

## **Approach taken in the Sustainability Appraisal to the assessment of Monks Wood**

This note has been prepared by the North Essex Authorities in response to the request from the Inspector for a written explanation of the approach taken in the Sustainability Appraisal ("SA") to the assessment of Monks Wood.

### **Approach to the 'Scoring' Monks Wood: SA Objectives 3, 4, 6 & 10**

Each of the Garden Communities and the Alternative Garden Community Permutations were assessed against the same 10 Sustainability Objectives. At the Examination in Public Lightwood Strategic raised specific concerns regarding the scoring in relation to Strategic Objectives 3, 4, 6 and 10. The NEAs have been asked to explain in writing the approach to the scoring of those objectives.

*SA Objective 3: Environment / Amenity – Acceptable relationship with and impact on occupiers of existing properties and neighbouring areas/towns (maintaining adequate separation)*

An uncertain / negative impact was predicted for the Monks Wood option against SA Objective 3. Commentary as to the reason for this predicted impact is given within Appendix 1 on page 203 of the SA (SD/001). These impacts relate to landscape impacts associated with the Blackwater river valley and the historic integrity of the area, as well as potential coalescence with Pattiswick. The assessment however noted that *'at the scale proposed, the Garden Community option can be considered able to ensure adequate separation is factored into the wider scheme whilst simultaneously ensuring that impacts on the rural and historic character of existing settlements in the broad area is minimised.'* This assessment and the overall 'scoring' was consistent across all options, with uncertain / negative impacts also highlighted for the North Colchester, Colchester / Braintree Borders and West of Braintree options.

*SA Objective 4: Transport - Incorporation of integrated and accessible sustainable transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.*

A minor negative impact was predicted for the Monks Wood option against SA Objective 4. Commentary as to the reason for this predicted impact is given within Appendix 1 on page 205/206 of the SA (SD/001), which focuses on the option's lack of existing connectivity regarding public transport (particularly rail) and the transport pressures a new community would put on the settlements of Feering and Kelvedon, where the nearest existing rail station is located. Additional commentary discusses the uncertainties regarding the A120. While it is recognised that the A120 re-routing may increase access to Braintree Freeport Station, this is located 8km from the Monks Wood site and "significant attractive public transport infrastructure solutions would need to be developed". The SA on page 206 concludes that *'at present the proposal is unlikely to meet the sustainability objective criteria / Garden City Principle without significant negative impacts on existing local rail stations; however once the preferred A120 re-routing scheme is known the ability to make more informed judgements regarding overall and alternative public transport options / solutions can be made. Overall, minor negative impacts are highlighted for comparison purposes with other options.'*

*SA Objective 6: Housing – Provision of a mix of tenures, including affordable homes and a range of housing types (including self-build/custom build and gypsy and traveller pitches).*

Significantly positive impacts were assessed for the Monks Wood option. In line with the content of the SA Objective, which was derived from the relevant housing related Garden City Principle, the SA on page 210 states that, *‘the Monks Wood Garden Community Option can be expected to have significantly positive impacts at this stage, and are all indistinguishable in regard to the opportunities of each option to adhere to relevant Garden City Principles regarding housing supply, type and tenure including gypsy and traveller provision.’* Aside from the Metro Plan option, which was not considered to be feasible in regard to available land, all the Garden Community options were assessed as having a strong prospect of fully meeting the criteria of the SA Objective with significant wider benefits due their scale and availability.

*SA Objective 10: Developability / Deliverability - The growth area is available, commercially attractive, and capable of delivering necessary physical / social / green infrastructure and could be viably developed within [6-10] years.*

The SA acknowledges that the Monks Wood option is available and is in single ownership; however uncertainty surrounds the ability to deliver necessary infrastructure on site, particularly regarding the re-routing of the A120 and utility infrastructure as identified in the AECOM Concept Feasibility Study (EB/010). The same uncertainty regarding the A120 routing consultation is considered as part of the Colchester/Braintree Borders appraisal.

The SA on page 220, states that, *‘the proposal was submitted during the Braintree District Council Preferred Options Local Plan consultation by a single promoter and the land is in single ownership. As greenfield agricultural land with direct access from the existing A120, the proposal indicates that development could be commenced relatively quickly and within 6-10 years, although much depends on the preferred route emanating from the A120 re-routing consultation. The extent of first phase development could be constrained by the need to invest heavily in utility infrastructure, which is consistent with the site’s rural location is currently very limited in terms of physical networks and capacity; however for the purposes of a consistent appraisal across all options, impacts are identified as similar to those of other rural locations. Overall, uncertain impacts are highlighted.’*

## **How the SA addresses short / mid-term impacts**

The SA at Section 5.5.1 sets out the context / justification for the Plan’s spatial strategy of Policy SP2. As explained on page 169, as a result of a strong history of making use of, or redeveloping previously developed land, the authorities have a very limited and diminishing supply of brownfield sites and these cannot be relied on in isolation to meet housing needs. Section 5.5.1 includes the notion of ‘proportionate growth’ being development in existing settlements of a scale that is appropriate to the role of that settlement in the spatial hierarchy, reflecting available land / submitted sites and allocations within emerging Neighbourhood Plans.

Policy SP2 states that *‘re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel.’* The SA addresses these elements of the Policy through the short-medium term impacts

highlighted within the appraisal of Policy SP2 on page 78. The Section Two Plans (and accompanying SAs) provide further emphasis on growth in the early part of the plan period, prior to the commencement of any Garden Communities. They focus on directing growth to existing settlements, the use of brownfield land, and sites below the Garden Community threshold of 5,000 dwellings through various policy and 'non-strategic' allocations. The short and medium term temporal impacts have been separately assessed.

## **Garden Community Permutations**

The SA includes an assessment of Alternative Garden Community (GC) Option Permutations (page 226) and an assessment of the cumulative & synergistic impacts of the preferred GC options (page 221, Table 29 of the SA). Page 226 notes that multiple alternative permutations of Garden Communities exist. The table on page 227 sets out those permutations which are considered theoretically 'reasonable' and gives reasons for that identification. These were primarily based on geographic dispersal. This was in order to explore the impacts of Garden Community combinations in specific areas within the strategic NEA area. The assessment of alternatives did not include all possible permutations, but properly focused on broad scenarios. These scenarios are set out in the right-hand column of the table on page 227 of the SA Environmental Report. The reasonable alternatives tested included the option of two garden communities. The combination of West of Braintree, Tendring /Colchester Borders and Monks Wood was explored in Alternative Scenario 1. The potential for heightened negative impacts at Marks Farm roundabout as a consequence of the development of both West of Braintree and Monks Wood was highlighted as well as further issues regarding wider congestion and air quality. The combination of including both Monks Wood and Colchester / Braintree Borders was explored in Alternative scenario 5 (representing a western focus of Garden Communities to address the fact that housing in Braintree is relatively unaffordable) with the majority of negative impacts arising from the combination of the Monks Wood and Colchester / Braintree Borders GC due to their relative close proximity. Alternative scenario 5 was discounted by the NEAs as *'the deliverability and sustainability of Garden Communities was considered to be best served by their location in three distinct areas of the strategic area'* (as reiterated on page 243 of the SA).

## **The approach to assessing Garden Communities (inputs not outputs)**

The notion of new settlements was identified early on within the respective authorities' plan-making processes. Colchester Borough and Braintree District's Local Plan Issues and Options consultations (2015) both included numerous options for meeting housing needs, including the option of new settlements in broad locations and these options were subject to SA. The Councils invited the submission of 'new settlements' through their call-for-sites processes. In response to these submissions, the principle of new settlements was established as an option that needed to be further explored. The common Section One (and accompanying SA) was developed at this stage to reflect the cross-boundary nature of the submissions. The SA came to a decision at the Scoping stage that an approach was needed to assess the Garden Communities using TCPA Garden City Principles as a starting point, whilst also factoring in local considerations (as set out in the Table 7, page 61) across the strategic NEA area. This was considered appropriate due to the potential scale of the Garden Community options submitted, the ability to mitigate negative impacts at such scales and

the wider benefits that they can deliver. The SA explored the broad areas of the submitted sites as reasonable alternatives.

As well as Garden Community options that meet the 5,000 dwelling threshold, the Section One SA includes spatial strategy options (see appraisal of Policy SP2 on page 77 of the SA) and more notional strategic options relevant to the scope and content of the Section One Plan and the strategic NEA area. This includes consideration of the sustainability implications of the Garden Community delivery mechanism itself (in line with the aspirations of Garden City Principles) against other options that could deliver strategic level growth. These are included within Appendix 1 on pages 169-184.

All options that have emerged throughout the plan-making processes and Regulation 18 consultations of the North Essex Authorities have been explored and assessed within either the Section One SA or the individual authorities' Section Two SAs. It is important to note that all submitted options that did not meet the 5,000 dwelling threshold have been assessed within the authorities' Section Two SAs, as well as spatial distribution options at each District / Borough level.