REBR004A

Braintree Local Plan Review 2043

Sustainability Appraisal (Regulation 19)

Braintree District Council

Final report
Prepared by LUC
September 2026

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Appendix A
Consultation comments

Consultation comments received in relation to the SA Scoping Report (2024)

Consultee: Spencer Davis

Consultee comment

A.1 The consultee states that the plan should embrace the future needs of the village, to provide more affordable homes for local people as the priority. Land for development should be chosen to bring tourists/income to the village. New sites should be used as an opportunity to improve e.g. road infrastructure. Furthermore, sites should be selected to that improve the mental well-being of the future occupiers by selecting those with goof views and easy access to more green spaces. Developers should fund the extra local services.

SA Team response

The comment relates mostly to the preparation of the Local Plan and not the SA.

This point considered; the SA appraises the ability of the plan to support the needs of local people through appraisal work in relation to the following SA objectives:

- SA Objective 1: Create safe environments which help to address deprivation, improve quality of life and community cohesion.
- SA Objective 2: Provide decent, affordable and safe homes for all.
- SA Objective 3: Improve health and wellbeing and reduce health inequalities.
- SA Objective 4: Promote the vitality and viability of services and facilities and centres throughout the district.

Consultee: Mark Champion

Consultee comment

A.2 The consultee questions the decision making in relation to planning services in Braintree in light of the granting of permission for the Indaver recycling/incinerator site.

SA team response

The comment relates mostly to the preparation of the Local Plan and not the SA.

Consultee: Mark East

Consultee comment

A.3 The consultee states that the SA does not accurately reflect the population at its time of preparation as it has not considered new housing delivered within the District. The report as presented would suggest a decreasing population in the Parish of Hatfield Peverel but given the number of new dwellings in the Parish it is suggested this is inaccurate. The Hatfield Peverel revised NDP has just passed referendum and should be factored in.

SA team response

The evidence reflecting the population in the Parish of Hatfield Peverel in the SA Scoping Report reflected evidence available from the ONS at the time. The baseline evidence relating to the population in this area has been updated in **Appendix C** of this report.

Consultee comment

A.4 Given DEFRA's Clean Air Strategy 2019 to reduce the number of individuals exposed to PM 2.5 above WHO targets the consultee states that it is surprising that grading is only identified as a minor negative, although it is

pleasing that the report does identify the need to locate development away from polluted.

SA team response

SA objective 14: Improve air quality identifies adverse effects as follows –

- Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines.
- Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives.

Consultee comment

A.5 The consultee states that account should also be taken as to capacity levels for education and NHS if it is to be an accurate assessment of sustainability.

SA team response

The capacity levels are not available to inform the SA work. Consideration of capacity and required improvements to infrastructure will be undertaken as part of the infrastructure planning for the emerging Local Plan.

Consultee: Graham Womack

Consultee comment

A.6 The consultee states that some areas within the scope of the SA will be affected by matters outside of the Local Plan (e.g.: plans for A12 & A120, Essex Minerals Local Plan, Norwich to Tilbury Grid Upgrade, etc).

A.7 The consultee notes that no information has been given in the baseline section of the SA Scoping Report regarding homelessness in the district.

A.8 It is also highlighted that the A120 between Braintree and the A12 is still only a single carriageway with impacts on road travel along this route.

A.9 The consultee highlights that the SA describes the potential impact of traffic on air quality - particularly with respect to the larger towns. This would also impact any new large-scale communities that form part of any new plan

A.10 The consultee also highlights that the SA does not mention the higher flood risk that affects areas of Kelvedon and Feering. The mapping in the SA Scoping Report does not reflect the risk of surface water flooding.

A.11 The consultee notes that the SA only refers to designated sites (e.g. LNRs), but that biodiversity can also be an important consideration in privately-owned countryside and certain brownfield sites.

SA team response

The baseline evidence for the SA (**Appendix C**) has been updated in the following ways:

- Further information is included in relation to homelessness in Braintree District.
- Flooding associated with the River Blackwater at Kelvedon and Feering is described and mapping is included for surface water flood risk in the plan area.
- The potential value of areas beyond designated biodiversity sites is noted.

Consultee comment

A.12 The consultee queries whether the order of the SA objectives is of any relevance in relation to their perceived value and notes that there is potential for conflicts between objectives.

SA team response

The order of the SA objectives does not relate to their value and weighting has not been assigned. The appraisal work identifies where there is potential for the plan, the policies and sites included and the reasonable

alternative options considered have potential for positive and negative effects in relation to each SA objective.

Consultee comment

A.13 In relation to SA objective 4 the consultee notes that it refers only to the provision of services in town centres. What about the services needed by those living in smaller villages and other communities?

SA team response

SA objective 4 includes an appraisal question relating to providing appropriate additional and preventing the loss of existing retail and other services in rural areas.

Consultee: Historic England

Consultee comment

A.14 The consultee concludes that the scope of the SA is broadly appropriate. The historic environment should be considered as part of the sustainability appraisal process. Historic England recommend that these comments should be read alongside our Advice Note 8.

A.15 The consultee states that the following documents should be reflected in the SA's review of plans, policies and programmes.

- International/European
  - UNESCO World Heritage Convention
  - European Landscape Convention
  - The Convention for the Protection of the Architectural Heritage of Europe
  - The European Convention on the Protection of Archaeological Heritage
- National
  - National Planning Practice Guidance
- Local

- Local Plans
- Historic Environment Record
- AONB Management Plans
- Heritage/Conservation Strategies
- Other Strategies (e.g. cultural or tourism)
- Conservation Area Character Appraisals and Management Plans
- Listed building Heritage Partnership Agreements

SA team response

Historic England's Advice Note 8 forms part of the context for the SA. It is included in the review of plans, policies and programmes in **Appendix B** of this report and has informed the appraisal of the Local Plan in relation to impacts on the historic environment.

A proportionate approach has been taken in the SA when considering plans, policies and programmes that should inform the preparation of the report. All international/European and national suggestions made by the consultee, of relevance to the plan area are reflected in the review of plans, policies and programmes included in **Appendix B** of this report. Relevant local data is reflected in the baseline information included **Appendix C** of this report.

Consultee comment

A.16 The consultee states that all designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, and Protected Wrecks) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas. Therefore, the reference to these assets at paragraph 3.135 and mapping at figure 3.14 of the SA Scoping Report is welcomed.

A.17 However, it is stressed that assessing the potential impact of development on the significance of heritage assets requires more than a simple mapping of the location of those assets and identification of those assets on or in proximity to potential sites.

A.18 The Historic England Advice Note 3 sets out a sequential approach to assessing the impact on significance.

A.19 The consultee also states that they would expect non-designated heritage assets to be identified. These are referenced at paragraph 3.139.

A.20 In addition to the above, the consultee also recommends that reference is made to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the area should be acknowledged and outlined in this section.

A.21 The consultee also suggests that the SA should use the word setting in relation to heritage assets.

A.22 Reference made to Heritage at Risk at paragraph 3.137 of the SA Scoping is welcomed.

A.23 It is also recommended that the SA refers to historic landscapes and townscapes. For Heritage at Risk, Historic England's National Heritage at Risk Register includes Grade II listed places of worship provided that they are used six or more times a year for worship.

A.24 Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. It is recommended that these other sources of evidence are considered as part of the SA process.

A.25 It is suggested that the SA also refers to Historic Landscape Characterisation data in the assessment. The Historic England website which is referred to which includes some helpful guidance in this regard and sets out some of the differences between this and Landscape Character Areas.

Consultee comment

A.26 The consultee refers to the key sustainability issues included in the SA for the historic environment stating that reference to heritage assets is welcoming. This reference should be extended to include designated and non-designated heritage assets. Reference to heritage at risk is also welcomed. Other issues to include are listed:

- Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where

development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it.

- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment.

SA team response

The key sustainability issues (see **Chapter 3**) included in the SA have been updated to include those listed by the consultee.

Consultee comment

A.27 The consultee states that the objectives and questions identified on page 137 of the scoping report provide a useful starting point for the historic environment. Whilst recognising that the number of objectives need to be manageable, a number of recommended objectives are set out by the consultee:

- Environmental Objectives
  - Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place
  - Protect, manage and improve local environmental quality
  - Achieve high quality sustainable design for buildings, spaces and the public realm
- Social Objectives
  - Improve and broaden access to the local historic environment
  - Provide better opportunities for people to understand local heritage and participate in cultural and leisure activities
- Economic Objectives
  - Foster heritage-led regeneration and address heritage at risk
  - Optimise the use of previously developed land, buildings and existing infrastructure
  - Promote heritage–led sustainable tourism
  - Support the sustainable use of historic farmsteads

A.28 With regard to decision making criteria/questions, the following examples of appropriate criteria are included:

- Environmental: will the policy or proposal
  - Conserve and/or enhance heritage assets, their setting and the wider historic environment?
  - Contribute to the better management of heritage assets and tackle heritage at risk?
  - Improve the quality and condition of the historic environment?
  - Respect, maintain and strengthen local character and distinctiveness?
  - Promote high quality design?
  - Integrate climate change mitigation and adaptation measures into the historic environment sensitively?
  - Alter the hydrological conditions of water-dependent heritage assets, including organic remains?
- Social: will the policy or proposal
  - Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?
  - Improve the satisfaction of people with their neighbourhoods as places to live?
  - Engage communities in identifying culturally important features and areas?
  - Provide for increased access to and enjoyment of the historic environment?
  - Provide for increased understanding and interpretation of the historic environment?
  - Provide new leisure, recreational, or cultural activities?
  - Support and widen community uses through shared facilities?
- Economic: will the policy or proposal
  - Increase the economic benefit derived from the historic environment?
  - Promote heritage-led regeneration?
  - Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?
  - Make the best use of existing buildings and physical infrastructure?

- Promote heritage based sustainable tourism?
- Ensure that repair and maintenance is sympathetic to local character?
- Help to reduce the number of vacant buildings through adaptive re-use?

SA team response

The suggestions made by the consultee have been reflected in the following appraisal questions. As the consultee has noted, the number of appraisal questions in the SA need to kept to a manageable level.

Edits made to the objectives are shown as follows; deletions are shown with strikethrough text and additions are with underlined text:

SA Objective 9: Conserve and enhance the historic environment, heritage assets and their settings.

- Will it help realise the economic benefits of the historic environment, including the promotion of heritage–led sustainable tourism and the sustainable use of historic farmsteads?
- Will it promote the integration of climate change mitigation and adaptation measures into the historic environment in a sensitive manner?
- Will it increase access to, and the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?

SA Objective 15: Maintain and enhance the quality of landscapes and townscapes.

- Will it help to maintain and strengthen local distinctiveness and sense of place?

SA Objective 16: Minimise waste and increase resource efficiency.

- Will it support the best use of existing buildings and physical infrastructure?

Consultee comment

A.29 In relation to the site assessment criteria, the consultee advises against a purely distance-based approach. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage.

A.30 The consultee also suggests the assessment should avoid summing the scores indicating how each proposal performs against the criteria to give an aggregate contribution to each relevant SA objective since such an approach may inadvertently mask 'showstoppers' by effectively averaging out the scores. There needs to be some mechanism of identifying where an impact is so great that the proposal should not be progressed.

SA team response

It is expected that heritage impact assessment work will be undertaken for sites proposed for allocation and where this is the case this work will be used to inform the appraisal of these sites.

The effects of the sites in relation to each of the SA objectives are presented in this report. The Council's own site assessment work undertaken against the Strategic Land Availability Assessment Methodology as part of the call for sites work will also influence the selection of sites for allocation.

Consultee: Helen Waterfield, Black Notley Parish Council

Consultee comment

A.31 The consultee endorses their previous comments regarding the Call for Sites 2024 -

A.32 Black Notley Parish Council objects to any further extensions to the Village Envelope with the Call for Sites by BDC to which many Developers responded. Many of these proposals would extend the village envelope, take up useful agricultural land, are on a flood plain, or present a harsh view across the Protected Brain Valley, turning the village into an Urban Corridor and Through Route.

A.33 Black Notley is a 3rd Tier Village with few facilities, a convenience store PO and a hairdressers. There is no school in the village and small children have a long hilly walk along a busy road or an expensive spasmodic bus service, Therefore, everyday life is unsustainable without a car.

A.34 Further development will put pressure on the already overburdened road system adding to traffic using Bakers Lane for Chelmsford the M11 and Stansted, and to Witham and the A12.

A.35 The Parish Council do not want to see further industrial expansion at Lyndeswood. A previous planning application has only recently been put forward for this site. Therefore, Black Notley Parish Council does not wish to see further Farmland taken over for Industry which will add to more Commercial Vehicles/Lorry Movements onto an inadequate road system.

A.36 Major changes to the village envelope and other large plans are not justified with the huge development within the Parish at Hayeswood included in the LDP for up to 1,650 homes. It must be noted that Black Notley Parish Council have been in negotiations with BDC Planning Dept and the developers for this site, stating that the existing road system and intended road system is not fit for purpose using Bakers Lane, Buck Hill, Church Hill, and the village as a through route to access Notley High School, Chelmsford, Stansted and the M11, and Witham for the A12. These roads are country lanes with pinch points and are single file in places.

A.37 The consultee would like to add the following points taking into consideration with regard the impact of future development on the wider area of Black Notley and local villages between Braintree and Witham:

A.38 There has already been enormous development at Cressing, and Developers have submitted intentions to extend White Notley by building a Garden Village. There is a single-track rail link between Braintree and Witham running a spasmodic service to London. Access to the stations Cressing and White Notley are along narrow unlit country lanes, not suitable for cyclists and there is no footway. The villages from Braintree to Witham, Black Notley White Notley, Faulkbourne, are linked by a narrow unclassified road. It is unlit and again unsuitable for cyclists. Any development at White Notley will put further pressure on this road to access Chelmsford/Stansted/M11. These are not sustainable areas for development without the use of a car.

A.39 The consultee states that development should first be on brown field sites. There should be no development on good quality Agricultural Land which is necessary for food production. Solar Farms/Panels should be installed on all

newbuilds and industrial areas roofs – not on good grade agricultural land. Climate change must be considered and building on flood plains avoided. Furthermore, the sewage works should be upgraded.

A.40 Transport access and infrastructure must be planned and implemented before construction. Wildlife Habitats must be considered, areas where wildlife can feed and breed.

A.41 The Historic Environment must be considered. The local economy and employment should be balanced to meet local needs.

A.42 The area has an ageing population therefore, more bungalows should be built for downsizers to encourage them to free up large family homes. Social housing should be for local residents.

SA team response

The comments made relate to the preparation of the Local Plan and not the SA.

Consultee: Natural England

Consultee comment

A.43 The consultee agrees that the proposed scope of the SA is appropriate for landscape, biodiversity and soils.

A.44 The consultee agrees that the review of the policy context highlights key international and national policy objectives of relevance to the SA for landscape, biodiversity and soils.

SA team response

Comments noted.

Consultee comment

A.45 The consultee states that the River Ter SSSI which is designated for its geological interest, is situated in Chelmsford District but is situated immediately

adjacent to the border with Braintree. Otherwise, the consultee agrees that the baseline information provided for the sections concerning soil, biodiversity, landscape and townscape is robust and provides a suitable baseline for the SA of the Local Plan. The consultee is pleased to see a section on Green Infrastructure and the benefits it can bring across a range of issues, including climate change mitigation and adaptation, improving air quality and biodiversity and promoting healthier living.

SA team response

The baseline evidence in this report (**Appendix C**) makes reference to the River Ter SSSI.

Consultee comment

A.46 The consultee states that they have not identified any additional sustainability issues.

SA team response

Comment noted.

Consultee comment

A.47 In relation to the SA framework the consultee makes the following observations:

- SA Objective 7: Conserve and enhance the biological and geological diversity of the environment
  - Natural England notes that there is no reference to developments delivering a minimum 10% biodiversity net gain. Some authorities have set a more ambitious target of 20% minimum BNG and the consultee would welcome a consideration of this by the Plan.
  - Table B.7 ‘SA Site Assessment criteria for objective 7’ uses distance criteria alone to determine the significance of potential impact. Natural England’s advice is that the assessment should apply Natural England’s Impact Risk Zones (IRZs), to capture pathways for impact that are likely to exceed 1km, e.g. through air quality, hydrology and

recreational pressure. Consideration should then be given to the sensitivity of site notified features to potential impacts and the availability of appropriate measures to mitigate any adverse effects.

- SA Objective 11: Support adaptation to the effects of climate change
  - Natural England welcomes the recognition of the significant role of the natural environment in delivering measures to reduce the effects of climate change through the green and blue infrastructure network. Green infrastructure and nature-based solutions play an important role in aiding climate change adaptation and reduction in urban air pollution. Natural England's Climate Change Adaptation Manual - NE751 (naturalengland.org.uk) is highlighted in the response as a useful resource.
  - Natural England's Green Infrastructure Framework was introduced alongside the government's Environmental Improvement Plan in January 2023. The '15 minute neighbourhood' concept is encouraged as part of the new GI standards. This seeks to ensure that everyone has access to good quality natural greenspace within 15 minutes walking distance from their homes, in line with the Accessible Natural Greenspace Standards and Green Flag Criteria. The emphasis on sustainable travel is welcomed.
  - Green infrastructure should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.
  - Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Green infrastructure mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.
- SA Objective 15: Maintain and enhance the quality of landscapes and townscapes
  - The Local Plan presents opportunities to protect and enhance locally valued landscapes, including any local landscape designations. Natural England advises that local landscape features and characteristics

should be incorporated into the design of development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments.

- SA Objective 17: Safeguard and enhance the quality of soil
  - Natural England suggest that there is specific reference to the protection of best and most versatile soil resources into SA objective 17. However, please note that brownfield/previously developed land may have high biodiversity interest, particularly for invertebrates, and this should be taken account of by the Local Plan/development. Further information about brownfield land, including links to the open mosaic habitats inventory, can be found here.
- Habitats Regulations Assessment (HRA)
  - Natural England notes the intention to carry out a HRA of the Local Plan which will consider the potential impact of development on internationally designated sites. Natural England recommended a strategic approach to mitigation along the Essex coast to enable the conclusion of 'no adverse effect on the integrity of the international designated sites' regarding in-combination recreational effects, namely Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The southern half of Braintree District falls within the overall ZoI, so new housing in this zone will be required to contribute financially to Essex Coast RAMS. Other potential impact pathways arising from the local plan, such as changes to water quality and quantity and air quality at the designated sites will also need to be appraised.
- Biodiversity
  - Braintree is a relatively rural borough but may give rise to recreational pressure on wildlife sites with public access, including SSSIs. Natural England expect to see that the biodiversity interest of SSSIs, local wildlife sites, ancient woodland, priority habitats and species will be safeguarded and enhanced where possible by the local plan. There may also be opportunities to improve the connectivity of wildlife sites and habitats as part of a Nature Recovery Network. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geo-conservation groups or recording societies. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees.

SA team response

SA objective 7 now includes reference to supporting the achievement of biodiversity net gain as one of its supporting appraisal questions.

Through recent engagement with Natural England team who created and maintain the SSSI IRZ data it was not designed to be used for the purposes of SA. As such the appraisal of site options in relation to potential impacts on biodiversity assets is based on a precautionary distance approach based.

Natural England's comment relating to the benefits of green infrastructure, including with regard to sustainable transport is noted. Natural England's Climate Change Adaptation Manual has been reviewed as part of the SA and is included in the review of plans, policies and programmes set out in **Appendix B**.

Natural England's comment relating to the need to protect and enhance locally valued landscapes is also noted. This relates mostly to the preparation of the Local Plan.

SA objective 17 now includes reference to the protection of best and most versatile soil resources through a related appraisal question. The baseline evidence of the SA (**Appendix C**) notes the value of brownfield/previously developed land in relation to biodiversity interest, particularly for invertebrates.

Comments relating to the HRA and policy protection set out in the Local Plan are noted. The HRA will be undertaken separately to the SA, however, its findings relating to international designations will be reflected in the final SA Report.

Consultee: Witham Town Council

Consultee comment

1.1 In relation to paragraph 1.6 of the scoping report, the consultee highlights that Witham should be referred to in relation to its position on the main railway line and on the A12.

SA team response

The change suggested has been made in this report.

Consultee comment

A.48 In relation to paragraph 2.12 of the scoping report which includes a summary of the NPPF's objectives, the consultee states that the text should include sustainable development under the environmental objective.

A.49 In relation to paragraph 2.18 of the scoping report, the consultee states that there should regulations to ensure that developers achieve at least 31% less carbon emissions and there should be a strong statement contained in the Local Plan insisting that this is achieved. Also believes that existing homes should be retrofitted.

A.50 In relation to paragraph 2.20 of the scoping report, the consultee considers that mixed use space should be integrated in the development, Poundbury in Dorset was cited as an example. Members gave support that policies should be put in place to optimise land usage.

A.51 In relation to paragraph 2.27 of the scoping report, which sets out how the Local Plan and SA can support the protection of the historic environment in response to policy at the national level, the consultee considers that refer to 'heritage assets, both physical and natural' should be included.

A.52 In relation to paragraph 2.28 of the scoping report, which discusses the NPPF requires relating to flood risk, the consultee states that the word 'avoided' should be strengthened as all development should be prevented in areas of flood risk.

A.53 In relation to paragraph 2.36 of the scoping report, the consultee agrees that the Local Plan should identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel.

A.54 In relation to paragraph 2.41 of the scoping report, the consultee states that the word 'can' should be strengthened and replaced with 'should' be best achieved. New transport links should be integrated into existing networks to achieve sustainable transport patterns.

A.55 In relation to paragraph 2.46 of the scoping report, the consultee agrees with the text that states that new housing should be considerate of local needs with regards to housing size. Witham's residents need smaller homes and flats rather than executive style homes.

SA team response

Many of the comments made relate to the policy that is summarised in the SA Report. The SA Report has no influence on the text of that policy. A number of comments relate to the preparation of the Local Plan and not the SA.

However, taking the consultee's comments in account, this report has updated the measures that the Local Plan and SA can take in relation to protecting the historic environment in response to the policy set out at national level.

Consultee comment

A.56 In relation to paragraph 3.7 of the scoping report, the consultee considers that as the district has an aging population, suitable homes such as small bungalows, need to be in an 'urban' setting with facilities close at hand.

A.57 In relation to paragraph 3.18 of the scoping report, the consultee considered that 'affordable' homes need to be within the financial reach of those on a single income with an occupation such as a nurse.

A.58 In relation to paragraph 3.25 of the scoping report, the consultee is concerned about green spaces that were not adopted by the District Council and that residents would need to pay a service charge.

A.59 In relation to paragraph 3.28 of the scoping report, the consultee states that crime in other parts of the district should be addressed. This should include rural crime.

A.60 In relation to paragraph 3.32 of the scoping report, the consultee highlights that the baseline evidence does not highlight potential issues for secondary education, query whether there are sufficient places available.

A.61 In relation to paragraph 3.48 of the scoping report, the consultee comments that no mention was made of the significant investment in Witham

which has the largest industrial estate in the district. Comment was also made as to why new innovative assets where either in Braintree or nearby. The consultee would press for similar new investment in Witham particularly if the A12 receives the promised funding for triple laning.

A.62 In relation to paragraph 3.59 of the scoping report, the consultee states that bus services in Witham, as a major town, are inadequate with residents in parts of the town unable to access the town centre on a Saturday by public transport. Public transport to either Broomfield or Braintree Hospitals requires at least two buses and can take hours. DigiGo or Community 360 transport is not available in Witham.

A.63 In relation to paragraph 3.61 of the scoping report, the consultee queries why Braintree town is the only town mentioned. Witham has a direct line to Liverpool Street so does not suffer the infrequent services suffered by Braintree. Hatfield Peverel and Kelvedon also benefit from being on the main line.

A.64 In relation to paragraph 3.65, the consultee queries where the data relating to access to healthcare had been obtained. With a majority of people over 60 years old, it would take them longer to reach their GP surgery. There is not a consistency in provision of health services in the District. Witham does not benefit from hospital facilities or diagnostic centres unlike Braintree.

SA team response

Many of the comments received relate to policy development that will be undertaken as part of the preparation of the Local Plan.

However, given the consultee's comments a number of updates have been made to the baseline evidence (**Appendix C**) presented in this report:

- Further information is included in relation to crime.
- Further information is included in relation to education provision.
- Further information is included in relation to public transport at Witham.

Consultee: Kevin Fraser, Essex County Council Spatial Planning

Consultee comment

A.65 Much of Braintree District is situated within the Essex Climate Action Commission's (ECAC) recommended Climate Focus Area (CFA), which is formed of the Blackwater and Colne River catchment areas (please see Figure 1 for further details). The consultee recommends this is referenced in the introduction to help set the context.

SA team response

The SA Report refers to the CFA within its introduction. Further detail of the CFA is set out in the baseline information section (**Appendix C**).

Consultee comment

A.66 Paragraph 1.9 of the scoping report refers to the Development Plan comprising the Section 1 and 2 Braintree Local Plan. However, the Development Plan also includes the adopted Essex Minerals Local Plan (2014) (MLP) and the Essex and Southend-on-Sea Waste Local Plan (2017) (WLP).

SA team response

The SA Report refers to the MLP and WLP as forming part of the Development Plan.

Consultee comment

A.67 Paragraph 2.19 of the scoping report identifies various ways of measuring the performance of new build homes. An additional means of assessing sustainability performance of buildings is through the accreditation scheme known as `Building with Nature'.

SA team response

The SA Report now includes reference to ‘Building with Nature’.

Consultee comment

A.68 The consultee states that reference should be made in the baseline to the ‘Healthy Life Expectancy’ (HLE) indicator which is a measure that looks at the number of years an individual is expected to live in ‘good health’, provided that current mortality and health trends remain fixed over their lifetime. ECC Public Health intelligence team have produced small area estimates of healthy life expectancy (available at: https://data.essex.gov.uk/dataset/epx8g/healthy-life-expectancy-small-area-estimates-and-inequalities) which should also be referred to. Further information relating to health is available at:

- https://data.essex.gov.uk/dataset/2yqdq/assessing-the-strength-of-communities-in-essex-the-essex-community-needs-index-2020
- https://digital.nhs.uk/
- https://shapeatlas.net/

SA team response

The baseline evidence (**Appendix C**) has been updated to include relevant suggestions made by the consultee.

Consultee comment

A.69 The consultee highlights that over 40% of residents in Braintree live in places achieving no more than a single benchmark of the original Accessible Natural Green Space Standards (now known as Natural England Accessible Greenspace Standard). There are parts of Northen Braintree that further investigation of GI provision could be merited (as support by Figure 10 – ANGSt benchmark results for Greater Essex, page 22. Of the Essex Green Infrastructure Strategy, 2020).

SA team response

The baseline evidence (**Appendix C**) has been updated to include relevant suggestions made by the consultee.

Consultee comment

A.70 The consultee states that the SA/SEA will need to consider the full range of potential impacts of proposed development on education including impact on early years and childcare (EYCC), mainstream education (primary and secondary), special educational needs and disabilities (SEND), and post-16 education opportunities. The impact on library provision and adult community learning opportunities will also be important.

A.71 Recommends reference is made to the Essex Developers' Guide to Infrastructure Contributions (2024) (Developers' Guide), the Garden Communities and Planning School Places Guide and the latest 10 Year Plan for further information and guidance.

A.72 Recommends paragraph 3.30 of the scoping report is amended to read:

- There are 52 primary, infants and junior ~~nursery~~ schools'.

A.73 Recommends paragraph 3.32 of the scoping report is updated with the data included in the latest 10 Year Plan covering the period 2024 to 2033. The paragraph should be amended to update where deficits are forecast for primary and secondary and to reference the updated planning groups. Sentence 3 should also be amended to read:

- Without action, the district is anticipated to experience significant capacity issues in some of its primary schools.

SA team response

The SA of site options considers the accessibility to primary schools and secondary schools. Potential capacity implications for and the need for the delivery of new provisions will be considered separately as part of infrastructure planning for the plan area.

Reference to the Essex Developers' Guide to Infrastructure Contributions (2024) (Developers' Guide), the Garden Communities and Planning School Places Guide and the latest 10 Year Plan are now included in the baseline evidence of the SA (**Appendix C**). Furthermore, the changes suggested by the consultee are also incorporated into the baseline evidence appendix.

Consultee comment

A.74 The consultee suggests that further evidence should be included in the economic baseline for the plan area and refers to:

- The Essex Local Skills Plan
- ECC Everyone's Essex (2021 – 2025)
- Levelling Up – An Essex White Paper (January 2022)
- ECC Developers Guide to Infrastructure Contributions (2024)
- Essex Sector Development Strategy (2022)
- Skills for Growth Strategy (April 2019)
- Essex Green Skills Infrastructure review (March 2022)
- Essex Skills Plan 2022 – 2023
- Essex, Southend-on-Sea & Thurrock Local Skills Improvement Plan
- NEC: North Essex Economic Board (2023) Delivering for North Essex
- Essex Design Guide (2019) - Commercial industrial and larger footprint building guidance

A.75 Also suggests that reference should be provided on occupational levels, which can be viewed using the Skills Insight and Economic Growth Tool here, available at: https://data.essex.gov.uk/dataset/29dzj/skills-insight-and-economic-growth-tool.

SA team response

A proportionate approach has been taken to assembly of relevant baseline evidence (**Appendix C**) that will inform the SA. The evidence base documents referred to by the consultee have been reviewed and where relevant they are reflected in the SA.

Consultee comments

A.76 The consultee recommends reference is made to the A131 with regards connectivity in paragraph 3.56 of the scoping report given the reference in paragraph 3.57 to accessing employment and services in Chelmsford.

SA team response

Reference to the A131 with regards to connectivity is now included in the baseline evidence of this report (**Appendix C**).

A.77 The consultee recommends paragraphs 3.58 and 3.59 are reviewed against the Essex Bus Strategy 2024 to 2034 to ensure consistency.

SA team response

The baseline evidence of this report (**Appendix C**) reflects the Essex Transport Strategy Implementation Plan for Braintree and North Essex (2025).

Consultee comments

A.78 The consultee recommends the following clarification is provided to paragraph 3.71 of the text in the scoping report to identify the full range of infrastructure schemes to read:

- With regards bullet 1: the text should refer to the Thames Freeport.
- With regards bullet 2:
  - New overhead and underground powerline schemes and renewable energy generation (Norwich to Tilbury, Bramford to Twinsted Connection, Rivenhall Integrated Waste Management Facility (IWMF) and Energy Centre and Longfield Solar Farm NSIPs).
  - New road building schemes such as the A12 Widening (Junctions 19 – 25) in the district and the Lower Thames Crossing outside of the district.
- With regards bullet 6:
  - Significant housing growth outside of the district, including new Garden Communities at Harlow and Gilston Garden Town, Colchester Tendring Borders Garden Community, Chelmsford Garden Community and Dunton Hills Garden Village.

A.79 The consultee recommends reference should be made to the Essex Climate Action Commission (ECAC) which was established by ECC to advise on Essex's response to climate change.

A.80 The consultee recommends reference is made to Longfield Solar Farm in the baseline evidence given that it is a cross-border scheme with Chelmsford City Council area.

SA team response

Reference to the ECAC and Longfield Solar farm have been made in the baseline evidence of this report (**Appendix C**).

Consultee comments

A.81 The consultee recommends reference in paragraph 3.119 of the scoping report to the health, social, and environmental benefits of green infrastructure. However, it is equally important for the SA to highlight the economic advantages. These include attracting investment and businesses, increasing property values, and boosting tourism.

A.82 For clarity, the consultee recommends reference to waterways should be 0.004875ha rather than just 0.0ha, as this may be interpreted that there are no waterways in Braintree.

SA team response

The health, social, economic and environmental benefits of green infrastructure are now referenced in the baseline evidence of this report (**Appendix C**).

The reference to total area of waterways has been amended in the evidence baseline.

A.83 The consultee states reference to the Mechanical Biological Treatment Facility at Tovi EcoPark in paragraph 3.85 of the scoping report should be deleted. The site is no longer in operation and is in the process of being dismantled.

SA team response

Reference to the Mechanical Biological Treatment Facility at Tovi EcoPark has now been deleted.

Consultee comments

Issue: Ageing population and pressure on the ability to access and capacity of local services facilities.

A.84 The consultee identifies that paragraph 4.6 of the scoping report makes reference to the ageing population of the district, with a higher proportion of older people, particularly those aged 50 years and old.

A.85 Paragraph 4.8 of the scoping report identifies that the new Local Plan presents the opportunity to improve the provision and accessibility of high-quality education and training facilities in the district. Without the new Local Plan, these educational and training improvements may not be realised, potentially perpetuating the current disparities.

A.86 The consultee identifies sectors which could be referenced in paragraph 4.10:

- Life sciences: including Cell and Gene Therapy Catapult Vaccines Manufacturing Innovation Centre
- Construction: the i-Construct centre in Braintree, Horizon 120 (Business, Innovation and Logistics park – including British Offsite (Weston Homes)
- Advanced manufacturing: STEM Centre, Braintree; EOS Horizon 120, Braintree; a cluster of firms including Nexus PLC/Triconnex, Millbank Ventures, Crittall, Maycast Noakes.

SA team response

Comment noted. Reference to the sectors in question were reflected in the baseline evidence of the scoping report and are carried through to **Appendix C** of this report.

Issue: Pockets of deprivation

A.87 The consultee states the inclusion of open spaces in the Local Plan to help address deprivation is a positive step, as referenced in paragraph 4.9 of the scoping report.

SA team response

Comment noted.

Issue: NO2 from vehicles travelling on the A12, A131 and A120

A.88 The consultee agrees that traffic and transport is within the scope of the SA.

A.89 Paragraph 4.13 of the scoping report states that no sites in Braintree currently exceed the air quality objective level in relation to NO2. However, the main air quality issues in the district relate to NO2 from vehicles travelling on the A12, A131 and A120 with monitoring currently taking place on these routes and roads that link to them. The consultee highlights that ECC is currently preparing a countywide Air Quality Strategy, which will inform LTP4, setting out the current baseline position in Essex, identify and prioritise areas of concern and set out actions to be taken to improve air quality.

A.90 The consultee supports reference to the new plan providing an opportunity to reduce car dependency in paragraph 4.12 of the scoping report and supporting development at more sustainable locations and promoting sustainable travel in paragraph 4.13.

SA team response

Comments noted. The SA will draw on evidence from the Air Quality Strategy once it is published.

Issue: Recycling

A.91 The consultee highlights that paragraph 4.15 of the scoping report identifies the higher average recycling rate in Braintree than nationally, but

which has shown a slightly decrease in the most recent year of reporting. Furthermore, a growing population will place increased pressure on waste management facilities and there will be a requirement to meet these growing needs.

Issue: Accelerating Climate Change

A.92 The consultee identifies that paragraph 4.18 of the scoping report highlights the potential for the new Local Plan to update the district's approach to mitigating and adapting to the effects of the changing climate and associated weather events. This can include through policy for the promotion of energy from low carbon sources, addressing embodied carbon, more sustainable design choices and the delivery of green infrastructure.

A.93 The consultee notes paragraph 3.134/Figure 3.13 identifies the location of Braintree District's designated biodiversity and geodiversity assets.

Issue: Risk of Flooding

A.94 The consultee notes that paragraph 4.17 of the scoping report identifies that there are a number of areas within Braintree District which are at risk of flooding (particularly around Sible Hedingham, Halstead, Earls Colne, Braintree town, Coggeshall, and Witham).

Issue: Water Stress

A.95 The consultee notes that paragraph 4.19 of the scoping report acknowledges that the district is identified as being under significant water stress and there is a need for water demand to be managed to achieve long term sustainability in terms of water resources.

Issue: Biodiversity Net Gain

A.96 The consultee notes that paragraph 4.20 of the scoping report identifies that Braintree District contains or is in close proximity to a number of both designated and non-designated natural habitats and species which are sensitive to the effects of development within it, including the impact of increased visitor numbers. It will be essential that the Local Plan ensures that the effects of development that cannot be avoided are adequately mitigated and that biodiversity net gain is secured.

A.97 The consultee welcomes reference to the Essex Local Nature Recovery Strategy in paragraph 3.132.

SA team response

Comments noted.

Issue: Heritage at Risk Register

A.98 The consultee notes that that paragraph 4.21 of the scoping report makes reference to heritage assets. This reference should be extended to include designated and non-designated heritage assets.

SA team response

The baseline evidence of this report (**Appendix C**) includes reference to designated and non-designated heritage assets in Braintree District. The key sustainability issues presented in **Chapter 3** includes reference to the potential for impacts on both types of heritage assets.

SA objective 2: Provide decent, affordable and safe homes for all.

A.99 With regards appraisal questions 1, 2 and 4 the consultee cross refers to the response to Chapter 4 Key sustainability issues and likely evolution without the Local Plan - Ageing population and pressure on the ability to access and capacity of local services facilities. They also refer to appraisal question 7 to Accelerating Climate Change

A.100 The consultee supports appraisal question 6 which seeks to provide new housing is supported by adequate local employment opportunities as this would help ensure that employment growth keeps pace with housing growth avoiding the exacerbation of net out commuting to jobs.

A.101 The consultee recommends an additional appraisal question to read:

- Will it provide for an appropriate mix of dwelling size, type and tenure is provided?

SA team response

Comments noted. SA objective 2 includes a number of appraisal questions that address the ageing local population, including:

- Will it (the Local Plan) respond to the needs of an ageing population?
- Will it provide additional capacity in care homes?
- Will it provide sufficient housing to meet existing and future housing need?

In relation to Appraisal Question 7, it is considered relevant for SA objective 2 to address the potential adaptability of homes to climate change given that related measures will help ensure that housing in the district is of a suitable quality and will meet the needs of residents in the longer term.

An additional question has been added to SA objective 2 in response to the consultee's suggestion in relation to providing an appropriate mix of dwellings in terms of size, type and tenure.

SA objective 3: Improve health and wellbeing and reduce health inequalities.

A.102 The consultee welcomes this objective subject to the following additional appraisal questions as the current objectives appear very focussed on access to health, sport and recreation facilities rather than the wider determinants of health.

- Will it promote improvements to health and wellbeing.
- Will it promote healthier lifestyles.
- Will it deliver safe and secure networks of multifunctional green infrastructure and open space.
- Will it ensure that there are appropriate facilities for the disabled and elderly.
- Will it reduce crime including the fear of crime.
- Will it reduce anti-social behaviour.
- Will it help to provide employment opportunities.

SA team response

Many of the suggestions made by the consultee are overlapping and the following appraisal question has been added to SA objective 3:

- Will it promote improvements to public health and support healthier lifestyle choices?

The issue of safety and crime is addressed through SA objective 1 and employment is addressed through SA objective 5.

SA objective 5: Achieve sustainable levels of prosperity and economic growth.

A.103 With regards appraisal questions 1 and 8 the consultee cross refers to the response to Chapter 4 Key sustainability issues and likely evolution without the Local Plan – Provision and accessibility of high-quality education and training facilities.

A.104 The consultee welcomes the aim to provide a range of suitable employment sites of varying sizes and types (SA objective 3), but recommends that the text 'of businesses' is replaced with 'of key employment sectors'.

A.105 The consultee supports appraisal question 7 to support increased broadband coverage / bandwidth, especially in rural areas.

SA team response

Comments noted. SA objective 5 includes a number of appraisal questions that address the lower proportion of residents with higher level qualifications and those working in related jobs, including:

- Will it support the growth of small businesses to grow and encourage business innovation?
- Will it encourage higher skilled economic sectors in the district?

Appraisal question 3 of SA Objective 5 has been amended to reflect the suggested change:

- Will it provide a range of suitable employment sites to meet the needs of varying types of key employment sectors and the needs employers of varying sizes?

SA Objective 6: Increase participation in and improve access to education, training and opportunities for lifelong learning

A.106 With regards appraisal question 3, the consultee cross refers to the response to Chapter 3 Baseline Information - Education. The consultee recommends reference is made to the Essex Developers' Guide to Infrastructure Contributions (2024) (Developers' Guide); Garden Communities and Planning School Places Guide and the latest 10 Year Plan for further information and guidance.

SA team response

Reference to the documents noted by the consultee is included in the baseline evidence of this report (**Appendix C**).

SA Objective 7: Conserve and enhance the biological and geological diversity of the environment.

A.107 With regards appraisal questions 1, 3 and 8, the consultee cross refers to the response to Chapter 4 Key sustainability issues and likely evolution without the Local Plan - Provision and accessibility of high quality education and training facilities.

A.108 The consultee recommends the following amendments to appraisal question 1 and 4 and that an additional appraisal question is added –

- Will it deliver net gain in biodiversity, conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species?
- Will it positively contribute to nature recovery having regard to the Local Nature Recovery Strategy?
- Will it provide appropriate opportunities for people to access multifunctional green infrastructure, wildlife and open green spaces?

SA team response

Comments noted.

The amendments suggested have been made to appraisal question 1 and 4. An additional question has also been added to reflect the consultee's suggestion.

SA objective 8: Reduce the need to travel and promote active travel and more sustainable transport choices

A.109 The consultee recommends the following amendments to appraisal question 1 to refer to the `attractiveness and frequency' of sustainable modes of transport.

- Will it increase and/or improve the availability, attractiveness, frequency, and viability of sustainable transport modes, including public transport?

A.110 The consultee recommends the following additional appraisal questions given the significant level of growth being required in the Local Plan Review and identification of freight and logistics as a key economic growth sector in the National Planning Policy Framework (2024) consultation document

- Will it ensure timely investment in transportation infrastructure to accommodate new development?
- Will it promote sustainable freight movement?
- Will it create safer and well-connected routes for pedestrians, cyclists and other vulnerable users?

A.111 The consultee seeks clarification with regards appraisal question 5. Is this implying that car parking will be provided lower than policy standards in certain locations?

- Does it seek to increase the uptake of public transport through parking standards at destinations?

SA team response

The suggested amendments have been made to appraisal question 1.

New appraisal questions have been added to SA objective 8 to address timely investment in transportation infrastructure and to promote freight movement. Routes for pedestrians, cyclists and other vulnerable users are addressed through other appraisal questions under this SA objective.

The appraisal question relating to parking has been updated as follows to provide more clarity:

- Does it seek to increase the uptake of public transport through the application of appropriate parking standards at destinations?

SA objective 9: Conserve and enhance the historic environment, heritage assets and their settings.

A.112 The consultee recommends the additional of the following appraisal question:

- Help to reduce the number of vacant buildings through adaptive re-use?

SA team response

SA objective 9 already includes a similar appraisal question:

- Will it offer opportunities to bring heritage assets back into active use in appropriate ways?

SA objective 10: Reduce contributions to climate change.

A.113 The consultee recommends the inclusion of additional appraisal questions to read:

- Will it reduce embodied carbon emissions in new buildings?
- Will it reduce space heating demand in new buildings?

SA team response

An additional appraisal question relating to reducing embodied carbon has been added to SA objective 10. Appraisal question 3 has been updated as follows:

- Will it increase energy efficiency and reduce space heating demand in new developments?

SA objective 11: Support adaptation to the effects of climate change.

A.114 The consultee recommends that appraisal question 2 is updated as follows:

- Will it encourage more multifunctional green infrastructure including street trees, green roofs and walls in urban areas?

SA team response

Amendments have been made to appraisal question 2 of SA objective 11 to reflect the consultee's comments.

SA objective 12: Improve water quality and address water scarcity and sewerage capacity.

A.115 The consultee recommends the following additional appraisal questions:

- Will it improve water efficiency?
- Will it promote measures to minimise water consumption and use?
- Will it ensure timely investment in water management infrastructure to accommodate new development?

SA team response

A new appraisal question has been added to SA objective 12 as follows:

- Will it improve water efficiency and promote measures to minimise what consumption and use?

The appraisal questions already address infrastructure relating to water management.

SA objective 13: Reduce and manage the risk of flooding

A.116 The consultee recommends the following amendments to appraisal question 2:

- Will it help to avoid development in areas at risk of flooding (fluvial, surface water, groundwater) taking into account the impact of climate change?

SA team response

Appraisal question 2 has been updated to reflect the consultee's comments.

SA objective 14: Improve air quality

A.117 The consultee recommends the addition of the following appraisal question to help improve air quality through green infrastructure:

- Will it support the delivery of green infrastructure to help ameliorate air quality?

SA team response

The following appraisal question is now included in relation to SA objective 14:

- Will it support measures to reduce emissions of key pollutants and improve air quality, including through the delivery of green infrastructure?

SA Objective 16: Minimise waste and increase resource efficiency.

A.118 The consultee recommends that appraisal question 3 encouraging the `prudent use of mineral resources' is replaced with the following:

- Will it promote the efficient and sustainable use of mineral resources.
- Will it avoid the sterilisation of mineral reserves.

The consultee supports the appraisal questions:

- Will it reduce household and commercial waste?
- Will it maximise the recovery, re-use and recycling of waste and reduce the proportion of waste sent to landfill?

SA team response

Appraisal question 3 is replaced with the following question:

- Will it promote the efficient and sustainable use of mineral resources and help prevent the sterilisation of mineral reserves?

SA Objective 17: Safeguard and enhance the quality of soil.

A.119 The consultee recommends appraisal question 1 is amended to ensure consistency with NPPF, paragraph 180 b with regards `best and most versatile land' defined in the glossary as grades 1, 2 and 3a of the Agricultural Land Classification:

- Will it minimise the loss of the best and most versatile agricultural land?

SA team response

Appraisal Question 1 is amended in this SA Report.

Consultee: Gladman

Consultee comment

A.120 The consultee states that they only have process specific points to make and look forward to reviewing the outcome of the Council's assessment in the future.

A.121 States that the scope of the SSA is suitable, but that a justified and robust SA should be used to inform the policies and allocations made in the Local Plan which should be especially clear in justifying why some policy options are progressed and others are rejected. This is especially important

when considering the commitment the new Labour Government is placing on the delivery of much needed market and affordable homes. The SA should not be used to arbitrarily restrict suitable sites being considered for allocation.

SA team response

Comment noted.

Consultee comment

A.122 The consultee states that specifically for the emerging Braintree Local Plan, the Council should be mindful of the current consultation being undertaken by MHCLG on the National Planning Policy Framework.

A.123 The December 2023 changes to the National Planning Policy Framework were disruptive to the sector and detrimental to housing supply. The Chancellor's speech on 8 July committed to consulting on reforms to the NPPF to take a different, growth-focused approach. Consequently, the Government have set out the specific changes they propose to make immediately to the NPPF and intend to publish NPPF revisions before the end of the year, so that policy changes can take effect as soon as possible.

A.124 As part of these changes, the Government are proposing revised standard method that aligns with aspirations for the housing market. Under this approach, Braintree will have a local housing need of 1,098 dwellings per annum, compared to the current figure of 813 and the adopted requirement of 716. Gladman recommend that the Council begin planning for this figure as a minimum immediately. This will ensure that the spatial strategy reflects the aspirations of national planning policy and the ability to maintain a five year housing land supply throughout the reviewed plan period is established.

A.125 The proposed reforms to national planning policy are clear that:

"Local planning authorities will be expected to make all efforts to allocate land in line with their housing need as per the standard method. Authorities would be able to justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery, such as existing National Park, protected habitats and flood risk areas, but would (as now) have to evidence and justify their approach through local plan consultation and examination. All local planning authorities will need to demonstrate they have taken all possible steps, including optimising density, sharing need with

neighbouring authorities, and reviewing Green Belt boundaries, before a lower housing requirement will be considered".

A.126 Fundamentally, the new Standard Method should provide the starting point for identifying the most appropriate spatial strategy for Braintree, and further consideration beyond baseline needs will need to be considered in order to respond to economic circumstances, affordable housing and other considerations.

SA team response

The SA has tested a number of options for the spatial strategy for the plan area. These are based on the local housing need for the plan area.

Consultee comment

A.127 The consultee considers the baseline as outlined in the Scoping Report to be suitable.

A.128 The consultant agrees with the identification of the key sustainability issues being based on previous SA's and reviewed and updated as necessary. The consultee agrees that the aging population, need for affordable housing and over-reliance on the private car are significant issues, and urges the Council to consider how delivering the right homes in the right places can alleviate such pressures. The delivery of new homes in sustainable settlements allow older people and young families to access homes, whether downsizing or upsizing, while ensuring that their daily needs can be met by foot or by cycle.

SA team response

Comments noted.

Consultee comment

A.129 The consultee considers the objectives as outlined are suitable but would encourage the Council to be consistent in the application of scoring. While it is recognised that the scoring is the result of a series of judgements, where evidence is submitted to demonstrate a mitigation strategy to any

potential harm, this should be duly accounted for in the assessment. Equally, the 'policy-off' approach should be applied consistently across all sites to ensure the scoring is robust.

SA team response

All sites are appraised 'policy-off'. Furthermore, given that mitigation strategies will not be available for all site options, this information is not reflected in the appraisal of site options. This approach is taken to ensure a consistent approach to the SA.

Consultee: Donna Walton, Braintree District Council

A.130 The consultee states that in relation to surface water flood risk in Braintree District, it may be more appropriate to refer to the number of properties at risk of flooding rather than the number of people.

SA team response

The baseline evidence relating to surface water flood risk in the SA has drawn on from information from the Braintree and Witham Surface Water Management Plan. Where further information is made available in this topic area this is reflected in the baseline evidence (**Appendix C**).

A.131 The consultee states that whilst summers may well be hotter and drier, there is also evidence of stormy wet weather extending into the early summer season which has not happened historically.

SA team response

The baseline evidence in the SA (**Appendix C**) reports the likelihood of more severe weather events across the calendar year.

A.132 The consultee states that reference could be made to the opportunity to future proof by upscaling blue/green infrastructure in new developments in order to help mitigate against future extreme weather events.

SA team response

The key sustainability issue relating to climate change (**Chapter 3**) includes reference to the delivery of green infrastructure as part of the approach to mitigating and adapting to the effects of climate change and associated weather events.

Consultee: Mr. Michael Hand, CPRE Essex

A.133 The consultee states that the relationship between the Development Plan, Local Plan and Neighbourhood Plans is not made clear in the scoping report and should be better explained.

A.134 Refers is made to Chapter 2 (para 2.5) of the scoping report, the relationship with other relevant plans and programmes, which mentions that the Braintree Local Plan comprises "made" Neighbourhood Plans within the district and is supported by other documents (such as, the Local Development Scheme and Supplementary Planning Documents etc). Planning Guidance states that "a neighbourhood plan forms part of the development plan and sits alongside the local plan" and "a neighbourhood plan attains the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum."

A.135 Figure 2.1 of the scoping report illustrating the relationship of the Local Plan with other relevant plans includes a reference to the Development Plan which tends to indicate that it consists solely of the Local Plan (strategic and non-strategic policies) and Neighbourhood Plans (non-strategic policies). The consultee considers that the distinction between the Local Plan and Development Plan requires greater clarification, especially with regard to Neighbourhood Plans.

SA team response

The relationship of the Local Plan with other relevant plans and programmes has been updated to more clearly set out what the development plan comprises.

Consultee: Richard Walker, Lightwood Strategic

A.136 The consultee notes that LUC was previously commissioned by the Council to prepare the Sustainability Appraisal of the adopted Local Plan (2019). This is highlighted on account of the submitted SA (Essex CC) being heavily criticised by the examining inspector. The SA of the new Local Plan should recall previous methodologies during the examination phase of the adopted plan. The consultee notes that the SA Scoping report sets the sustainability objectives, and framework for assessing sites against those objectives, using GIS. As previously, given that standalone sites will need to be assessed both of themselves as part of spatial strategies, the SA Scoping methodology (on its own) will generate a very basic picture of sustainability. For example, observing that a new settlement location isn't well connected to school or playing pitches is fairly, meaningless, when the proposals would deliver those facilities, subject to evidence of viability confirming this. The Additional SA work of the adopted plan assessed stand-alone sites on the basis of GIS, but also in more detail, including and as part of a spatial strategy. At present, the SA Scoping Report does not hint at the need for, or how it will undertake deeper analysis and evaluation. The papers to the 15 August Local Plan Sub-Committee note that several stand-alone proposals were submitted at call for sites stage. The papers advise at para 3.28 that the assessment of whether any could feature in the new Local Plan will be a long and complicated process, requiring specialist advice. The consultee agrees. For transparency, as plan preparation progresses, it is advisable for the Council to set out its further SA methodologies, and before generating key outputs. There would be merit in the SA Scoping Report identifying that the full approach to assessment that took place in 2019 that a broadly similar process will be needed again.

SA team response

The site assessment criteria have been used to ensure that all small-scale sites are appraised on an even footing. Where larger strategic sites are promoted (i.e. new settlements, substantial urban extensions, etc.) and there is potential for them to deliver new services and facilities, their appraisal reflects this.

Consultee: Councillor Phil Barlow, Witham Town Council

A.137 The consultee states that the appraisal overall seems to confuse and/or conflate Braintree as a district and as a town in much of the text. By way of example, the presence of five railway stations, bookended by Witham and Braintree, is not acknowledged in some paragraphs and the bus services are very different across rural and urban areas.

SA team response

The baseline evidence in this SA Report (**Appendix C**) has been updated to reflect consultee's comments in relation to the presence of the railway stations in Braintree District and differences in bus service provisions in the rural and urban areas of the district.

Consultation comments received in relation to the SA Report for the Preferred Options (Regulation 18) Local Plan Review (2026)

A.138 The bullet points below set out summaries of the comments received in response to consultation on Preferred Options Local Plan, that relate to the SA Report. The text below each of the bullet points describes how the responses have been dealt with or why no action has been taken.

Natural England

- Natural England broadly accepts the SA findings and conclusions at this stage, but advises that the SA should be updated to reflect the findings and recommendations of the HRA, once the assessment has been revised to address Natural England's advice in relation to Habitats Sites matters, in accordance with Natural England's advice on wider natural environment matters and issues.
  - It is noted that Natural England broadly accepts the SA findings. The HRA findings are reflected in the cumulative effects presented in this iteration of the SA Report in relation to SA objective 7: Biodiversity and geodiversity.

Environment Agency

- Environment Agency notes that in relation to the appraisal of Policy LPR 4: Location of Employment Land, the SA states no new employment allocations are in areas of flood risk. The consultee states that several employment allocations appear to be within flood risk areas. This concern is raised in the context of potential viability issues. The Environment Agency states that this point raises questions about whether SA objective 13 of the SA has been met. It also questions the robustness of the appraisal process without the refined understanding of flood risk that a Level 2 SFRA could provide. The Environment Agency also highlights this issue in relation to the appraisal of Employment Policy Areas (Policy LPR 5), Comprehensive Development areas (Policies LPR 29 to 32), Special Employment Areas (Policy LPR 6), and Business Parks (Policy LPR 7).
  - The SA reflects the most recent National Flood Risk Assessment (NaFRA2) datasets. The appraisal of Policy LPR 4 reflects the distribution of areas of flood risk in the plan area in relation to sites set

out for additional development. The appraisal of Policy LPR 5 reflects the policy approach to resist other types of development and allow for minimal amounts of additional employment development meaning that any additional development within areas of flood risk is likely to minimal. This is also the case for the appraisal of Policy LPR 7. The appraisal of Policies LPR5 and LPR 29 to 32 is based on GIS analysis of the sites allocated by these policies. The appraisal of these sites considers the most recent National Flood Risk Assessment (NaFRA2) datasets.

- The Environment Agency states that the appraisal of Policy LPR 42: Specialist Housing is only focussed on the Mount Hill, Halstead site. The SA has not assessed the flood risk of the site on Kelvedon proposal map (site referenced KELV2214 in the Local Plan). It is stated that the Kelvedon proposal map is at risk of flooding.
  - The policy reference number is updated to Policy LPR 36 in the Submission Local Plan. The policy sets out requirements that proposals for supported and specialist housing should meet. While the policy refers to allocations on the Proposals Map, these site allocations have been appraised separately in the SA Report as part of the consideration of the site specific allocation policies included in the plan. In respect of the KELV2214, although very small areas of fluvial and surface-water flood risk are present at the site, these do not meet the SA criteria, which require at least 25% of a site to be affected before a minor or significant negative effect is recorded. The negligible effect against SA objective 13 is therefore considered appropriate. There are no site specific allocation policies for the non-strategic sites allocated in the Local Plan Review, hence appraisals have been undertaken policy-off.
- The Environment Agency states that Table 5.1 of the SA Report identifies a mixed minor positive and minor negative effect for Policy LPR 84: Flooding Risk and Surface Water Drainage in relation to SA objective 13: Flood risk and also notes that several allocations have a negative effect against the flood risk objective.
  - Table 5.1 of the previous iteration of the SA Report for the Preferred Options Local Plan and this iteration of the SA Report for the Submission Draft Local Plan presents the SA findings of all site options considered for allocation in the Local Plan. The effects for the sites allocated in the Submission Draft Local Plan are presented by the relevant allocation specific policies included in the plan. Further to this, Table 7.1 of this SA Report includes a summary of the SA findings for

all policies (including any allocations) included in the Local Plan. A mixed minor positive and minor negative effect is recorded in relation to SA objective 13 in Chapter 7 of the SA Report when considering all allocations included in the Local Plan and the policies set out to mitigate adverse effects. This includes Policy LPR 84 (Policy LPR 77 in the most recent version of the plan) which is included in the Local Plan to manage flood risk and therefore receives a significant positive effect in relation to SA objective 13.

Honourable John Frederick Strutt, Thomas Dixon Developments Ltd & Argon 18 Investments Ltd (HATF219)

- The consultee states that the SA supports the allocation of Land North of the A12, Hatfield Peverel is reasonable and justified when tested against alternatives. This site is being promoted by the consultee. It is stated that the site delivers significant sustainability benefits, particularly in relation to housing delivery, accessibility, transport and community infrastructure. Any potential adverse effects identified are typical of strategic greenfield growth locations and are capable of being appropriately managed through the Local Plan framework and subsequent masterplanning.
  - The comment is noted. The site is allocated through Policy LPR 28: SGL - Land North of the A12, Hatfield Peverel. The SA findings form only part of the evidence the Council has considered as part of its decision making for the selection of sites for allocation in the Local Plan.

Croudace Homes (SILV2278)

- The consultee states that the SA site assessment criteria are too narrow and flawed that understate the sustainability of site Land North of Temple Lane, Silver End's. They have referred to issues beyond those addressed by the site assessment criteria in relation to SA objectives 4: Services and facilities, 5: Economic growth, 6: Access to education, 7: Biodiversity and geodiversity, 8: Transport and travel, 9: Cultural heritage, 12: Water resources, 14: Air quality, 15: Landscape and townscape and 17: Soil. For some of these objectives they have referred to provisions/mitigation that could be provided as part of development that might result in improved sustainability effects being recorded.
  - The appraisal of all site options has been undertaken in line with the site assessment criteria set out in Appendix D. This is a proven

approach undertaken for numerous SAs and allows for the appraisal of the large number of site options considered as part of plan making in a consistent manner. The approach is considered proportionate to the strategic scale required for the SA. The additional information supplied by the consultee about the specifics of the site and provisions/mitigation that might be achieved as part of development is not available for all site options. To consider this would introduce inconsistency to the appraisal process.

Individual (BRAD2049)

- The consultee generally supports the SA process and accepts that Option 1 is broadly justified. However, they consider that the explanation for selecting the preferred spatial strategy is insufficiently set out within the SA and should be expanded.
  - The reasons for selecting the preferred spatial strategy are set out in the final paragraphs of Chapter 4. Chapter 5 provides the Council's approach for selecting sites for allocation in the Local Plan.
- The consultee is promoting the Monks Wood site. They state that this site should also be allocated and that the SA of non-preferred sites is very limited, with the focus being on the spatial strategies of which they are part. Site specific assessment is limited to a very high-level GIS based assessment of constraints and distances from existing facilities, presented as ticks, crosses and symbols. Compares the site to Kings Dene stating that the promoted site could also deliver a high number of homes and services and facilities in a similar way to Kings Dene.
  - The assessment of spatial strategy options reflects the various elements included in each. Table 4.3 shows the spatial components that are common across the various options considered. The SA findings are summarised in Table 4.4. All site options have been appraised using GIS to understand their environmental constraints and their proximity to services and facilities. This is considered a proportionate approach given that even larger sites are likely to be more sustainable when they are close to existing services and facilities that are mostly found within the higher order centres in the district.

Miller Homes RAYE2235E

- The consultee is promoting the Land at School Road, Rayne site (RAYN2235). They state that it appears that the SA has not been informed

by the site-specific evidence submitted by Miller Homes via the Call for Sites process in May 2024, nor the appeal decision for planning application reference 19/01326/OUT (appeal reference: APP/Z1510/W/20/3247020).

- The level of detail included in the SA is considered proportionate to the strategic nature of the appraisal required and the large number of site options that needed to be considered as part of the plan making process. Furthermore, the level of detail provided by the consultee has not been made available for all site options considered. It is necessary to appraise all options on an equal footing. As such the SA has been undertaken using a consistent methodology applied across all site options. More detail is provided in Chapter 2 of this iteration of the SA Report.

Individual

- The consultee states that more information needs to be gathered to ensure a fairer assessment in relation to all proposed site options considered including Andrewsfield and Pattiswick. The SA should not be limited to looking at their proximity to a railway or main trunk road.
  - All site options considered have been appraised in relation to 17 SA objectives that address a range of topic areas. These extend beyond transport. SA objective 9: Transport and travel considers the proximity of site options to railway stations, bus stops and cycle routes.
- The consultee also highlights a number of additional issues relating to:
  - Considering housing for people living north of the district so that people can continue to live near their families and friends; this also reduces travel.
  - Water supply and sewage needs.
  - Removal the 10% buffer as these targets are government driven and not assessed need.
  - The want of some people to live in a less urban area.
  - These points relate to the development of policy for inclusion in the Local Plan and are outside the scope of the SA.

Individual

- The consultee states that Kings Dene is not a sustainable location. It is states that the rail proximity is misrepresented and that Kelvedon railway station is actually approximately 3 to 4 kilometres from the centre of the site. This distance is mot realistically walkable for daily commuting or routine trips and only marginal for cycling, and only viable for a limited minority.
    - The Kings Dene site (appraised policy-off as sites KELV2208, KELV2212 and KELV2217) has been appraised consistently against SA objective 8 using criteria covering access to rail, bus and cycle routes, rather than rail proximity alone. These are set out in more detail in Appendix D. The policy-off appraisals identify minor positive effects for the site options in question in relation to this SA objective given their close proximity to a railway station and bus stops but not a cycle route. As explained under the heading ‘Difficulties encountered’ in Chapter 2 of this iteration of the SA Report, all distances have been calculated from the nearest site boundary. The site specific policy appraisal (Policy LPR 26: SGL - Kings Dene - North, West and South West of Kelvedon) also considers the policy requirements for the delivery of local facilities, employment and sustainable travel measures. However, it recognises that road improvements could increase traffic and therefore an overall mixed significant positive and minor negative effect has been recorded in relation to SA objectives 8.
- The consultee states that there is no certainty regarding service and infrastructure provision as part of development of the site (including that relating to transport).
    - The set specific policy appraisal included in this iteration of the SA Report considers the requirements included in that policy as it is written. Detailed matters relating to the ability to achieve the requirements of the policy are beyond the scope of the SA.

Individual

- The consultee states that the Kings Dene site appears more sustainable on paper than in reality. The sustainability of the Kings Dene site has been artificially inflated by referring to hypothetical future infrastructure that has not been properly costed or secured. The site will be predominantly car dependent with lagging transport infrastructure due to the cancellation of the A12 and all-ways movement junction at Kelvedon South and Inworth

Road (B1023), creating traffic that will impede movement along the B1024 corridor which forms part of the strategic road network of the A12. The consultee also states that an overemphasis has been placed upon the accessibility and proximity of the Kings Dene site to Kelvedon railway station. They also refer to the RAG Assessment Criteria included in the Essex Highways Sustainable Accessibility and Baseline Appraisal. It is stated that this study showed bias to Kings Dene over Andrewsfield.

- The appraisal of sites allocated in the Local Plan reflect the relevant site specific policy requirements as they are written in the plan. The appraisal in the SA assumes that these requirements will be delivered as part of the planning and development processes for the sites selected. As set out in Appendix D of the SA Report, the SA applies consistent proximity-based criteria for the appraisal of all site options considered for allocation in the plan. As explained under the heading 'Difficulties encountered' in Chapter 2 of the SA Report, the appraisal has been undertake based on straight line distances calculated from the nearest site boundary. For the accessibility to rail services, the SA applies a threshold of 500m to identify a major positive score. The Essex Highways Sustainable Accessibility and Baseline Appraisal is a separate study to the SA.

- The consultee states that there is no overall scoring for all sites that considers important factors such as:
  - Ecology and biodiversity sensitivities.
  - Character and heritage.
  - Landscape sensitivities, including topography (highlighting that not all of the Kings Dene site is covered by the 2025 Landscape Sensitivity Assessment).
  - Soil grading of the land, which is predominantly Grade 2.

  - The SA considers these issues as part of the appraisal of the site in relation to SA objectives 7: Biodiversity and geodiversity, 9: Cultural heritage, 15: Landscapes and townscapes and 17: Soils. The appraisal of Policy LPR 26: SGL - Kings Dene - North, West and South West of Kelvedon (that sets out the allocation of the site in the plan) in relation to SA objective 9: Cultural heritage has been informed by a separate HIA commissioned by the Council for the site. The appraisal of the site in relation to each of these SA objectives notes the potential for at least minor negative effects. In relation to impacts on landscape character the SA also acknowledges that one of the parcels that make up the

larger site is not covered by the Landscape Sensitivity Assessment and an uncertain effect is recorded in relation to SA objective 15.

Kelvedon Parish Council

- The consultee states that the reasons set out in Chapter 4 of the SA Report for the Preferred Options Local Plan in relation to the selection of the preferred spatial strategy is not detailed enough.
  - Chapter 4 of this iteration of the SA Report includes further detail about the Council's reasons for selecting the preferred spatial strategy. Further to this Chapter 5 sets out the Council's reasons for selecting site options that comprise the spatial strategy.
- The consultee states that the SA Report confirms that soils around Kelvedon are Grade 2 agricultural land, and development would be on greenfield land. Reference is also made to the appraisal of spatial strategy Option 1 and its scoring as significant negative in relation to SA objective 17: Soil.
  - It is acknowledged that the SA identifies that the Kings Dene site at Kelvedon performs less favourably than other site options in relation to potential impacts on higher quality agricultural soils. The SA forms only part of the evidence base that the Council has considered as part of its decision making for the selection of sites for allocation in the Local Plan.
- The consultee states that the Kings Dene site has only been partially considered by the Landscape Sensitivity Assessment.
  - The SA acknowledges that one of the parcels that make up the larger site is not covered by the Landscape Sensitivity Assessment and an uncertain effect is recorded in relation to SA objective 15: Landscapes.
- The consultee states that no HIA has been undertaken for the Kings Dene site.
  - The appraisal of Policy LPR 26: SGL - Kings Dene - North, West and South West of Kelvedon (that sets out the allocation of the site in the plan) in relation to SA objectives 9: Cultural heritage has been informed by a separate HIA commissioned by the Council.

Castle Hedingham Parish Council

- The consultee states that the baseline evidence presented in Appendix C of the SA Report refers to “Sible Hedingham or Hedingham" in relation to flood risk and conservation areas and omit specific mention of Castle Hedingham in these sections.
  - Reference to the flood risk close to the settlement of Castle Hedingham is presented in Appendix C of this iteration of the SA Report. This appendix is intended to present an overview of strategic issues across the district as such does not cover all issues for locations in the district. In relation to heritage assets, Figure C.14 sets out the location of conservation areas including the Castle Hedingham Conservation Area.
- The consultee states that the Castle Hedingham Conservation Area appears to have never had a conservation area appraisal and management plan.
  - The preparation of a Conservation Area Appraisal and Management Plan is matter separate to the preparation of the SA.

Mount Bures Parish Council

- The consultee states that Chapter 5 of the SA Report for the Preferred Options Local Plan contains a summary of the assessment of two site options in the area around Bures: BURE2070 and BURE2071. The consultee disagrees with the allocation of site BURE2070 and the following points are set out by the consultee in relation to the SA findings for the site options:
  - SA objective 1: Safe and cohesive communities - Site BURE2070 is located in a remote location, with no footways, street lighting or safe access, particularly for children, the elderly, or those with disabilities. A negative impact should be recorded.
  - SA objectives 4: Services and facilities - Site BURE2070 is remote from services and facilities and a significant negative is therefore appropriate. Site BURE2071 is located adjoining Bures Hamlet village with good access to facilities and the railway station where an increase in score could be considered.
  - SA objective 8: Transport and travel. Site BURE2070 is remote from services and facilities with no easy sustainable transport options and a significant negative is therefore appropriate.

- SA objective 12: Water resources and quality. There is no justification for a higher positive score for BURE2070 when compared to BURE2071. Site BURE2070 is not in an area of mains drainage. The effect for BURE2070 should be amended to a significant negative.
- SA objective 14: Air quality. There is no justification for a more positive effect for BURE2070 when compared to BURE2071. Development at site BURE2070 would also have a negative impact on air quality, if not more so than BURE2071 given the location at BURE2070 is highly car dependent and unsustainable.
- SA objectives 15: Landscape and townscapes: Site BURE2070 is in a highly sensitive landscape, as demonstrated by the Inspector's findings in appeal APP/Z1510/W/18/3207509 which stated that "the landscape around Bures, including the appeal site, is not ordinary countryside of no value but is of high sensitivity and is locally valued." The site is also in a very prominent location at the top of the valley slopes towards the River Stour and Cambridge Brook and development would result in a very high degree of landscape harm. The effect for BURE2070 should be amended to a significant negative.

■ The selection of sites for allocation in the Local Plan considers the evidence base prepared for the plan which extends beyond the SA Report to include other relevant documents. The Council's approach to the selection of sites for allocation in the Local Plan is set out in Chapter 5 of this report. All site options included in Chapter 5 of the SA Report have been appraised consistently in line with the site assessment criteria included in Appendix D. Much of the information that the consultee has referred to does not align with the criteria. The specific points highlighted by the consultee are addressed as follows:

- SA objective 1 considers sites in relation to potential impacts on deprivation. Sites have been appraised using spatial criteria relating to the 2025 IMD. Neither site falls within an area of higher deprivation and therefore a negligible effect has been recorded.
- SA objective 4 considers sites in relation to potential for residents at these locations to access services and facilities within the town, district and local centres in Braintree District. Given that neither site is close to a centre a significant negative effect has been recorded.
- SA objective 8 considers the potential for residents to make use of sustainable transport from the sites considered. BURE2071 scores

more positively (a significant positive effect is recorded) than BURE2070 given the better access to rail from this location. BURE2070 is close to a bus stop and cycle route and therefore a minor positive effect is applicable.

- SA objective 12 considers the potential for development at sites to contribute to poor water quality. This has been considered through the location of sites within Source Protection Zones and proximity to watercourses which may result in the drainage of run off into these features. Neither site lies within an Source Protection Zone however BURE2070 lies close to a water course and BURE2071 contains part of a water course. As such a significant negative and minor negative effect has been recorded for BURE2070 and BURE2071, respectively.
- SA objective 14 considers the potential for air pollution (i.e. poor air quality issues associated with AQMAs and areas of higher concentration of NO_2, PM_{10} and $PM_{2.5}$) to affect site users. In relation to SA objective 14 BURE2070 received a negligible effect given that it does not lie within an area affected by higher air pollution. BURE2071 lies within an area with $PM_{2.5}$ concentrations of 5-10 ug and therefore a minor negative effect was recorded.
- SA objective 15 considers the findings of the Braintree District Settlement Fringe Study: Landscape Sensitivity Assessment 2025 and the Braintree Settlement Fringes Study 2015. Neither site is covered by either of the studies and therefore an uncertain effect is applicable in relation to SA objective 15. The level of detail the consultee has described for BURE2070 is not available for all site options and therefore is not appropriate to consider for the SA.

Messing Cum Inworth Parish Council

- The consultee is objecting to the Kings Dene site and highlights section of the SA in support of their objection. It is stated that SA acknowledges the lack of nearby secondary schools to the site. Only developer contributions are proposed for primary and secondary schools. The consultee states that sites for schools and health facilities should be allocated within such large proposed developments.
  - The SA has considered the proximity of the site to existing education facilities as part of the appraisal relating to SA objective 6. Updates to the policy prepared in the Regulation 19 version Local Plan have been appraised in this iteration of the SA Report. The findings of the SA

Report have been considered alongside other parts of the evidence base prepared as part of plan making as the Council has developed the Local Plan.

- The consultee states that the SA states "The allocation is close to or contains biodiversity and heritage assets, such as an area of ancient woodland and Kelvedon Conservation Area and several listed buildings and it is likely to prove difficult to fully mitigate the effects in relation to these assets". The consultee also highlights that the site is a large allocation that will cause significant harm to the natural and historic features of the village and surrounding countryside, added to which it does not have the infrastructure to sustainability support it.
  - The SA considers these issues as part of the appraisal relating to SA objectives 7: Biodiversity and geodiversity, 9: Cultural heritage and 15; Landscape and townscape. Negative effects have been identified for the sites policy-off (i.e. the 'red light' boundary appraisal) and the appraisal notes the potential to achieve mitigation when considering the requirements set out as part of site allocation policy
- The consultee states that the cumulative effects are incomplete in the SA Report.
  - Chapter 7 sets out the cumulative effects of the Local Plan by each of the SA objectives. This chapter also sets out the potential for cumulative effects in combination with development included in Local Plans for the surrounding areas.
- In relation to SA objective 1: Create safe environments the consultee states that the SA state that Kelvedon does not have a wide range of services and facilities and that as such some overburdening of existing facilities could result is an understatement of the effect by providing a large number of new homes at this location.
  - The SA has considered the potential for overburdening of services and facilities at Kelvedon in the context of the appraisal of all other site allocations included in the plan. Considering the mitigation set out in the policies in the plan and the distribution of growth in the plan area, a cumulative minor positive effect is considered approach for SA objective 1.
- In relation to SA objective 3: Health and wellbeing the consultee highlights the SA findings that some of the site allocations could result in some residents being adversely affected by noise pollution and states that this is a reason by the plan should not be found sound.

- The SA records a cumulative mixed significant positive and minor negative effect in relation to SA objective 3. The Council's approach to decision making for the allocation of sites in the plan are set out in the final paragraphs of Chapter 5. The SA forms only part of the evidence that has informed the development of the Local Plan.

- The consultee refers to the cumulative effects identified in relation to SA objective 4: Services and facilities highlighting that the text states that the main settlements of the district are Braintree town, Witham, Halstead and Kelvedon where SGLs will be delivered. They contrast this text with the text of plan that does not identify Kelvedon as a main settlement.
  - The cumulative effects set out that much of the development in the plan area is directed to the main settlements or the key service village of Kelvedon with Feering.
- In relation to the cumulative effects identified in relation to SA objective 9: Cultural heritage the consultee sets out that the SA does not acknowledge that Kelvedon and Feering have a high density of historic and listed buildings.
  - The cumulative effects note the potential for adverse effects on heritage assets in Kelvedon.
- The consultee refers to the cumulative effects relating to SA objective 10: Climate change mitigation and states that Kelvedon has in correctly been referred to as an urban area.
  - The cumulative effects for SA objective 10 note the status of Kelvedon as a key service village.

Redding Park Limited

- The consultee states that the SA does not acknowledge the infrastructure constraints that exist in relation to some of the proposed allocations.
  - The cumulative effects included in Chapter 7 of the SA Report reflect the findings of the IDP which sets out the infrastructure that is required to be delivered to support the development included in the Local Plan.

Orchestra Land Ltd

- The consultee is promoting site GOSF2158. States that whilst Gosfield is currently designated as a 'Third Tier' settlement, its provision of and access to services and facilities allows for growth to be supported, and the

argument to be made for it to be upgraded within the settlement hierarchy. The site has been considered to be in poor proximity to services and facilities, despite Gosfield containing primary schools, local businesses amenity spaces and restaurants; the Main Settlement of Halstead is also in close proximity. The site was also considered to be poorly connected to the local transport infrastructure. It is evident however that future proposals could be sustainably linked to public transport nodes on The Street to the east, each of which provide sustainable access to two of the district's Main Settlements. This is emphasised by the presence of two Public Rights of Way that intersect the Sites, allowing lateral movement into the village to be achieved. The site should be reconsidered to reflect the opportunities that the consultee believes the site presents to the Council and the local community.

- All site options (including GOSF2158) were appraised in line with the criteria set out in Appendix D. The appraisal of reasonable alternative site options was undertaken on a policy-off basis and therefore does not assume future infrastructure provision or mitigation measures that might arise if a site were allocated. Such assumptions cannot be applied selectively to individual sites without compromising the consistency of the appraisal of site options presented in Chapter 5. The proximity to schools has been considered as part of the appraisal of GOSF2158 in relation to SA objective 8: Access to education and while the site is close to a primary school it is not close to a secondary school and therefore a negligible effect is applicable. The potential access for access to services and facilities more widely has been considered in relation to SA objective 4: Services and facilities which considered the proximity of sites to the town, district and local centres in the district given that these are locations where services and facilities are concentrated. A significant negative effect was recorded for the site given that it is not close to any centres in the plan area. SA objective 7: Transport and travel considers the proximity of the site to sustainable transport nodes including railway stations, bus stops and cycle routes. A minor negative effect has been recorded given that the site is close to bus stops within Gosfield but is not close any railway stations or cycle routes.

AL52 and Essex Hunt

- The consultee states that the SA Report for the Preferred Options recognises the benefits of directing growth to locations with good access to services, facilities and public transport. Development within or adjoining

Key Service Villages typically performs strongly against social and economic sustainability objectives when compared with more dispersed alternatives. In this regard, Colne Stoves and Essex Hunt perform well against the SA objectives, offering excellent accessibility, opportunities for walking, cycling and public transport use, efficient use of previously developed and well related land, and the ability to deliver high quality green infrastructure and biodiversity enhancements. Explicitly testing and recognising such sites alongside the preferred spatial strategy would strengthen the evidential basis of the plan and demonstrate that reasonable and deliverable alternatives have been properly considered.

- It is assumed that the consultee is referring to sites EARL2119: Land West of the Kennells, East Essex Hunt, Earls Colne and EARL2121: Land at Colne Stoves, Halstead Road, Earls Colne. Both of these sites are appraised in this iteration of the SA Report. The appraisal of all reasonable alternative site options is presented in Chapter 4 so that their effects can be considered alongside each other.

Orchestra Land and Waterers Farm Ltd

- The consultee is promoting site HATR2203. The consultee states that the site has been allocated within the emerging Local Plan for 70 dwellings and is supportive of this approach and the appraisal of the site in the SA Report. However, the consultee states that the site is highly sustainable with regard to SA objective 8: Transport and travel given that the site could be made accessible via the allocation to the south, and would be highly accessible from the A131.
  - All site options have been appraised in line with the site assessment criteria set out in Appendix D. The policy-off appraisal in relation to SA objective 8 considers the straight line distance of the site to existing railway stations, bus stops and cycle routes. A minor negative effect is applicable in relation to this SA objective given that the site lies close to a bus stop but not a railway station or a cycle route.

Crest Nicholson

- The consultee states that the SA broadly follows the regulatory requirements and follows an established methodology which is clearly set out in the document. A series of options have been tested within the SA but it is difficult to understand the sites and level of growth considered in each of these and in particular how they relate to Gosfield. Option 8 looks

at rural distribution and appears to include employment and residential uses in Gosfield but the site areas are limited. Based on this it is unclear as to how the Council have considered growth opportunities in locations such as Gosfield and what implications this process has had on the settlement hierarchy and the strategy outlined in the Preferred Options document.

- As highlighted by the consultee the SA Report includes the appraisal of nine distinct spatial strategy options in Chapter 4. Mapping is set out in this chapter to illustrate the distribution of growth that would be achieved through each option. Each of these options includes at least some growth at Gosfield.

- Table 5.1 of the Sustainability Appraisal provides a summary of the sites submitted to the Council when considered against the SA objectives devised. GOSF2155B has been considered and performs similarly to other sites put forward in Gosfield and other rural communities. It does however perform well when considered against SA objective 2: Access to Housing and this should have been taken into account further when balanced against the Government objective of significantly boosting housing supply across the country. However, this has not been the case as the Local Plan Strategy seeks to direct development away from sustainable rural communities and has chosen to limit growth in such locations. The Council have therefore failed to follow the findings of the SA and chosen to continue with a strategy similar to that seen in the adopted plan.

  - The SA has tested a range of site options at Gosfield – GOSF2155B, GOSF2157, GOSF2158, GOSF2159, GOSF2162, GOSF2163, GOSF2164 and GOSF2415. It is noted that site GOSF2155B received a significant positive effect in relation to SA objective 2. This reflects its larger size and capacity to accommodate a larger number of homes. The findings in relation to SA objective 1 have been considered by the Council alongside those for the other SA objectives presented in the SA Report. The Council has also considered other evidence prepared in support of the plan as part of its decision making for the selection of sites for allocation. Chapter 5 presents information about the Council's approach to decision making for the selection of sites for allocation in the plan.

Acorn (Braintree Phase 2) Ltd

- The consultee states that the conclusion of Chapter 4 in the SA Report for the Preferred Options Local Plan (SA findings for the spatial strategy options) has not been completed.
  - The Council's reasons for selection the preferred spatial strategy option are set out in the final paragraphs of Chapter 4 of this SA Report. Additional text is included to set out a more complete overview of how the preferred spatial strategy has been arrived at.
- The consultee states that Option 1 for the spatial strategy in the SA Report appears to reflect the proposed spatial strategy within the Regulation 18 Local Plan. The focus of growth in the main towns is supported by the consultee, noting their sustainability. The SA framework, sets out 17 SA objectives and the appraisal questions considered when appraising the likely significant effects of the Local Plan. The consultee states that it is important that smaller sites are also allocated in the main towns to ensure new homes can be delivered in the early part of the plan period. The benefits of small sites in main towns are outlined of the SA. This element of the assessment is supported.
  - Comment noted – the SA Report has appraised nine spatial strategy options. The SA Report sets out that Option 1 has been taken forward as the preferred option as well as the reasons for selecting this option.

The consultee states that Chapter 5 of the SA Report provides the assessment of sites considered for allocation. They contest a number of SA findings:

- They state that the SA explains that a limited number of sites that were appraised to have a positive effect in relation to SA objective 1 on the basis that they are not located in the areas of lowest deprivation. It is argued that this does not correlate with the appraisal questions which relate to wider issues such as access, improvement and supply of community facilities and measures to increase safety and security within new development and the public realm.
- They state that delivery of any amount of housing should be afforded significant positive effects in relation to SA objective 2. The appraisal is said to undermine the importance that small and medium scale residential developments have in the delivery of housing.

- They state that in relation to SA objective 4, that it is not clear how LUC has measured distance to a town centre. It is also stated that the distances used to appraise the objective are restrictive.
- They request clarity about how the distances have been measured for SA objective 6. It is stated that the allocation of all sites being promoted by the consultee would allow for the delivery of a new school on site. As such, this would provide a significant positive effect.
- They state that all development must deliver a net gain in biodiversity, as a consequence all sites should have some positive effects on SA objective 7.
- They state that the appraisal of SA objective 8, appears to have overlooked the important role of the Flitch Way in supporting and promoting active travel within the District. As a strategic, traffic-free corridor connecting a number of settlements, the Flitch Way provides a well-used and highly accessible route for walking, cycling and other non-motorised journeys.
- They state that the appraisal of SA Objective 12, notes significant negative effects on the basis that the River Brain and its tributaries fall within sites which is within a source protection zone.
- They state that one of the sites is assessed to have significant negative effects against SA Objective 13 regarding flood risk. It is noted that a portion of the site falls within Flood Zone 3. The consultee states that no development is proposed in this area. C
- They state that in relation to SA objective 15, the SA considers the effects to be uncertain on the basis of Braintree District Settlement Fringe Studies. However, it does not consider the potential to improve and enhance the existing landscape and townscape.

■ The site options have been appraised consistently making use of the site assessment criteria set out in Appendix D of the SA Report. The individual issues raised by the consultee are addressed below.

- SA objective 1: Safe and cohesive communities - The site appraisal uses deprivation as a consistent locational criterion. Wider effects relating to community facilities, safety and design are considered through the appraisal of allocation policies where relevant.
- SA objective 2: Housing - The 100-home threshold distinguishes sites making a significant contribution to housing delivery. Smaller

residential sites receive a minor positive effect, and the criteria have been applied consistently.

- SA objective 4: Services and facilities - Distances for all SA objectives were measured on a straight-line basis and applied consistently. The general benefit of additional residents supporting services would apply to all residential sites and would not differentiate between alternative site options.
- SA objective 6: Access to education - Distances for all SA objectives were measured on a straight-line basis and applied consistently. The appraisal considers proximity to existing schools. A potential new school is not assumed at the site options stage.
- SA objective 7: Biodiversity and geodiversity - Biodiversity net gain requirements apply to all development and therefore do not differentiate between site options. The appraisal instead considers effects on existing designated biodiversity. A distance based assessment allows for a high level consideration of potential for habitat loss, fragmentation or disturbance.
- SA objective 8: Transport and travel - The appraisal considers proximity to cycle routes in addition to railway stations and bus stops. Individual footpaths (such as Flitch Way) do not form part of the assessment.
- SA objective 12: Water quality - The scores reflect the presence of watercourses and Source Protection Zones. Development within sites close to watercourses could result in the run off of pollution and development within Source Protection Zones could result in increased potential for contamination of groundwater resources. Future mitigation measures are not assumed in the consistent, policy-off appraisal of site options.
- SA objective 13: Flood risk - The site appraisal applies consistent thresholds based on the proportion of the whole site (at least 25%) within areas of flood risk.
- SA objective 15: Landscape - The scores reflect the landscape sensitivity evidence available. Potential enhancements through detailed design are uncertain and cannot be assumed consistently across all site options.

Parker Strategic Town Planning Ltd

- The consultee states Option 1 for the spatial strategy is the most sustainable and that the SA needs to be clearer on the reasons for the spatial strategy chosen in the Local Plan.
    - The methodology for the appraisal of and reasons for selecting the preferred option for the spatial strategy are set out in Chapters 2 and 4. Chapter 5 sets out the Council's approach to selecting the site allocations that comprise the spatial strategy.
- The consultee is promoting the Kings Dene site and states that it is more sustainable than the SA recognises. The appraisal of the site separately for residential and employment uses and not for mixed use is not supported. It is stated that in relation to the SA scoring of the site, the consultee has access to additional data that they are pleased to share with the Council which demonstrates the sustainability performance of the site.
    - The SA Report appraises all mixed use site options for residential and employment uses to identify likely sustainability effects of developing these sites for a range of uses. To ensure a consistent approach all sites have been appraised making use of the site assessment criteria included in Appendix D. While additional information may be available to inform the appraisal of the site, it is not considered appropriate to make use of this given that this level of detail will not be available for all site options. A review of the appraisal of these sites alongside each other for both use types provides an overview of the likely benefits and disbenefits that might result from their development for mixed use. This appraisal work has been used as basis for the appraisal of the policy that allocates the Kings Dene site which also considers the mitigation and enhancement required by the policy.
- The consultee sets out an overview of their views on the various options appraised for the spatial strategy. These views are set out as follows:
    - The consultee supports Option 1 and specifically the intention to locate the majority of development around the main towns of Halstead and Braintree and allocate a new settlement at Kelvedon which is a key service village with excellent public transport links. One significant spatial advantage of this Option is that it also focuses development on the southern part of the district which has key strategic transport infrastructure such as the mainline rail network and the A12 which connects key settlements such as Braintree, Colchester, Chelmsford and London.

- For Option 2, the consultee notes that this option proposes large urban extensions to Harverhill and Coggeshall of which the latter does not have a train station and so risks increasing private car use and unsustainable travel patterns.
- The consultee considers there to be significant sustainability challenges with Option 3 which proposes to locate major new settlements at Pattiswick and Andrewsfield however neither of these locations are close to a train station and therefore will only exasperate issues of private care use and out-commuting.
- The consultee notes inherent challenges with Option 4 (excluding large sites) on the basis that the key sustainability issues can best be addressed through the allocation of larger sites that can provide a large degree of self-containment via access to key services and facilities. The consultee considers that any application of Option 4 would result in an unsustainable distribution pattern.
- The consultee highlights positive and negative sustainability benefits from Option 5 (large sites only) in that they support the principal of allocating large sites above 500 units. Given that one of the key challenges of the district is the lack of social infrastructure such as health care, the allocation of large sites provides an opportunity for new services and facilities. Option 5 however proposes a large allocation in the service village of Earls Colne which does not have a train station and so would exasperate the issues of unsustainable commuting.
- The consultee can also see sustainability benefits arising from Option 6 (sites with sustainable transport) as this would provide residents with options other than the private car to travel in and around the district.
- The consultee considers that Option 8 (rural distribution) would result in significant negative sustainability benefits given that the development would be located in areas with generally poor access to services and facilities and sustainable modes of transportation.

  - The consultee's comments relating to the options for spatial strategy are noted. The points highlighted are not misaligned with the appraisal of the options presented in Chapter 4.

- The consultee states that the appraisal of the spatial strategy options should note that the range of services of facilities provided at larger sites is likely to be proportionate to their size (i.e. that sites of Kings Dene size will

be able to support services and facilities of a greater range and significance). They also state that the larger sites should be assumed to provide enhanced sustainable transport modes such as greater walking and cycling connectivity, bus routes and services and access to a train station if possible. Furthermore, large urban extensions provide extensive green and blue infrastructure which can provide high-quality play and recreational opportunities for on-site residents and those of neighbouring communities. Such facilities provide a wealth of benefits such as climate resilience, health and wellbeing and community cohesion. Larger scale schemes are also able to provide employment land within their boundary which provides residents with local job opportunities. This co-location can provide sustainability benefits in the form of reducing private car use and outcommuting.

- The appraisal of the spatial strategy options set out in Chapter 4 reflect the potential to provide services and facilities of a greater range and significance at new settlements given that these are likely to be larger sites than urban extensions in most instances.

- With respect to the sustainability disbenefits identified by the SA, the consultee makes the following comments:

  - They disagree that large urban extensions will cause potential capacity issues for existing services and facilities. Housing and the provision of services can be developed in phasing to ensure residents have access to services on site.

  - The challenge associated with disruption of community networks placemaking and community cohesion can be easily mitigated through the planning process (design reviews, masterplanning workshops etc. etc.) and the selection of responsible developers with a track record of delivering high-quality new settlements with placemaking at its heart.

  - Acknowledges that new settlements and other large schemes may require larger areas of greenfield land however it is often the case that this land is unproductive and with great placemaking is converted into high quality open space and green infrastructure which is of greater use to residents.

  - The consultee’s comments regarding the potential disbenefits of the delivery of strategic sites are noted. While the potential for mitigating adverse effects is noted, it is considered appropriate to identify the potential for these disbenefits.

Bellway Strategic Land

- The consultee supports the appraisal of Option 1 within the SA and the benefits in particular identified as part of the delivery of Land South and North East of Halstead and its ultimate identification for draft allocation under Policy LPR 24. It is considered that the SA has taken a justified approach to support identifying the appropriate spatial strategy and allocations in line with NPPF paragraph 36.
  - Comment noted.

Catesby Estates

- The consultee states that the spatial strategy should focus on a more balanced distribution of strategic-scale growth across the district which more accurately reflects the findings of the SA, reflecting the opportunities for sustainable strategic growth present in the North of the plan area (including cross boundary growth opportunities with West Suffolk).
  - The decision making relating to the selection of the spatial strategy for inclusion in the Local Plan has been undertaken by the Council. It is informed by the findings of the SA but also the other evidence base documents prepared as part of the plan making process.
- The consultee considers that while the SA finds that there is very little difference between Options 1 and Option 2 and therefore asserts the allocation of a new settlement, urban extension at Haverhill Vales or Halstead would have little difference in terms of sustainability outcomes.
  - Option 2 has tested a cross-boundary urban extension at Haverhill.
- They state that the site assessment underpinning the SA is flawed in its consideration of scoring outcomes for each strategic site. Also asserts that the process of large site selection was predetermined prior to the consideration of the SA findings, and that the full suite of technical information which would normally be provided through the SHLAA to enable a full and comparative assessment of sites - including land at Haverhill - has not been made available to decision makers in advance of the selection of those sites now included in the Reg 18 Plan. The objectivity and soundness of site selection is therefore called into question.
  - All site options were appraised consistently using the SA assessment criteria included in Appendix D. As highlighted above, the SA has informed, but not determined, site selection. The Council's approach to

decision making for the selection of sites for allocation is set out in Chapter 5.

Hill Residential Ltd and Barwood Development Securities Ltd

- The consultee is promoting site RAYN2241E. States that the SA makes no reference to the assessment criteria or results set out in the Sustainable Accessibility Appraisal or the Highways Impact Appraisal documents on the sustainability potential of the sites and that this has led to an inconsistent approaches to the analysis of the Draft Local Plan allocations.
  - As part of its appraisal of the options for the spatial strategy for the Local Plan, the SA considered the improvements identified to mitigate adverse impacts on the network, balance traffic movements, improve connectivity and support the plan's overarching vision. These schemes where originally identified in the transport evidence prepared to support plan preparation. The appraisal of site options has been informed by evidence that is available for all site options to ensure a consistent approach. In relation to transport the appraisal considers the proximity of sites to sustainable transport nodes. All site options have not been tested through the documents identified by the consultee.
- The consultee states that the SA and site selection process places too much emphasis on access to rail. The focus should instead be on bus accessibility, or rail combined with good bus access.
  - In relation to the SA, the distance thresholds applied for sites in terms of access to railway (SA objective 8: Transport and travel) are longer than those applied to bus stops or cycle routes. This reflects research by the Chartered Institution of Highways and Transportation that demonstrates that people are consistently willing to walk longer distances to reach rail services than they are for buses and other modes of sustainable transport.
- The consultee states that there is no available commentary in the SA on how site allocation options were identified and assessed. It is also stated that there is no evidence on the reasons for selecting or rejecting site options considered for the Local Plan or why the proposed spatial strategy was chosen.
  - Information about how the site allocation options were identified and assessed is provided in Chapter 4. The final paragraphs of Chapter 5 provide details about the Council's approach to the selection of site

options for allocation in the Local Plan and Chapter 4 provides information about the Council's reasons for selecting the preferred spatial strategy.

- The consultee states that as part of the assumptions set out to inform the appraisal of the spatial strategy options, for new settlements the SA asserts that they typically have a sustainability disbenefit due to the relatively long lead in time to plan and deliver development at scale. This assertion is a generic one without reference to the deliverability of any specific new settlement proposals, and in any event is not, in of itself, a sustainability disbenefit provided the strategy correctly identifies the amount of housing delivered within the plan period.
  - It is acknowledged that the assumptions set out to inform the appraisal of the spatial strategy options are generic in nature. They have been included in the SA as a high level starting point for the appraisal and as the consultee notes they do not relate to any specific site considered for the inclusion in the spatial strategy. The appraisal itself introduces more nuance from the starting point provided by the assumptions. The longer lead in times noted reflect the larger number of homes and larger amounts of supporting infrastructure that will typically be delivered at freestanding settlements. It is noted that this may not be a disbenefit when the site is delivered alongside other smaller sites that can deliver homes earlier in the plan period. However, a focus on larger new settlements only, may result in disbenefits in the timing of delivery over the plan period.
- The consultee states that the failure to consider the potential to mitigate adverse effects through appropriate mitigate for all site options means that the sites have not been considered on an equal footing.
  - All site options considered have been appraised without considering mitigation in line with the site assessment criteria set out in Appendix D. This allows all sites to be appraised in a consistent manner and is considered proportionate to the large number of site options that needed to be considered and appraised and to the strategic scale of the SA. It is not considered necessary for the policy requirements relating to mitigation and enhancement for all site options for potential allocation to be developed and tested through the SA.
- The consultee queries the effects recorded for site RAYN2241 in relation to SA objectives 4 Services and facilities, 5 Economic growth, 8: Transport and travel and travel and 17: Soil.

- The site option has been appraised in line with the site boundaries provided to the Council as part of the call for sites. It has been appraised as a housing site and employment site given that mixed use development could incorporate these types of uses. Reviewing the SA of the site for both types of uses allows the reader to consider the sustainability effects of delivering a range of uses at the site. The appraisal of the site has not considered the potential for additional infrastructure provisions or mitigation to be delivered as part of development given that this level of detail is not available for all site options.

  The appraisal of SA objective 4 reflects the proximity of the site to town, district and local centres. The appraisal of the site for employment use in relation to SA objective 5: Economic growth has considered the potential to deliver new employment uses. The appraisal of SA objective 8: Transport and travel considers the proximity of the site to railway stations, bus stops and cycle routes. The appraisal of SA objective 17: Soil considers whether the site contains greenfield land and higher value agricultural soils.

The Unex Group

- The consultee welcomes the findings of the SA with regard to the Former Towerlands Park Site (BOCN 137) which they are promoting. They make reference to individual SA findings for the site in support of its promotion for allocation.
  - The consultee's support for the SA findings for the Former Towerlands Park Site is noted. The SA findings have been considered by the Council alongside all other evidence base documents prepared for plan making as part of their decision making regarding sites for allocation in the Local Plan.

Gladman

- The consultee states that in accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to SA. The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be

clear from the results of the assessment why some policy options have been progressed and others have been rejected. The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives have not been pursued.

  - The SA has been undertaken to accompany each stage of plan making. Chapter 2 sets out the approach to the identification of options considered for the Local Plan and appraised through the SA. Nine reasonable alternative options have been appraised for the spatial strategy in Chapter 4. This chapter also sets out the reasons for selecting the preferred approach to spatial strategy. All site options considered for allocation are appraised in Chapter 5. To ensure a consistent approach to the appraisal, the SA made use of the site assessment criteria included in Appendix D. Where sites have been taken forward by the Council for allocating in the plan, the appraisal of these site options have been revisited and revised in Chapter 6 to reflect any mitigation or enhancement requirements set out in the relevant site allocation policy. Chapter 6 also presents the appraisal of all other policies included in the Regulation 19 version of the Local Plan.

- The consultee states that Table 5.1 shows a scoring for all sites assessed, however, there is no clear reasoning for why certain sites have been discounted for allocation. This is a fundamental requirement of the SA. Appendix E: Reasons for selecting or rejecting options considered for the Local Plan' is labelled in the contents of the SA, however, in the SA and Appendices document this cannot be found.

  - The final paragraphs of Chapter 5 of this iteration of the SA Report set out the Council’s approach to decision making for the allocation of sites in the Local Plan.

- The consultee states that the SA is incomplete as there is no information about the decision-making process in relation to the spatial strategy.

  - Chapter 2 of the SA Report sets out information about how the reasonable alternatives for site allocations and spatial strategy have been identified. Information is also included in the final paragraphs of Chapter 4 about the Council’s decision making in relation to selection of the preferred spatial strategy.

- The consultee considers that the SA has not informed the site selection process.

- The SA has informed, but does not determine site selection, which also considers other evidence base documents prepared as part of the plan making process. Details about the Council's approach to site selection for the Local Plan is set out in the final paragraphs of Chapter 5.

CPRE Essex

- The consultee states that the plan pursues a heavily greenfield approach. It is stated that the strategy should make use of brownfield land where possible. In relation to this, it is stated that it appears that the Brownfield Land Register has not been updated for a number of years.
  - SA objective 17 distinguishes between brownfield and greenfield sites in line with the site assessment criteria set out in Appendix D. Negative effects are recorded for sites that would result in greenfield development. The status of the Brownfield Land Register is separate to the SA process.

Individual

- The consultee objects to the allocation of the Kings Dene site (North, West and South West of Kelvedon). It is stated that the evidence within the SA demonstrates that Kings Dene is not a sustainable or justified location for strategic growth.
  - The SA has been considered as part of the plan making process alongside the other evidence base documents prepared as part of the plan making process. It does not determine the sites selected for allocation. The final paragraphs of Chapter 5 sets out the Council's approach to decision making for the selection of sites for allocation.
- The consultee provides a summary of their grounds for objecting. A summary of these issues is set out below. A response to each issue is provided directly after each of the issues identified.
    - Significant environmental constraints affecting landscape, biodiversity, soil quality and heritage.
  - The SA appraises all site options in relation to potential effects relating to each of these topic areas (SA objectives 7: Biodiversity and geodiversity, 17: Soil and 9: Cultural heritage). The SA records at least minor negative effects for these SA objectives.

- Methodological limitations in the SA that systematically underestimate the harm of large rural sites.

- The SA Report records the limitations of the appraisal undertaken in Chapter 2.
  - Transport and accessibility weaknesses that cannot be mitigated.
- The SA has considered the potential for walking from site options to surrounding features by applying straight line distances. At this stage it is unknown where access to any site option would be achieved. The internal layout of the road network within these sites is also unknown.
  - Conflict with SA objectives, particularly those relating to landscape, climate, soil, biodiversity and sustainable travel.
- These issues have been considered through SA objectives 15: landscape and townscape, 10: Climate change mitigation, 11: Climate change adaptation, 17: Soil, 7: Biodiversity and geodiversity and 8: Transport and travel. The appraisal findings have been considered by the Council alongside other evidence prepared as part of the plan making process.

Individual

- The consultee objects to the allocation of the Kings Dene site in the plan. Sets out that the SA identifies that the land allocated is of higher agricultural value.
  - The SA records a significant negative effect for the loss of greenfield and best and most versatile agricultural land (SA objective 17). The SA forms part of the wider evidence base that has been used by the Council to inform their selection of sites for allocation in the plan. The Council's approach to decision making for the allocation of sites in the plan is set out in the final paragraphs of Chapter 5.

Orchestra Land and Waterers Farm Lt

- The consultee considers that the site's (CRES2114) sustainability performance has been underestimated in the SA. They argue that the site should receive more favourable scores in relation to access to services, facilities and education, given its proximity to both Cressing Tye Green and Braintree, which together provide a broad range of community facilities, employment opportunities and primary and secondary schools.

The consultee also highlights the presence of established pedestrian and transport connections that facilitate sustainable travel within Cressing and to nearby settlements, particularly Braintree. They contend that these factors demonstrate the site's suitability to accommodate growth and should be more positively reflected within the SA. In addition, the consultee notes that the site is not subject to any known ecological or landscape designations that would constrain development.

- Site CRES2114 and all other site options was appraised using the site assessment criteria set out in Appendix D. Future connections cannot be assumed in the policy-off appraisal, so the scores are considered appropriate. The representation's comments regarding proximity to Cressing Tye Green and Braintree are noted. However, the site is not located within proximity to a town centre, district centre or local centre. As such, the significant negative effect identified against SA objective 4: Services and facilities remains justified. In relation to sustainable transport, the site is located near a bus stop but is not within the relevant proximity thresholds to a railway station or strategic cycle route. The minor negative effect identified against SA objective 8: Transport and travel therefore remains appropriate. For education, the site is located near to a primary school but not a secondary school. Accordingly, the minor negative effect identified against SA objective 6: Access to education is considered appropriate. The comments regarding the absence of ecological constraints are supported. The SA identified negligible effects in relation to SA objective 7 given that the site is not near to any designated biodiversity assets. The site was also assessed as having medium-high landscape sensitivity. Consequently, the significant negative effect identified against SA objective 15: Landscape and townscape remains appropriate.

Joint Ventures in Land (JVL) Ltd

- The consultee notes that the site has been identified within the SGL Land South and North-East of Halstead and considers this demonstrates the Council's recognition of its suitability for development. They also note that the SA identifies positive effects in relation to certain objectives, including health and education. However, the consultee considers that the site's overall sustainability performance has been underestimated and requests that a number of the SA scores be reviewed to better reflect the site's accessibility and development potential. In particular, the consultee questions the assessment of the site's access to services and facilities. They argue that the site is located at a similar distance from services and

facilities within Halstead, including local businesses, amenity spaces and restaurants, as it is from educational and healthcare facilities that received more favourable scores within the appraisal. On this basis, they consider that the score against the services and facilities objective should be reviewed to more accurately reflect the site's relationship with Halstead. The consultee also considers that the site benefits from a greater level of sustainable transport accessibility than is reflected in the appraisal. They highlight the presence of pedestrian infrastructure along the A131 and nearby public rights of way which provide access to Halstead and its wider range of bus services. They contend that these connections support active travel and reduce reliance on private vehicles, and therefore warrant a more positive score in relation to transport and accessibility.

- The site comprises numerous parcels that have been appraised policy off as: sites HASA2179, GGHR2142, GGHR 2416, GGHR2141 and COLE2100. The policy-off appraisal is based in the site assessment criteria set out in Appendix D to ensure a consistent approach to this element of the SA. The appraisal scores were subsequently reviewed to take account of the mitigation and enhancement measures proposed through the relevant site allocation policy. However, the policy-off appraisal reflects the sites' baseline characteristics and accessibility. The majority of the sites are located relatively far from town, district and local centres. Consequently, most of the sites were scored as having a negative effect in relation to SA objective 4: Services and facilities. The policy-off appraisal of the sites is notable more favourable in relation to SA objectives 3: Health and wellbeing and 6: Access to education given their location closer to areas of open space and PRoWs as well as school facilities. In respect to SA objective 8: Transport and travel, the sites benefit from nearby access to bus services but are not located within the relevant proximity thresholds of a railway station or strategic cycle route. The negative policy-off scores therefore remain appropriate.

Barratt David Wilson Homes

- The consultee states that paragraph 4.4 of the SA Report for the Preferred Options Local Plan demonstrates that the Council considered nine options for the broad distribution of growth in the plan area. Each of the spatial strategy options reflects a different distribution of potential new site allocations in the new Local Plan. The SA of the spatial strategy options focuses on alternative broad distributions for new allocations, including Option 6: Sites with high sustainable transport accessibility. For this

option, railway stations along the Great Eastern Main Line, the Braintree branch line and the Gainsborough Line (to Sudbury) were considered to have a higher level of sustainable transport accessibility. Some of these locations are also served by high frequency bus routes or function as bus hubs.

  - Comment noted.

- The consultee highlights paragraph 4.42 of the SA Report for the Preferred Options Local Plan, which identifies that Option 6 could facilitate large-scale development, including urban extensions and new settlements, with associated benefits such as healthcare provision, open space and opportunities for active travel. The consultee states that the White Notley Garden Village Site represents a particularly sustainable location, given its relationship with both White Notley and Cressing Tye Green, and its proximity to Braintree.

  - Comment noted. The Council's approach to decision making for the selection of the preferred option for the spatial strategy is set out in final paragraphs of Chapter 4. The SA has been considered by the Council alongside the other evidence base documents prepared as part of plan making.

Individual

- The consultee requests that the SA be revised to undertake GPA3 Steps 2 and 3 for designated heritage assets affected by LPR25 and LPR26 (allocations Land at South East Feering and West of Feering - Kings Dene in the Preferred Options Local Plan) and states that SA scores should not be upgraded solely on the basis of policy wording.

  - The appraisal of sites allocated in the plan comprised two stages. A policy-off appraisal in line with the site assessment criteria set out in Appendix D and a revision of this appraisal to reflect policy requirements set out in the relevant site allocation policy. The appraisal relating to SA objective 9: Cultural heritage has been informed by heritage impact assessment work where the Council has deemed this appropriate. This work was undertaken for the Kings Dene site and is reflected in this iteration of the SA Report.

Appendix B
Review of plans, policies and programmes

International plans and programmes

B.1 The **Declaration on Climate, Relief, Recovery and Peace (COP28 Declaration)** (2023) **[See reference 1]** - international commitment to address the complex challenges posed by climate change, particularly in the most vulnerable regions. Although non-binding and outside the formal UNFCCC negotiations, this declaration unites the concerns and proposed solutions of countries and institutions across humanitarian, development, climate, and peace sectors. It aims to urgently enhance climate resilience in vulnerable communities that are most affected by climate-related conflicts and crises.

B.2 The **2022 Convention on Biological Diversity [See reference 2]** – COP15 Kunming-Montreal adopted the "Kunming-Montreal Global Biodiversity Framework" (GBF), including four goals and 23 targets for achievement by 2030.

B.3 The **Glasgow Climate Pact (UN Framework Convention on Climate Change, 2021)** - Nations adopted the Glasgow Climate Pact **[See reference 3]**. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing $100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

B.4 United Nations **Declaration on Forests and Land Use (COP26 Declaration)** (2021) **[See reference 4]**: international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.5 The **2030 Agenda for Sustainable Development** (2015) **[See reference 5]**, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

B.6 The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) **[See reference 6]** establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.7 The United Nations Declaration on Sustainable Development (**Johannesburg Declaration**) (2002) **[See reference 7]** sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.8 The United Nations **Paris Climate Change Agreement** (2015) **[See reference 8]** is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.9 The **International Convention on Wetlands (Ramsar Convention**) (1976) **[See reference 9]** is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

B.10 The European Convention on the Conservation of European Wildlife and Natural Habitats (**Bern Convention**) (1979) **[See reference 10]** aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.11 The **International Convention on Biological Diversity** (1992) **[See reference 11]** is an international commitment to biodiversity conservation through national strategies and action plans.

B.12 The **European Habitats Directive** (1992) **[See reference 12]**, together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.13 The **European Birds Directive** (2009) **[See reference 13]** requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological,

scientific and cultural requirements, while taking account of economic and recreational requirements.

B.14 The **United Nations Declaration on Forests** (**New York Declaration**) (2014) **[See reference** 14**]** sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.15 The **Valletta Treaty** (1992) **[See reference** 15**]**, formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

B.16 The United Nations **(UNESCO) World Heritage Convention** (1972) **[See reference** 16**]** promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.17 The **European Convention for the Protection of the Architectural Heritage of Europe** (1985) **[See reference** 17**]** defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.18 The **European Landscape Convention** (2002) **[See reference** 18**]** promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National plans and programmes (beyond NPPF) of most relevance to the Local Plan

Climate Change Adaptation and Mitigation

B.19 The Planning and Infrastructure Act (2025) **[See reference** 19**]** sets out the Government's plan to support housing and economic growth. The Act aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the government's Clean Power 2030

target by ensuring that key clean energy projects are built as quickly as possible.

B.20 The **Clean Energy Industries Sector Plan** (2025) **[See reference** 20**]** is the UK government's strategic initiative, under the Modern Industrial Strategy, to position the nation as a global leader in frontier clean energy technologies by 2035. The Plan sets out an ambition to double investment across key clean energy industries, such as wind (onshore, offshore, floating), nuclear fission, fusion, hydrogen, carbon capture, usage and storage (CCUS), greenhouse gas removals, and heat pumps, to over £30 billion per year, while continuing to support other vital technologies like solar, long-duration energy storage and bioenergy. It aims to catalyse private sector engagement by deploying targeted public investment, including more than £8.3 billion through Great British Energy and Great British Energy-Nuclear up to 2029 and a Clean Energy Supply Chain Fund, and by reducing barriers to investment, thereby providing industry certainty and encouraging deployment and innovation.

B.21 The **Hydrogen Update to the Market** (2025) **[See reference** 21**]** provides a detailed overview of the UK's hydrogen sector progress in the first half of 2025 and outlines forthcoming opportunities as part of the government's Clean Energy Superpower and Growth Missions. It reports substantial milestones, including the shortlist of 27 projects advancing to Hydrogen Allocation Round 2 (HAR 2), with HAR 3 and HAR 4 scheduled from 2026 and 2028 respectively; HAR 1 winners have begun construction, unlocking over 700 skilled jobs across industrial regions. Significant investment commitments include over £500 million allocated toward developing the first regional hydrogen transport and storage network, aiming for operation by 2031, supported by a forthcoming Hydrogen to Power Business Model in 2026. The report highlights plans to abolish Climate Change Levy charges on electricity used in hydrogen electrolysis, regulatory and sector development initiatives, including skills and infrastructure planning, and signals the intent to publish a comprehensive UK Hydrogen Strategy in autumn 2025

B.22 The **Onshore Wind Strategy (2025) [See reference** 22**]** presents the country's first dedicated strategy to accelerate onshore wind deployment as a key component of its Clean Power 2030 mission. The strategy sets a target of deploying 27-29 GW of onshore wind capacity across Great Britain by 2030, significantly increasing from existing capacity of over 16 GW, and backed by over 40 actions to tackle barriers such as planning delays, aviation and defence conflicts, grid access, and community engagement. New measures include the creation of an Onshore Wind Council to oversee implementation, potential expansion of the Clean Industry Bonus to support UK-based supply chains,

workforce and skills development initiatives, and a programme to repower ageing turbines while smoothing the consenting and survey process for new projects. The strategy also outlines mechanisms to ensure community benefit through up to £70 million annually (£5,000 per MW) in local investment, while projecting creation of up to 45,000 direct and indirect jobs by 2030. The overarching aim is to deliver affordable, home grown renewable energy, reduce reliance on volatile gas markets, and bolster energy security through rapid onshore wind expansion.

B.23 The **Carbon Budget and Growth Delivery Plan** (2025) **[See reference 23]** sets out how the government will meet its statutory carbon budgets and secure the benefits of this transition for people and businesses. The plan sets out a package of quantified and unquantified proposals and policies and associated timescales and delivery risks. This includes actions around energy security and lower bills, such as incentivising new clean electricity generating projects in Great Britain.

B.24 The **Seventh Carbon Budget** (2025) **[See reference 24]** provides advice to the UK Government on the level of the Carbon Budget for the period 2038 to 2042. A limit on the UK's greenhouse gas emissions over this five-year period is set as 535 MtCO2e, including emissions from international aviation and shipping.

B.25 Met Office, State of the UK Climate (2024) **[See reference 25]** – the tenth in the annual series of reports that provide a summary of the UK weather and climate through the calendar year 2023, alongside the historical context for a number of essential climate variables. It provides an accessible, authoritative and up-to-date assessment of UK climate trends, variations and extremes based on the most up to date observational datasets of climate quality.

B.26 HM Government Clean Power 2030 Action Plan (2024) **[See reference 26]** – the action plan sets out a pathway to a clean power system, what government will do to support and accelerate delivery of the new infrastructure needed.

B.27 The **Carbon Budget Delivery Plan** (2023) **[See reference 27]** explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets
- the contribution of these proposals and policies to sustainable development

- the impact the package has on sectors of the economy

B.28 Powering up Britain (2023) **[See reference** 28**]** sets out the department's approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan.

B.29 The **Environmental Improvement Plan** (2025) **[See reference** 29**]** is a long-term delivery plan setting out ten goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving "restored nature", including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

B.30 The National Adaptation Programme and the Fourth Strategy for Climate Adaptation Reporting (2023) sets out a series of actions for the following sectors over a 5-year period:

- Infrastructure - new commitments on resilience standards, investment in water quality and a new transport adaptation strategy
- Nature environment - Local Nature Recovery Strategies, incorporate climate change adaptation into the design of Environmental Land Management schemes and Nature Recovery Projects
- Health, communities and the built environment - investment in flood and coastal erosion schemes, Adverse Weather & Health Plan, update the National Planning Policy Framework to support both adaptation and mitigation efforts and provide local climate projections
- Business and industry - Green Finance Strategy 2023, new strategy on supply chains and imports and survey business readiness for climate impacts.

B.31 International impacts – the government will adapt and build resilience in vulnerable communities to climate related disasters and continue to drive international action and consensus in negotiations on climate adaptation

B.32 UK Climate Change Risk Assessment 2022 **[See reference** 30**]** outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces today. The risk assessment

considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

- risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards
- risks to soil health from increased flooding and drought
- risks to natural carbon stores and sequestration from multiple hazards
- risks to crops, livestock and commercial trees from multiple climate hazards
- risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks
- risks to people and the economy from climate-related failure of the power system
- risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings
- multiple risks to the UK from climate change impacts overseas

B.33 The **British Energy Security Strategy** (2022) **[See reference** 31**]** sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – Aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining

which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.

- Oil and gas – A licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing – The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.34 It is anticipated that following the 2024 general election, the British Energy Security Strategy, based on the former Prime Minister's 'Ten Point Plan for a Green Industrial Revolution' and the 'Net Zero Strategy' may undergo several changes influenced by the new government's priorities, and evolving economic and technological conditions.

B.35 The **Environment Act** 2021 **[See reference** 32**]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

B.36 The **Industrial Decarbonisation Strategy** (2021) **[See reference** 33**]** aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister’s 10 Point Plan for a

Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions. Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO2 is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

B.37 The **Heat and Buildings Strategy** (2021) **[See reference** 34**]** sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.

- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.38 The **UK Hydrogen Strategy** (2021) **[See reference** 35**]** sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the

economy, and the UK Government's commitments for a hydrogen economy. The Energy Performance of Buildings Regulations (2021).

B.39 The **Energy Performance of Buildings Regulations** (2021) **[See reference** 36**]** seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.40 Natural England's **Climate Change Adaptation Manual (NE751): Evidence to support nature conservation in a changing climate** (2020) **[See reference** 37**]** provides a resource to support decision-making for climate change adaptation. It brings together recent science, experience and case study evidence to help guide land management. The first edition of the manual was published in 2014 with a focus on habitat management. The updated version includes sections on species, green infrastructure, geology and geomorphology, and access and recreation.

B.41 Decarbonising Transport: Setting the Challenge (2020) **[See reference** 38**]** sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.42 Flood and Coastal Erosion Risk Management: Policy Statement (2020) **[See reference** 39**]** sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;

- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

B.43 Net Zero – The UK's contribution to stopping global warming (Climate Change Committee, 2019) **[See reference** 40**]** responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. Our new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report's key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

B.44 The **Promotion of the Use of Energy from Renewables Sources Regulations 2011** **[See reference** 41**]** required the government to ensure that renewable energy comprised 15% of the UK's total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from renewable sources and reaffirmation of the EU's 2030 "targets" and the UK's 2030 "ambitions" for renewable energy and energy efficiency.

B.45 The **National Flood and Coastal Erosion Risk Management Strategy for England 2011** **[See reference** 42**]** sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property;
- Facilitate decision-making and action at the appropriate level – individual, community or Local Authority, river catchment, coastal cell or national; and
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.46 The **Flood and Water Management Act 2010** **[See reference** 43**]** and The Flood and Water Regulations 2019 **[See reference** 44**]** sets out measures

to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.47 Our Waste, Our Resources: A strategy for England (2018) **[See reference** 45**]** aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.48 The **Clean Growth Strategy (2017) [See reference** 46**]** sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

B.49 The **National Planning Policy for Waste (NPPW)** (2014) **[See reference** 47**]** identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

B.50 The **Waste Management Plan for England** (2021) **[See reference** 48**]** sets out the measures for England to work towards a zero waste economy.

B.51 The **Climate Change Act 2008** **[See reference** 49**]** sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

B.52 The **Planning and Energy Act (2008)** **[See reference** 50**]** enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

B.53 The **Waste (Circular Economy) (Amendment) Regulations** **[See reference** 51**]** seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

Health and wellbeing

B.54 The Planning and Infrastructure Act (2025) **[See reference** 52**]** sets out the Government's plan to support housing and economic growth. The Act aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

B.55 Fit for the Future: The 10-Year Health Plan for England (2025) **[See reference** 53**]** is a strategic blueprint designed to modernise the NHS. The plan implements three shifts in focus for healthcare delivery: moving care from hospitals into communities, transitioning from analogue to digital, and focusing on sickness prevention.

B.56 The Policy Statement on New Towns (2024) **[See reference** 54**]** outlines a strategic vision to stimulate economic growth and enhance living standards by constructing 1.5 million new homes during the current parliamentary term. Central to this initiative is the development of large-scale communities, each comprising at least 10,000 homes, through both standalone new towns on greenfield sites and significant urban extensions or regeneration projects. These developments aim to address housing demand, alleviate constraints in existing urban areas, and align with national infrastructure plans. To ensure these new towns are well-connected, sustainable, and desirable places to live, the government has introduced a 'New Towns Code' mandating high standards of design and infrastructure, with a target of 40% affordable housing, focusing on social rented homes. An independent New Towns Taskforce, chaired by Sir Michael Lyons, has been established to advise on suitable locations for these developments, with a final shortlist expected within 12 months.

B.57 Planning Policy for Traveller Sites (2024) **[See reference** 55**]** outlines objectives to ensure fair treatment of Gypsies, Travellers and Travelling Showpeople while respecting the interests of the settled community. Local planning authorities are encouraged to assess and address the need for Gypsy, Traveller and Travelling Showperson sites collaboratively, developing fair strategies and identifying appropriate land. The policy emphasises protecting the Green Belt from inappropriate development, promoting private site provision, and reducing unauthorised developments through effective planning and enforcement. This policy should be read alongside the National Planning Policy Framework to guide local authorities in plan-making and decision-taking regarding Gypsy, Traveller and Travelling Showperson sites.

B.58 The **Department for Levelling Up, Housing and Communities, Levelling Up and Regeneration Act** (2023) **[See reference** 56**]** – sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

B.59 The **Green Infrastructure Framework** (2023) **[See reference** 57**]** by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to

support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future.

B.60 The **State of the Environment: Health, People and the Environment** (2023) **[See reference 58]** focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

B.61 The **Homes England Strategic Plan 2023 to 2028** (2023) **[See reference** 59**]**: Provides five interconnected strategic objectives to level up communities across England. These strategic objectives together seek the creation of sustainable high-quality homes in well-designed places that reflect community priorities by taking an inclusive and long-term approach.

B.62 The **White Paper Levelling Up the United Kingdom** (2022) **[See reference** 60**]** sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people’s satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England,

this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.

- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

B.63 A fairer private rented sector White Paper (2022) **[See reference** 61**]** aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

B.64 The **National Design Guide** (2021) **[See reference** 62**]** sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.65 The Charter for Social Housing Residents: Social Housing White Paper (2020) **[See reference** 63**]** sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.66 Using the planning system to promote healthy weight environments (2020), Addendum (2021) **[See reference** 64**]** provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.67 The Public Health England, PHE Strategy 2020-25 (2019) **[See reference** 65**]** identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.68 The **Housing White Paper 2017 (Fixing our broken housing market)** **[See reference** 66**]** sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

B.69 The Technical Housing Standards – Nationally Described Space Standard (2015) **[See reference** 67**]** sets out the Government's new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

B.70 The **Select Committee on Public Service and Demographic Change Report Ready for Ageing** (2013) **[See reference** 68**]** warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.71 Fair Society, Healthy Lives (2011) **[See reference** 69**]** investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

B.72 Laying the foundations: A housing strategy for England [See reference 70] aims to provide support to deliver new homes and improve social mobility.

B.73 Healthy Lives, Healthy People: Our strategy for public health in England 2010 **[See reference 71]** sets out how the Government's approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline;
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it;
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework;
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.74 The **Environmental Noise Regulations** 2006 **[See reference 72]** apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

Environment (biodiversity/geodiversity, landscape and soils)

B.75 Environmental Improvement Plan 2025 is a long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving "restored nature", including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

B.76 Natural England's Strategy: Recovering Nature for Growth, Health and Security (2025) sets out the actions needed for nature to adapt and be more resilient to pressures such as climate change. It focuses on nature recovery contributing to housing delivery, public health, and national security, recognising nature as essential to sustaining growth and a healthy society. The Strategy is framed around four strategic outcomes for nature:

- Recovering Nature – Increased scale and quality of places where nature thrives.
- Building Better Places – Greener homes and infrastructure create healthier, more investible places, recognising we live better where nature thrives around us.
- Improving Health and Wellbeing – Build nature into everyday life so people can support, access and benefit from nature, wherever they live.
- Delivering Security through Nature – Nature helps us adapt to the threats of a changing climate and improves our national security, supporting more resilient food production, healthy soils, clean and plentiful water and clean air.

B.77 The Climate and Nature Bill (2024) **[See reference** 73**]** is a proposed piece of legislation aimed at addressing the climate and ecological crises by setting legally binding targets to limit global heating and restore nature. It seeks to ensure that the UK does its fair share in reducing greenhouse gas emissions in line with the most up-to-date science, aiming to keep global temperature rises below 1.5°C. The bill also emphasises protecting and restoring biodiversity, requiring the government to develop and implement a strategy for nature recovery. A key aspect is the inclusion of a citizens' assembly to guide decision-making, ensuring public involvement in shaping climate and nature policies. The

bill proposes stricter accountability measures, obliging the government to take action beyond existing net-zero commitments and biodiversity targets. It has gained support from environmental groups, scientists, and some MPs, though it has not yet been passed into law.

B.78 The **Environment Improvement Plan 20253** **[See reference** 74**]** for is a strategic framework for improving England's natural environment up to 2043. This document revises the previous EIP 2023 and set new interim targets for the statutory Environment Act 2021 targets. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the original 25YEP set out 10 goals, which have now been revised to the following::

- Goal 1: Restored nature
- Goal 2: Air
- Goal 3: Water
- Goal 5: Waste
- Goal 9: Biosecurity

B.79 Working with nature (2022) **[See reference** 75**]** discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England's habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

B.80 Establishing the Best Available Techniques for the UK (UK BAT) (2022) **[See reference** 76**]** sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

B.81 The **Environment Act 2021** **[See reference** 77**]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

B.82 The **Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019** **[See reference** 78**]** protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.83 Environmental Damage (Prevention and Remediation) Regulations 2015 **[See reference** 79**]** are wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

B.84 Defra Right of Way Circular (1/09) (2011) **[See reference** 80**]** gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

B.85 The **Countryside and Rights of Way Act 2010** **[See reference** 81**]** is an Act of Parliament to make new provision for public access to the countryside.

B.86 Safeguarding our Soils – A Strategy for England (2009) **[See reference** 82**]** sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

B.87 England Biodiversity Strategy Climate Change Adaptation Principles (2008) **[See reference** 83**]** sets out principles to guide adaptation to climate change. The principles are take: practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these. Natural Environment and Rural Communities Act 2006.

B.88 The Natural Environment and Rural Communities Act 2006 **[See reference** 84**]** places a duty on public bodies to conserve biodiversity.

B.89 Wildlife and Countryside Act 1981 (as amended) **[See reference** 85**]** was enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).
- Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

B.90 The **National Parks and Access to the Countryside Act 1949** **[See reference** 86**]** is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording,

creation, maintenance and improvement of public paths and for securing access to open country.

Historic Environment

B.91 Historic England Strategy 2026-2031 (2026) **[See reference** 87**]** contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

B.92 The **Heritage Statement 2017 [See reference** 88**]** sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.93 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) **[See reference** 89**]** sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

B.94 The **Government's Statement on the Historic Environment for England 2010 [See reference** 90**]** sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.95 The **Planning (Listed Buildings and Conservation Areas) Act 1990 [See reference** 91**]** is an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

B.96 The **Ancient Monuments and Archaeological Areas Act 1979 [See reference** 92**]** is a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also

creates criminal offences for unauthorised works to, or damage of, these monuments.

B.97 The **Historic Buildings and Ancient Monuments Act 1953** **[See reference** 93**]** is an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Water and Air

B.98 The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) **[See reference** 94**]** provides a strategic blueprint for managing England's long-term water needs. It emphasises the twin imperatives of securing resilient water supplies to support housing, energy, food production, economic growth, and a thriving natural environment, while safeguarding ecosystems through sustainable abstraction and nature-based solutions. The Framework projects significant pressures on water resources driven by climate change, population growth, and emerging industrial demands, forecasting a shortfall of up to 5 billion litres per day by 2055. It calls for integrated, multi-sector planning across national, regional, and local levels, combining demand management (such as leakage reduction and efficiency improvements) with development of new infrastructure and environmental enhancements.

B.99 Defra, Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023) **[See reference 95]** – sets out actions to transform the management of the water system, deliver cleaner water for nature and people, and secure a plentiful water supply. The Plan also sets out measures to address sources of pollution, and boost water supplies through more investment, tighter regulation, and more effective enforcement.

B.100 The **Air quality strategy for England** (2023) **[See reference 96]** – sets out local authorities powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

B.101 Managing Water Abstraction (2021) **[See reference** 97**]** is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.102 The **Environment Act 2021** **[See reference** 98**]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the

Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

B.103 National Chalk Streams Strategy (2021) **[See reference** 99**]** was built around the "trinity of ecological health": water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

B.104 The **Clean Air Strategy 2019** **[See reference** 100**]** sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.105 The **Environment Agency's Approach for Groundwater Protection** (2018) **[See reference** 101**]** contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

B.106 The **Water Environment (Water Framework Directive) (England and Wales) Regulations 2017** **[See reference** 102**]** protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

B.107 Drought response: our framework for England (2017) **[See reference 103]** tells you how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- how drought affects different parts of England
- who is involved in managing drought and how we work together
- how we and others take action to manage drought
- how we monitor and measure the impacts of drought to advise senior management and government on the prospects and possible action
- how we report on drought and communicate with others

B.108 The **Nitrate Pollution Prevention Regulations 2016** **[See reference 104]** provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

B.109 The **Water Supply (Water Quality) Regulations 2016** **[See reference 105]** focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

B.110 The **Environmental Permitting Regulations 2016** **[See reference 106]** streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

B.111 The **Air Quality Standards Regulations 2016** **[See reference 107]** set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.112 The **Water White Paper (2012)** **[See reference** 108**]** sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.113 The **National Policy Statement for Waste Water** (2012) **[See reference** 109**]** sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

B.114 The **Flood and Water Management Act 2010** **[See reference** 110**]** and The Flood and Water Regulations (2019) **[See reference** 111**]** sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.115 Groundwater (England and Wales) Regulations 2009 **[See reference** 112**]** implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

B.116 Flood Risk Regulations 2009 **[See reference** 113**]** regulations were enacted in December 2009. They outline a set of tasks, which the county council is required to follow between now and approximately 2015. The regulations also implement the 2007 EU Floods Directive. In accordance with the regulations the council has a series of new responsibilities, these are:

- The preparation of a Preliminary Flood Risk Assessment (PFRA) Report, including the identification of flood risk areas

- The preparation of Flood Hazard Maps and Flood Risk Maps
- The preparation of Flood Risk Management Plans
- Cooperating with the Environment Agency and other Lead Local Flood Authorities.

B.117 The **Environmental Noise Regulations 2006** **[See reference** 114**]** apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

B.118 The **Urban Waste Water Treatment Regulations (2003)** **[See reference** 115**]** protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

B.119 The **Environmental Protection Act 1990** **[See reference** 116**]** makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

Economic Growth

B.120 The Planning and Infrastructure Act (2025) **[See reference** 117**]** sets out the Government's plan to support housing and economic growth. The Act aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

B.121 UK Infrastructure: A 10 Year Strategy (2025) **[See reference** 118**]** sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

B.122 The UK's Modern Industrial Strategy (2025) **[See reference** 119**]** outlines a 10-year plan to boost business investment and elevate the UK's performance in eight designated growth driving sectors: advanced manufacturing; clean energy industries; creative industries; defence; digital and technologies; financial services; life sciences; and professional & business services. The strategy aims to provide long term stability and certainty to encourage both domestic and international investment, through sector plans, streamlined regulation, enhanced access to finance, including via the National Wealth Fund and British Business Bank, and by accelerating grid connections and infrastructure delivery. It includes regional and place-based initiatives, with targeted support for city regions, industrial clusters and Industrial Strategy Zones to drive inclusive growth across the UK. The strategy is also supported by a robust monitoring framework overseen by a newly established Industrial Strategy Advisory Council, and embeds vocabulary around long-termism, pro-business engagement, competition policy, skills development and innovation.

B.123 The Plan for Change (2024) **[See reference** 120**]** outlines the UK Government's framework for long-term policy delivery across five priority areas: economic growth, healthcare, public safety, opportunity, and clean energy. It sets out specific targets within this Parliament, underpinned by aims to ensure economic stability, reform public services, and implement a more mission-focused approach to governance.

B.124 UK Parliament, **The Levelling Up and Regeneration Act** (2023) **[See reference 121]** – sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between

plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.125 The Department for Levelling Up, Housing and Communities, **Levelling Up the United Kingdom White Paper** (2022) **[See reference 122]** – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.
- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

B.126 The **Growth Plan 2022** **[See reference** 123**]** makes growth the government's central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer's "growth plan" contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

B.127 The **Agricultural Transition Plan 2021 to 2024** **[See reference** 124**]** aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making

landscape-scale changes such as establishing new woodland and other ecosystem services).

B.128 The **Agriculture Act 2020** **[See reference** 125**]** sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

B.129 The **LEP Network Response to the Industrial Strategy Green Paper Consultation** (2017) **[See reference** 126**]** seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

Transport

B.130 Better Connected: a strategy for integrated transport (2026) outlines eight priorities for creating an integrated transport system that makes greener modes of transport easier and more reliable. They are:

- Simplify payments and information
- Provide safe and dependable journeys
- Make travel accessible and affordable
- Create healthier communities
- Align transport and development
- Champion data and technology
- Empower local leaders
- Optimise decision-making and appraisal

B.131 UK Infrastructure: A 10 Year Strategy (2025) sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National

Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

B.132 The Department for Transport, **Future of Transport: supporting rural transport innovation** (2023) **[See reference 127]** – shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding principles for the introduction of new technologies and services.

B.133 The **Cycling and Walking Investment Strategy Report to Parliament** (2022) **[See reference** 128**]** sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

B.134 Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) **[See reference** 129**]** sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.135 Decarbonising Transport: Setting the Challenge (2020) **[See reference** 130**]** sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there

have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.136 The Road to Zero (2018) **[See reference** 131**]** sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.137 The **Highways England Sustainable Development Strategy and Action Plan** (2017) **[See reference** 132**]** is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

B.138 Door to Door: A strategy for improving sustainable transport integration (2013) **[See reference** 133**]** focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options;
- Convenient and affordable tickets;
- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

B.139 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

B.140

Appendix C
Baseline information

C.1 The term “baseline information” refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan. Data is included on historic and likely future trends wherever possible.

Population, health and wellbeing

C.2 The population of Braintree District was 155,200 residents in 2021, a 5.5% increase on the 147,100 residents recorded in the district in 2011 **[See reference** 134**]**. It has the fourth largest population of the local authority areas in Essex. The percentage of population increase in Braintree from 2011 in 2021 is lower than the increase experienced by England (6.6%), and Essex (8.1%), as well as for the regional (8.3%) during the same time. By 2047, it is expected that the population in the district will reach 180,077 **[See reference** 135**]**.

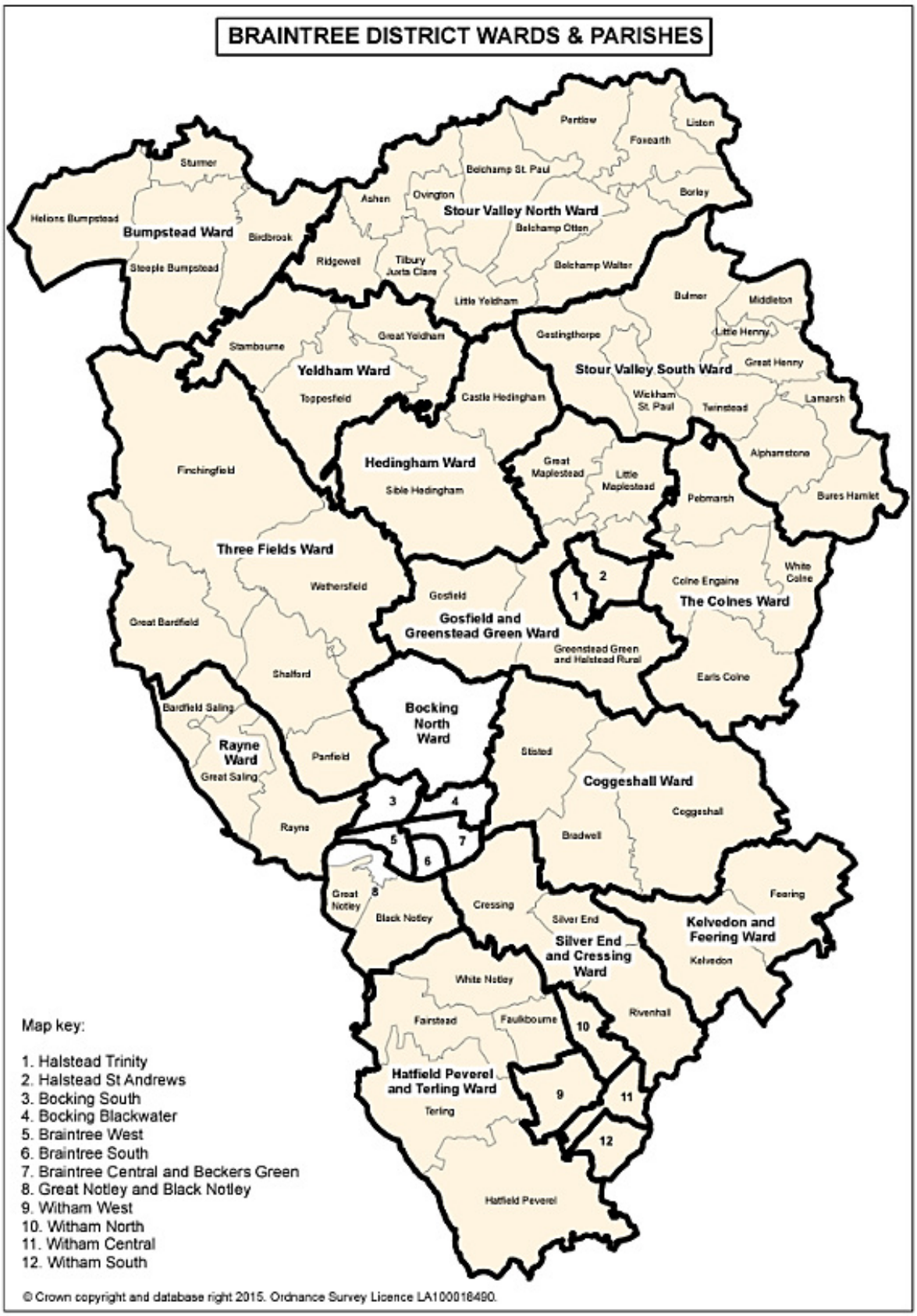
C.3 Braintree District is the 16th least densely populated of the East England's 45 local authority areas, with a population density of 254 residents per square kilometre.

C.4 There are 65,000 households in Braintree District **[See reference** 136**]**. The population in Braintree District is spread across 26 wards. Bocking Blackwater has the highest population of the 26 wards, with 10,485 residents. **Table C.1** below presents the population change between 2011 and 2022 by ward in Braintree District. The largest settlements of Braintree town, Witham and Halstead are divided into a number of different wards as shown in **Figure C.1**. As shown in the table, much of the population growth between 2011 and 2021 has occurred at the main settlements of Braintree town, Witham (with the exception of Waltham West) and Halstead. Witham Central displayed the highest population increase between 2011 and 2022, with an increase of 1,256 people. Sizeable growth has also occurred at Bocking (a suburb village at the northern edge of Braintree town) and Silver End and Cressing (containing the villages of Silver End, Cressing and Rivenhall), Hedingham (containing the adjoining villages of Sible Hedingham and Castle Hedingham) and Gosfield and Greenstead Green (containing the villages with the same names as well as the rural area surrounding Halstead).

Table C.1: Estimated populations by ward in Braintree District for 2011 and 2022 [See reference 137]

Ward	Population in 2011	Population in 2022	Population change
Bocking Blackwater	9,924	10,485	561
Great Notley and Black Notley	9,929	10,215	286
Braintree Central & Beckers Green	9,554	9,666	112
Witham North	6,839	7,410	571
Halstead Trinity	6,382	7,223	841
Silver End and Cressing	6,252	7,324	1,072
Witham West	6,960	6,796	-164
Bocking South	6,304	6,943	639
Witham Central	5,778	7,034	1,256
Braintree South	6,043	6,554	511
Halstead St Andrew's	5,897	6,712	815
Witham South	5,776	6,360	584
Braintree West	5,810	6,086	276
Hedingham	5,195	6,051	856
The Colnes	5,811	6,190	379
Hatfield Peverel & Terling	5,952	6,121	169
Coggeshall	5,898	6,082	184
Three Fields	5,555	5,761	206
Kelvedon and Feering	5,622	5,784	162
Bocking North	5,161	5,422	261
Stour Valley South	2,936	3,042	106
Stour Valley North	2,745	2,907	162
Rayne	2,774	2,888	114
Bumpstead	2,955	2,900	-55
Yeldham	2,760	2,895	135
Gosfield and Greenstead Green	2,272	2,830	558

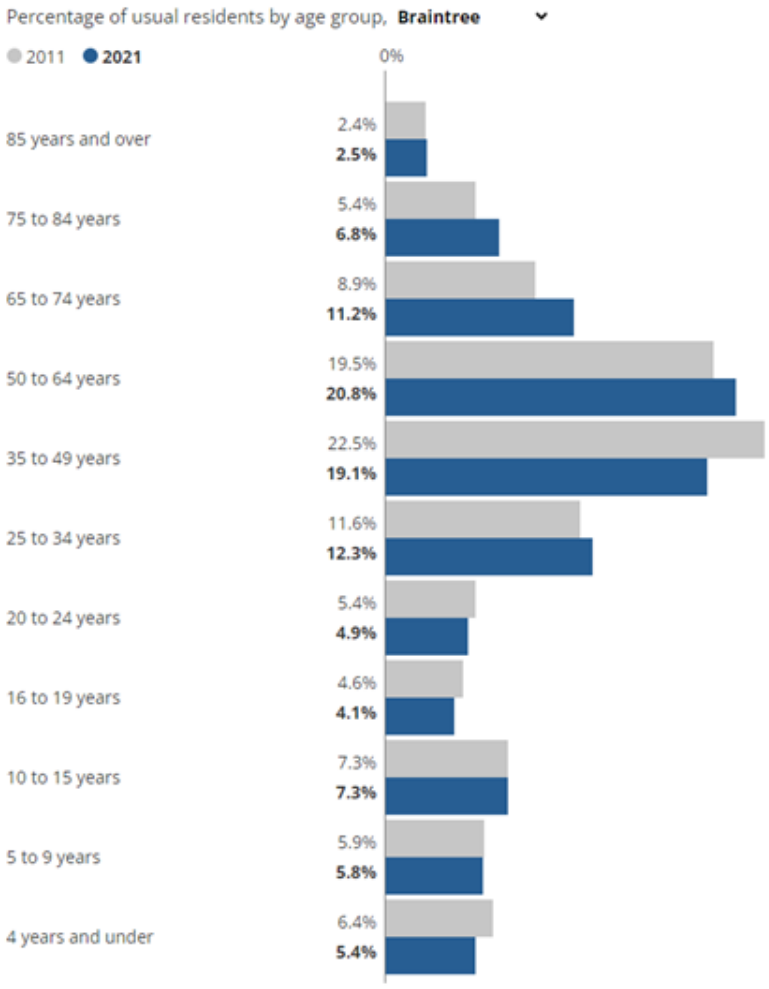
Figure C.1: Braintree District wards and parishes [See reference 138]



C.5 The population of Braintree District is ageing. From 2011 to 2021, there was a growth in the proportion of residents in all age categories from 50 years and older, while all age categories 24 years and younger saw a decrease as illustrated by **Figure C.2**. Between the last two censuses, the average (median) age of those living in Braintree District increased by two years, from 41 to 43 years of age. The area had a higher average (median) age than the East of England as a whole in 2021 (41 years) and a higher average (median) age than England (40 years).

C.6 The Old Age Dependency Ratio for Braintree is 327.0, which is substantially higher than the UK average (288.0). This refers to the number of people aged State Pension age (SPA) and over for every 1,000 people aged16 years and over to the SPA **[See reference** 139**]**.

Figure C.2: Percentage of residents by age group 2011 – 2021 [See reference 140]



Source: Office for National Statistics – 2011 Census and Census 2021

C.7 According to the 2021 Census, the largest ethnic group in Braintree District is 'White: English, Welsh, Scottish, Northern Irish or British', with 94.7% of residents identifying as such. The proportion of residents who identify as being part of this group decreased by 2.0% from 2011 to 2021. In 2021, 1.7% of Braintree District residents identified as 'Asian, Asian British or Asian Welsh'; a 0.3% increase from 2011. In 2021, 1.9% of Braintree District residents identified their ethnic group as 'Mixed or Multiple', up from 0.7% in 2011. This 0.7% change was the largest increase among high-level ethnic groups in this area. **Table C.2** below.

Table C.2: Braintree District population by ethnic group (2021) [See reference 141]

Ethnic group	% of population
Asian, Asian British or Asian Welsh	1.7
Black, Black British, Black Welsh, Caribbean or African	1.2
Mixed or Multiple ethnic groups	1.9
White	94.7
Other ethnic groups	0.5

C.8 Across the District, the percentage of households comprising a couple with dependent children fell from 22.4% in 2011 to 20.9% in 2021. During the same period, the percentage of households comprising a couple without children in Braintree District fell from 20.4% to 18.6%, while the percentage of households comprising a couple with only non-dependent children increased from 6.7% to 7.3%. Furthermore, the percentage of households including a lone parent in Braintree District increased from 9.8% to 9.9% during this period **[See reference** 142**]**.

Housing

C.9 The median house price (existing dwellings) in Braintree District as of April 2026 is £317,000. There was a relatively modest decrease of 1.4% from the median house price of £321,000 in April 2025 **[See reference** 143**]**. This price makes homes in Braintree District more affordable compared to Essex, where the median house price in February 2026 was £358,078, and comparable to the East of England, where the median house price is £336,000. It is less affordable than England as a whole, for which a median house price of £336,000 was recorded in April 2026 **[See reference** 144**]**.

C.10 The median gross annual residence-based earnings figure for Braintree District was £39,712 in 2025. Dividing the (median) house price for a given area by its earnings, produces a ratio which serves as an indicator of relative affordability. A higher ratio indicates that on average, it is less affordable for a resident to purchase a house in their local authority district. Conversely, a lower ratio indicates higher affordability in a local authority. While there are many more factors that influence affordability, the simple ratio provides an overview of geographic differences across England and Wales. The median property price-to-earnings ratio for Braintree District is 8.39, higher than the regional figure (8.32) and the figure for England and Wales (7.43) **[See reference** 145**]**. This shows that considering earnings in Braintree and those at the regional and national levels, housing is more affordable than within the wider region, but less affordable than within the country as a whole.

C.11 In 2021, 15.1% of Braintree households rented privately, up from 13.2% in 2011. Meanwhile, 16.3% lived in socially rented housing, slightly down from 16.5% in 2011. Homeownership (outright or with a mortgage) fell from 68.6% to 67.8%. This surpasses homeownership rates in the East of England (66.2%) and England (62.3%). The decline in the proportion of residents who own their home between 2011 and 2021 was less pronounced in Braintree (0.8%) compared to the East of England (2.4%) and England overall (2.0%) **[See reference** 146**]**.

C.12 The last published Braintree District Strategic Housing Land Availability Assessment (SHLAA) from 2025 **[See reference** 147**]** provides evidence on the potential supply of housing across Braintree District. The SHLAA shows that 5588ha of land was available for residential development within the district on 330 sites. 5159ha of this land are greenfield sites, 415ha are mixed greenfield/brownfield and 32ha is purely brownfield sites.

C.13 Braintree District Council includes a windfall allowance of 75 dwellings per year in the adopted Section 2 Local Plan. Over the period since the Local Plan base date (2013-2022) the median average completions from the windfall permissions was 6 in Monitoring Year 1; 42 in Year 2; 54 in Year 3; 51 in Year 4 and 8 in Year 5.

C.14 The net dwellings completions in Braintree per year are displayed in **Table C.3**.

Table C.3: Net dwelling (C3 use class) completions per year [See reference 148]

Year	Net dwelling completions
2013/14	182
2014/15	409
2015/16	523
2016/17	291
2017/18	492
2018/19	534
2019/20	883
2020/21	847
2021/22	1,081
2022/23	1,088
2023/24	1,145
Total	**7,475**

C.15 As shown in **Table C.3**, housing delivery in recent years (from 2019/20 up to 2023/24) has exceeded the annual target of 716 dwellings set out for the district in the North Essex Authorities' Shared Strategic Section 1 Plan for the 2013 to 2033 plan period **[See reference** 149**]**. However, low delivery rates in the early years of the plan period mean that overall, from 2013 to 2024 there was a cumulative shortfall of 300 dwellings measured against this annual target. The calculation of the shortfall is summarised in **Table C.4.**

Table C.4: Calculation of the shortfall (2013-23) [See reference 150]

Calculation of the shortfall	
Net supply of homes 2013-2024, C3 Use Class	7,475
Net additional rooms C2 Use Class 2013-2024	181
Equivalent contribution to dwelling supply from C2 Use Class 2013-2024 (after applying ratio of 1.8)	101
Net total housing supply 2013-2024	7,576
Pro-rata target 2013-2022 at 716 X 10	7,876
Shortfall at end March 2024	**300**

C.16 The high delivery rates achieved in recent years have reduced the cumulative shortfall. In the year 2021, the shortfall decreased from 1,517

dwellings to 1,169 in 2022, 787 in 2023, and 300 in 2024 indicating that Braintree District is on course to eliminate the shortfall within five years.

C.17 The adopted Local Plan requires the completion of 14,320 homes in Braintree by 2033 and that 30% of these homes should be delivered as affordable housing sites where 10 properties or more are built. From 2017 to 2022 Braintree District saw 1,159 affordable homes completed, averaging 232 a year. In 2020-2021 the annual target to build 250 new affordable homes was exceeded, and 417 properties were completed. Braintree District Council have developed a Healthy Housing Strategy to promote homes that enhance resident's health and well-being. The objectives of the strategy include the delivery of affordable homes, providing housing that meets the specific needs of residents and enhancing existing properties **[See reference** 151**]**.

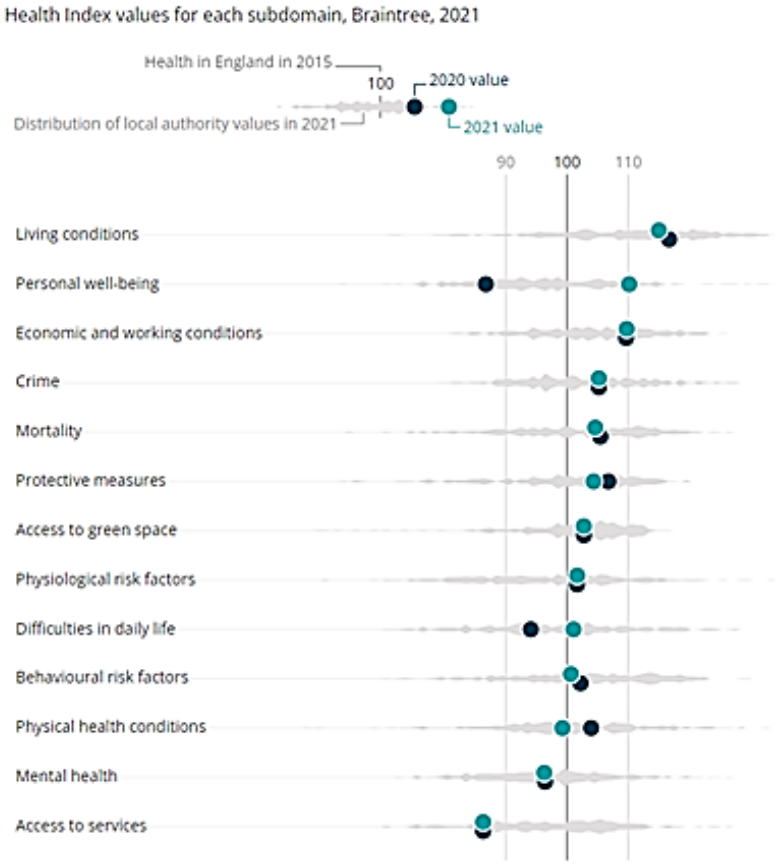
Gypsies, Travellers and Travelling Showpeople

C.18 The 2021 Census reported that there were 155 people in the district who define their ethnic group as 'White, Gypsy or Irish Traveller'; 67 people who define their ethnic group as 'White Roma', and one person who defines their ethnic group as 'Other, Gypsy or Romany'. The Council's evidence base on Gypsy and Traveller and Travelling Showpeople has identified a need of 26 pitches to meet the needs of Gypsies and Travellers between 2016 and 2033. An additional need for 6 plots has been identified for Travelling Showpeople for the same period **[See reference** 152**]**.

Health and wellbeing

C.19 The Health Index for England is a measure of the health of the nation. It uses a broad definition of health to provide a single value for the health of each local authority area that can be broken down into various measures within three broad domains: health outcomes; health-related behaviours and personal circumstances; and wider drivers of health that relate to the places where people live. Based on the latest update to the Health Index reporting in the 2021 Census, Braintree District has an index score of 106.5. The figure increased by 2.2 points compared to the previous year. The score is a ranked average among local authority areas in England **[See reference** 153**]**. As presented in **Figure C.3**, health in Braintree District is strongest for measures relating to the 'living conditions' subdomain, which looks at air pollution, household overcrowding, noise complaints, road safety, and rough sleeping. Braintree's worst score is in relation to 'access to services'.

Figure C.3: Health Index values for each subdomain in Braintree (2021) [See reference 154]



Source: Health Index for England from the Office for National Statistics

C.20

C.21 Based on the 2021 Census, 47.4% of Braintree residents described their health as "very good", an increase from 45.9% reported in 2011. Those describing their health as "good" fell from 36.3% to 35.7%. In 2021, 6.6% of Braintree District residents were identified as being "disabled and limited a lot", thereby facing significant restrictions in daily activities and participation due to impairments. This figure decreased from 7.8% in 2011 **[See reference** 155**]**. It should be noted however that the 2021 Census was conducted during the coronavirus (COVID-19) pandemic, which may have influenced how people perceived and rated their health, affecting how people chose to respond.

C.22 Life expectancy for males in Braintree District is 80.3 years which is lower than the regional average (80.5 years) and higher than the national average (79.7 years). Life expectancy for females in Braintree District is 83.8 years which is the higher than the national average (83.5 years), but lower than the regional average (84.2 years) **[See reference** 156**]**.

C.23 Further to this, Braintree District's mortality rate for individuals under 75 years old, stemming from all causes in 2022 was 312.9 per 100,000. This figure is lower than both the regional rate of 342.3 per 100,000 and national rate of 342.3 per 100,000. The mortality rate for individuals under 75 years old, stemming from all circulatory diseases in 2022 for Braintree District, was 73.8 per 100,000. This figure is lower than both the regional rate of 77.8 per 100,000 and the national rate of 77.8 per 100,000.

C.24 Healthy Life Expectancy (HLE) indicates the average number of years people are expected to spend in "good" self-reported general health. Across Essex, residents have a HLE of 67.5 years, an additional 1.7 years compared to the national average for England (65.8 years). For Braintree District, the HLE is 67.2 years which is above the national average but below the regional average **[See reference** 157**]**.

1.2 Based on indicators reported by the Office for Health Improvement and Disparities **[See reference** 158**]**, the health of the population in Braintree District is generally better than the England average.

Access to services and facilities

C.25 In the Health Index **[See reference** 159**]**, Braintree District received a relatively low score of 86.3 compared to other local authorities in the 'access to services' subdomain in 2021. The district scored much higher in the 'access to green spaces' subdomain, with a score of102.8. In 2021, the national score for access to services was 100.3, whilst the average for access to green spaces was 99.9. More information about the travel times to key services and facilities by sustainable modes and car in the district is provided in the 'transport and accessibility' section of this report.

Open space, sports and recreation

C.26 Provision of open space in the district varies across wards and typologies (allotments, amenity green space, park and recreation ground, play space, accessible natural green space), with some meeting quantity and quality standards and some falling below. There is insufficient youth provision across the majority of Braintree wards (with the exception of Witham West Ward and Yeldham Ward) **[See reference** 160**]**. Park and recreation grounds (public and private combined) are in sufficient supply across over half of the wards, whereas all other typologies (with the exception of natural green space) are insufficient across the majority of wards. In relation to the quality of open spaces

in the district, a majority of households rated the quality of outdoor facilities and open spaces in the district as average or better, though "average" was the most common rating. However, there were significant levels of dissatisfaction with specific facilities: 48% rated facilities for teenagers as poor or very poor, and at least 35% rated tennis courts, bowling greens, and artificial turf pitches as poor or worse. Conversely, 56% of households rated parks and recreation grounds highly in terms of quality **[See reference** 161**]**.

C.27 Over 40% of residents in Braintree District live in places achieving no more than a single benchmark of Natural England's Accessible Greenspace Standard. In some areas, the percentage of accessible green space is low due to deficiency. In many instances, however, the provision is sufficient but spaces are inaccessible or access is limited. Rural communities were identified as being particularly affected by lack of access in the Essex Green Infrastructure Strategy 2020 **[See reference** 162**]**.

C.28 Reporting by Sport England **[See reference** 163**]** shows that in Braintree District:

- 18.7% of adults were classed as 'inactive' with less than 30 minutes of recorded activity a week in November 2023-24. This compares to 25.3% in November 2021-22 and 31.4% in November 20-21.
- In November 2023-24, 10.4% of adults were reported as fairly active (30-149 minutes of activity) and 66.0% were reported as active (150 minutes or more of activity).

Crime

C.29 As of December 2025, Braintree District had a crime rate of 58.09 per 1,000 population, which is lower than the Essex force area average of 77.69 per 1,000. Braintree District also has lower-than-average rate for all crime types compared to other areas in the Essex force area. Violence and sexual offences make up the highest proportion of recorded offences in the district. In the year ending June 2025, the violence and sexual offences crime rate in Braintree District was lower than average for the Essex area. **[See reference** 164**]**. Longer term trends indicate violent crime have been increasing across England, due to both an increase in the number of crime and improvements in crime reporting **[See reference** 165**]**.

C.30 There are six Lower Layer Super Output Areas (LSOA) in the district within the 20% most deprived in the country in relation to the crime domain in the English Indices of Multiple Deprivation (IMD, 2025). This is an increase

compared to 2015 when just one LSOA was in the 20% most deprived and 2019 when two LSOAs were in the 20% most deprived. These LSOAs fall within the wards of Witham North, Braintree Central, Bocking North and Halstead St Andrews. There is one LSOA within the 10% most deprived domain for crime and this is in Braintree Central **[See reference** 166**]**.

Education

C.31 There are 52 primary, infant and junior schools, eight secondary schools and three special schools (The Edith Borthwick School, Chatten Free School and Southview School) in Braintree District **[See reference** 167**]**.

C.32 The Colchester Institute Braintree Campus is found in the north of Braintree town and is the Institute's second largest campus. While the Braintree Campus serves as a significant education hub, the district lags behind Colchester and Chelmsford in terms of provision of tertiary education facilities, such as universities, and post-16 institutions. As such, there is potential for students in Braintree to have to travel out of the district to access tertiary education facilities. The location of schools and other services and facilities within the district is displayed in **Figure C.4**.

The ‘Essex County Council Developers Guide to Infrastructure Contributions’ **[See reference** 168**]** provides guidance for securing new infrastructure requirements across the county, including schools and educational institutions. This is supported by the ‘Garden Communities and Planning School Places’ **[See reference** 169**]** guidance document and the ‘Essex Design Guide’ which inform delivery and design.

Figure C.4: Services and Facilities is Braintree District

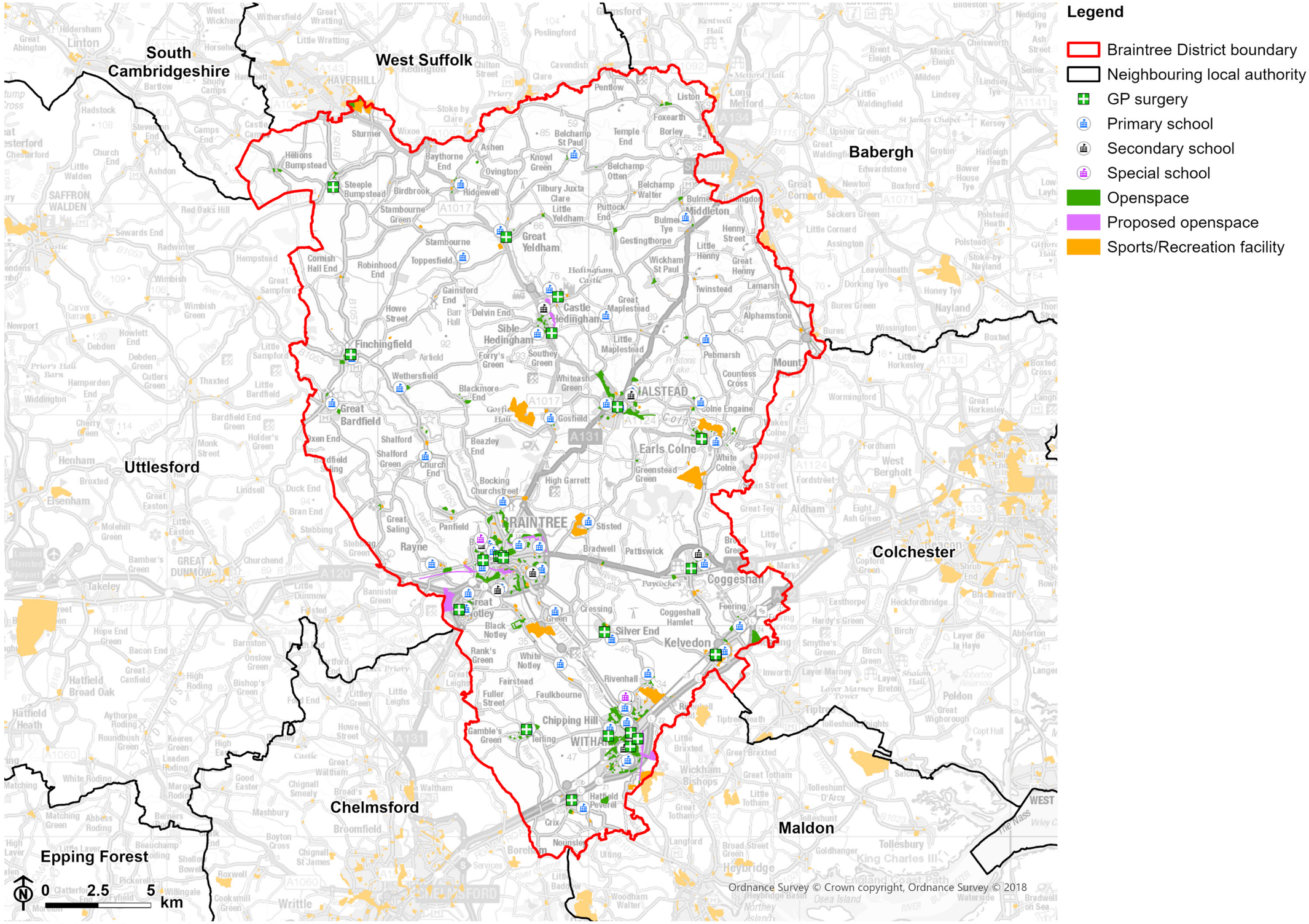


Figure C.4: Services and facilities in Braintree District
Braintree District Council O/S Licence No. LA 100018490 2026.
Contains Ordnance Survey data © Crown copyright and database right 2026.

C.33 There is a significant demand for school places in Essex. The total number of pupils by 2030/31 will reach 131,635 primary school pupils and 99,693 secondary school pupils (including sixth form). The district is anticipated to experience significant capacity issues in its primary schools from 2025 onwards, particularly in Witham/Rivenhall, Kelvedon/Feering, Braintree Town & Surrounds, Earls Colne/Colne Engaine, Cressing/Silver End, and Hatfield Peverel/Terling. To manage demand, expansion projects are in the pipeline and new primary schools will be built on the Lodge Farm development and Panfield Lane development through S106 agreements **[See reference** 170**]**.

C.34 According to the latest labour market statistics (January to December 2025) **[See reference** 171**]**, Braintree District has a higher-than-average proportion of people with RQF1 and RQF2 qualifications compared to the regional and national average. The proportion of people with RQF3 and RQF4 qualifications are higher than regional levels but below national levels.

C.35 Braintree District is in the lowest 20% of local authority areas in England and Wales in relation to the Education, skills and training domain of the 2025 Index of Multiple Deprivation (IMD25). Educational attainment is particularly poor in two Lower Layer Super Output Areas (LSOAs) (located in Bocking North and Halstead Trinity) which are classified as being within the 10% most deprived in the country in relation to the education, skills and training domain in the English IMD. A further nine LSOAs fall within the 20% most deprived in this domain. These lie within the wards of Halstead Trinity, Bocking South, Braintree Central and Beckes Green, Witham West and Witham North **[See reference** 172**]**.

Deprivation

C.36 The IMD uses Lower Layer Super Output Areas (LSOA) to measure deprivation at local authority and county level. The seven distinct domains of deprivation (Income; Employment; Health Deprivation and Disability: Education and Skills Training; Crime; Barriers to Housing and Services; and Living Environment) which when weighted and combined from the IMD 2025 have been mapped for the district (see **Figure C.5)**.

C.37 The IMD25 reveals that Braintree District was more deprived than 45% of all local authorities in the country, ranking 164th most out of 296 local authority areas which is an increase from its rank as 194th out of 317 in 2019 and 203th out of 326 in 2015. Braintree District ranks 7th in comparison to 12 other Essex

authorities in terms of average score, with Tendring, Harlow, South-on-Sea, Thurrock, Basildon and Castle Point the more deprived Essex authorities.

C.38 According to the English IMD25 **[See reference** 173**]**, out of the 87 Lower-Layer Super Output Areas (LSOAs) in the district, four LSOAs are in the 20% most deprived (overall when considering all domains) in the country in the wards of Bocking North, Braintree Central and Beckers Green, Witham North and Halstead Trinity. No LSOAs in Braintree fall within the 10% most deprived in the country. Six additional LSOAs fall within the 30% most deprived in the country, while 15 additional LSOAs are within the 40% most deprived in the country. In the IMD25 and IMD19 there were only two LSOAs within the 20% most deprived in the country.

C.39 The LSOA within the Bocking North ward remained within the 20% most deprived from 2015 to 2025. Since the IMD19, the number of LSOAs in the 30% category has risen from four to six and the number of LSOAs in the 40% category has risen from seven to 15.

C.40 In the year 2024-25, homeless households in Braintree District equated to 2.2 per 1,000 population. This is below the national average of 6.8 per 1,000 for areas of England (outside of London) **[See reference** 174**]**. In Braintree District 13% of households live in fuel poverty, higher than levels across Essex as a whole, where 12% of residents are below the poverty line due to the cost of heating their home. 25% of Braintree District households are on non-mains gas, which incur the highest bills in Essex and have therefore experienced the highest proportional increases to their bills **[See reference** 175**]**.

C.41 Across the UK as a whole in the 2021-22 period there was a significant increase of 37% in the total number of food parcels distributed by foodbanks. In Braintree District, this increase was 66%, with children comprising 45% of the total individuals supported, exceeding the national average (38%). The top three areas in Braintree District using foodbanks are Braintree Central & Beckers Green, Bocking South, and Braintree South **[See reference** 176**]**.

Figure C.5: Indices of Multiple Deprivation

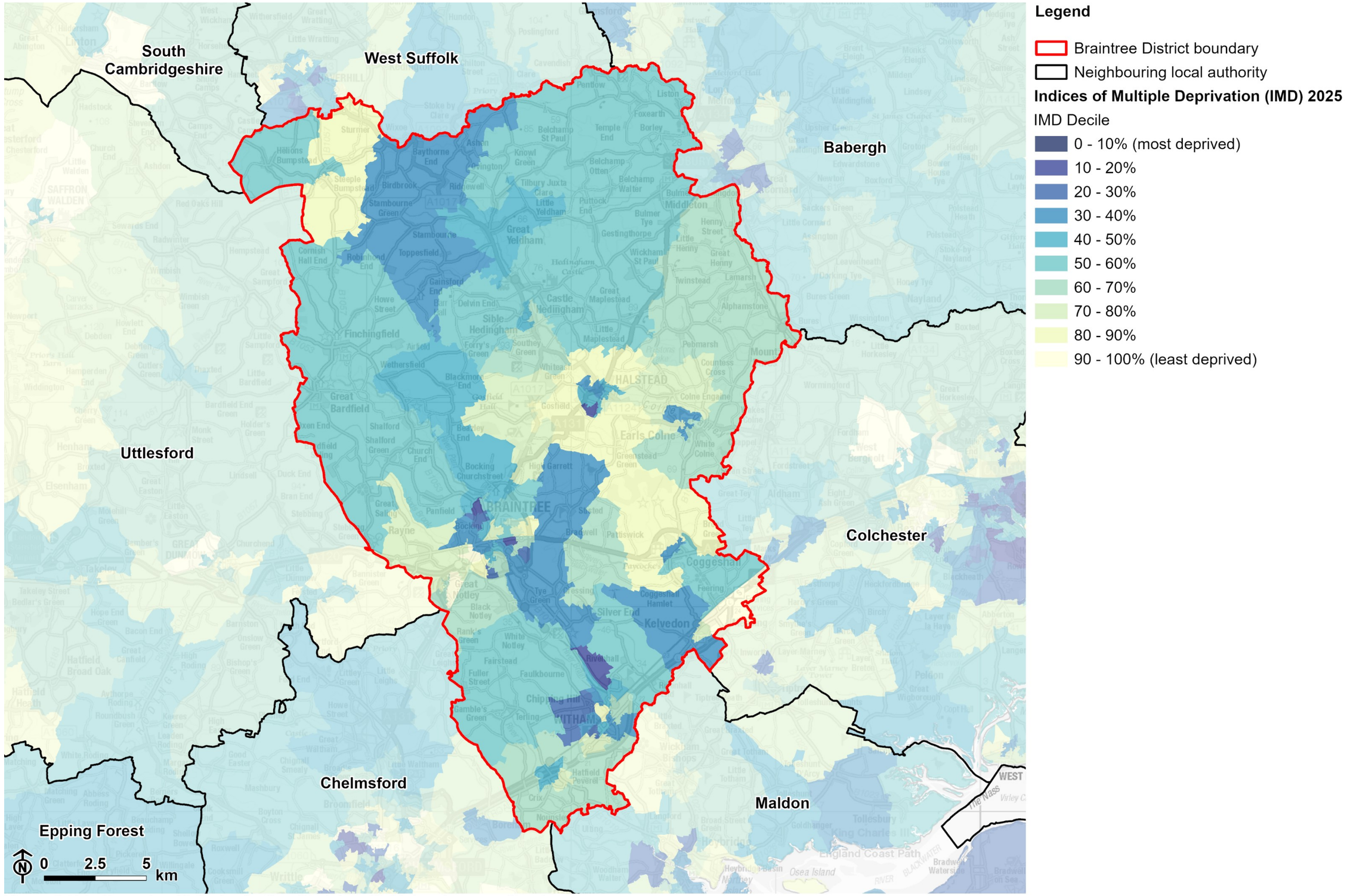


Figure C.5: Indices of multiple deprivation (Braintree District and surroundings)
Data produced by Ministry of Housing, Communities and Local Government (MHCLG). Boundaries used for data provided by Office of National Statistics (ONS).
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Economy and employment

C.42 Braintree District plays an important role in the North Essex sub-region, producing £3.26 billion per annum (2020) and accounting for 28% of all economic production in North Essex and 9% of economic production across Essex **[See reference** 177**]**. EY's February 2024 Regional Economic Forecast noted that the UK experienced a challenging year in 2023 due to high inflation and continued increases in interest rates, with the economy ending the year in a recession **[See reference** 178**]**. This was reflected in relatively weak performance across the regions and nations of the UK. Despite this, the East of England achieved 0.3% GVA growth, placing it joint-third among UK regions. The region's GVA is projected to grow by a further 1.9% from 2025 to 2033, slightly above the predicted average UK growth for the same period (1.8%) **[See reference** 179**]**.

C.43 As of December 2025, 80.8% of the population of Braintree were in employment and 17.1% of the population were economically inactive. The reported figure for those in employment for the East of England for the same period was 81.8%, and for England was 79.2% **[See reference** 180**]**.

C.44 In 2024, 65.4% of total employees were full-time in Braintree District, and 32.7% were part-time. Full-time employment is slightly lower than the regional average of 66.5% and national average of 69.2%. The proportion of part-time workers is slightly lower than the regional average of 33.5% and higher than the national average of 30.8% **[See reference** 181**]**.

C.45 Braintree District has a diverse economic profile with several key sectors contributing to local employment. Wholesale and retail trade; repair of motor vehicles and motorcycles is a significant part of the district's economy, comprising 19.2% of employee jobs. This is followed by each of the following sectors – Manufacturing; Construction; and Human Health and Social Work Activities – which contribute the second largest proportion (9.6%) of employee jobs respectively **[See reference** 182**]**.

Table C.5: Employee jobs by industry 2024 [See reference 183**]**

Employee Jobs by Industry	Braintree (%)	East of England (%)	Great Britain (%)
Mining and Quarrying	0.2	0.1	0.2
Manufacturing	9.6	7.2	7.3

Employee Jobs by Industry	Braintree (%)	East of England (%)	Great Britain (%)
Electricity, gas, steam and air conditioning	0.1	0.3	0.4
Water supply; sewerage, waste management and remediation activities	1.0	0.7	0.7
Construction	9.6	6.5	5.0
Wholesale and retail trade; repair of motor vehicles and motorcycles	19.2	14.9	13.7
Transportation and storage	4.8	5.7	5.0
Accommodation and food service activities	7.7	7.0	7.8
Information and communication	2.4	3.2	4.5
Financial and insurance activities	2.9	1.8	3.4
Real estate activities	2.4	2.3	1.9
Professional, scientific and technical, activities	6.7	8.7	8.6
Administrative and support service activities	8.7	11.7	8.6
Public administration and defence; compulsory social security	2.9	3.8	4.9
Education	7.7	9.1	8.6
Human health and social work activities	9.6	12.7	14.2
Arts, entertainment and recreation	1.9	2.4	2.5
Other service activities	1.7	1.9	1.9

C.46 The district's main towns (Braintree, Witham and Halstead) are critical components of the district's overall economy, supporting 55% of employment across the area. Braintree town and Witham are the two largest centres in the district (supporting 14,780 and 11,325 jobs respectively) and have a range of strengths in wholesale and retail, construction and manufacturing. Further to

this, 45% of employment opportunities in the district come from more rural areas **[See reference** 184**]**.

C.47 In 2021, the job density in Braintree District was 0.69, which is below both the regional average of 0.84 and the national average of 0.85. This represents a decline from 0.73 in 2020. Job density measures the ratio of jobs to the working-age population, with a job density of 1 representing the fact that there is a single job available for every person of working age A lower figure indicates fewer available jobs per resident. Braintree's job density is lower than that of neighbouring districts such as Chelmsford and Colchester **[See reference** 185**]**.

C.48 In 2023, gross weekly pay in Braintree District was around £695.20, which is lower than the average for the East of England of £705.70, but higher than the national average, £682.60. Full-time earnings in the district have stagnated since 2016, mirroring stagnant productivity growth. Workplace-based earnings are 16% higher than residence-based earnings, indicating that many residents commute to higher-paying jobs outside the district in areas such as Chelmsford, Colchester, and London **[See reference** 186**]**.

C.49 As of 2023, Braintree District had 6,595 businesses, with 89.2% being micro-sized. Business start-up rates in the district are lower than both Essex and national levels, with around 100 new businesses per 1,000 active enterprises in 2020, which is 20% below the national rate. Despite stable business closure rates, the number of businesses declined in 2020, likely due to pandemic-related interventions such as the furlough scheme and business loans, which kept many businesses afloat and may have also contributed to the decline in new business births during that year **[See reference** 187**]**.

C.50 Business survival rates in the district are strong, with 45% of newly established businesses surviving their first five years of trading. This is above average for Essex (43%) and nationally (39%), suggesting that access to localised business support plays an important factor in supporting the survival of local businesses **[See reference** 188**]**.

C.51 A variety of programmes operate across Braintree District and Essex to support local businesses and promote sustainable job creation. Braintree District Council secured £1.036 million of grant funding for these types of schemes through the Shared Prosperity Fund in 2022, and a further £589,191 has been allocated to Braintree District Council through the Rural England Prosperity Fund, as an appendage to the Shared Prosperity Fund to tackle rural deprivation **[See reference** 189**]**. This funding will help start and expand local businesses, improve community facilities, boost tourism, and support rural business growth with new products and services. Additionally, Braintree District

has significant potential to achieve further economic growth through several innovation assets including:

- I-Construct Innovation Hub, a centre of excellence for construction innovation;
- Horizon 120 Business and Innovation Park, a 50,000 sq ft business park comprising hi-tech, industrial, office and logistics space; and
- The Cell and Gene Therapy Catapult manufacturing centre.

C.52 The District Council aims to maximise these opportunities and develop business clusters around these sites **[See reference** 190**]**.

C.53 The North Essex Economic Board, which includes Braintree District Council, is a partnership of local authorities in the area working together to drive economic growth. The Board offers fully funded support programs for business survival and expansion, including apprenticeships. In the longer term, the North Essex Economic Board is committed to promoting wider economic growth and investment across the geographical region **[See reference** 191**]**.

C.54 At county level, the 'Levelling Up Essex White Paper' **[See reference** 192**]** sets out the vision for tackling several key challenges in Essex. It identifies Rural Braintree as one of the six priority places for investment. The 'Essex Sector Development Strategy' **[See reference** 193**]** identifies key growth sectors for the county, including construction (including retrofit), clean energy, advanced manufacturing and engineering, and digital and life sciences.

C.55 Braintree District Council's 2025 Employment Land Review **[See reference** 194**]** calculated the additional need for employment space in the District over the period 2024-41 and made a number of detailed recommendations to help support the local economy. Key points included the following:

- Braintree District's office market is comparatively small compared to its neighbours, with approximately 266,352 sqm of floorspace. Offices are mostly comprised of small office units and are concentrated in the towns of Braintree, Witham and Halstead. Forecasts indicate that an estimated additional 18,300 sqm of office space would be needed, representing modest and steady growth (15% over the 17-year period).
- Around 32.7ha of employment land is for industrial uses. The majority of industrial land was located at three large industrial areas: Springwood Industrial Estate (Braintree), Witham Industrial Estates and Bluebridge Industrial Estate (Halstead). It was estimated that demand for industrial

floorspace is approximately 97,000 sqm (or 24.2 ha of land) to 2041, largely aimed a providing for a rapidly changing logistics sector.

- The development pipeline for industrial and distribution space is strong in Braintree, due to the Skyline 120 and Horizon 120 developments

1.3 Horizon 120 Business and Innovation Park has now been part completed and is a flagship modern employment site within Braintree District. The Council approved a Local Development Order (LDO) in April 2020; the LDO provided planning permission for specific types of development on the site including employment uses, a hotel and a central facilities hub in a high-quality environment. A hybrid planning application was submitted in November 2023 seeking planning permission for Phase 2 of Horizon 120. It comprises a further 55,000 sqm of employment floorspace on the 15 ha site **[See reference** 195**]**.

C.56 Between 2016 and 2021, a total of 73,750 sqm of non-residential floorspace was completed **[See reference** 196**]** as shown in **Table C.6**. This floorspace makes provision for Use classes E (commercial, business and service, including light industry), B2(general industrial) and B8(storage and distribution), although these categories are not separately distinguished.

Table C.6: Non-residential floorspace completed between 2016 - 2021 [See reference 197]

	2016/17	2017/18	2018/19	2019/20	2020/21	Overall change 2016/21
Floorspace completed sqm	3,918	14,909	23,272	16,057	15,594	73,750
Floorspace Losses sqm	1,587	9,019	18,102	8,048	7,67	44,623
Net change in floorspace sqm	2,331	5,890	5,170	8,009	7,827	29,227

C.57 The retail hierarchy of centres set out in the adopted Local Plan (2013-2033) is as follows:

- Town Centres: Braintree, Witham, Halstead
- District Centres: Great Notley
- Local Centres: Coggeshall, Earls Colne, Hatfield Peverel, Kelvedon Maltings Lane (Witham), Sible Hedingham

C.58 According to the Braintree District Retail Study, in July 2024, there were 72 vacant shop units within the town, district and local centres in the district which equates to an overall vacancy rate of 10.6%. This is below the Experian Goad Plan UK national average of 14.8%. There were 58 vacant units in the three main town centres and 14 vacant units in the local centres. Halstead has the highest vacancy rate (just over 11.0%). Retail performance is measured by unit vacancies and there have been cyclical trends in vacancy rates at the national level, reflecting macro-economic trends. Shopping behaviour will continue to change and town centres will need to respond to pressures such as the prominence of online shopping and the cost-of-living crisis **[See reference** 198**]**.

Transport and accessibility

C.59 Braintree District has good connectivity to the national transport network. The A120 and A12 pass through the southern half of the District, providing access to the M11 and other major routes, as displayed in **Figure C.6**. This figure also shows the railway stations and bus stops in the district. As described later in this section some of the bus stops in the district are served less frequently than others with some only benefiting from services operating four times daily or less.

C.60 The A120 connects the district to the M11, which in turn links to London and the Midlands, whilst the A12 travels to London to the south west and Colchester, Ipswich and the eastern coast to the north east. The A131 connects Braintree town south with Chelmsford and north with Sudbury via Halstead. This strategic positioning supports local businesses, enhances accessibility for residents, and strengthens the District's integration within the wider regional and national transport infrastructure.

C.61 Braintree District's strategic connectivity with surrounding districts and London is essential for accessing employment and services. The district is well-positioned for commuters travelling to major employment hubs such as those within Chelmsford, which includes key sites like Chelmsford Business Park, Springfield, Dukes Park Industrial Estate, and Widford Industrial Estate **[See reference** 199**]**. Colchester, a significant regional centre, offers a wide range of retail outlets, cultural facilities, and educational institutions. London, with its high-level professional roles and extensive cultural attraction, attracts commuters seeking specialised opportunities and experiences. Additionally, major employers such as Stansted Airport in nearby Uttlesford contribute to regional economic activity and job growth. This well-developed transport

infrastructure not only supports Braintree District's local economy but also enhances its role within the broader regional and national economy, facilitating both local employment and commuting to external opportunities.

Figure C.6: Transport network in Braintree District and surroundings

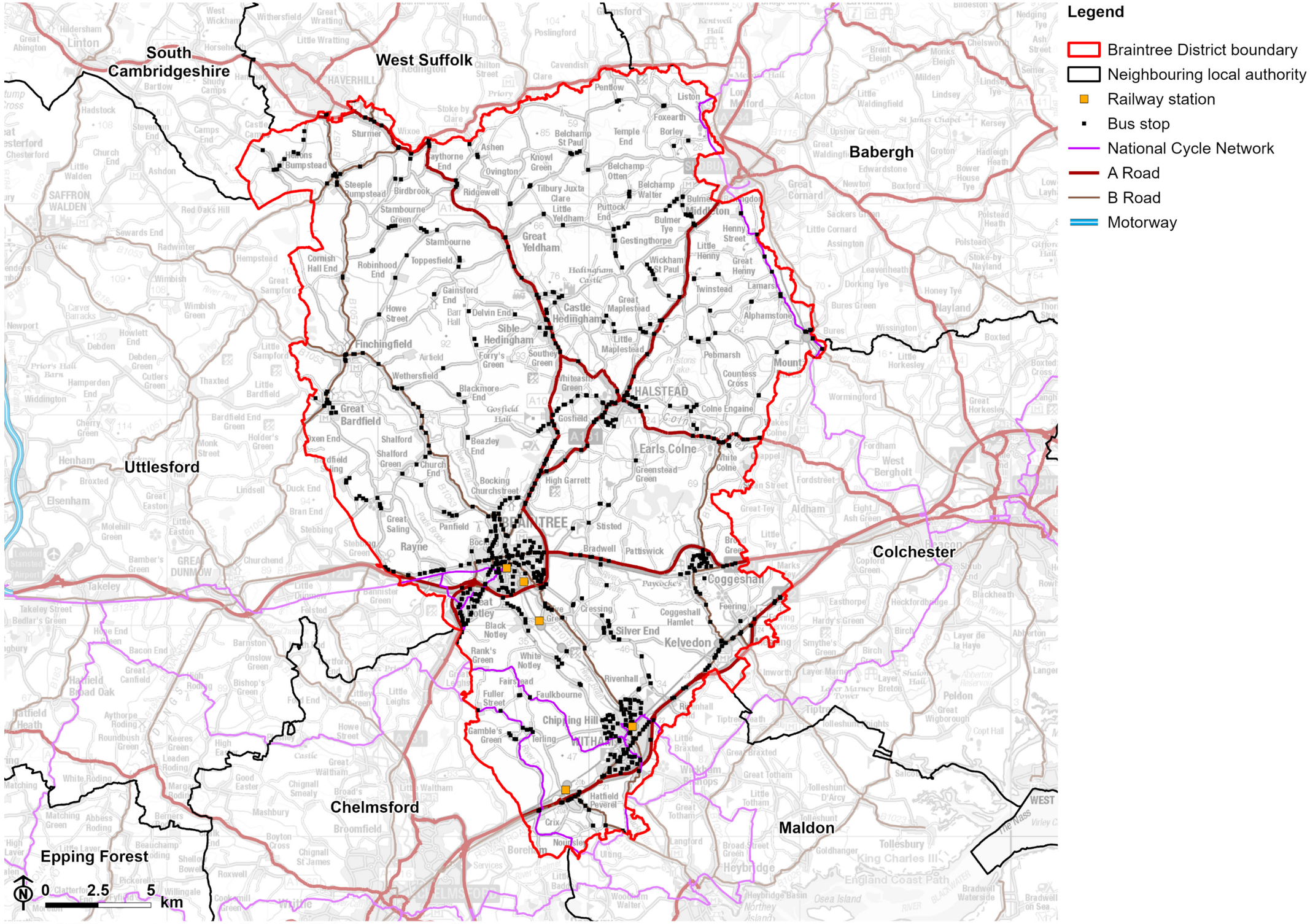


Figure C.6: Transport network in Braintree District and surroundings
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C.62 Accessibility by public transport or walking to key services and educational facilities is generally better within and in close proximity to the three main towns of Braintree, Halstead and Witham than other parts of the district. Just over half of residents live in these three main urban areas. Many residents not located within these settlements are in more rural locations where the private car is often the main means of transport. Partly reflective of this, car ownership rates are higher in Braintree District (at 86.3%) than the regional (83.2%) and national average (76.5%) **[See reference** 200**]**.

C.63 Public transport networks in the towns of the district are relatively strong however most bus routes radiate from Braintree town centre linking to Chelmsford, Colchester, Halstead and Stansted Airport. Bus services operate more regularly between the more developed areas in Braintree town and there are relatively frequent services which extend to surrounding towns and villages, including Halstead and Witham. Bus services in Braintree town also connect to neighbouring areas such as Colchester and Chelmsford. Regular express buses from the station in Braintree town provide connections to Stansted Airport. Witham and Halstead have links to surrounding areas, however services are relatively infrequent. Generally, the bus network in the district is fragmented with no single bus operator **[See reference** 201**]**. Operators in the district include Arriva, First Essex Buses, Stephensons of Essex, and DaRT services. Frequency and days of operation vary considerably with the availability of services during evenings, weekends and in rural areas more limited.

C.64 Rural areas of the district experience infrequent or no bus services, due to low population. Only 2% of the residents in these areas travel to work by bus **[See reference** 202**]**. the DaRT services 3 and 299 provide demand responsive transport in rural areas of north east Braintree and west Braintree as well as west and north Uttlesford and Epping Forest **[See reference** 203**]**. DigiGo shared public transport service provides on-demand travel in parts of Essex including parts of west Braintree District **[See reference** 204**]**.

C.65 There are seven railway stations in the district. Hatfield Peverel, Witham and Kelvedon are located on the Great Eastern Main Line and benefit from direct and frequent services to central London (Liverpool Street Station). Braintree town has from two railway stations: Braintree and Braintree Freeport with the Braintree branch railway line connecting to Witham via Cressing and White Notley. However, rail services between Braintree town and London are relatively infrequent, being constrained by its location on a single-track branch line. This can make it difficult for those without access to a car to access key

services and facilities, including for the less well-off and the district's growing elderly population. The other station in the district is at Bures, located on the Gainsborough Line which connects Sudbury and Marks Tey (for connections to the Great Eastern Main Line).

C.66 National Cycle Routes 16 and 50 pass into the district. Route 16 connects Route 13 near Stansted via Great Dunmow, Braintree and Witham and continues to the intersection of Route 1 near Great Totham. Route 50 passes to the south of Hatfield Peverel in the district providing connections to National Cycle Network Link Routes that provide access to the wider network.

C.67 However, in places the cycle network in the district is fragmented, with poor connectivity, lack of signage and abrupt route endings, particularly in the north of the district and in some parts of Braintree town centre. Cycling infrastructure is largely concentrated in the south of the district, specifically in and around the settlements of Braintree town, Halstead and Witham. While these areas have some infrastructure it is not integrated as a coherent network with few clearly defined routes. The existing situation does not encourage or support short local journeys by bicycle. Cycle access to rail stations within the district is limited with only Braintree town having a clearly defined route from the west along Flitch Way. The district is largely rural and contains many roads which accommodate low flows of traffic but allow for vehicles to travel at the national speed limit. The higher speed limits at these locations may discourage cyclists, despite the lack of traffic relative to the urban areas. Overall, cycling levels in the District are around the mid-point for Essex, and the propensity to cycle within the District is reasonable, suggesting that it is possible that improved cycling facilities and encouragement of cycling will lead to a greater uptake in the number of people cycling **[See reference** 205**]**, **[See reference** 206**]**.

C.68 Around one fifth of those who use employment centres in the district are unable to access them by public transport or walking **[See reference** 207**]**. More than 80% of the population of Braintree District lives within 30 minutes travel time by public transport or walking to of each of five key services: primary school, secondary school, employment site, retail centre, GP surgery. The proportion of residents living within 15 minutes travel time of these services is as follows:

- Primary schools 79%,
- GP surgeries 64%, Retail centres 62%,
- Employment sites 59%; and

- Secondary schools 41%.

C.69 According to the Department for Transport, Braintree District residents have slightly longer travel times to local services compared to the Essex average (19.4 minutes). At 23.7 minutes, Braintree District has the joint third highest average travel time by public transport or walking to reach eight key services of the local authorities in the county. Average times to GP surgeries are estimated at just under 14 minutes, whilst for hospitals this is 60 minutes and are the fourth and third highest times in Essex. Access to a car reduces these travel times significantly to 8.5 minutes for GP surgeries and 30 minutes to hospitals. **[See reference** 208**]**.

C.70 Data from the Essex County Bus Service Improvement Plan **[See reference** 209**]** indicates that services have an overall satisfaction score of 86.0%. This score is 23rd out of the 31 authorities who took part in the satisfaction survey. The figure for Essex is 9.0% lower than the top score. The average score across all authorities is 89.2%, 3.2% above the Essex level.

C.71 Travel to work data is available and this gives an indication of the modes used for trips made by residents of the district. The high rate of commuting to work by car, reflects the more rural nature of the district and the dependency of residents in more rural locations on higher order centres for access to jobs and services and facilities.

C.72 Travel to work data taken from the 2021 Census (**Figure C.7**) indicates that 1.1% of the resident population of Braintree District travel to work by bus, which is much lower than the national average of 4.3% and regional average of 2%. The commuting figures (**Figure C.8**) show that 23.7% of the resident population travel less than 10km to work. There has been a noticeable shift towards working from home during and in the aftermath of the COVID-19 pandemic, with 38.8% of the resident population in employment in Braintree District working mainly from home, although this is lower than the regional average of 31.9%. Additionally, 21.2% of residents in the district commute between 10km and 30km, which is significantly higher than the national average of 14.4% **[See reference** 210**]**. The district's strong connectivity to neighbouring authorities and employment hubs, such as Chelmsford, Uttlesford, Colchester and Stansted Airport is facilitated by key routes like the A120, the A131 and A12, which provide access to major highways including the M11. This robust network supports longer commuting, even though the data does not specify exact destinations.

C.73 Stansted Airport is located within Uttlesford District but it is a major employer for Braintree District residents, and it is therefore a major cause of

out-commuting, with potential negative effects on road congestion and road traffic-related air pollution and greenhouse gas emissions. The airport plans to address these issues by improving the attractiveness of public transport to the airport for both staff and passengers, for example offering discounted travel opportunities and working with bus, coach and rail operators to provide scheduled services that match working patterns where possible **[See reference** 211**]**.

C.74 Based on 2021 census data, 54,686 Braintree residents work within the district. This includes 35,384 who work from home and 19,302 who commute locally. Additionally, 11,932 people travel into Braintree District for employment, the largest number – 3,031 – coming from Colchester. In terms of outflow, a total of 21,595 residents travel out of the district for work. 2,736 residents commute to Colchester, 3,584 to Uttlesford, and 5,405 to Chelmsford for work. This data underscores the district's relatively strong local employment base but also the need for a substantial proportion of residents to travel to other locations for work. The district's good connectivity to employment hubs in areas such as Chelmsford, Colchester, and Stansted Airport supports the level of out commuting recorded **[See reference** 212**]**.

C.75 The Economic Growth Strategy **[See reference** 213**]** identifies a number of major infrastructure and growth schemes inside and outside the district that could impact the relatively high levels of commuting out from the district. These include:

- Freeport East – At Felixstowe and Harwich, the new Freeport will deliver a secure customs zone for businesses importing and exporting. Plans to develop two green hubs that would create 13,500 jobs via £500m investment are expected within the next 10 years.
- New overhead and underground powerline schemes and renewable energy generation.
- New road building schemes such as the A12 in the district and the Lower Thames Crossing outside of the district.
- Stansted Expansion – Investment of £600m to increase the airport's capacity to 43 million passengers per year will be made as well as the development of its own business park on site.
- Bradwell B and Sizewell C Nuclear Power Stations.
- Significant housing growth outside of the district, including new Garden Communities at Harlow, Colchester borders, and Chelmsford.

Figure C.7: Method of travel to workplace in Braintree District [See reference 214]

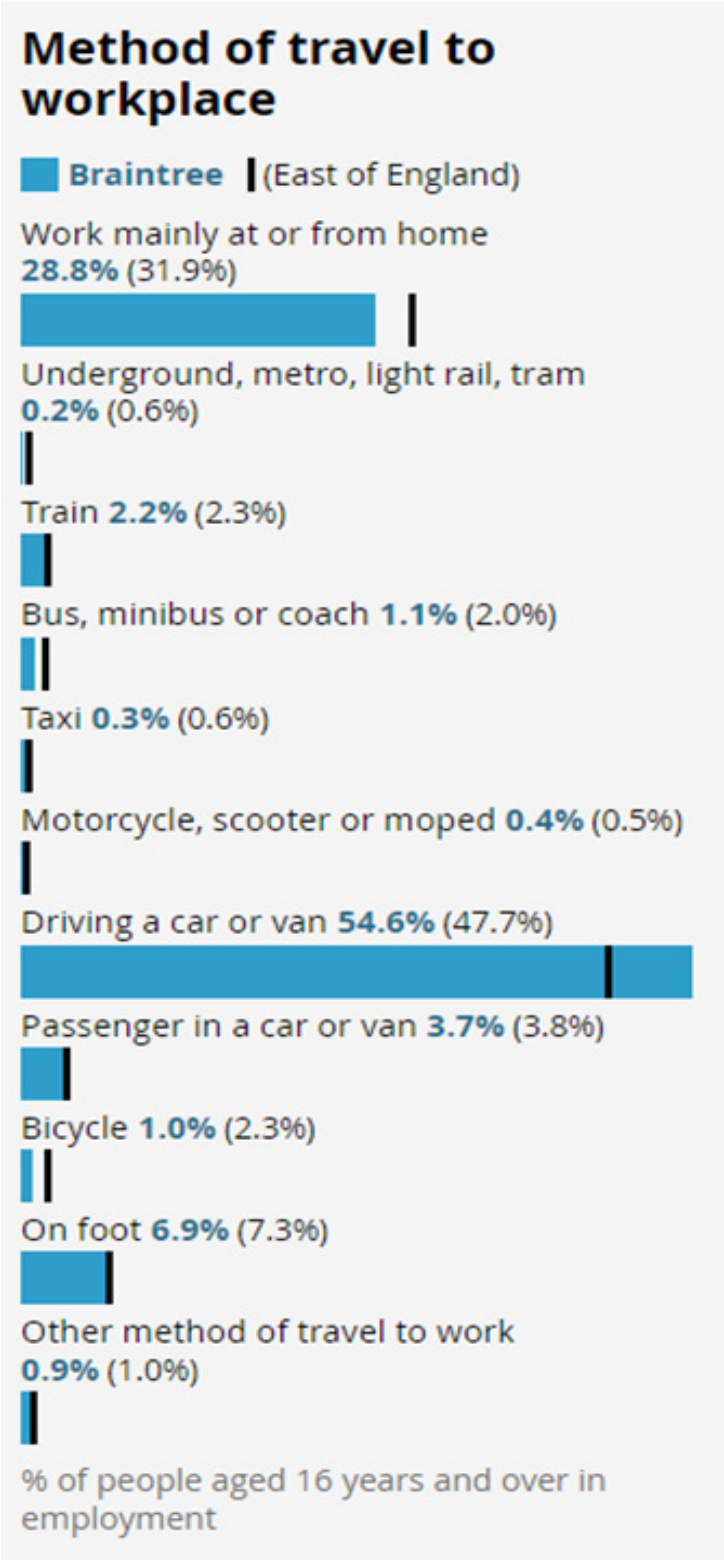
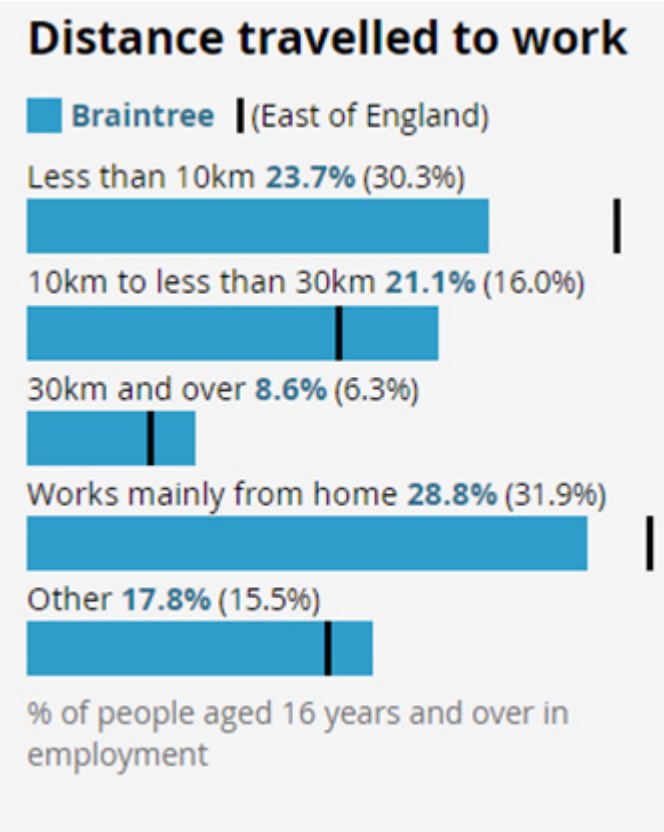


Figure C.8: Distance travelled to work in Braintree District [See reference 215]



C.76

Air, land and water

Air quality

C.77 There are currently no Air Quality Management Areas (AQMAs) declared in Braintree District. The main air quality issues in the district relate to nitrogen dioxide (NO_2) from vehicles travelling on the A12, A131 and A120 with monitoring occurring along these routes and routes that lead directly to them. The three main towns are Braintree, Halstead and Witham and these areas see traffic flows through them due to both commercial and residential development in the surroundings. Within the towns and larger (key service) villages there is the potential for elevated NO_2 levels close to road junctions and air pollutant monitoring is focussed on these locations. In 2023, the highest measured pollutant levels were at Head Street/Colchester Road junction in Halstead **[See reference** 216**]**.

C.78 There is no current regulatory standard applied to $PM_{2.5}$ (for local authorities in England) to require action to reduce emissions or concentrations of fine particulate air pollution, although efforts to reduce PM_{10} and NOx emissions typically help to lower $PM_{2.5}$ levels. The Public Health Outcomes Framework introduced a $PM_{2.5}$ indicator reflecting the 'fraction of adult mortality attributed to particulate air pollution'. In 2023, Braintree reported a level of 5.39% against this indicator, which is comparable to the East of England region average of 5.47%, and England average of 5.5%. In 2023 $PM_{2.5}$ levels were reported as 11.5 µg/m3 in Braintree **[See reference** 217**]**. During the reporting period up to 2020, figures for $PM_{2.5}$ were substantially reduced for Braintree District and at the national level because of reduced travelling experienced during the COVID-19 pandemic. According to the latest Air Quality Annual Status Report for Braintree, there are 24 NO_2 diffusion tubes monitoring air quality at 20 different locations **[See reference** 218**]**. These are located within the three main towns of Halstead, Braintree and Witham and within the parishes of Bradwell, Rivenhall, Kelvedon and Hatfield Peverel. Even though transport is considered the most significant source of pollution, no sites exceed the air quality objective level of 40µg/m^3 at any points of relevant exposure, that being at the facades of residential property. Following a reduction of air pollutants levels during the pandemic for the year 2020 levels, as expected levels increased in 2021 and 2022 as England emerged from COVID-19 restrictions on movement.

C.79 AQMAs are present in the neighbouring authorities to Braintree District:

- Babergh District Council:
  - Sudbury AQMA – an area encompassing part of Cross Street, Sudbury.
- Colchester City Council:
  - Brook Street.
  - Mersea Road.
  - Osborne Street and St. John's Street.
- Maldon District Council:
  - Maldon District Council AQMA number 1 – a designated area incorporating the stretch of road and properties between Anchorage Hill and Bull Lane, Maldon.
- West Suffolk Council:

- Great Barton AQMA – this designated area incorporates Gatehouse Cottage and 1 to 8 The Street (A143), in the Parish of Great Barton, Suffolk.
- Sicklesmere Road Bury St Edmunds AQMA 2018 – this designated area incorporates 2 and 7 Sicklesmere Road and 28 Southgate House, Rougham Road, in the Parish of Bury St Edmunds (Southgate Ward).

C.80 It is recognised that air quality does not respect administrative or political boundaries and that there is potential for the occurrence of cross boundary impacts on neighbouring AQMAs. Development in Braintree District has potential to impact the AQMAs present in neighbouring authorities as a result of traffic growth. Most notably the Sudbury AQMA lies along the A131 which connects to Halstead and is within 1.1km of the district boundary.

Geology and minerals

C.81 The Essex Minerals Local Plan (2012 – 2029) **[See reference** 219**]** estimates the quantity of minerals across the county and plans for a steady and adequate supply of aggregates over the coming years to help meet housing and infrastructure needs.

C.82 The assessment identifies that the aggregate supply to the administrative area comprises various minerals, including:

- Aggregate minerals such as sand, gravel, crushed rock, and other bulk materials used by the construction industry;
- Silica sand;
- Brick clay;
- Brickearth;
- And chalk.

C.83 Aggregates are both imported into Essex (hard rock, and sand and gravel), and exported (sand and gravel, primarily to London). Essex is the largest producer and consumer of sand and gravel in the East of England. The county has 20 permitted sand and gravel sites, one silica sand site, two brick clay and one chalk site. Essex also features two marine wharves and four rail depots capable of handling aggregate. Construction, demolition and excavation waste is also recycled at 29 dedicated and 15 active aggregate recycling sites.

C.84 Seven sites within Braintree District have been identified as preferred or reserved sites for primary mineral extraction of sand and gravel in the Essex Minerals Plan. These include five sites at Bradwell Quarry, Rivenhall Airfield; one site at Broadfield Farm, Rayne; and one site on land at Colemans Farm.

C.85 There are no geological SSSIs and 27 Local Geological Sites (LoGS) in Braintree District. The designated LoGS include Bulmer Brickworks (manufacture of traditional, hand-made bricks for historic buildings); Ferriers Farm Pit (disused sand and gravel pit); Alphamstone Churchyard boulders; and Goldingham Hall Chalk Pit **[See reference** 220**]**.

Soil

C.86 Agricultural Land Classification (ALC) is a system **[See reference** 221**]** used to assess the quality of agricultural land. It classifies land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land.

C.87 The majority of agricultural land in Braintree District is classified as Grade 2 or 3, with 65.8% (40,243 hectares) of agricultural land classified as Grade 2 and 29.9% (18,304 hectares) as Grade 3 **[See reference** 222**]**. Areas of Grade 2 and Grade 3 agricultural land are interspersed with each other away from the main settlements of the plan area. The breakdown of the district in relation to its soil classification is shown in **Figure C.9**.

Figure C.9: Agricultural Land Classification

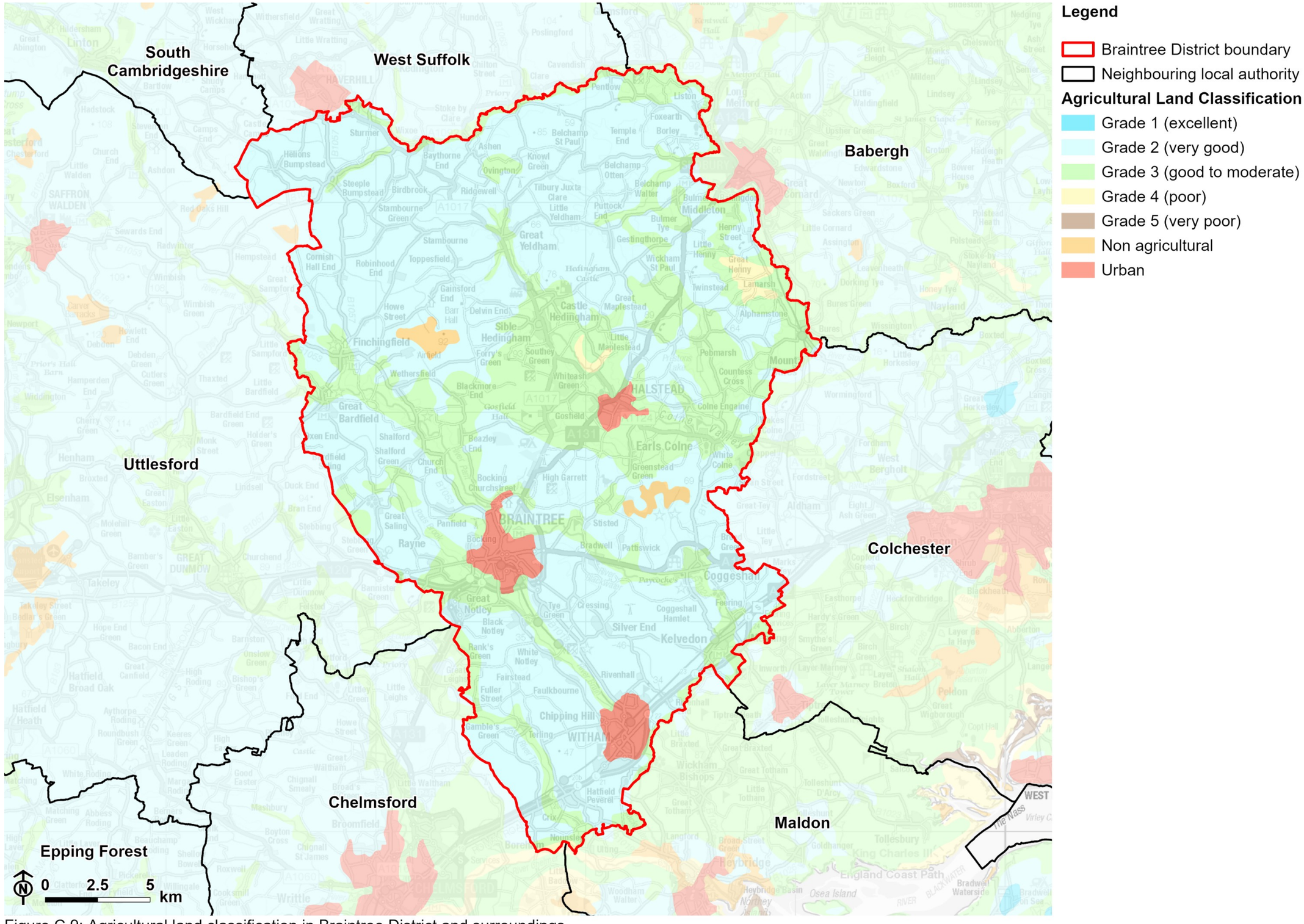


Figure C.9: Agricultural land classification in Braintree District and surroundings
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Contaminated Land

C.88 The existence of large historical manufacturing industries in the Braintree District, has led to some degree of contamination of sites through associated industrial processes, or activities that are now defunct. Contamination of land can have adverse impacts on health and wellbeing as well as damaging wildlife and contributing to pollution of water bodies. Currently, there are 916 entries on Braintree District Council's contaminated land register **[See reference** 223**]**. In 2025, there were 33 sites on the Brownfield Register totalling 20.8ha of previously developed land in the district **[See reference** 224**]**.

Waste

C.89 In Braintree District, Braintree District Council is the authority responsible for waste collection while Essex County Council is responsible for waste disposal.

C.90 Essex County and Southend-on-Sea have adopted a waste plan to cover that area. The Essex and Southend-on-Sea Waste Local Plan (2017 – 2032) **[See reference** 225**]** stipulates that there is a total of 186 waste management facilities across the plan area, with an estimated capacity of 22,602,560 tonnes. This includes 116 waste transfer facilities, with an estimated capacity of 1,776,928 tonnes, as well as 12 disposal landfills, which have an estimated capacity of 17,964,802 tonnes. Local Authority Collected Waste, making up approximately 20% of the total amount of waste created in the Plan area, is managed through a network of sites which comprises a number of Recycling Centres for Household Waste and six supporting municipal waste transfer stations, which includes Cordons Farm in Braintree. Braintree has one main household waste and recycling centre **[See reference** 226**]**.

C.91 In Braintree District, about 60,361 tonnes of household waste was recorded in 2022-23 – down from 64,039 tonnes in 2021-22. Of the household waste collected in 2022-23, 26,588 tonnes were sent for reuse, recycling or composting – meaning the area had a recycling rate of 44.05%. This is a decrease of 3.02% from the previous year, although this is higher than the national rate of 43.4% **[See reference** 227**]**.

Water

C.92 The main water courses running through Braintree District are the Rivers Blackwater, Colne, Brain, Pant, Stour and Ter. Braintree District contains major aquifers within the northern half of the district, together with scattered minor aquifers in the south of the district.

C.93 Catchment Abstraction Management Strategies (CAMS) set out how the Environment Agency will manage the water resources of a catchment and contribute to implementing the Water Framework Directive (WFD). Overall, Essex CAMS area is heavily abstracted with further licensing most likely only available at high flows. Looking in more detail at the CAMS river catchments within the District, the resource availability during the lowest flow times of the year (Q95 flows) is detailed in **Table C.7**.

Table C.7: Water resource availability in CAMS catchments intersecting Braintree District [See reference 228]

CAMS catchment intersecting Braintree District	Water resource availability
Stour	'Water not available' in almost all of catchment
Colner & Tendring	'Water not available' in all of catchment upstream of Colchester
Blackwater	'Water not available' in all of catchment except for small portion at the Essex coast
Chelmer	'Water not available' in almost all of catchment

C.94 The 'water not available' CAMS status across the district indicates that recent actual river flows are below the Environmental Flow Indicator (EFI), the flow required to support a healthy ecology. In these areas, no further consumptive licences will be granted although unused capacity may exist within abstraction licences that have already been granted.

C.95 Essex falls within the Anglian River Basin District. The Anglian River Basin District is subdivided into catchment areas, and the Combined Essex catchment area lies within the counties of Essex and Suffolk, as well as a small part of Cambridgeshire. Current water quality in Essex is described in the Anglian River Basin Management Plan **[See reference** 229**]**.

C.96 The Water Environment (Water Framework Directive) Regulations (2017) looks at the ecological and chemical health of both groundwater and surface water with the aim of achieving 'good ecological status' and 'good chemical status' by 2027, and to ensure that there is no deterioration from existing statuses. The current overall, ecological and chemical WFD status or potential of each of the water bodies within the Combined Essex catchment associated with Braintree District is shown in **Table C.8**. These water bodies lie within the operational catchments of Chelmer, Blackwater, Colne Essex, and Stour OC.

Table C.8: Water quality in waterbodies [See reference 230]

Waterbody name	Current ecological status	Current chemical status
Ter	Moderate	Fail
Domsey Brook	Good	Fail
River Chelmer (confluence with Can)	Poor	Fail
Pant	Moderate	Fail
Brain	Moderate	Fail
Boreham Tributary	Good	Fail
River Blackwater	Moderate	Fail
Bourne Brook	Poor	Fail
Colne (Gt. Yeldham - Doe's Corner)	Poor	Fail
Colne (d/s Doe's Corner)	Moderate	Fail
Toppesfield Brook	Moderate	Fail
Pebmarsh Brook	Good	Fail
Belchamp Brook	Moderate	Fail
Stour (Wixoe - Lamarsh)	Moderate	Fail

C.97 This shows that, in 2022, sections of rivers within Braintree District were recorded as having poor water quality. All rivers within Braintree District are failing in terms of achieving good chemical status. Note that this is an issue that is not confined to the district and no English rivers are currently reported as achieving this objective.

C.98 Source Protection Zones are defined around large and public potable groundwater abstraction sites, and they provide additional protection to safeguard drinking water quality by constraining the proximity of an activity that can impact the quality of drinking water. Much of the north of the district is

covered by a Source Protection Zone and there are areas of Source Protection Zones 1 and 2 towards Braintree town and Halstead. The Source Protection Zones and watercourses in the district are presented in **Figure C.10**.

Figure C.10: Watercourses and Source Protection Zones in Braintree

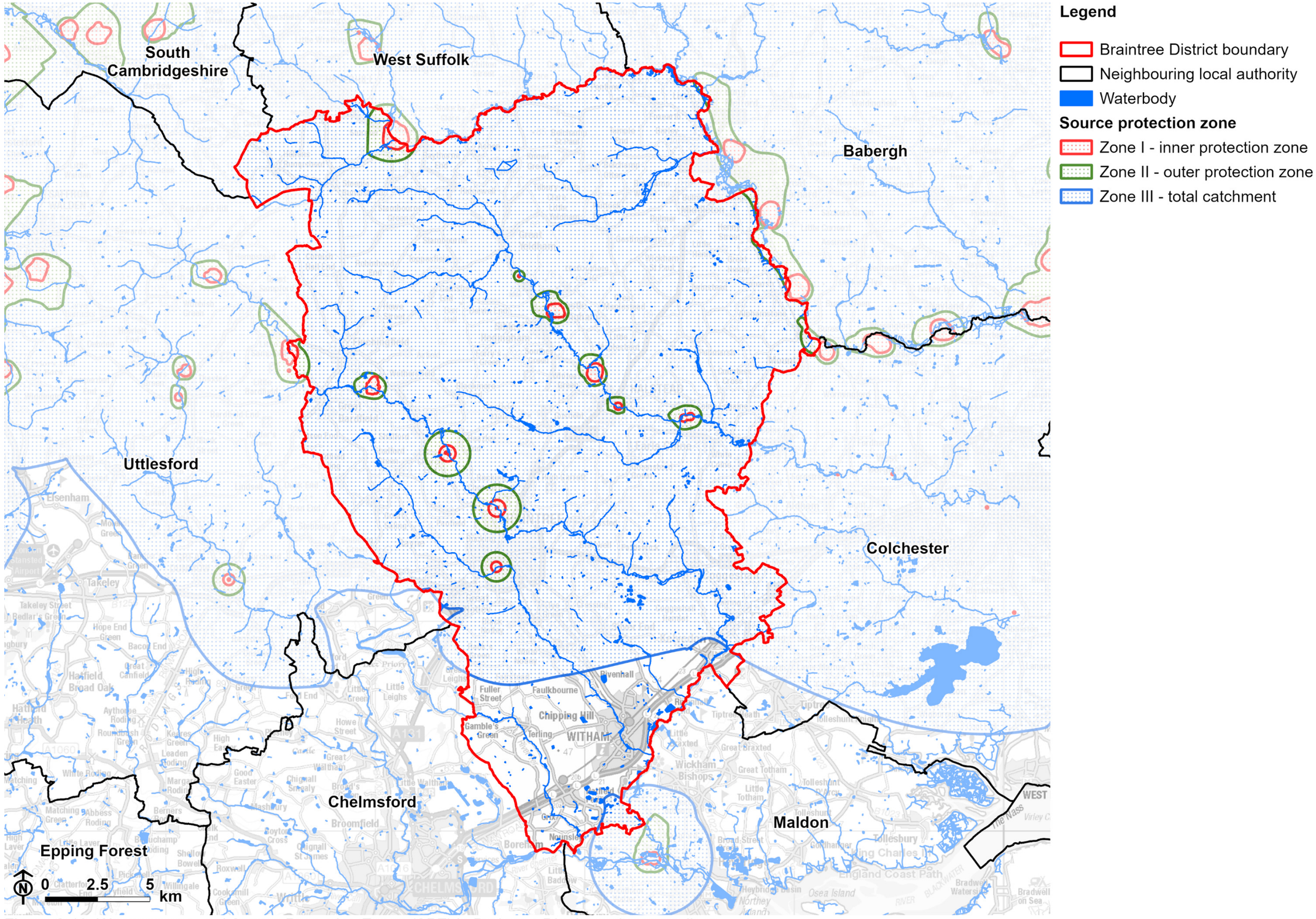


Figure C.10: Watercourses and Source Protection Zones (SPZ) in Braintree District and surroundings

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C.99 Braintree District Council's most recent Water Cycle Study (WCS) **[See reference** 231**]** assesses planned future development of the district with regards to water supply capacity, wastewater capacity and environmental capacity. The WCS identifies that in total, 14 Water Recycling Centres (WRCs) serve the proposed future development across the district. The WRCs that are likely to require changes to permits that control discharge and potential infrastructure upgrades include:

- Bocking
- Braintree
- Coggeshall
- White Notley

C.100 The WCS shows that to accommodate development in the adopted Local Plan improvements to Bocking, Coggeshall and White Notley WRCs are possible using wastewater treatment technologies (conventional). However, Braintree WRC will require more advanced treatment technologies (non-conventional) to ensure future development can be accepted without significantly compromising water quality targets in the River Basin.

C.101 It is important to note that significant water stress was identified in the district and in the wider Anglian Water Services area, as well as limitations on water available in local water resources. Hence there are key drivers requiring that water demand is managed in the district for all new development in order to achieve long-term sustainability in terms of water resources.

Flood Risk

C.102 The risk of flooding posed to properties within the district arises from a number of different sources including river flooding, sewer and surface water flooding.

C.103 The dominant fluvial systems within the district are the River Blackwater, the River Brain and the River Colne. These rivers run close to a number of settlements. The River Brain flows through the towns of Braintree and Witham. The River Blackwater flows through Braintree town, Coggeshall, Kelvedon and Feering to the south of Witham. The confluence of the Rivers Brain and Blackwater is situated to the south east of Witham town centre. The River Colne flows through Great Yeldham, Sible Hedingham, Castle Hedingham and Halstead.

C.104 The large majority of the district falls within Flood Zone 1, where there is a low probability of flooding from fluvial sources. However, due to the lowland nature of the landscape, floodplains associated with principal watercourses are broad. There are large extents of Flood Zone 2 and 3 around Sible Hedingham, Castle Hedingham, Halstead, Earls Colne, Braintree town, Coggeshall, Feering, Kelvedon and Witham **[See reference** 232**]**. The sources of flooding include fluvial flooding and surface water flooding. The most significant flood events reported to have affected the district occurred in 2001 and 2009. The risk of flooding is likely to be intensified due to climate change and certain areas of the district are particularly vulnerable. For example. flood alleviation scheme has been designed to reduce the risk of flooding form the River Blackwater to around 300 properties in the villages of Coggeshall, Feering and Kelvedon **[See reference** 233**]**.

C.105 Surface water flooding can occur from sewers, drains, or groundwater and from runoff from land, small watercourses and ditches because of heavy rainfall. The effect of climate change on surface water flood risk is predicted to increase the intensity and likelihood of summer rainfall events, meaning surface water flooding may become more severe and more frequent in the future. An increase in rainfall intensity of 20% and 40% was applied in the Braintree and Witham Surface Water Management Plan to account for the projected impacts of climate change based on updated guidance provided by the Environment Agency, which takes account of the uncertainty in climate change projections **[See reference** 234**]**.

C.106 Based on the Environment Agency's Flood Map for Surface Water (FMfSW), the Preliminary Flood Risk Assessment (PFRA) identified clusters of areas where surface water poses a potential flood risk. Two of the clusters identified within Essex were centred on Braintree town and Witham, with over 2,000 and 1,000 people respectively predicted to be at risk of surface water flooding **[See reference** 235**]**.

C.107 The Level 1 SFRA Update found no indication that groundwater flooding forms a significant risk within the district. A large proportion of the district is underlain by London Clay, including all of the main settlements. This forms an impenetrable barrier to groundwater at depth, limiting the risk from this source **[See reference** 236**]**. **Figure C.11** shows the areas of flood risk in Braintree District.

Figure C.11: Flood Risk

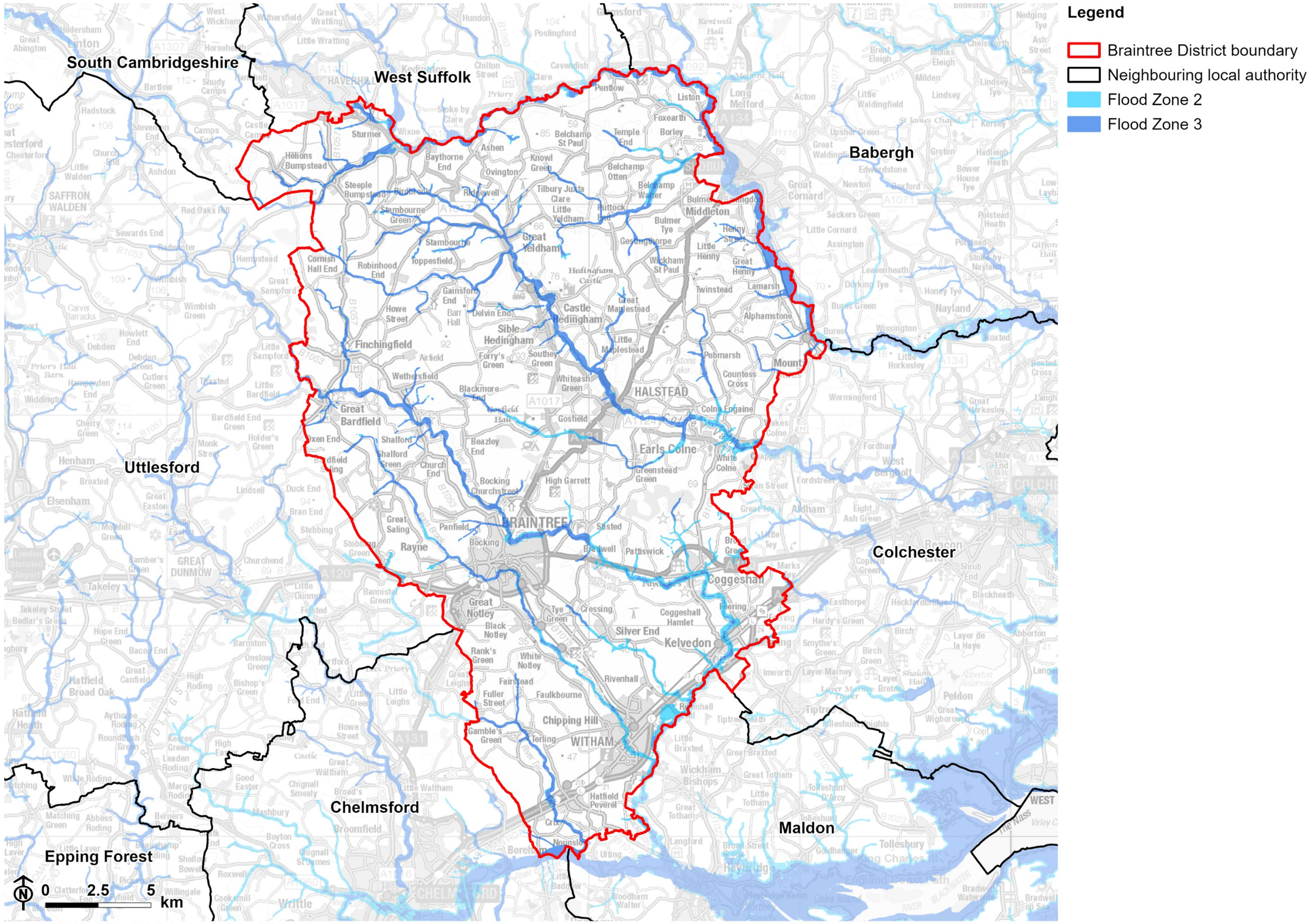


Figure C.11: Flood risk in Braintree District and surroundings
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Climate change mitigation and adaptation

C.108 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within Braintree District across numerous receptors. A key challenge in protecting the environment is to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year as well resulting in higher sea levels and increased river flooding. A strong response is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

C.109 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century **[See reference 237]**.

C.110 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012 to 2021) UK summers have been on average 6% wetter than between 1991 and 2020 and 15% wetter than between 1961 and 1990, whilst winters have been 10% to 26% wetter **[See reference 238]**.

C.111 With 2025 recorded as the warmest year on record, July and August experienced especially dry months and drought conditions were declared across parts of England and Wales. In total, the rainfall for 2025 was 1,041.2 mm – this is 90% of the average for the period from 1991 to 2020 **[See reference 239]**. The UK encountered more sun across 2025 than the average year, the highest since 1995**[See reference 240]**.

C.112 The Paris Agreement **[See reference** 241**]** is a legally binding international treaty involving, as of January 2026, 194 Parties. The overarching goal of this agreement is to limit global warming increasing to 1.5°C by the end of the century. Achieving this goal still requires multiple actions but since 2016 when the agreement was established, low–carbon solutions and new markets for climate resilience have been sparked.

C.113 The IPCC AR6 Synthesis Report (2023) highlights that greenhouse gas (GHG) emissions are predicted to continue into 2030 making it likely that the global warming threshold of 1.5°C, will be exceeded. As a result of this, climate hazards are considered more likely such as increased incidences of heatwaves, droughts, increased global monsoon precipitation, tropical storms, very wet and very dry weather. The Earth's natural land and ocean carbon sinks are expected to become less effective, sea levels will rise, become more acidic and experience deoxygenation amongst other climate events **[See reference 242]**.

C.114 The Tyndall Centre has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Agreement. Based on the analysis undertaken the following recommendations have been made for Braintree District **[See reference 243]**:

- Stay within a maximum cumulative carbon dioxide emissions budget of 4.6 million tonnes ($MtCO_2$) for the period of 2020 to 2100. At 2017 CO_2 emission levels, Braintree District would use this entire budget within 7 years from 2020.
- Initiate an immediate programme of CO_2 mitigation to deliver cuts in emissions averaging a minimum of -13.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2042. This report provides an indicative CO_2 reduction pathway that stays within the recommended maximum carbon budget of 4.6 $MtCO_2$. At 2042 5% of the budget remains. This represents very low levels of residual CO_2 emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO_2 emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO_2 emissions are also adopted.

C.115 Braintree District declared a Climate Emergency in 2019 and subsequently prepared a Climate Change Strategy **[See reference** 244**]** for the period 2021 to 2030, with the following aims:

- To make the Council activities carbon neutral as far as practical by 2030.
- Support partners, residents and local businesses to achieve carbon neutrality by 2030.
- Build resilient communities that adapt to the impacts of climate change.

C.116 The Essex Climate Action Commission (ECAC) is an independent group set up in 2020 to advise Essex County Council about tackling climate change. Their recommendations were set out in the 'Net Zero: Making Essex Carbon Neutral Report' which sets out recommendations for land use and green infrastructure, energy, the built environment, transport and waste and Climate Focus Areas (CFAs) **[See reference** 245**]**.

C.117 Most of Braintree District is located within the Essex CFA which comprises the Blackwater and River Colne catchment areas, covering almost of third of Essex County. The overall goal of the CFA is to achieve net zero carbon emissions through carbon reduction and carbon sequestration method. The secondary goal is to improve climate change resilience by reducing flooding and air pollution, improving soil health, access to green space and biodiversity and encouraging landowners to adopt Sustainable Land Stewardship practices **[See reference** 246**]**.

Carbon Dioxide Emissions

C.118 The Government regularly publishes Local Authority and regional carbon dioxide emissions national statistics. This data shows that emissions for Braintree District between 2005 and 2022 fell from 7.5t per capita to 4.2t per capita **[See reference** 247**]**. Per capita emissions in the plan area within the scope of influence of the local authority show that emissions generally declined each year, with the exceptions of 2010 and 2012, when emissions increased. This is shown in **Table C.9**.

Table C.9: Carbon dioxide emissions estimates in Braintree District [See reference 248]

Year	Total Emissions (kilotonnes (kt))	Per Capita Emissions (tonnes (t))
2005	1,024.8	7.4
2006	1,010.8	7.2
2007	996.4	7.0
2008	978.6	6.8
2009	916.6	6.3
2010	948.7	6.5
2011	871.2	5.9
2012	917.6	6.2

Year	Total Emissions (kilotonnes (kt))	Per Capita Emissions (tonnes (t))
2013	888.9	6.0
2014	822.5	5.5
2015	804.9	5.3
2016	769.0	5.1
2017	750.5	4.9
2018	726.9	4.8
2019	702.4	4.6
2020	645.0	4.2
2021	673.5	4.3
2022	634.8	4.0
2023	598.8	3.7
2024	607.2	3.7

C.119 In Braintree District, the main contributor of emissions is from transport and domestic sources. Between 2005 and 2024, the levels of emissions from transport and domestic sources have dropped significantly for the district, by 17.44% and 49.41%, respectively. This is shown in **Table C.10**.

Table C.10: Changes in carbon dioxide emissions by sector for Braintree District between 2005 and 2024 [See reference 249]

Source of emissions	Total emissions in kt (2005)	Total emissions in kt (2024)
Industry	158.5	48.0
Commercial	94.4	39.4
Public Sector	31.7	12.3
Domestic	350.1	177.1
Transport	360.1	297.3
Land Use, Land-Use Change and Forestry	4.4	6.2
Agriculture	37.0	40.2
Total	1,024.8	607.2

1.4 Compared to neighbouring Local Authorities, Braintree District demonstrates similar per capita CO_2 emissions to Chelmsford, Colchester, and Babergh, and displays much lower per capita CO_2 emissions compared to Uttlesford and West Suffolk, as presented in **Figure C.12**.

Figure C.12: Per Capita CO_2 Emissions Compared to Neighbouring Authorities

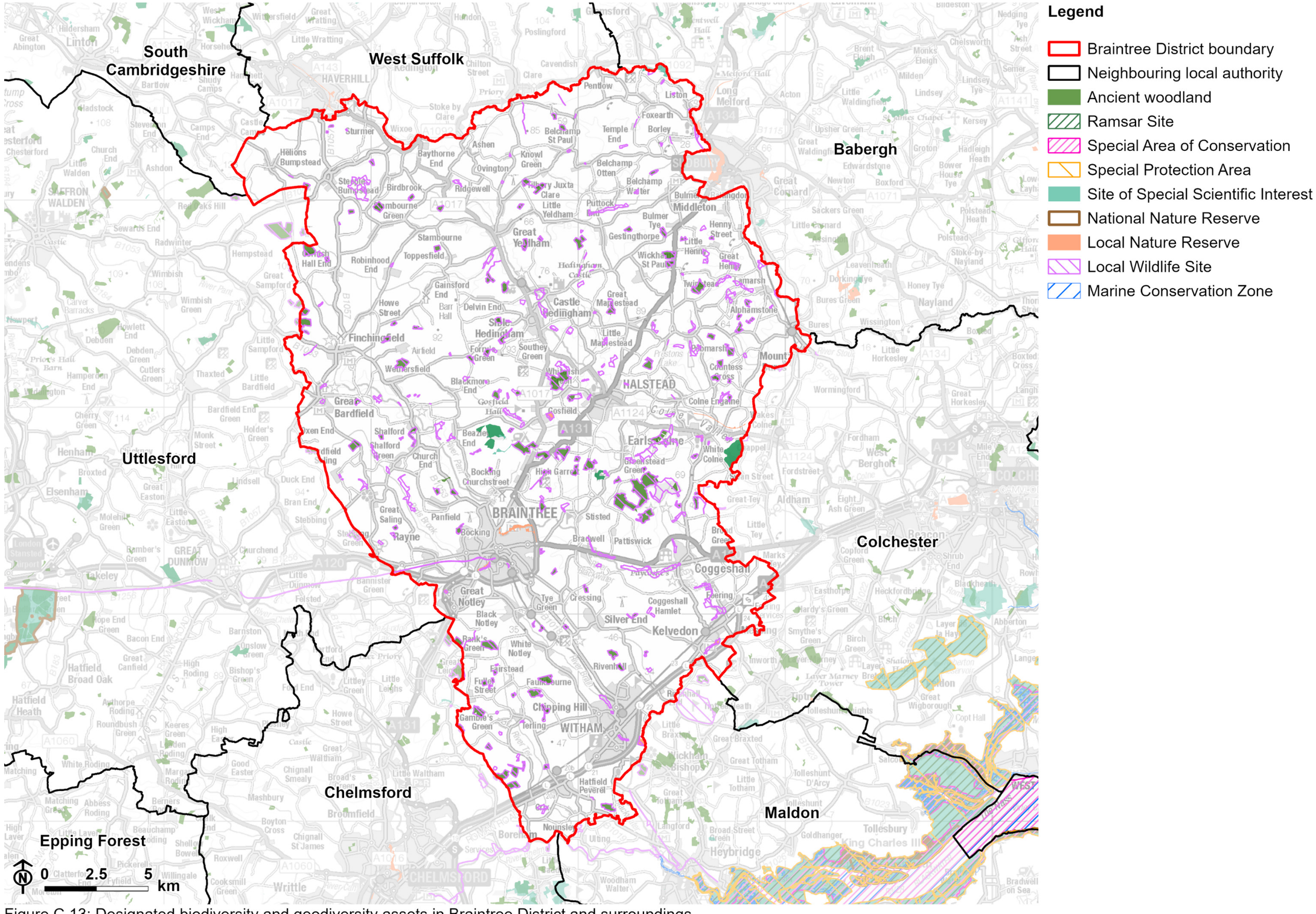


Figure C.13: Designated biodiversity and geodiversity assets in Braintree District and surroundings
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Overall energy consumption

C.120 The Department for Business, Energy and Industrial Strategy produced the following consumption figures for Braintree District in 2023 **[See reference 250]**. These figures are presented as ktoe (kilotonnes of oil equivalent):

- All fuels – A total of 254.2 ktoe across domestic, transport and industrial and commercial use.
- Coal – A total of 1.0 ktoe predominantly through industrial and domestic use.
- Manufactured fuels – A total of 1.2 ktoe through domestic and industrial use.
- Petroleum – A total of 133.6 ktoe predominantly from road transport.
- Gas – A total of 64.2 ktoe predominantly through domestic use.
- Electricity – A total of 42.0 ktoe through domestic and industrial and commercial use.
- Bioenergy and wastes – A total of 12.2 ktoe predominantly from road transport.

C.121 Table C.11 below highlights the energy consumption for Braintree District between 2005 to 2023 by type. With the exception of bioenergy and wastes, which saw a 435.71% increase between 2005 and 2023, all energy types saw a decrease in consumption between 2005 and 2023.

Table C.11: Energy Consumption in Braintree District by Type [See reference **251**]

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2023)
Coal	2.7	1.0
Manufactured Fuels	2.0	1.2
Petroleum	152.3	133.6
Gas	93.3	64.2
Electricity	56.1	42.0
Bioenergy and Wastes	2.8	12.2
Total	309.2	254.2

Renewable Energy

C.122 Renewable energy is recognised as an important contributor to reducing reliance on energy from fossil fuels which make a substantial contribution to climate change.

C.123 Within the East of England, in 2024, there was a total of 196,906 sites that were capable of generating energy from wind, solar, wave, hydro and biomass renewable sources. This accounts for 11.5% of all renewable energy sites in the UK. In 2024, the East of England generated a total of 17,181.5 GWh (Gigawatt hours) of renewable energy. This is 552.8% of renewable energy generation that was achieved in 2011. In 2024, a total of 4,002 photovoltaic panels and 11 onshore wind turbines were installed in Braintree District **[See reference** 252**]**.

C.124 EDF's Longfield Solar farm is a 500 megawatt (MW) solar farm co-located with battery storage. The Nationally Significant Infrastructure Project, which was granted consent in 2023, is located in the south-west of Braintree district between Terling and the planned Chelmsford Garden Village. Pre-commencement works are underway, and construction is due to commence in 2026 **[See reference** 253**]**.

C.125 Braintree District Council's Climate Change Strategy highlights the importance of renewable energy, stating increasing the proportion of energy from renewable sources is a priority for the Council. The Council has recently implemented various initiatives to reduce carbon emissions, including facilitating energy-saving measures like boilers, solar panels, and insulation, which has stopped around 1,000 tonnes of carbon entering the atmosphere. 0.5MW of solar power are located on local authority buildings in the district **[See reference** 254**]**.

Green Infrastructure

C.126 Green infrastructure has a range of benefits, for example: promoting healthier living, improving air quality and water quality, encouraging walking and cycling, improving the attractiveness of an area and encouraging investment. In particular it can help with climate change mitigation and adaptation by storing carbon, improving biodiversity and mitigating flooding, extreme heat and drought.

C.127 Essex County Council's Green Infrastructure Strategy outlines the existing green infrastructure within Braintree District, highlighting its significance

for biodiversity and habitat networks **[See reference** 255**]**. The strategy identifies that Braintree District benefits from the following areas of green infrastructure:

- Parks and gardens: 5.1ha
- Natural and semi-natural open spaces: 51.4ha
- Ancient woodlands: 12.7ha
- Coastal features: 0.1ha
- Greenways: 4.8ha
- Outdoor sports facilities: 6.2ha
- Amenity green spaces: 0.1ha
- Cemeteries and church yards: 0.7ha
- Allotments, community gardens and city farms: 1.4ha
- Open spaces and premises: 4.5ha
- Reservoirs, lakes and ponds: 0.3ha
- Waterways: 0.005ha

C.128 The total area covered by green infrastructure in Braintree District amounts to 87.3ha. This is similar to other Essex authorities such as Colchester, with 87.0ha, and Uttlesford, with 78.9ha **[See reference** 256**]**.

C.129 Key components of green infrastructure in Braintree District include elements of the South Suffolk and North Essex Clayland National Character Area (NCA), which falls within the southern and eastern part of the district and is characterised by its wooded arable countryside. As noted in the Braintree Climate Change Strategy, the District Council seeks to continue to develop green infrastructure, increasing the network of natural and semi-natural areas across the district, and increase the range of ecosystems in both rural and urban settings.

C.130 The Council supports the enhancement of green infrastructure networks through the community tree and bulb planting scheme. This scheme provides native tree whips and bulbs to Parish and Town Councils, local community and voluntary groups, schools, colleges, and charities. Between October 2021 and March 2022, 850 trees and 41,600 bulbs were planted across the district. Additionally, more were planted on council-owned land, bringing the overall total to 18,700 native trees and 73,000 bulbs **[See reference** 257**]**.

C.131 In order to help offset carbon emissions, Essex County Council initiated the Essex Forest Initiative in 2019, committing to planting £1 million worth of trees over the next five years. This included planting 375,000 trees, over 150 hectares. So far, the initiative has exceeded its targets for the first four years, making a total of 412,503 trees, 100ha, and 51,028 hedgerows. The trees have been planted across Essex, which includes Braintree and other districts **[See reference** 258**]**.

Biodiversity

C.132 There are no international biodiversity designations (Special Areas of Conservation, Special Protection Areas or Ramsar sites) in Braintree District. However, potential pathways exist for development within the District to affect a variety of such sites beyond the district boundary. Most of these are on or near the Essex/Suffolk coast and estuaries and are designated for a range of wetland and coastal habitats and bird species. In addition, new residential developments in much of the district, (the 'zone of influence') are likely to have a direct effect on designated parts of the Essex coastline. For developments within the zone of influence, the Council already has to assess the impact of new development on designated areas and protect such areas from the impact of increased visitor numbers. The Council has worked with 11 other Essex authorities and the Bird Aware Essex Coast initiative to develop a single approach to manage visitor impact - the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The potential effects of the Local Plan on the internationally designated sites will be considered in detail through a separate Habitats Regulations Assessment (HRA) and its findings reflected, as relevant, in the SA.

C.133 There are four Sites of Special Scientific Interest (SSSIs) in Braintree District:

- Belcher's and Broadfield Woods
- Bovingdon Hall Woods
- Chalkney Wood
- Glemsford Pits

C.134 The condition of the SSSIs at Belcher's and Broadfield Woods, and Glemsford Pits is assessed as unfavourable but recovering (100%). Chalkney Wood and Bovingdon Hall Woods are generally in favourable condition (100% and 93% respectively). The 7% of Bovingdon Hall Woods assessed as being in

'unfavourable – no change' condition is due to inappropriate deer grazing/browsing rather than development pressure. There are no SSSIs designated for their geological diversity or Local Geological Sites in the District. However, the River Ter SSSI is located adjacent to the border of Braintree District, within Chelmsford District, and is designated for its geological importance.

C.135 There are no National Nature Reserves (NNRs) located in Braintree, however there are nine Local Nature Reserves (LNRs):

- Bocking Blackwater LNR;
- Gosfield Sandpits LNR;
- Cuckoo Wood LNR;
- Colne Valley LNR (dismantled Railway);
- Brickfield and Long Meadow LNR;
- Brockwell Meadows LNR;
- Whetmead LNR;
- Hoppit Mead LNR; and,
- The Railway Walks LNR (on the border with Babergh)

C.136 There are 253 Local Wildlife Sites (LWSs) scattered throughout Braintree District, with many concentrated in the centre of the district. These non-statutory nature conservation sites which, along with the statutory sites, play a key role in helping to conserve the district's biodiversity in both urban and rural locations **[See reference** 259**]**. However, not all sites of high environmental value are designated as statutory or non-statutory sites of ecological importance.

C.137 Some previously developed ('brownfield') land can have high biodiversity interest, particularly for invertebrates. Defra has published information on Open Mosaic Habitat which is a type of priority habitat of high ecological value on brownfield land **[See reference** 260**]**.

C.138 Roadside verges, if sensitively managed, can benefit the biodiversity not only supported by the verges themselves but also the wider countryside by acting as corridors interlinking fragmented or isolated habitats. These areas are often remnants of larger grassland areas such as old hay meadows that have been lost due to agricultural intensification or development pressures. In the 1970s, Essex County Council Highways Agency, Nature Conservancy Council and Essex Wildlife Trust identified a number of important verges, which were

subsequently designated as Special Roadside Nature Reserves (SRNR). Once designated, wooden posts are erected on the verges with warning plaques and arrows. There are over 100 SRNRs designated in Essex and these are reviewed annually **[See reference** 261**]**.

C.139 There are no Nature Improvement Areas (NIAs) in Braintree District.

C.140 Essex County Council is leading the delivery of the Essex Local Nature Recovery Strategy (LNRS) for Greater Essex, including Thurrock and Southend. Published in July 2025, The primary purpose of the LNRS is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment. It maps these areas and suggests actions for nature recovery within them to help connect and expand important natural areas. **[See reference** 262**]**.

C.141 With regards to geodiversity, Braintree District has over forty geological sites, Local Geological Sites, historic sites, and potential Local Geological Sites. In relation to Local Geological Sites specifically, the district contains the Alphamstone Church and Finchingfield Boulder **[See reference** 263**]**.

C.142 The location of Braintree District's designated biodiversity and geodiversity assets is presented in **Figure C.13.**

Figure C.13: Designated Biodiversity and Geodiversity Assets

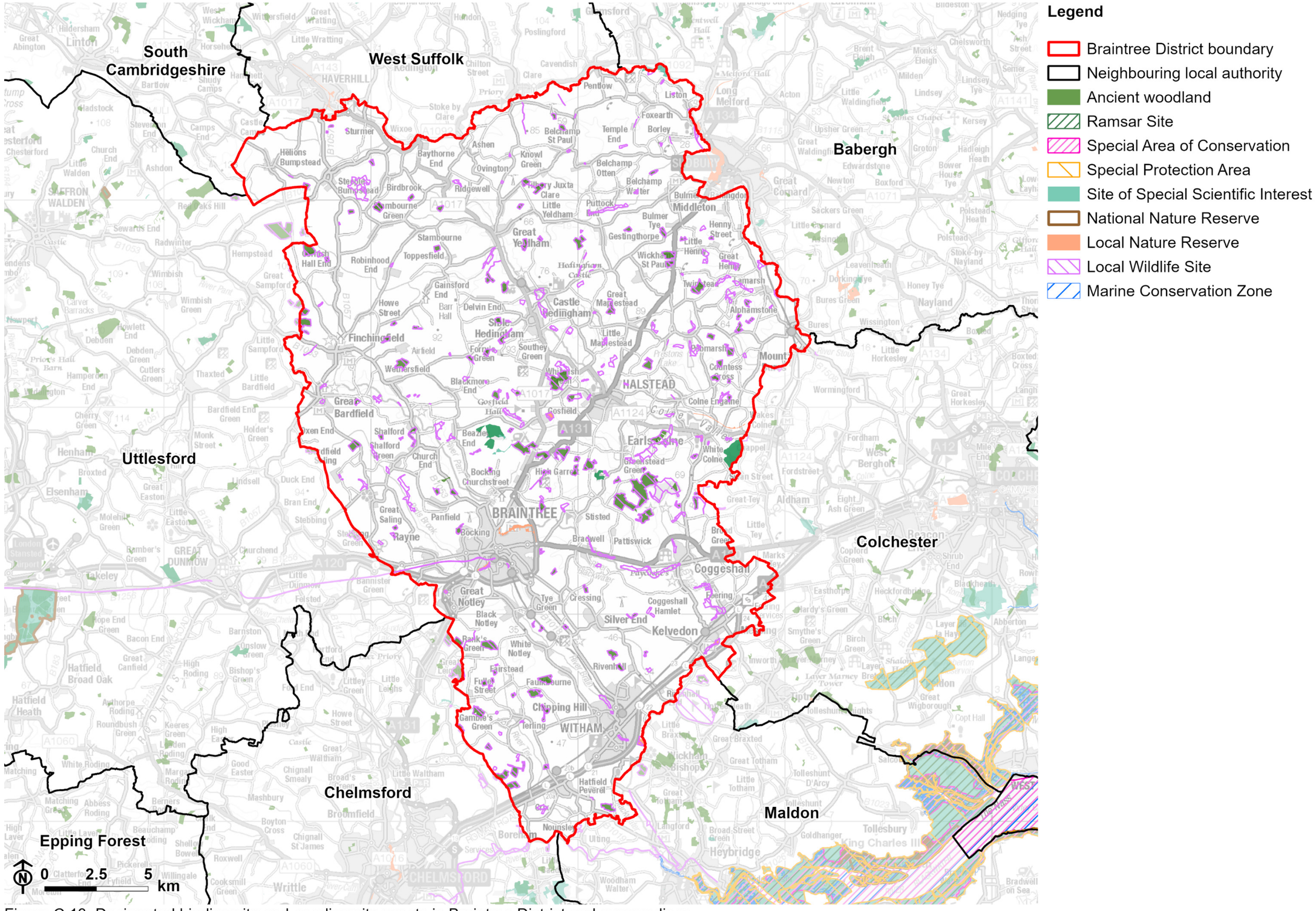


Figure C.13: Designated biodiversity and geodiversity assets in Braintree District and surroundings
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Historic environment

C.143 According to Historic England's most recent Local Authority Profile for Braintree **[See reference** 264**]**, Braintree District has 40 Scheduled Monuments, eight Registered Parks and Gardens, and 3,184 Listed Buildings, the majority of which are Grade II. Listed buildings within the district are fairly widely spread out.

C.144 There are 37 conservation areas within the district and of these, 15 have management plans in place, which set out desired actions to deal with detracting elements. Action plans have been put in place for the conservation areas in Silver End, Bulmer, Cressing, Finchingfield, Sible Hedingham, Witham Town Centre Newland Street and Pebmarsh **[See reference** 265**]**.

C.145 Updated annually by Historic England, the Heritage at Risk Register provides an understanding of the overall state of England's heritage assets. In 2025, there were six sites in Braintree District on the Heritage at Risk Register **[See reference** 266**]**. The site names, designations and locations are presented in the table below.

Table C.12: Braintree District Heritage at Risk [See reference 267]

Site Name	Designation	Condition	Location
Hedingham Castle	Listed Building, Grade I	Poor	Castle Hedingham
Codham Mill and Mill House, Wethersfield	Listed Building, Grade II*	Poor	Codham's Lane, Wethersfield
Church of St Mary the Virgin, Stebbing	Listed Place of Worship, Grade II*	Poor	Church Road, Ovington
Circular crop mark at Ferriers Farm, Bures Hamlet	Scheduled Monument	Extensive significant problems	Ferriers Farm, 190m south west of Hill Farm, Bures Hamlet
Sible Hedingham South	Conservation Area including 46 Listed Buildings	Poor	Swan Street, Sible Hedingham

Site Name	Designation	Condition	Location
Silver End	Conservation Area, including 22 Listed Buildings	Poor	Between Braintree and Witham

C.146 Heritage assets in the district are presented in **Figure C.14**.

C.147 The Essex Historic Environment Record (EHER) **[See reference** 268**]** provides a record of heritage assets in Essex from the earliest occupation of the area, through to the Cold War. It contains approximately 46,572 archaeological records for the county, of which 7,138 relate to Braintree District.

Figure C.14: Heritage Assets

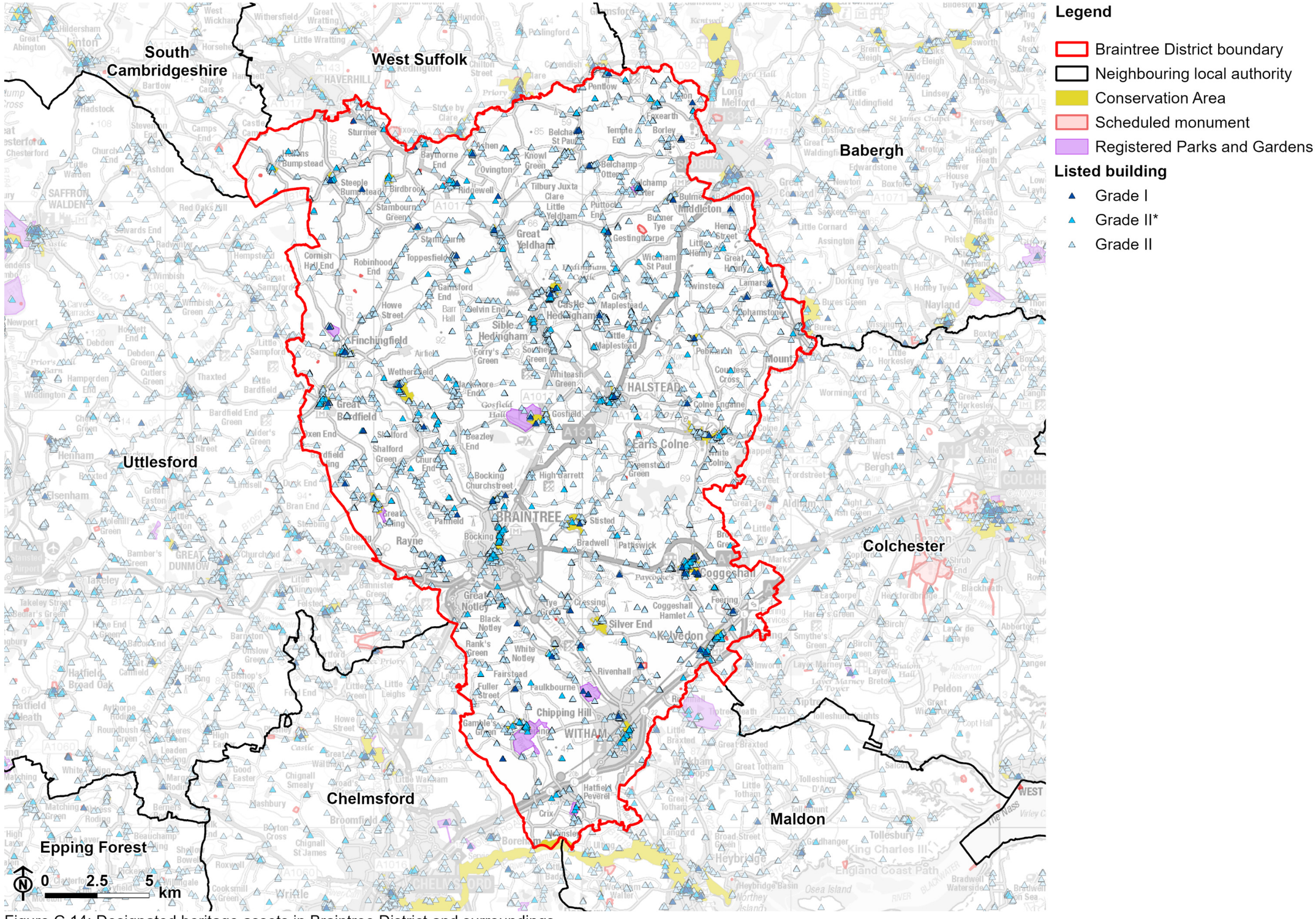


Figure C.14: Designated heritage assets in Braintree District and surroundings
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Landscape and townscape

C.148 Braintree District is an area of undulating countryside, bordered by the River Stour valley to the north. The area contains the upper reaches of the River Colne and the River Pant/Blackwater, as well as many smaller streams and tributaries creating a landscape of gentle slopes and small valleys **[See reference** 269**]**. The historic features of this landscape and of the urban areas described below are potentially sensitive to development.

C.149 The main towns of the district comprise Braintree, Witham, and Halstead, all of which are medieval market towns, some having their origins in Roman times. The rural settlement pattern was historically very dispersed, comprising church/hall complexes, manors, farms, moated sites and small hamlets strung out along extensive network of linear and triangular greens, the latter located at road junctions. Post-1950s boundary loss varies widely **[See reference** 270**]**.

C.150 The River Stour and River Colne valley bottoms are characterised by extensive meadows or meadow pasture. The higher ground between them is characterised by a complex mix of pre-18th century irregular fields of probable of medieval origin or older and common arable field enclosed by agreement largely before the mid-19th century. The Upper Pant/Blackwater valley, and the area to the southwest of Braintree town, are characterised by pre-18th century irregular fields. The Coggeshall area is complex, comprising a mix of pre-18th century irregular fields and pre-18th century co-axial fields. The southern part of the district has a more complex fieldscape with a mixture of irregular and regular fields, including some coaxial fields, and enclosed heathlands and commons. The area around Gosfield is notable for its Ancient Woodland and a number of large, landscaped parks, some of which are medieval in origin, including Gosfield Hall, Gosfield Place and Marks Hall Park **[See reference** 271**]**.

C.151 There are no National Landscapes in the district. However, the Dedham Vale National Landscape is within 1.2km of the district boundary to the east by the village of Bures. It was an aspiration since 2009 of the Dedham Vale National Landscape and Stour Valley Partnership (a grouping of around 26 organisations with an interest in the area) to extend the nationally designated National Landscape boundary. The Partnership wanted to see the National Landscape boundary moved upstream to include the land to the north west some of which falls within Braintree District. The Partnership commissioned a report to identify the special qualities of the area in question (the Stour Valley project area **[See reference** 272**]**.

C.152 The Dedham Vale AONB and Stour Valley Management Plan was published in 2021 and covers the period up until 2026 **[See reference** 273**]**. The plan expresses an aspiration to extend the AONB boundary into Braintree. The 2026 – 2031 Dedham Vale AONB and Stour Valley Management Plan also notes this ambition **[See reference** 274**]**.

C.153 Braintree District lies within the South Suffolk and North Essex Clayland National Character Area (NCA) **[See reference** 275**]**, as presented in **Figure C.15**. The Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment **[See reference** 276**]** identified three Landscape Character Types in the district: River Valley Landscapes, Farmland Plateau Landscapes, and Wooded Farmland Landscapes, as shown in **Figure C.15**.

C.154 The Landscape Partnership completed an updated Landscape Character Assessment: Capacity Analysis for Braintree District **[See reference** 277**]**. It assesses the capacity of the landscape to accommodate new development around nine settlements, namely Braintree (together with the various satellite settlements and surrounding smaller villages), Coggeshall, Earls Colne, Halstead, Hatfield Peverel, Kelvedon and Feering, Sible Hedingham, Silver End and Witham. The Overall Capacity Profile score identifies each 'parcel's' capacity based on five ranges 'Low' (27 - 33.5 homes), 'Medium-Low' (34 - 40.5 homes), 'Medium' (41 - 47.5 homes), 'Medium-High' (48 - 54.5 homes) and High (55 - 61.5 homes).

C.155 Further landscape work has been undertaken to support the new Local Plan **[See reference** 278**]**. To support the development of the Local Plan's housing strategy an analysis was undertaken of the landscape capacity of the fringes of nine key settlements within the District to accommodate housing development. The nine settlements were:

- Braintree (including Bocking Churchstreet, Rayne, Great Notley, Black Notley, and Cressing)
- Coggeshall
- Earls Colne
- Halstead
- Hatfield Peverel
- Kelvedon and Feering
- Sible Hedingham
- Silver End

- Witham

C.156 The number of Protected Lanes in Braintree District has decreased since they were originally designated mostly due to changes in agricultural practice but also because of road improvements **[See reference** 279**]**. The open character, nature conservation importance and recreational importance of the floodplains of the River Stour, Colne, Brain, Pent, Blackwater, Ter Valley and their tributaries and the Chelmer and Blackwater Navigation are potentially sensitive to inappropriate development close to these watercourses **[See reference** 280**]**.

Figure C.15: Landscape Character

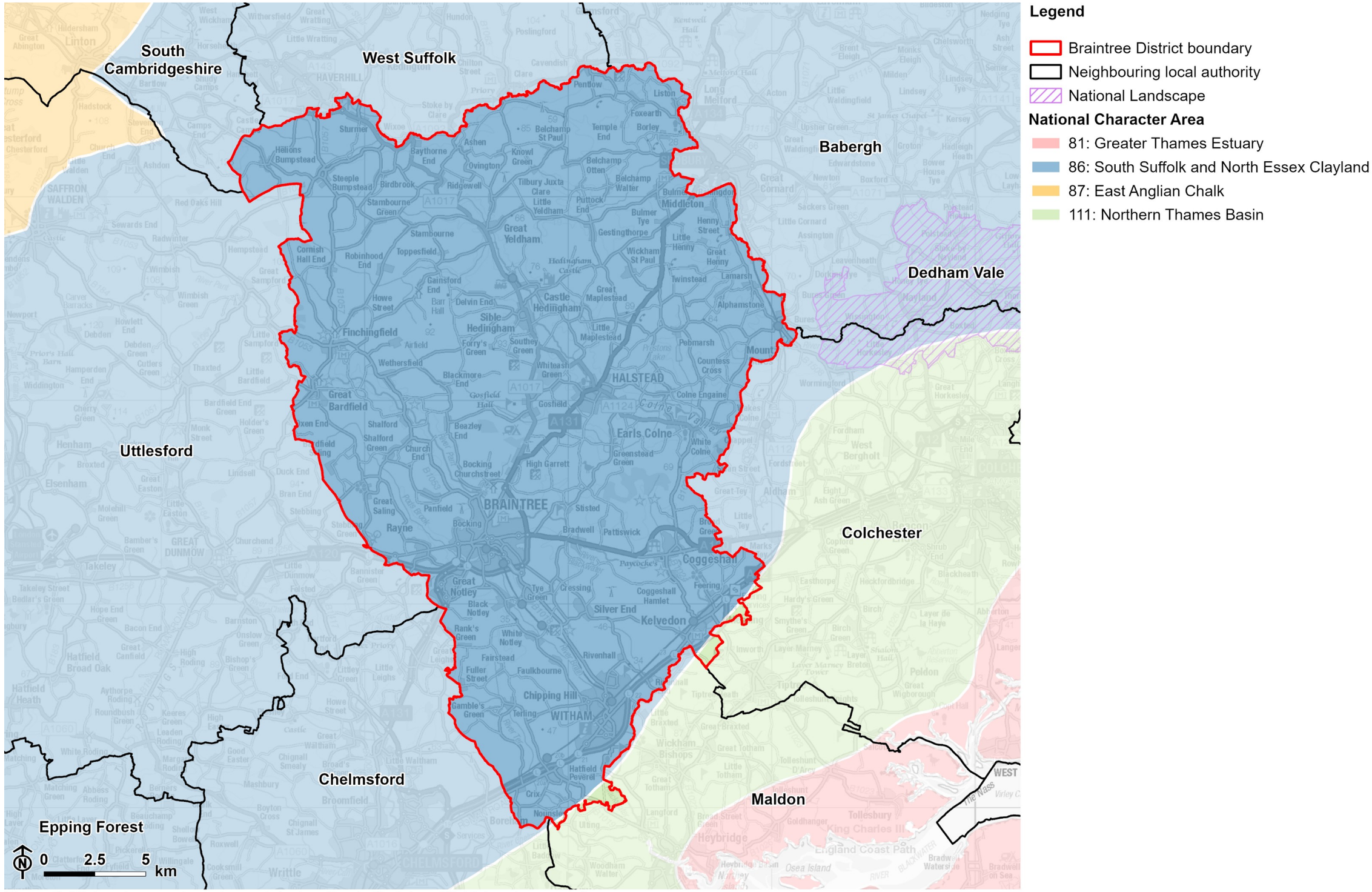


Figure C.19: Landscape character and designation in Braintree District and surroundings

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Appendix D
Site assessment criteria

D.1 The site assessment criteria used for the GIS-based assessment of site options against each SA objective are set out below.

D.2 The criteria used to assess sites considered for residential use are described first, followed by those for employment. Site options considered for 'other' uses (including renewable energy and biodiversity net gain sites and sites considered for road infrastructure projects) were initially appraised in line with the employment site assessment criteria. The assessment of these sites was subsequently revisited to reflect the specific uses considered for each of these sites.

D.3 Where sites were considered for allocation for mixed use development, they were appraised separately for the variety of uses considered.

D.4 For each SA objective, this appendix provides:

- A table setting out the individual criteria and how they have been applied.
- A description of how the scores calculated against each individual criterion were brought together to derive the overall significance of effect (i.e. minor or significant and positive or negative) in relation to the SA objective in question.

Residential site assessment criteria

SA Objective 1: Create safe environments which help to address deprivation, improve quality of life and community cohesion

Significance scoring for SA Objective 1 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++

- All other 0

Table D.1: SA site assessment criteria for objective 1

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
1a Levels of deprivation	>=25% of site located within one of the 10% most deprived areas nationally	>=25% of site located within one of the 20% most deprived areas nationally	All other sites	N/A	N/A	Index of Multiple Deprivation

SA Objective 2: Provide decent, affordable and safe homes for all

Significance scoring for SA Objective 2 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table D.2: SA site assessment criteria for objective 2

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
2a Housing provision	Significantly contributes to the delivery of housing: >=100 dwellings	Contributes to the delivery of housing: <100 dwellings	N/A	N/A	N/A	Based on data provided by Council on expected site capacity.

SA Objective 3: Improve health and wellbeing and reduce health inequalities

Significance scoring for SA Objective 3 criteria

Criteria 3a to 3f are scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled and then averaged (i.e. total score divided by 6). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.3: SA site assessment criteria for objective 3

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
3a Open space, sport and recreation	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility	>1,200m from open space, sport and recreation facility	Braintree District Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data
3b Loss of open space	N/A	N/A	All other sites	1-24.9% of site is open space, sport, recreation facility, open country and registered common land	>=25% of site is open space, sport, recreation facility, open country and registered common land	Braintree District Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
3c Public Rights of Way (PRoW)	<=200m from PRoW	201-400m from PRoW	N/A	401-800m from PRoW	>800m from PRoW	Braintree District Council PRoW data
3d GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	Braintree Council GP surgery data
3e Noise pollution from roads and railways	N/A	N/A	All other sites.	>=25% site within: Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	>=25% site within: Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB	Defra road and rail noise data
3f Odour	N/A	N/A	All other sites.	N/A	Site is <=400m from a wastewater treatment works, <=500m from an anaerobic digestion facility OR <= 250m from a Site Safeguard Area of a waste management facility or a waste management facility	Environment Agency wastewater treatment plant data; Environment Agency anaerobic digestion facilities data; Braintree District Council waste management facilities; Braintree District Council Site Safeguard

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
						Area of a waste management facility

SA Objective 4: Promote the vitality and viability of services and facilities and centres throughout the district

Significance scoring for SA Objective 4 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- Minor negative –
- Major negative --

Table D.4: SA site assessment criteria for objective 4

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
4a Town centres	<=400m from town centre OR <=200m from district centre	401-800m from town centre OR 201-400m from district centre	N/A	801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre	>1,200m from town centre AND >800m from district centre AND >400m from local centre	Braintree District Council centre data

SA Objective 5: Achieve sustainable levels of prosperity and economic growth

Significance scoring for SA Objective 5 criteria

Criteria 5a, 5c, 5d and 5e are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.5: SA site assessment criteria for objective 5

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
5a Loss of employment land	N/A	N/A	All other sites	1.0-24.9% of site is an existing employment area	>=25% of site is an existing employment area or the site is identified as containing an existing employment generating use	Braintree District Council employment area data
5b Provision of employment sites	N/A for residential site options	N/A for residential site options	N/A for residential site options	N/A for residential site options	N/A for residential site options	N/A
5c Employment deprivation	N/A	N/A	All other sites	>=25% of site located within one of the 20-40% most deprived areas nationally (‘Employment' domain of the Index of Multiple Deprivation).	>=25% of site located within one of the 20% most deprived areas nationally (‘Employment' domain of the Index of Multiple Deprivation).	'Employment' domain of the Index of Multiple Deprivation 2019
5d Access to jobs, N.B. Jobs density	Site located in LSOA that is in	Site located in LSOA that is in	Site located in LSOA that is in	Site located in LSOA that is in	Site located in LSOA that is in	Nomis Business Register and

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
= number of employees / population	top 20% of LSOAs in district for jobs density	20-40 percentile of LSOAs in district for jobs density	40-60 percentile of LSOAs in district for jobs density	60-80 percentile of LSOAs in district for jobs density	80-100 percentile of LSOAs in district for jobs density	Employment Survey; Office for National Statistics Lower layer Super Output Area population estimates
5e Town centres	<=400m from town centre OR <=200m from district centre	401-800m from town centre OR 201-400m from district centre	N/A	801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre	>1,200m from town centre AND >800m from district centre AND >400m from local centre	Braintree District Council town centre boundaries

SA Objective 6: Increase participation in and improve access to education, training and opportunities for lifelong learning

Significance scoring for SA Objective 6 criteria

Each criterion 6a to 6b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.6: SA site assessment criteria for objective 6

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
6a Primary schools	<=400m from primary school	401-800m from primary school	N/A	801-1,200m from primary school	>1,200m from primary school	Braintree District Council primary school data
6b Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	Braintree District Council secondary school data

SA Objective 7: Conserve and enhance the biological and geological diversity of the environment

Significance scoring for SA Objective 7 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria score minor negative, then the effect is significant negative.

If only one criterion scores minor negative, then the effect is minor negative.

All other sites score negligible (0).

Table D.7: SA site assessment criteria for objective 7

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
7a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	<=1km from an internationally or nationally designated site	<=250m from an internationally or nationally designated site	Natural England SSSI, Ramsar, SAC, SPA, NNR
7b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	N/A	N/A	All other sites	<=250m from a LWS, LNR, Priority Habitat or Ancient Woodland	>=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland	Local Wildlife Sites (LWS); Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland

SA Objective 8: Reduce the need to travel and promote active travel and more sustainable transport choices

Significance scoring for SA Objective 8 criteria

Criteria 8a to 8c are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.8: SA site assessment criteria for objective 8

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
8a Rail	<= 500m from a railway station	501-1,000m from a railway station	N/A	1,001-2,000m from a railway station	>2,000m from a railway station	Ordnance Survey railway station data
8b Bus	<= 300m from a bus stop	301-600m from a bus stop or within an area served by Digigo shared public transport service	N/A	601-1,000m from a bus stop	>1,000m from a bus stop	National Public Transport Access Nodes bus stop data Where information about the frequency of nearby bus services is available and indicates that services are very infrequent, this will be taken into account in the SA which may result in the scores included in this table being reduced.
8c Cycling	<= 200m from a cycle route	201-400m from a cycle route	N/A	401-800m from a cycle route	>800m from a cycle route	Local cycle routes; National and Regional Cycle Routes

SA Objective 9: Conserve and enhance the historic environment, heritage assets and their settings

Significance scoring for SA Objective 9 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

However, all effects for site options considered will acknowledge uncertainty in the absence of a heritage impact assessment. It is expected that heritage impact assessment work will be undertaken for sites proposed for allocation and where this is the case this work will be used to inform the appraisal of these sites. The use of this two stage approach for the appraisal of site options and sites proposed for allocation will allow for a consistent approach to the appraisal work.

Table D.9: SA site assessment criteria for objective 9

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
9a Proximity to historic assets: sites within existing settlements, or	N/A	N/A	All other sites	101-250m	<=100m	Braintree District Council settlement boundaries; Braintree District Council /Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens
9b Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1,000m	<=500m	Braintree District Council settlement boundaries; Braintree District Council /Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens

SA Objective 10: Reduce contributions to climate change

D.5 The extent to which the location of site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA objective 8. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design. This SA objective is therefore scoped out for the appraisal of site options.

SA Objective 11: Support adaptation to the effects of climate change

D.6 The extent to which the location of site options would be affect by flood risk is considered separately under SA objective 13. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. This SA objective is therefore scoped out for the appraisal of site options.

SA Objective 12: Improve water quality and address water scarcity and sewerage capacity

Significance scoring for SA Objective 12 criteria

Each criterion 12a and 12b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2

Table D.10: SA site assessment criteria for objective 12

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
12a Source Protection Zones	N/A	N/A	All other sites.	>=25% site falls within Source Protection Zone 2 or 3.	>=25% site falls within Source Protection Zone 1.	Environment Agency Source Protection Zones
12b Water quality	N/A	N/A	All other sites	Site is within 100m of a watercourse or water body	Site contains a watercourse or water body	Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies

SA Objective 13: Reduce and manage the risk of flooding

Significance scoring for SA Objective 13 criteria

If either criterion 13a or 13b receives a major negative, the SA objective automatically receives a significant negative effect.

If both of these criteria are minor negative, then a significant negative is given.

If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

Table D.11: SA site assessment criteria for objective 13

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
13a Flood zones	N/A	N/A	All other sites	>=25% site within Flood Zone 2	>=25% site within Flood Zone 3	Environment Agency Flood Zone 3; Environment Agency Flood Zone 2
13b Surface water flood risk	N/A	N/A	All other sites	>=25% on land with a 1 in 100 year risk of surface water flooding	>=25% on land with a 1 in 30 year risk of surface water flooding	Environment Agency 1:30 surface water flooding data; Environment Agency 1:100 surface water flooding data

SA Objective 14: Improve air quality

D.7 The site assessment criteria focus on the potential for development to contribute to traffic within AQMAs, to contribute to air pollution in areas where there are already issues of poor air quality, or to result in new residents being exposed to air pollution.

D.8 The assessment of site options does not take into account planned measures that will improve future air quality (such as the ban on sale of new petrol and diesel cars in the UK from 2035), or site-specific mitigation. The effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the SA.

D.9 In 2021, the WHO updated its recommended guidelines for air pollutants ("WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide" - https://www.who.int/publications/i/item/9789240034228). The new air quality guidelines reflect the best available health evidence and WHO's recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives (see Air Quality Objectives Update)

Significance scoring for SA Objective 14 criteria

Each criterion 14a to 14d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.12: SA site assessment criteria for objective 14

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
14a Air quality	N/A	N/A	All other sites	N/A	Site located within or connected to an AQMA	Defra AQMA mapping
14b NO_2 pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 10-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra NO2 pollution data
14c PM_{10} pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 15-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra PM10 pollution data
14d $PM_{2.5}$ pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 5-20 µg/m3	>=25% of site has pollutant concentration of >20 µg/m3	Defra PM2.5 pollution data

SA Objective 15: Maintain and enhance the quality of landscapes and townscapes

Significance scoring for SA Objective 15 criteria

Scoring of significance will match the major, minor, negligible and uncertain effects:

- Minor negative -?
- Major negative --?
- Negligible 0?
- All other sites recorded as uncertain ?

Table D.13: SA site assessment criteria for objective 15

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Uncertain	Data
15a Landscape sensitivity	N/A	N/A	Site identified as lying within a settlement or on land that has low sensitivity to development	>=25% of site identified as lying on land that has medium-low or medium sensitivity to development Or >=25% of site identified as lying on land that has medium or medium-high capacity for development	>=25% of site identified as lying on land that has medium-high or high sensitivity to development	Site on land that is not considered in the Settlement Fringe Study 2025 or the Braintree Settlement Fringes 2015	Braintree District Settlement Fringe Study: Landscape Sensitivity Assessment 2025 Braintree Settlement Fringes 2015

Sites

SA Objective 16: Minimise waste and increase resource efficiency

D.10 The location of residential sites is not likely to influence sustainable design and construction techniques. This includes the production of waste from the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material. The potential for the re-use of brownfield land has been considered separately under SA objective 17.

D.11 These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies. This SA objective has therefore been scoped out for the appraisal of site options.

SA Objective 17: Safeguard and enhance the quality of soil

Significance scoring for SA Objective 17 criteria

If criterion 17a is a major positive then site scores significant positive, irrespective of criterion 17b.

If criterion 17a is not major positive, then criteria 17a to 17b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.14: SA site assessment criteria for objective 17

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
17a Brownfield/ greenfield land	Majority of site is brownfield land (i.e. >50%)	N/A	N/A	N/A	Majority of site is greenfield land (i.e. >50%)	Contained within the shapefile for each site
17b Agricultural Land Classification	N/A	N/A	All other sites	Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land)	Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land	Natural England Agricultural Land Classification

Employment site assessment criteria

SA Objective 1: Create safe environments which help to address deprivation, improve quality of life and community cohesion

Significance scoring for SA Objective 1 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table D.15: SA site assessment criteria for objective 1

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
1a Levels of deprivation	>=25% of site located within one of the 10% most deprived areas nationally	>=25% of site located within one of the 20% most deprived areas nationally	All other sites	N/A	N/A	Index of Multiple Deprivation

SA Objective 2: Provide decent, affordable and safe homes for all

D.12 The delivery, specific location and size of employment sites will not influence the ability of the district to provide a sufficient level and suitable mix of housing to meet its assessed need over the plan period. This SA objective has therefore been scoped out for the appraisal of employment site options.

SA Objective 3: Improve health and wellbeing and reduce health inequalities

Significance scoring for SA Objective 3 criteria

Criteria 3a to 3c are scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.16: SA site assessment criteria for objective 3

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
3a Open space, sport and recreation	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility	>1,200m from open space, sport and recreation facility	Braintree District Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data; Braintree District Council PRoW data
3b Loss of open space	N/A	N/A	All other sites	1-24.9% of site is open space, sport, recreation facility, open country and registered common land	>=25% of site is open space, sport, recreation facility, open country and registered common land	Braintree District Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data; Braintree District Council PRoW data
3c Public Rights of Way (PRoW)	<=200m from PRoW	201-400m from PRoW	N/A	401-800m from PRoW	>800m from PRoW	Braintree District Council open space, sport and recreation

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
						facility data; National Trust Open Country data; Natural England Registered Common Land data; Braintree District Council PRoW data
3d GP surgeries	N/A	N/A	N/A	N/A	N/A	N/A
3e Noise pollution from roads and railways	N/A	N/A	N/A	N/A	N/A	N/A
3f Odour	N/A	N/A	N/A	N/A	N/A	N/A

SA Objective 4: Promote the vitality and viability of services and facilities and centres throughout the district

Significance scoring for SA Objective 4 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- Minor negative –
- Major negative –

Table D.17: SA site assessment criteria for objective 4

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
4a Town centres	<=400m from town centre OR <=200m from district centre	401-800m from town centre OR 201-400m from district centre	N/A	801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre	>1,200m from town centre AND >800m from district centre AND >400m from local centre	Braintree District Council centre data

SA Objective 5: Achieve sustainable levels of prosperity and economic growth

Significance scoring for SA Objective 5 criteria

Criteria 5a and 5d not relevant to employment sites.

Each criterion 5b, 5c and 5e is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.18: SA site assessment criteria for objective 5

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
5a Loss of employment land	N/A	N/A	N/A	N/A	N/A	Braintree District Council employment area data
5b Provision of employment sites	Sites that are >=3ha	Sites that are <3ha	N/A	N/A	N/A	Within the shapefile for the site
5c Employment deprivation	>=25% of site is located within one of the 20% most deprived areas nationally (‘Employment’ domain of the Index of Multiple Deprivation).	>=25% of site located within one of the 20-40% most deprived areas nationally (‘Employment’ domain of the Index of Multiple Deprivation).	All other sites	N/A	N/A	'Employment' domain of the Index of Multiple Deprivation 2019
5d Access to jobs, N.B. Jobs density = number of employees / population	N/A	N/A	N/A	N/A	N/A	N/A

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
5e Town centres	<=400m from town centre OR <=200m from district centre	401-800m from town centre OR 201-400m from district centre	N/A	801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre	>1,200m from town centre AND >800m from district centre AND >400m from local centre	Braintree District Council town centre boundaries

SA Objective 6: Increase participation in and improve access to education, training and opportunities for lifelong learning

D.13 The ability of employment site options to support opportunities for training and learning will be most influenced by the specific uses to be delivered at the site. For example, where a site is to be developed to incorporate uses that support the green economy and is likely to provide opportunities for training local people in high value, long term areas of employment. Given that this level of detail not available for all employment site options, a negligible effect is recorded for all sites.

SA Objective 7: Conserve and enhance the biological and geological diversity of the environment

Significance scoring for SA Objective 7 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

Table D.19: SA site assessment criteria for objective 7

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
7a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	<=1km from an internationally or nationally designated site	<=250m from an internationally or nationally designated site	Natural England SSSI, Ramsar, SAC, SPA, NNR
7b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	N/A	N/A	All other sites	<=250m from a LWS, LNR, Priority Habitat or Ancient Woodland	>=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland	Local Wildlife Sites (LWS); Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland

SA Objective 8: Reduce the need to travel and promote active travel and more sustainable transport choices

Significance scoring for SA Objective 8 criteria

Criteria 8a to 8c are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.20: SA site assessment criteria for objective 8

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
8a Rail	<= 500m from a railway station	501-1,000m from a railway station	N/A	1,001-2,000m from a railway station	>2,000m from a railway station	Ordnance Survey railway station data
8b Bus	<= 300m from a bus stop	301-600m from a bus stop or within an area served by Digigo shared public transport service	N/A	601-1,000m from a bus stop	>1,000m from a bus stop	National Public Transport Access Nodes bus stop data Where information about the frequency of nearby bus services is available and indicates that services are very infrequent, this will be taken into account in the SA which may result in the scores included in this table being reduced.
8c Cycling	<= 200m from a cycle route	201-400m from a cycle route	N/A	401-800m from a cycle route	>800m from a cycle route	Local cycle routes; National and Regional Cycle Routes

SA Objective 9: Conserve and enhance the historic environment, heritage assets and their settings

Significance scoring for SA Objective 9 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

However, all effects for site options considered will acknowledge uncertainty in the absence of a heritage impact assessment. It is expected that heritage impact assessment work will be undertaken for sites proposed for allocation and where this is the case this work will be used to inform the appraisal of these sites. The use of this two stage approach for the appraisal of site options and sites proposed for allocation will allow for a consistent approach to the appraisal work.

Table D.21: SA site assessment criteria for objective 9

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
9a Proximity to historic assets: sites within existing settlements, or	N/A	N/A	All other sites	101-250m	<=100m	Braintree District Council settlement boundaries; Braintree District Council /Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens
9b Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1,000m	<=500m	Braintree District Council settlement boundaries; Braintree District Council /Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens

SA Objective 10: Reduce contributions to climate change

D.14 The extent to which the location of site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA objective 8. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design. This SA objective is therefore scoped out for the appraisal of site options.

SA Objective 11: Support adaptation to the effects of climate change

D.15 The extent to which the location of site options would be affect by flood risk is considered separately under SA objective 13. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. This SA objective is therefore scoped out for the appraisal of site options.

SA Objective 12: Improve water quality and address water scarcity and sewerage capacity

Significance scoring for SA Objective 12 criteria

Each criterion 12a and 12b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible = 0
- Minor negative <0 to >-2

Table D.22: SA site assessment criteria for objective 12

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
12a Source Protection Zones	N/A	N/A	All other sites.	>=25% site falls within Source Protection Zone 2 or 3.	>=25% site falls within Source Protection Zone 1.	Environment Agency Source Protection Zones
12b Water quality	N/A	N/A	All other sites	Site is within 100m of a watercourse or water body	Site contains a watercourse or water body	Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies

SA Objective 13: Reduce and manage the risk of flooding

Significance scoring for SA Objective 13 criteria

If either criterion 13a or 13b receives a major negative, the SA objective automatically receives a significant negative effect.

If both of these criteria are minor negative, then a significant negative is given.

If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

Table D.23: SA site assessment criteria for objective 13

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
13a Flood zones	N/A	N/A	All other sites	>=25% site within Flood Zone 2	>=25% site within Flood Zone 3	Environment Agency Flood Zone 3; Environment Agency Flood Zone 2
13b Surface water flood risk	N/A	N/A	All other sites	>=25% on land with a 1 in 100 year risk of surface water flooding	>=25% on land with a 1 in 30 year risk of surface water flooding	Environment Agency 1:30 surface water flooding data; Environment Agency 1:100 surface water flooding data

SA Objective 14: Improve air quality

D.16 The site assessment criteria focus on the potential to the potential for development to contribute to traffic within AQMAs, to contribute to air pollution in areas where there are already issues of poor air quality, or to result in new residents being exposed to air pollution.

D.17 The assessment of site options does not take into account planned measures that will improve future air quality (such as the ban on sale of new petrol and diesel cars in the UK from 2035), or site-specific mitigation. The effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the SA.

D.18 In 2021, the WHO updated its recommended guidelines for air pollutants ("WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide" - https://www.who.int/publications/i/item/9789240034228). The new air quality guidelines reflect the best available health evidence and WHO's recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives (see Air Quality Objectives Update).

Significance scoring for SA Objective 14 criteria

Each criterion 14a to 14d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.24: SA site assessment criteria for SA Objective 14

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
14a Air quality	N/A	N/A	All other sites	N/A	Site located within or connected to an AQMA	Defra AQMA mapping
14b NO_2 pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 10-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra NO2 pollution data
14c PM_{10} pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 15-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra PM10 pollution data
14d $PM_{2.5}$ pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 5-20 µg/m3	>=25% of site has pollutant concentration of >20 µg/m3	Defra PM2.5 pollution data

SA Objective 15: Maintain and enhance the quality of landscapes and townscapes

Significance scoring for SA Objective 15 criteria

Scoring of significance will match the major, minor, negligible or uncertain effects:

- Minor negative -?
- Major negative --?
- Negligible 0?
- All other sites recorded as uncertain ?

Table D.25: SA site assessment criteria for objective 15

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Uncertain	Data
15a Landscape sensitivity	N/A	N/A	Site identified as lying within the settlement or site identified having low sensitivity to development	>=25% of site identified as lying on land that has medium-low or medium sensitivity to development Or >=25% of site identified as lying on land that has medium or medium-high capacity for development	>=25% of site identified as lying on land that has medium-high or high sensitivity to development	Site on land that is not considered in the Settlement Fringe Study 2025 or the Braintree Settlement Fringes 2015	Braintree District Settlement Fringe Study: Landscape Sensitivity Assessment

SA Objective 16: Minimise waste and increase resource efficiency

D.19 The location of sites is not likely to influence sustainable design and construction techniques. This includes the production of waste from the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material. The potential for the re-use of brownfield land has been considered separately under SA objective 17.

D.20 These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies. Therefore, this SA objective has been scoped out for the appraisal of site options.

SA Objective 17: Safeguard and enhance the quality of soil

Significance scoring for SA Objective 17 criteria

If criterion 17a is a major positive then site scores significant positive, irrespective of criterion 17b.

If criterion 17a is not major positive, then criteria 17a to 17b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table D.26: SA site assessment criteria for objective 17

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
17a Brownfield/ greenfield land	Majority of site is brownfield land (i.e. >50%)	N/A	N/A	N/A	Majority of site is greenfield land (i.e. >50%)	Contained within the shapefile for each site
17b Agricultural Land Classification	N/A	N/A	All other sites	Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land)	Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land	Natural England Agricultural Land Classification

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