County Council

- Biodiversity
- Cultural heritage
- Landscapes and townscapes

# 3.2.10 Overall Compatibility of Policies and Sustainability Objectives

	Positive impacts	Negative / Uncertain impacts	Highest Individual Impact
1. Community facilities, cohesion, safety	21/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 1/76 policy has an uncertain impact on this objective.	+
2. Housing	16/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 2/76 policies have an uncertain impact on this objective.	++
3. Health	19/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective 1/76 policy has an uncertain impact on this objective.	++
4. Service centre vitality	14/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective 0/76 policies have an uncertain impact on this objective.	++
5. Economic growth	23/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective 0/76 policies have uncertain impacts on this objective.	++
6. Biodiversity	13/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective 5/76 policies have uncertain impacts on this objective.	++
7. Sustainable transport	19/76 policies address this sustainability objective positively.	2/76 policies have negative impacts on this objective (). 1/76 policy has an uncertain impact on this objective	++
8. Accessibility	28/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective 0/76 policies have uncertain impacts on this objective	++
9. Education and skills	3/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 0/76 policies have uncertain impacts on this objective.	++

10. Cultural heritage	23/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 4/76 policies have uncertain impacts on this objective.	++
11. Climate change	6/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 0/76 policies have uncertain impacts on this objective.	++
12. Water	7/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 0/76 policies have uncertain impacts on this objective.	+
13. Flood risk	3/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 0/76 policies have uncertain impacts on this objective.	+
14. Air quality	2/76 policies address this sustainability objective positively.	0/76 policies have negative impacts on this objective. 0/76 policies have uncertain impacts on this objective.	+
15. Landscapes, townscapes	32/76 policies address this sustainability objective positively.	<ul><li>0/76 policies have negative impacts on this objective.</li><li>4/76 policies have uncertain impacts on this objective.</li></ul>	++

As can be seen, the Development management Policies positively impact on all of the Sustainability Objectives both individually and cumulatively. Performance is particularly strong in shaping the District's communities, economy and landscape.

Areas of possible improvement exist concerning water quality and sewerage, flood risk and air quality.

# 3.3 Site Allocations

The preferred site allocations within the Pre Submission Site Allocation and Development Management Plan have been appraised on their own individual merits. These are summarised below. For more detailed individual impacts across all settlements, please see Annexes with the prefix D – Site Appraisals.

#### 3.3.1 Braintree Sites

There will generally be positive impacts on:

- Distances to Post Offices
- Delivery of affordable housing
- Distances to primary shopping area boundaries
- Distances to employment sites (B1, B2, B8)
- Distances to Bus Stops and Bus Regularity
- Distances to Railway Stations and Train Regularity
- Accessible locations

- Rail links
- Highways access
- Distances to a primary school
- Distances to a secondary school
- The utilisation of PDL

There will generally be negative impacts on:

- Distances to accessible natural greenspace
- Capacity of primary schools
- Capacity of secondary schools
- Loss of Greenfield land in peripheral locations

There will be uncertain impacts on:

- Air quality
- Overland flow and surface water runoff

# 3.3.2 Halstead Sites

There will generally be positive impacts on:

- Distances to Post Offices
- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.
- Distances to primary shopping area boundaries
- Distances to employment sites (B1, B2, B8)
- Distances to Bus Stops and Bus Regularity
- Accessible locations
- Highways access
- Distances to a primary school
- Distances to a secondary school
- Capacity of secondary school
- The utilisation of PDL

There will be generally negative impacts on:

- Distances to accessible natural greenspace
- Capacity of primary schools

There will be uncertain impacts on:

• A groundwater protection zone

# 3.3.3 Witham Sites

There will generally be positive impacts on:

• Distances to Post Offices

- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.
- Distances to primary shopping area boundaries
- Distances to employment sites (B1, B2, B8)
- Distances to Bus Stops and Bus Regularity
- Distances to Railway Stations and Train Regularity
- Accessible locations
- Rail links
- Distances to a secondary school
- Capacity in secondary schools
- Utilisation of PDL

There will generally be negative impacts on:

- Distances to accessible natural greenspace
- Capacity of primary schools
- Access to rail (walking / cycling)
- Heritage designations / features

There will be uncertain impacts on:

• Air quality

#### 3.3.4 Coggeshall Site

There will be positive impacts on:

- Distances to Post Offices
- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments
- Distances to primary shopping area boundaries
- Distances to Bus Stops and Bus Regularity
- Accessible locations
- Distances to a primary school
- Distance to a secondary school

There will be negative impacts on:

- Distances to accessible natural greenspace
- Distances to employment sites (B1, B2, B8)
- Presence of TPOs on site
- Highways access
- Capacity in nearest primary school
- Capacity in nearest secondary school

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- Heritage designations / features / archaeology
- Sensitivity to change in the LCA
- Loss of Greenfield land

#### 3.3.5 Earls Colne Sites

There will be positive impacts on:

- Distances to Post Offices
- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.
- Distances to employment sites (B1, B2, B8)
- Distances to Bus Stops and Bus Regularity
- Accessible locations
- Distances to a primary school
- Distances to a secondary school
- Capacity in nearest secondary school
- Capacity in nearest primary school

There will be negative impacts on:

- Distances to accessible natural greenspace
- Distances to Railway Stations and Train Regularity
- Heritage designations / features / archaeology
- Sensitivity to change in the LCA

#### 3.3.6 Hatfield Peverel Site

There will be positive impacts on:

- Distances to Post Offices
- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.
- Distances to employment sites (B1, B2, B8)
- Distances to Bus Stops and Bus Regularity
- Distances to Railway Stations and Train Regularity
- Accessible locations
- Rail links
- Distances to a secondary school
- Capacity in nearest secondary school

There will be negative impacts on:

• Distances to accessible natural greenspace

- Loss of high quality agricultural land (Grades 1 & 2)
- Distances to a primary school
- Capacity in nearest primary school
- Distance to A12 (air quality)

## 3.3.7 Kelvedon Site

There will be positive impacts on:

- Distance to Post Office
- Delivery of affordable housing
- Distance to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.
- Increase in retail floorspace
- Distance to Bus Stops and Bus Regularity
- Distance to Railway Stations and Train Regularity
- Accessible location
- Rail links
- Highways access
- Distance to a primary school
- Distance to a secondary school
- Capacity in nearest primary school
- Capacity in nearest secondary school
- Utilisation of PDL

There will be negative impacts on:

- Distance to accessible natural greenspace
- Heritage designation / feature / archaeology

There will be uncertain impacts on:

• Potential contamination

# 3.3.8 Sible Hedingham Sites

There will generally be positive impacts on:

- Distances to Post Office
- Delivery of affordable housing
- No loss of recreation (formal / informal) or open space or allotments.
- Distances to employment sites (B1, B2, B8)
- Distances to Bus Stops and Bus Regularity
- Accessible locations
- Distances to a secondary school
- Capacity in nearest secondary school

• Utilisation of PDL

There will be generally negative impacts on:

- Distances to accessible natural greenspace
- Distances to LNR
- Distances to LoWS
- Distances to Railway Stations and Train Regularity
- Distances to a primary school
- Capacity in nearest primary school
- Groundwater protection zone
- Provision of employment sites (B1, B2, B8)

## 3.3.9 Silver End Sites

There will generally be positive impacts on:

- Distances to Post Offices
- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.
- Distances to Bus Stops and Bus Regularity
- Accessible locations
- Highways access
- Distances to a primary school
- Distances to a secondary school
- Utilisation of PDL
- Capacity in nearest secondary school

There will be negative impacts on:

- Distances to accessible natural greenspace
- Loss of high quality agricultural land (Grades 1 & 2)
- Distances to Railway Stations and Train Regularity
- Capacity in nearest primary school
- Heritage designations / features / archaeology

#### 3.3.10 Steeple Bumpstead Site

There will be positive impacts on:

- Distance to Post Office
- Delivery of affordable housing
- No loss of recreation (formal / informal) or open space or allotments.
- Distance to employment sites (B1, B2, B8)
- Distance to Bus Stops and Bus Regularity

- Distance to a primary school
- Capacity in nearest secondary school
- Capacity in nearest primary school

There will be negative impacts on:

- Distance to accessible natural greenspace
- Loss of high quality agricultural land (Grades 1 & 2)
- Distance to a secondary school
- Heritage designation / feature / archaeology
- Sensitivity to change in the LCA
- Loss of Greenfield land

#### 3.3.11 Feering Site

There will be positive impacts on:

- Delivery of affordable housing
- No loss of recreation (formal / informal) or open space or allotments.
- Distance to employment sites (B1, B2, B8)
- Distance to Bus Stops and Bus Regularity
- Rail links
- Distance to a primary school
- Distance to a secondary school
- Capacity in nearest secondary school
- Capacity in nearest primary school

There will be negative impacts on:

- Distance to accessible natural greenspace
- Loss of high quality agricultural land (Grades 1 & 2)
- Distance to Railway Stations and Train Regularity
- Heritage designation / feature / archaeology
- Distance to A12 (air quality)
- Loss of Greenfield

There will be uncertain impacts on:

• Identified potential risk from overland flow and/or surface water runoff

#### 3.3.12 Great Yeldham Sites

There will generally be positive impacts on:

- Distances to Post Office
- Delivery of affordable housing
- Distances to nearest GP
- No loss of recreation (formal / informal) or open space or allotments.

- Distances to Bus Stops and Bus Regularity
- Distances to a primary school
- Distances to a secondary school
- Capacity in nearest secondary school

There will be generally negative impacts on:

- Distances to accessible natural greenspace
- Distances to employment sites (B1, B2, B8)
- Distances to Railway Stations and Train Regularity
- Capacity in nearest primary school

## 3.4 Secondary, Cumulative and Synergistic Impacts of the Site Allocations

#### 3.4.1 Positive

The majority of the preferred site allocations are well located, with numerous positive impacts realised for distance and access to services. As such it would be hoped that there would be a cumulative strengthening of positive impacts on sustainable transport uptake and also cumulative positive impacts on inclusive access to schools, jobs and other healthcare facilities.

There will also be a cumulative positive impact on townscape through the allocation of development on a significant proportion of the District's brownfield / previously developed sites. Positive cumulative impacts will also be realised in the delivery of affordable housing in the District through a range of small schemes and larger developments in the District's main towns and key service villages.

#### 3.4.2 Negative

There will be a number of negative cumulative impacts to be expected from growth. There may be cumulative negative impacts on health through the majority of sites being distanced from designated accessible natural greenspace. Despite this, the District Council have an adopted Open Space SPD which will alleviate some of these health impacts and seeks to provide open space for developments commensurate to scale.

There may also be negative cumulative impacts on the general historic character of settlements and the District as a whole through the preferred allocations. It is acknowledged however that these cumulative impacts are likely to be alleviated through addressing individual impacts at the application stage and in conformity to Policies ADM63-ADM69 where relevant. It should also be noted that there is a general thread of cultural heritage asset protection running through the proposed development management policies.

Regarding the District's main towns, there is likely to be a cumulative negative impact on air quality, where some key junctions currently perform poorly for air quality.

Of particular note are the cumulative negative impacts identified on education and skills through the capacity of existing schools. It is acknowledged that Policy ADM38 includes its support for the re-modelling and expansion of primary and secondary schools, which implies that certain other planning constraints may be relaxed to ensure that local needs are addressed and that provision is not within the District Council's remit. Despite this, the impacts of development at present would be considerable taking into account the current capacity of the District's schools.

# 4 Monitoring and Next Steps

#### 4.1 Monitoring

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

Appendix 14 of the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' guidance (ODPM) provides further details on the implementation and monitoring of LDFs. It states that it is not necessary to monitor everything, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

#### 4.2 Next Steps

#### 4.2.1 Consultation

To enable the community and other stakeholders to continue to contribute to the Plan, there is now a period of formal consultation on the Pre-Submission Site Allocation and Development Management Plan. The Environmental Report, this Non-Technical Summary and all the supporting Annexes 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, views and comments will be reported to the Braintree District Council following the end of the public consultation period. They will then approve a plan for Submission – a revised version of the consultation document, which will be submitted to the Planning Inspectorate for examination. The Submission Plan and any objections to this document will be sent to the Planning Inspector who will consider whether the Submission Plan meets the following tests of soundness:-

- To be positively prepared
- Justified
- Effective
- Consistent with national policy

#### 4.2.2 SA/SEA Adoption 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 Adoption Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

# place services

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Published February 2014