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Appendix 8 to Additional Sustainability Appraisal of North Essex Section 1 Local Plan

Reasons for rejection or endorsement of alternative spatial strategies

Prepared by North Essex Authorities July 2019

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Reasons for rejection or endorsement of alternative spatial strategies

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Planning & EIA Design Landscape Planning Landscape Management Ecology GIS & Visualisation LUC LONDON 43 Chalton Street London NW1 1JD T +44 (0)20 7383 5784 london@landuse.co.uk

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Comparison of the submitted spatial strategy with alternative spatial strategy options

The NEA's Section 1 Local Plan, as submitted, proposes a spatial strategy with three Garden Communities: The West of Braintree Garden Community (NEAGC1), the Colchester/Braintree Garden Community (NEAGC2) and the Tendring/Colchester Borders Garden Community (NEAGC3).

The Section 1 strategy is effectively assessed in the Sustainability Appraisal by looking at combination of Spatial Strategy Options West 3 and East 3. The findings of the stage 1 and stage 2 Sustainability Appraisal show that a number of sites and spatial strategy options perform similarly against the sustainability objectives, but nothing arises from the appraisal to suggest that the spatial strategy in the submitted Section 1 Local Plan is wrong or that there are any obviously stronger-performing alternatives that should be substituted into the plan in favour of the current agreed approach. The following commentary sets out some further reasoning for rejecting alternative spatial strategies.

Spatial Strategy Option	Commentary		
West 1 Proportionate (percentage-based) growth [Resulting in a thin distribution of growth across both urban and rural settlements]	The alternative of further proportionate growth around existing settlements up to 2033 has been assessed as part of the additional SA work and can only be compared with the smaller scale NEA cross-border garden communities at up to 2,500 dwellings each. However, the Local Plan process has already considered options relating to growing towns and villages across North Essex and the housing allocations in the three authorities' Section 2 Local Plans is the conclusion of this process. The NEAs consider that reasonable opportunities to accommodate growth around existing settlements have already been properly explored for the purposes of the plan period to 2033 and this is reflected in Section 2 Plans, and their discounted alternative sites, as appropriate.		
	villages to make up the residual housing requirement to 2033 raises some genuine concerns about the efficient provision of infrastructure across a dispersed area as 60% of the additional dwellings (1,850) is to be allocated at settlements of 100 or less. Applying a 'percentage-based' approach to achieving further proportionate growth around existing settlements, including rural settlements would result in a thin distribution of development around numerous settlements, particularly to the west of Colchester, and would not achieve sustainable travel in both shorter and longer journeys, given that a thin distribution of growth is likely to lead to further dependence on the private car. This strategy scores better for noise mitigation and impact on AQMAs. However it scores poorly for ability to include renewable energy technology, access to employment opportunities, access to health facilities and support for vitality and viability for existing centres. West 1 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.		
West 2 Proportionate (hierarchy-	A 'hierarchy-based' approach to proportionate growth which directs additional housing to larger settlements would, in contrast to the percentage-based approach, place a large proportion of North Essex's development to land on the eastern edge of Braintree (a town that is already earmarked for significant growth in the plan period to 2033 in the Braintree Section 2 Plan); and, to a lesser extent, Halstead and Hatfield Peverel. Delivery of 4,500 –		
based) growth [Resulting a strong focus for growth on Braintree, Halstead and Hatfield Peverel]	5,000 dwellings within one or two sites by the end of the plan period raises concerns that the significant quantum of housing would be undeliverable due to constraints on build-out rates and market demand. Development immediately east of Braintree would breach the natural and defensible boundary currently formed by the A120 east of the town and would potentially act as a barrier to integration of new development with the town. It would also be dependent on a new junction at Galleys Corner on the A120 to secure the capacity required to deal with additional traffic.		

Spatial Strategy Option	Commentary
	At Hatfield Peverel, there are limited available site options left to accommodate an additional 540 dwellings and it may not be possible to deliver this scale of development. Any development would result in significant negative effects on the existing community cohesion, landscape, character and historic assets. Whilst Hatfield Peverel at least lies within the A12 corridor, Halstead is not located on either the A120 or A12 corridors and does not offer the strategic advantages in terms of being an attractive location for business clusters and integration via a rapid transit system with existing major towns / employment growth areas that Garden Communities on the A120 would bring. The additional SA work concludes (see paragraph 4.19 in Summary of Draft Findings) that spatial strategies that do not include easy access to rail, especially to the Great Eastern mainline, could be considered to perform less well. Halstead is not well connected for longer journeys in sustainable transport terms, and commutes out to Braintree would likely generate traffic on the A131 and A1124. The SA concludes that those spatial strategies that include significant additional development at Halstead may be considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.
West of Braintree GC [NEAGC1] + Colchester/Braintree GC [NEAGC2] [As currently proposed in the submitted Section 1 Local Plan]	To the west of Colchester, whilst many of the alternative strategies for strategic growth perform similarly against the sustainability objectives in the additional SA work, the proposals for Garden Communities to the West of Braintree and crossing the Colchester/Braintree Border carry genuine advantages. The proposal West of Braintree provides a strategic long term opportunity to deliver growth within the current plan period and beyond and to address needs in the western part of North Essex with direct access to the A120 and the proposed RTS. It is well located to Stansted Airport both as a centre of local employment but also providing opportunities for new business growth. It also provides access to the M11 and the London Stansted Cambridge Corridor. It is well located to the urban area of Braintree thus enabling it to benefit from the services and facilities provided in that higher order settlement, with a rapid transport system integral to realising that benefit. The Colchester/Braintree Borders Garden Community also provides the potential for long term growth on a site with close proximity to the mainline railway station at Marks Tey and regular train links to London, Colchester and beyond within walking, cycling or bus rapid transport system to the station. It is well located at the intersection of the A12 and A120 thus providing opportunities to integrate road links with other transport modes, including the proposed RTS, for good accessibility and attractiveness to prospective residents and employers alike. There are also more opportunities for sustainable travel links into Colchester, a regionally important centre of employment, offering a full range of facilities including a hospital (with A&E) and a major shopping and cultural destination. None of the other options are considered to be stronger alternative to this strategy, as set out in the submitted Plan.
West 4	This option is for a combination of three garden communities rather than two. Different combinations of two Garden Communities are considered under Options West 3, 5 and 6. Option 4a is a variation of option west 4 and both scored identically against SA objectives.
West of Braintree GC [NEAGC1] + Monks Wood [ALTGC3] + Colchester/Braintree GC [NEAGC2] and West 4a: smaller scale of West of Braintree [NEAGC1] + Monks Wood [ALTGC3] +	Lightwood Strategic's proposal for an alternative Garden Community at Pattiswick Estate (Monks Wood) is located within 3km of the proposed Colchester/Braintree Borders Garden Community with the large village of Coggeshall located between the two. Pattiswick performs similarly against the sustainability objectives in the additional SA work but given the scale and proximity of these three proposals, it is not considered appropriate to include another garden community in the plan as well as the current

Spatial Strategy Option	Commentary
smaller scale of Colchester/Braintree GC [NEAGC2] [Options involving three Garden Communities	Colchester/Braintree Borders and West of Braintree Garden Communities. Three Garden Communities do not perform any better than two however the impact on infrastructure, heritage, character, soils and minerals, landscape, and the existing resident population that three large developments would have is greater than two.
including Pattiswick]	For longer journeys, all sites have uncertain minor negative effects linking with regional employment hubs. A Garden Community at Pattiswick would be located on the highly trafficked single carriageway of the A120 and whilst it is proposed that the A120 is dualled, this would require significant external funding leaving the only other roads in the vicinity as rural lanes with very limited opportunity to access a site of this size by other routes. The practical deliverability of a sustainable travel link to Kelvedon Rail Station is also a concern for the NEAs.
	The impact on the historic character of the dispersed settlement of Pattiswick is also considered to be greater than on the character of Marks Tey which is much more of a modern settlement. Establishing three Garden Communities to the west of Colchester as opposed to two would naturally have an impact on the countryside and character of existing communities in more locations than is necessary and, of the three, Pattiswick is not as well connected to the jobs, shops, services and facilities offered by the existing towns of Braintree and Colchester although the proposed RTS might be capable of being used to service it. Pattiswick is also located notably further from Stansted than the West of Braintree Garden Community and further from a mainline rail service to London than the Colchester/Braintree Borders Garden Community. West 4 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.
West 5 Monks Wood [ALTGC3] + Colchester/Braintree Borders GC [NEAGC2] [An alternative combination of two Garden Communities]	In this option Pattiswick Garden Community would be developed in combination with Colchester/Braintree Borders. Lightwood Strategic's proposal for an alternative Garden Community at Pattiswick Estate (Monks Wood) is located within 3km of the proposed Colchester/Braintree Borders Garden Community with the large village of Coggeshall located between the two. Pattiswick performs similarly against the sustainability objectives in the additional SA work but given the large scale and close proximity of Pattiswick and the Colchester/Braintree Borders Garden Community within a small area, it is not considered appropriate to include both in the plan given the impact on infrastructure, heritage, character, landscape and the existing resident population that these two large developments would have.
	As outlined above, Pattiswick is not as well connected to the jobs, shops, services and facilities offered by the existing towns of Braintree and Colchester although the proposed RTS might be capable of being used to service it. Pattiswick is also located notably further from Stansted than the West of Braintree Garden Community and further from a mainline rail service to London than the Colchester/Braintree Borders Garden Community.
	A Garden Community at Pattiswick would be located on the highly trafficked single carriageway of the A120 and whilst it is proposed that the A120 is dualled, this would require significant external funding leaving the only other roads in the vicinity as rural lanes with very limited opportunity to access a site of this size by other routes. The practical deliverability of a sustainable travel link to Kelvedon Rail Station is also a concern for the NEAs. West 5 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.

Spatial Strategy Option	Commentary
West of Braintree GC [NEAGC1] + Monks Wood [ALTGC3] [Another_alternative	In this option Pattiswick would be developed in combination with land West of Braintree. Pattiswick performs similarly against the sustainability objectives in the additional SA work, but it is not considered appropriate to include Pattiswick in the plan as an alternative to the Colchester/Braintree Borders Garden Community because it does not offer the same strategic advantages in terms of, proximity to Colchester, ability to meet Colchester's housing need linkage into Colchester via RTS and access to mainline rail services to London.
combination of two Garden Communities]	As outlined above, Pattiswick is not as well connected to the jobs, shops, services and facilities offered by the existing towns of Braintree and Colchester although the proposed RTS might be capable of being used to service it. Pattiswick is also located notably further from Stansted than the West of Braintree Garden Community and further from a mainline rail service to London than the Colchester/Braintree Borders Garden Community. A Garden Community at Pattiswick would be located on the highly trafficked single carriageway of the A120 and whilst it is proposed that the A120 is dualled, this would require significant external funding leaving the only other roads in the vicinity as rural lanes with very limited opportunity to access a site of this size by other routes. The practical deliverability of a sustainable travel link to Kelvedon Rail Station is also a concern for the NEAs.
	In addition, it would mean that the vast majority of North Essex' future growth would be accommodated further west into Braintree District, notwithstanding the large requirements for housing generated by Colchester. Furthermore, the Local Plan Inspector commented in his 8 th June 2018 letter (paragraph 114) that <i>"it is difficult to see the logic of assessing Monk Wood as an alternative to [the Colchester/Braintree Borders Garden Community] CBBGC and to [the Tendring/Colchester Borders Garden Community] TCBGC, but not to [West of Braintree Garden Community] WoBGC, when appraising combinations of three GCs." West 6 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.</i>
West 7 East of Braintree [SUE2] + Kelvedon [VE1] [A non-Garden Community option proposing focussed growth at Braintree and Kelvedon]	In this option, strategic development would be focussed on land on the eastern side of Braintree and on northern side of Kelvedon. Whilst they both occupy strategically important locations on the A120 and A12 corridors respectively, they are not well linked to their respective host settlements as their boundaries are formed by either the rail line or A120. Neither are they well linked to each other in terms of role, function or transport infrastructure, tempering any in-combination positive effects. Development immediately east of Braintree would breach the natural and defensible boundary currently formed by the A120 east of the town and would potentially act as a barrier to integration of new development with the town. It would also be dependent on a
, Keiveaonj	barrier to integration of new development with the town. It would also be dependent on a new junction at Galleys Corner on the A120 to secure the capacity required to deal with additional traffic, however this would result in a further barrier to integration of new development. By the end of plan period to 2033, Braintree would already be subject of significant growth according to allocations in the Braintree Section 2 Local Plan, and further growth would place pressure on services. In addition, it would mean that the vast majority of North Essex's future growth would be accommodated further west into Braintree District, notwithstanding the large requirements for housing generated by Colchester. West 7 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.

Spatial Strategy Option	Commentary		
West 8 Land at Halstead [SUE1] + proportionate growth.	In this option, strategic development would be focussed on Halstead and land on the eastern side of Braintree, with a minor development at Hatfield Peverel. Halstead is not located on either the A120 or A12 corridors and does not offer the strategic advantages in terms of linking with regional employment hubs and accessibility via sustainable travel into existing major towns compared with the preferred Garden Communities.		
[One alternative Garden Community alongside proportionate growth at existing settlements]	The additional SA work concludes (see paragraph 4.19 in Summary of Draft Findings) that spatial strategies that do not include easy access to rail, especially to the Great Eastern mainline, could be considered to perform less well. Halstead is not well connected for longer journeys in sustainable transport terms, and commutes out to Braintree would likely generate traffic on the A131 and A1124. The SA concludes that those spatial strategies that include significant additional development at Halstead may be considered less sustainable than some of the other spatial strategies.		
	The proportionate growth element of this strategy would result in a minor development at Hatfield Peverel and significant development to the east of Braintree which would breach the natural and defensible boundary currently formed by the A120 east of the town and would potentially act as a barrier to integration of new development with the town. It would also be dependent on a new junction at Galleys Corner on the A120 to secure the capacity required to deal with additional traffic, however this would result in a further barrier to integration of new development.		
	By the end of plan period to 2033, Braintree would already be subject of significant growth according to allocations in the Braintree Section 2 Local Plan, and further growth would place pressure on services. Proportionate growth at SUE2, Hatfield Peverel and Halstead is not likely to be of a large enough scale to support the delivery of higher order services and facilities, although there would be potential to further expand SUE2 beyond the plan period. In addition, it would mean that the vast majority of North Essex' future growth would be accommodated further west into Braintree District, notwithstanding the large requirements for housing generated by Colchester. West 8 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.		
West 9	This option would essentially mean proportionate growth with a focus for development on the eastern edge of Braintree in combination with a new Garden Community to the west, but no Garden Community on the Colchester/Braintree borders.		
West of Braintree GC [NEAGC1] + proportionate growth [One alternative Garden Community alongside proportionate growth at existing settlements]	The proportionate growth element of this strategy would result in a minor development at Hatfield Peverel and significant development to the east of Braintree which would breach the natural and defensible boundary currently formed by the A120 east of the town and would potentially act as a barrier to integration of new development with the town. It would also be dependent on a new junction at Galleys Corner on the A120 to secure the capacity required to deal with additional traffic, however this would result in a further barrier to integration of new development.		
	By the end of plan period to 2033, Braintree would already be subject of significant growth according to allocations in the Braintree Section 2 Local Plan, and further growth would		

Spatial Strategy Option	Commentary		
	place pressure on services. Proportionate growth at SUE2, Hatfield Peverel and Halstead is not likely to be of a large enough scale to support the delivery of higher order services and facilities, although there would be potential to further expand SUE2 beyond the plan period. In addition, it would mean that the vast majority of North Essex' future growth would be accommodated further west into Braintree District, notwithstanding the large requirements for housing generated by Colchester. West 9 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.		
West 10	This option would essentially mean proportionate growth with a focus for development on the eastern edge of Braintree in combination with a new Garden Community on the Colchester/Braintree borders, but no Garden Community west of Braintree.		
Colchester/Braintree GC [NEAGC2] + proportionate growth [One alternative Garden Community alongside proportionate growth at existing settlements]	The proportionate growth element of this strategy would result in significant development to the east of Braintree which would breach the natural and defensible boundary currently formed by the A120 east of the town and would potentially act as a barrier to integration of new development with the town. It would also be dependent on a new junction at Galleys Corner on the A120 to secure the capacity required to deal with additional traffic, however this would result in a further barrier to integration of new development. By the end of plan period to 2033, Braintree would already be subject of significant growth according to allocations in the Braintree Section 2 Local Plan, and further growth would place pressure on services. Proportionate growth at SUE2, Hatfield Peverel and Halstead is not likely to be of a large enough scale to support the delivery of higher order services and facilities, although there would be potential to further expand SUE2 beyond the plan period.		
	The West of Braintree Garden Community in contrast offers the strategic advantage of being well located on the A120 to Stansted Airport via sustainable travel using RTS, both as a centre of local employment but as an opportunity for airport related logistics business growth. It also provides easier access to the M11 and the London Stanstead Cambridge Corridor and due to congestion, land east of Braintree does not offer such strategic advantages. West 10 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.		
West 11 Monks Wood [ALTGC3] + proportionate growth	This option would essentially mean proportionate growth with a focus for development on the eastern edge of Braintree in combination with a new Garden Community at Pattiswick, but no Garden Community on the Colchester/Braintree borders. Lightwood Strategic's proposal for an alternative Garden Community at Pattiswick Estate (Monks Wood) is located within 2km of SUE2 Land east of Braintree with the village of Bradwell located between the two.		
[One alternative Garden Community alongside proportionate growth at existing settlements]	The proportionate growth element of this strategy would result in a minor development at Hatfield Peverel and significant development to the east of Braintree which would breach the natural and defensible boundary currently formed by the A120 east of the town and would potentially act as a barrier to integration of new development with the town. It would also be dependent on a new junction at Galleys Corner on the A120 to secure the capacity required to deal with additional traffic, however this would result in a further barrier to integration of new development.		
	As outlined above, Pattiswick is not as well connected to the jobs, shops, services and facilities offered by the existing towns of Braintree and Colchester although the proposed		

Spatial Strategy Option	Commentary
	RTS might be capable of being used to service it. Pattiswick is also located notably further from Stansted than the West of Braintree Garden Community and further from a mainline rail service to London than the Colchester/Braintree Borders Garden Community.
	A Garden Community at Pattiswick would be located on the highly trafficked single carriageway of the A120 and whilst it is proposed that the A120 is dualled, this would require significant external funding leaving the only other roads in the vicinity as rural lanes with very limited opportunity to access a site of this size by other routes. The practical deliverability of a sustainable travel link to Kelvedon Rail Station is also a concern for the NEAs.
	For longer journeys, both ALTGC3 and SUE2 lack of sustainable options to travel to the most popular commuting destinations, based on current commuting patterns from the site areas. There is potentially synergy for both sites to assist the delivery of the A120 route option and an RTS along the same route. However, given the scale and proximity of these two major developments, and that Route Option A is not the Council's preferred option, it is not considered appropriate to adopt this strategy given the impact on infrastructure, heritage, character, landscape and the existing resident population that two large developments in close proximity would both have.
	By the end of plan period to 2033, Braintree would already be subject of significant growth according to allocations in the Braintree Section 2 Local Plan, and further growth would place pressure on services. Proportionate growth at SUE2, Hatfield Peverel and Halstead is not likely to be of a large enough scale to support the delivery of higher order services and facilities, although there would be potential to further expand SUE2 beyond the plan period. In addition, it would mean that the vast majority of North Essex's future growth would be accommodated further west into Braintree District, notwithstanding the large requirements for housing generated by Colchester. West 11 is not considered to be a stronger alternative to West 3 i.e. the strategy in the submitted Plan.
East 1 Proportionate (percentage-based) growth [Resulting in large increases in development at coastal towns]	The alternative of further proportionate growth around existing settlements up to 2033 has been assessed as part of the additional SA work to help determine whether or not the NEAs are justified in taking a more strategic cross-border approach involving the establishment of new communities beyond the plan period. However, the Local Plan process has already considered options relating to growing the main urban areas across North Essex and the majority of housing allocations in the three authorities' Section 2 Local Plans already comprise such sites. The NEAs consider that reasonable opportunities to accommodate growth around existing settlements have already been properly explored for the purposes of the plan period to 2033 and this is reflected in Section 2 Plans as appropriate. It should be noted that the NEAs have also had a strong record in making use of existing previously developed 'brownfield' sites within settlements where possible. Adding more development to existing towns and villages to make up the residual housing requirement to 2033 raises some genuine concerns about the efficient provision of infrastructure with existing and future residents having to cope with unnecessary pressure and demand on existing services and facilities that are not able to be efficiently expanded to cater for growth. Applying a 'percentage-based' approach to achieving further proportionate growth around existing settlements would result in more development on the edge of the coastal towns of Clacton, Harwich, Frinton/Walton, Brightlingsea, Wivenhoe and West Mersea and this raises serious concerns about environmental impacts on internationally important habitats sites, sensitive landscapes and impacts on existing transport infrastructure and the ability for the market to realistically deliver the number of homes required given the weaker housing market conditions to the

Spatial Strategy Option	Commentary
	east. East 1 is not considered to be a stronger alternative to East 3 i.e. the strategy in the submitted Plan.
East 2 Proportionate (hierarchy- based) growth [Resulting in major development around Brightlingsea]	For the area east of Braintree, a 'hierarchy-based' approach to proportionate growth would also result in increased development around the coastal towns with a greater focus on Brightlingsea which is located on the internationally important Colne Estuary, is highly sensitive in landscape terms and has severe limitations in terms of its transport infrastructure with no rail services and just a single road of access. To rectify such issues through the re-establishment of a rail service or to construct a secondary road access to handle higher volumes of traffic would introduce further concerns over environmental impacts and the high costs of such infrastructure would not be justified to deliver the number of homes concerned. East 2 is not considered to be a stronger alternative to East 3 i.e. the strategy in the submitted Plan.
East 3 Tendring Colchester Borders GC [NEAGC3] [As currently proposed in the submitted Section 1 Local Plan]	The Tendring/Colchester Borders Garden Community offers multiple benefits to both Colchester and Tendring in terms of housing delivery, improved accessibility through rapid transit and the A133/120 link road and unlocking the economic potential for more expansion of the University of Essex and the Knowledge Gateway whilst relieving pressure caused by continued growth on the edge of existing towns and villages. None of the other options are considered to be stronger alternative to this strategy, as set out in the submitted Plan.
East 4 Colchester North-East Urban Extension [ALTGC7] [Strategic urban extension across the Colchester/Tendring border]	The additional SA work finds that a strategic urban extension to the north east of Colchester crossing the Colchester/Tendring boundary at Ardleigh is considered to be the weakest of the options available east of Colchester due to its potential negative impacts on the Bullock Wood Ancient Woodland and SSSI (which would be surrounded by development) – describing the potential disturbance effects on ecological networks as a significant risk. This development also has limited options for transport connections into Colchester when compared to other options with better access to the A133. East 4 is not considered to be a stronger alternative to East 3 i.e. the strategy in the submitted Plan.
East 5 Tendring Central Garden Village [VE5] [New settlement at Frating at the	The Tendring Central Garden Village concept scores similarly to the Tendring/Colchester Borders Garden Community in the additional SA work, but critically does not offer the mutual cross-border benefits to Colchester and Tendring that arise from the link road and potential for growth at the University of Essex and the Knowledge Gateway – it would be an unnecessary standalone development further east into Tendring that would encourage longer car journeys. East 5 is not considered to be a stronger alternative to East 3 i.e. the strategy in the submitted Plan.

Spatial Strategy Option	Commentary
A133/A120 interchange]	
East 6	CAUSE's Metro Plan concept offers the prospect of rail served communities although their scale means that they are unlikely to have an appropriate frequency of service which raises concerns about encouraging car-borne journeys. The limited scale of the proposed
CAUSE Metro Plan [C1, C2, C3 & C4]	communities means that they would not be able to provide services or employment in a way that would minimise travel. It would also significantly and unnecessarily alter the character of a number of rural communities in Tendring that are already under pressure
[Development focussed on railway stations along the Colchester to Clacton branch line at Alresford, Great Bentley, Weeley and Thorpe le Soken]	from current developments. The majority of the land required to deliver the Metro Plan developments is also not being actively promoted by landowners or developers through the Local Plan process or through current planning applications, and there are no neighbourhood plan areas designated within the area promoted by CAUSE. This option would not offer the mutual cross-border benefits to Colchester and Tendring that arise from the link road and potential for growth at the University of Essex and the Knowledge Gateway. East 6 is not considered to be a stronger alternative to East 3 i.e. the strategy in the submitted Plan.