



# Tendring District Council Local Plan Review

## Integrated Sustainability Appraisal (ISA): Interim Report

January 2026





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# 1. Introduction

## 1.1 Background

On behalf of Tendring District Council (TDC), Place Services has been commissioned to undertake an independent Integrated Sustainability Appraisal (ISA) for the emerging Tendring District Local Plan Review.

## 1.2 The Tendring District Council Local Plan

### 1.2.1 The Adopted Local Plan

The 'Tendring District Local Plan 2013-2033 and Beyond: North Essex Authorities' Shared Strategic Section 1 Plan' was adopted by the Council on the 26<sup>th</sup> of January 2021. The Local Plan Section One covers a plan area that encompasses the administrative boundaries of Tendring District Council, Colchester Borough Council and Braintree District Council. It sets out numerous requirements of a Local Plan, including:

- A minimum total housing requirement for the plan period;
- The amount of employment land required for office, research & development, industrial, storage and distribution uses;
- Place shaping principles for all new development;
- A 'garden community' at the Tendring/Colchester Borders which will deliver between 2,200 and 2,500 homes, 7 hectares of employment land and provision for Gypsies and Travellers within the Plan period (as part of an expected overall total of between 7,000 and 9,000 homes and 25 hectares of employment land to be delivered beyond 2033);
- That a Development Plan Document (DPD) approach will be forthcoming to address various principles and requirements in the design, development, and delivery of the new garden community;
- The provision of the infrastructure, services and facilities that are identified to serve the needs arising from the development; and
- The adoption of a Recreational disturbance Avoidance Mitigation Strategy (RAMS), in order for the Council to collect contributions towards mitigating effects on wildlife at the coast from an increase in population visiting such areas.

The adopted Local Plan Section Two was developed at the same time as the abovementioned Section One and offers a more locally specific framework for the administrative area of Tendring alone. This includes:

- Strategic Policies;
- Development management policies; and
- Site allocations for housing and employment needs.

## 1.2.2 The Local Plan Review

The Town and Country Planning Regulations 2017 sets out that reviews at least every five years are a legal requirement for all local plans. This is supported by the National Planning Policy Framework (NPPF).

The performance of the Plan is subject to regular monitoring and the results are published in the council's Authority Monitoring Reports (AMRs). The council is also required to undertake a more in-depth review of the Plan every five years in order to assess whether the policies in the plan are performing effectively or need updating. It has been determined that elements of the Local Plan as adopted are in need of amendment and these are required to be subject to Sustainability Appraisal.

## 1.3 The Requirement for Integrated Sustainability Appraisal

### 1.3.1 Legislative Requirements – Sustainability Appraisal

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

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

This definition is consistent with the themes of the NPPF, which draws upon The UK Sustainable Development Strategy Securing the Future's five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development. The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA

Regulation') which requires SEA to be carried out for plans or programmes,

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

This includes Local Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as:

'biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' as specified in Annex 1(f) of the Directive.'

SA examines the effects of proposed plans and programmes in a wider context, taking into account economic, social, and environmental considerations in order to promote sustainable development. It is mandatory for Local Plans to undergo a Sustainability Appraisal in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, and in accordance with paragraph 165 of the NPPF.

Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met. This integrated appraisal process will hereafter be referred to as SA.

### 1.3.2 Legislative Requirements – Health Impact Assessment

There is no statutory duty in place to undertake a Health Impact Assessment (HIA) as part of undertaking a Local Plan, however the policies and site allocations identified within a Local Plan may have the potential to impact on health, which could be a cause for concern amongst members of the public. HIA can have a strong role in the plan-making process, as well as for individual projects that emanate from the Plan.

The Department of Health provides a brief overview of what a HIA of a policy document (in the case of this assessment, a Local Plan) should achieve:

- Screen the Plan area to determine if the Plan is likely to result in health impacts, paying specific mind to any local inequality issues;
- Provide recommendations throughout the decision making process, allowing for responses to be made to any issues that are raised;
- Seek to maximise positive impacts, while minimising the negative impacts of the Plan.

Appendix 1 of this ISA Report includes the HIA Screening of the Local Plan.



### 1.3.3 Legislative Requirements – Equalities Impact Assessment

An Equality Impact Assessment (EqIA) is an assessment designed to assist authorities to ensure that policies are fair and do not present barriers to participation or disadvantage any protected groups from participation. EqIAs help to ensure that:

- The potential effects of the Plan are understood by assessing the impacts on different groups;
- Any adverse impacts are identified, and actions identified to remove or mitigate them; and
- Policies are based on evidence and clearly justified.

As EqIA is an evidence-led process of assessment, consultation with key groups is crucial to ensuring that equality duties are met. It is considered that this ISA Report be updated post-consultation at every stage, alongside any other necessary assessment details that may emanate from consultation, prior to adoption of the Local Plan. Appendix 2 of this ISA Report offers a provisional assessment.

### 1.3.4 The Requirement Concerning the Tendring District Local Plan

The adopted Local Plan has been subject to SA as required by the above legislation throughout that plan-making process. This has, to date, consisted of the following documents that have been produced and consulted upon:

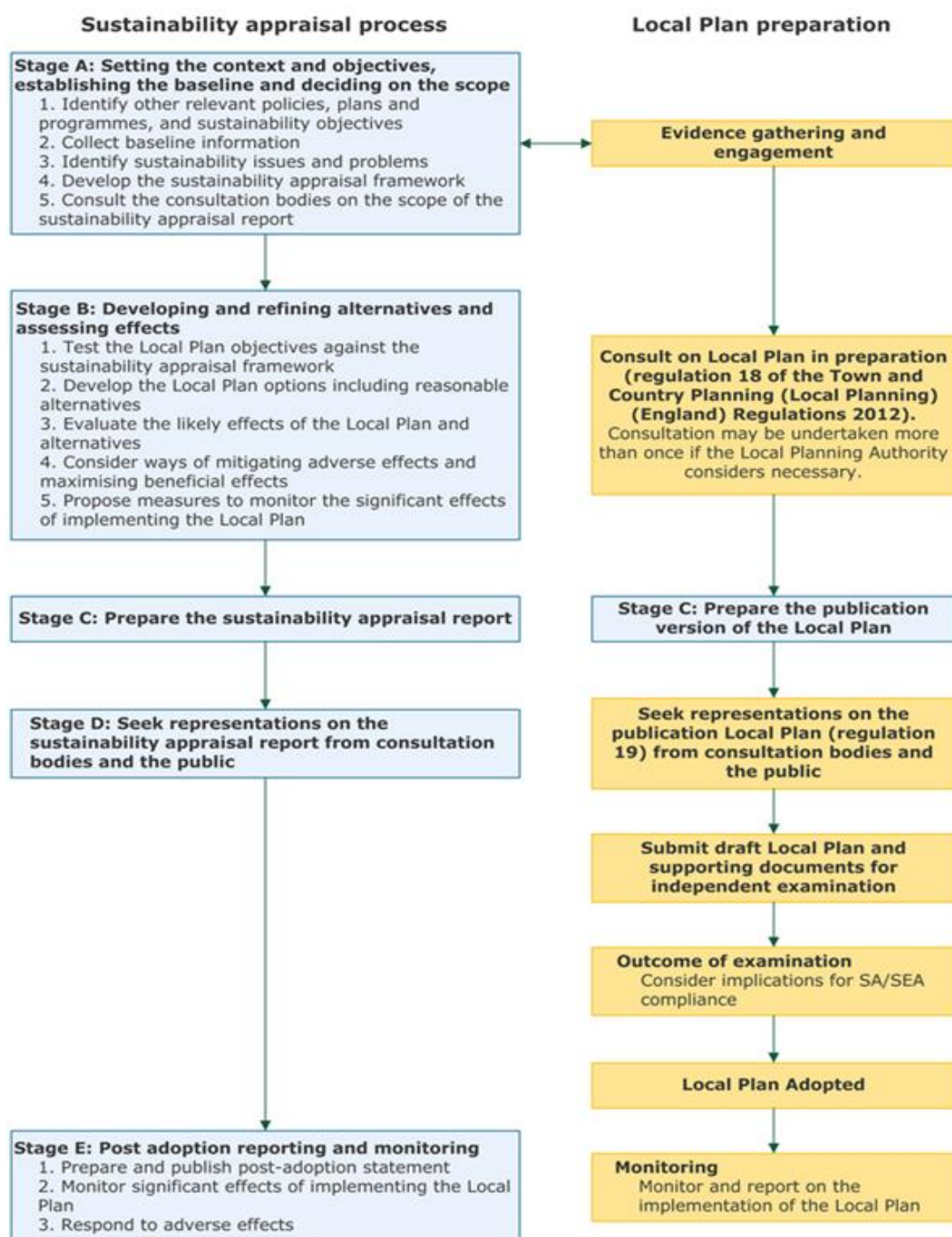
- Sustainability Appraisal Scoping Report, 2015
- Interim Sustainability Appraisal Report, 2016
- Section 2 Sustainability Appraisal & Strategic Environmental Assessment – Non-Technical Summary, 2017
- Section 2 Sustainability Appraisal & Strategic Environmental Assessment – Environmental Report, 2017
- (Section Two) Sustainability Appraisal Addendum: Appraisal of New Policy HP4, 2017
- Tendring District Council (TDC) Local Plan – Section Two: Main Modifications Sustainability Appraisal (SA) Addendum (2021)

Carrying out SA work throughout the plan preparation was part of an integrated approach. The Plan review process, which will culminate in a revised Local Plan, will need SA work to inform and justify revisions alongside reasonable alternative approaches if required. In summary, the progression of the adopted Local Plan was influenced by an assessment of its sustainability implications and effects, and any changes to that document will also need such an assessment.

## 1.4 The Sustainability Appraisal Process

The methodology adopted for the SA of the Local Plan Review at this stage follows that of the Sustainability Appraisal process. The following 5 sequential stages are:

**Figure 1: Stages in the SA Process and Local Plan Preparation**



Source: Planning Practice Guidance – Sustainability appraisal requirements for local plans (Paragraph: 013 Reference ID: 11-013-20140306 Revision date: 06 03 2014)

## 1.5 The Aim and Structure of this Report

The aim of this Report responds to the requirements identified in the above figure under Stages B and Stage C. These stages represent the full interim assessment of all elements of the Plan Review at this stage and at the previous Issues and Options stage where necessary and relevant.

## 2. Sustainability and Environmental Context, Baseline, and Objectives

### 2.1 Introduction

The ISA of the Plan review is required to set the scope for the assessment of options and Plan content relevant to that Plan area. Stage A of the ISA process sets out how the context and the objectives of the SEA should be set, whilst establishing the baseline relevant to the Plan area. This involves:

- Identifying other relevant policies, plans and programmes, and sustainability objectives;
- Collecting baseline information;
- Identifying sustainability issues and problems; and
- Developing the ISA frameworks (formulating relevant criteria against which the Plan's policy content and site allocations will be assessed).

The following section outlines the relevant plans and programmes and the baseline information profile for the Plan review area and where relevant beyond.

### 2.2 Policies, Plans, and Programmes (Stage A1)

Any amendment to the Local Plan must have regard to existing policies, plans and programmes at national and regional levels and strengthen and support other plans and strategies. It is therefore important to identify and review those policies, plans and programmes which are likely to influence the Plan review at an early stage. The content of these plans and programmes can also assist in the identification of any conflicting content of plans and programmes in accumulation with the Plan review. Local supporting documents have also been included within this list as they will significantly shape policies and decisions in the area.

It is recognised that no list of plans or programmes can be definitive and as a result this report describes only the key documents which influence the Plan review. The table below outlines the key documents, whilst a comprehensive description of these documents together with their relevance to the Plan review is provided within Annex B.

**Table 1: Other relevant policies, plans and programmes**

Relevant Plans and Programmes
International Plans and Programmes
European Landscape Convention (Florence, 2002)
European Union Water Framework Directive 2000 (Directive 2000/60/EC)
European Union Nitrates Directive 1991 (91/676/EEC)
European Union Environmental Noise Directive 2002 (2002/49/EC)
European Union Floods Directive 2007 (2007/60/EC)
European Union Air Quality Directive 2008 (2008/50/EC) and previous directives (96/62/EC; 99/30/EC; 2000/69/EC and 2002/3/EC)
European Union Directive on the Conservation of Wild Birds 2009 (2009/147/EC)
European Union Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992 (92/43/EEC)
European Union Biodiversity Strategy for 2030
United Nations Kyoto Protocol
World Commission on Environment and Development 'Our Common Future' 1987
The World Summit on Sustainable Development Johannesburg Summit 2002
Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)

## Relevant Plans and Programmes

The Conservation of Habitats and Species Regulations, 2019

The Industrial Emissions Directive 2010 (2010/75/EU)

European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)

European Union Groundwater Directive (2006/118/EC)

European Union Waste Framework Directive (2008/98/EC)

European Union Soil Strategy for 2030, 2021

Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat, UNESCO, 1971

## National Plans and Programmes

The Conservation of Habitats and Species Regulations, 2019

Nature Recovery Network (2022)

Local Nature Recovery Strategies (forthcoming)

Safeguarding our Soils: A Strategy for England (Defra, 2009)

The Countryside and Rights of Way (CROW) Act, 2000

Future Water: The Government's water strategy for England (2008)

Flood and Water Management Act, 2010

## Relevant Plans and Programmes

The Environment Agency's approach to groundwater protection (2018)

Planning (Listed Buildings and Conservation Areas) Act, 1990

Ancient Monuments and Archaeological Areas Act 1979

The Governments Statement on the Historic Environment for England (2010)

National Heritage Protection Plan Framework (2012)

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, 2007

(National) Planning Practice Guidance (updated 2021)

National Planning Policy Framework (including proposed amendments 2025)

Natural Environment and Rural Communities Act (2006)

Wildlife and Countryside Act (1981)

National Flood and Coastal Erosion Risk Management Strategy, 2020

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)

UK Geodiversity Action Plan: A framework for enhancing the importance and role of geodiversity

National Flood and Coastal Erosion Risk Management Strategy for England (2020)

Air Pollution: Action in a Changing Climate (2010)

## Relevant Plans and Programmes

Climate Change Act (2050 Target amendment) (2008) Order 2019

Environment Act, 2021

Flood Risk Regulations, 2009

A Green Future: Our 25 Year Plan to Improve the Environment, Defra, 2018

Net Zero Strategy: Build Back Greener, 2021

Clean Air Strategy, 2019

Land Use: Reducing emissions and preparing for climate change, Climate Change Committee, 2018

UK Climate Change Risk Assessment, Committee on Climate Change, 2022

Water Abstraction Plan, Defra, 2011

Meeting our Future Water Needs: A National Framework for Water Resources, 2020

## County and Regional Plans and Programmes

Essex Minerals Local Plan (2014) and emerging Review

Essex and Southend-on-Sea Waste Local Plan (2017)

Essex Green Infrastructure Strategy

The Essex County Council Local and Neighbourhood Planners' Guide to School Organisation



## Relevant Plans and Programmes

10 Year Plan -Meeting the demand for mainstream school places in Essex 2025-2033 (January 2025)

Essex Coast Recreational disturbance Avoidance & Mitigation Strategy (RAMS) Habitats Regulations Assessment Strategy document 2018-2038

Essex Coast Recreational disturbance Avoidance and Mitigation Strategy Draft Supplementary Planning Document (SPD) May 2020

The Essex County Council Developers' Guide to Infrastructure Contributions Revised 2020

National Gypsy and Traveller Guidance

National Minerals and Waste Guidance

Essex Walking and Cycling Strategy 2021

### District level Plans and Programmes

Tendring 2025 Air Quality Annual Status Report (ASR)

Alresford Neighbourhood Plan 2018-2033

Ardleigh Neighbourhood Plan 2020 - 2033

Elmstead Market Neighbourhood Plan (2013- 2033)

Tendring District Council Indoor & Built Sport Facilities Assessment Report – Leisure Facilities Framework (2023)

Tendring District Council Indoor & Built Sport Facilities – Leisure Facilities Needs

## Relevant Plans and Programmes

Assessment Report (2022)

Tendring District Council Open Space Report (2023)

Tendring District Council Playing Pitch and Outdoor Sport Strategy Assessment Report (2023)

Tendring District Council Playing Pitch and Outdoor Sport Strategy Framework (2023)

Tendring District Council Housing Strategy 2020-2025

Tendring District Council Flood Risk Assessment 2017

Tendring District Council Sports Strategy 2025 – 2028

Tendring District Council Strategic Housing Market Assessment 2021

Garden Community DPD 2025

Colchester's Local Plan and Neighbourhood Plans

Tendring Gypsy and Traveller Accommodation Assessment Need Summary Report May 2017

Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Summary 2016-2033 (January 2018)

Strategic Housing Land Availability Assessment (SHLAA) (ongoing)

Tendring Economic Strategy 2020-24 (2019)

## Relevant Plans and Programmes

Tendring Retail & Town Centre Uses Study (2020)

Tendring Employment Land Review (ELR) (2019)

Tourism Strategy for Tendring 2021—2026

Tendring District Council Water Cycle Study Final Report - September 2017

Tendring District Council Strategic Green Gaps Review 2020

Tendring Heritage Strategy (2020)

Tendring District Protected Lanes Assessment 2015

## 2.3 Collecting Baseline Information (Stage A2)

This sub-section details the Baseline Information profile for the Local Plan area and those neighbouring areas that are considered relevant to the content of the Local Plan review. The following section outlines a summary of the key baseline information and therefore the current state of the environment for the Plan review area. The SA Directive requires the production of the following information:

‘The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;” Annex 1(b);

The environmental characteristics of areas likely to be significantly affected;” Annex 1(c); and

Any existing problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/ECC” Annex 1(d).’

The baseline information identifies current sustainability issues and problems in the Local Plan area which should be addressed and provides a basis for predicting and monitoring the effects of implementing the document. To ensure the data collected was relevant and captured the full range of sustainability issues, it was categorised under various thematic

topics. They cover all the topics referred to in Annex 1(f) of the SEA Directive and follow the order of:

- Population
- Housing
- Economy and employment
- Health and wellbeing
- Transport and connectivity
- Cultural heritage
- Biodiversity and nature conservation
- Landscapes
- Water
- Climate and energy
- Air
- Soils
- Minerals
- Waste

Annex A to this Report outlines the full baseline information profile for the Local Plan area, and where relevant further afield. The key sustainability issues for the Local Plan area are outlined in the following sub-section.

## 2.4 Sustainability Issues (Stage A3) and the formulation of ISA Objectives (Stage A4)

The outcome of the above processes related to the identification of relevant plans and programmes and the baseline information profile of the Plan review area is the identification of key sustainability and environmental issues. These represent those sustainability and environmental problems facing the Plan review area which assist in the finalisation of a set of relevant SA Objectives that can be subsequently expanded upon in an ISA Framework.

The assessment of the Local Plan review will be able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the Local Plan review's content. The following table outlines the thought process which has led to the formulation of the ISA Objectives for the Local Plan review, bearing in mind that they build upon those of the SA of the adopted Local Plan.

**Table 2: Key Sustainability Issues**

General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
Population increase	Tendring is forecast to see an increase of over 12,000 people in the next 10 years, the third largest increase of Essex districts, with neighbouring Colchester forecast to see the largest increase in Essex by nearly 15,000 people.	It can be expected that without a Planned system, new housing and employment development to meet the demands of an increased population would not be delivered in a manner that would ensure necessary benefits in terms of location, scale, and supporting infrastructure.
Internal net migration	In regard to internal migration, a significant number of people, in comparison to other Local Authority areas, moved to Tendring in 2019/2020 (1,743).	It can be expected that without a Planned system, new housing and employment development to meet the demands of an increased population would not be delivered in a manner that would ensure necessary benefits in terms of location, scale, and supporting infrastructure.
Ageing population	Tendring has a high population of people aged over 65. This age group is also predicted to increase over the Local Plan period. The highest median age of Local Authority populations in Greater Essex is in Tendring at 50 years. This is above the England and Wales median of 40.	As indicated by need, market forces alone cannot be expected to deliver all types of housing need in the District. The exploration of relevant policy and suitable housing requirements that explore type and tenure across the District enables growth that reflects need and ensures the delivery of such housing.
Life expectancy	Tendring has lowest life expectancies in Essex for both males and females at 78.17 and 82.02, respectively. These are also lower than the averages for Essex, the Eastern region,	As indicated by need, market forces alone cannot be expected to deliver all types of housing need in the District. The exploration of relevant policy and suitable housing requirements that explore type and tenure across the District enables growth that reflects

General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
	and England.	need and ensures the delivery of such housing.
Deprivation	Tendring is the overall most deprived district in Essex, and also for health related deprivation. Deprivation is higher than the England and Wales averages.	Social integration is an important issue and can be aided through policy requirements that seek social infrastructure and through sensitive and appropriate housing allocations within the District. A plan-led system is able to ensure proportionate growth is allocated to the most sustainable areas, or with a focus on regeneration, rather than being led by market forces alone as could perhaps be expected in the absence of a Local Plan.
Housing needs	The proposed changes to the NPPF (2025) set new targets for each Local Authority area. The current standard methodology for calculating housing need identifies a significant increase in annual housing requirements.	The Plan can ensure that housing needs are met in the most sustainable areas through allocations that benefit from a plan-led system and all the evidence base requirements that they entail. In the absence of the Plan, new development sites can be expected to be more ad hoc and without the exploration of cumulative effects.
Employment opportunities	Tendring District is predominantly rural in nature; however the majority of businesses are located in an urban location.	The link between homes and jobs is a key tenet of sustainability. This is best addressed at the plan level and cannot be ensured through a reliance on suitable proposals coming forward. Without a plan-led approach it could be expected that the location of new housing and employment opportunities could be disparate.
Employment mix	Significant elements of the District's employment are in the care, tourism, and	The link between homes and jobs is a key tenet of sustainability, as is ensuring progressive growth in

General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
	agricultural sectors. The District registers significant proportions of residents travelling outside to other local authority areas to find employment.	employment opportunities across a range of sectors and in sustainable locations. This is best addressed at the plan level and cannot be ensured through a reliance on suitable proposals coming forward. Without a plan-led approach it could be expected that out commuting will continue.
Accessible green space	In Essex only 9% of Essex households have all of their Accessible Natural Greenspace requirements met. Tendring has the highest proportion of households without access to natural greenspace in Essex at 59%.	Ensuring that open space standards are met is a requirement of the adopted Local Plan, as are strategic solutions where necessary and thresholds are met. This is unlikely to change through the Plan review, however, remains a key sustainability issue in the District
Activity	Sport England's Active Lives Survey indicates Tendring residents as being the least active in Essex.	Ensuring that open space standards are met is a requirement of the adopted Local Plan, as are strategic solutions where necessary and thresholds are met. This is unlikely to change through the Plan review, however, remains a key sustainability issue in the District
Heritage / Historic Environment	There are 17 listings on the Heritage at Risk Register in Tendring. Notably, these include the Conservation Areas of Clacton Seafront, Dovercourt, St Osyth, Thorpe-le-Soken, and Thorpe-le-Soken Station and Maltings.	A plan-led system can ensure that sites are allocated away from heritage designations in the first instance. Policy can also ensure that impacts are known and understood at the application stage through the submission of suitable evidence.
Wildlife designations	Tendring includes Habitats sites at the coast, 15 SSSIs,	A plan-led system can ensure that sites are allocated away from wildlife

General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
	a National Nature Reserve, and over 100 Local Wildlife Sites.	designations in the first instance. Policy can also ensure that impacts are known and understood at the application stage through the submission of suitable evidence.
Essex Coast RAMS	<p>The Essex coast Recreational disturbance Avoidance and Mitigation Strategy (the “Essex coast RAMS”) aims to deliver the mitigation necessary to avoid significant adverse effects from ‘in-combination’ impacts of residential development that is anticipated across Essex; thus protecting the Habitats (European) sites on the Essex coast from adverse effect on site integrity.</p> <p>All new residential developments within the evidenced Zone of Influence where there is a net increase in dwelling numbers are included in the Essex Coast RAMS. The entirety of Tendring is within this zone.</p>	The Essex Coast RAMS, and the recreational impacts of visitor trips to the coast from new communities in Tendring, emanates from the in-combination effects identified at the Plan level. Nevertheless, the appropriate mechanism for collecting contributions is in place and will not be affected by the Plan review.
Landscape / AONB	Tendring includes the Suffolk and Essex Coast and Heaths AONB along the Stour River from Manningtree to Harwich.	A plan-led system can ensure that sites are allocated away from landscape designations in the first instance. Policy can also ensure that impacts are known and understood at the application stage through the submission of suitable evidence.
Climate change	Sea level rise and subsidence will lead to more	A plan-led system can ensure that sites can be allocated in mind of flood



General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
	frequent flooding of coastal areas. Increased temperatures and greater fluctuation in annual precipitation will further increase pressure on water resources. Essex is already one of the driest areas in the UK.	risk and with the benefits of the sequential testing of site options.
Flood Risk	Climate change is increasing the magnitude and frequency of intense rainfall events that cause flooding and the risk of flooding from the River Colne and Stour which are also heightened by increased winter precipitation. There is a risk of flooding from a number of sources: fluvial, tidal and pluvial.	A plan-led system can ensure that sites can be allocated in mind of flood risk and with the benefits of the sequential testing of site options.
Emissions	The largest proportion of CO <sub>2</sub> emissions are within the transport sector, accounting for about half of total CO <sub>2</sub> emissions, followed by the domestic sector.	The Plan can ensure that policy is robust in prioritising public transport. Development sites can be allocated with regard to reducing the need to use private vehicle trips and maximising public transport, walking and cycling. The Plan will also ensure requirements for reducing building emissions while increasing energy efficiency.
Air quality	The junction and mini roundabout at North Road, Clacton on Sea, is heavily congested by road traffic throughout the day, and during rush hours. This has been an area of concern	The Plan can ensure that planning applications are submitted with suitable air quality considerations. Equally, the Plan can allocate sites with the air quality of key junctions or areas in mind.

General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
	within Tendring for the last few years.	
Soils / BMV	Tendring has a significant concentration of grade 1 and 2 agricultural land to the north west of the District on the border with Colchester Borough. The majority of the central part of the District is grade 3 land, with small areas of grade 2 running from south west to north east through the centre of Tendring.	Although decisions will be made on the balance of benefits and constraints, the Plan has the ability to consider BMV and grade 1 agricultural land in regard to the location of new site allocations.
Preserving mineral deposits	The area has extensive deposits of sand and gravel. The sand and gravel resources in Essex are significant in national, sub-national and local terms - Essex is one of the largest producers in the UK; most geographically extensive and significantly mixed within the centre and north of Essex – namely the districts of Uttlesford, Braintree, Chelmsford, Colchester and Tendring.	The consideration of land within Minerals Safeguarding Areas (MSAs) is best done at the plan level. Without a plan-led approach regarding the allocation of land to meet development needs, development proposals are likely to come forward without such regard.
Transport	The Plan Area is largely rural in nature and rural public transport services and interconnectivity is poor.	A plan-led approach to allocating sites for development enables rural transport issues to be taken fully into account and improved where possible through enhancements to such infrastructure. In the absence of the plan, it is possible that isolated and individual proposals would come

General Theme	Description and supporting evidence	State of environment in the absence of the Local Plan
		forward in rural areas with no scope for such improvements and policy considerations.

The following table explores whether the identified ISA Objectives above fall into the three broad categories of sustainability, namely social, environmental and economic themes.

**Table 3: The Integrated Sustainability Appraisal (ISA) Objectives**

ISA Objective	Society	Environment	Economy
1) To deliver a sufficient supply of homes for all including an appropriate mix of housing types	Yes	N/A	Yes
2) To promote economic growth and diversity across the District	Yes	N/A	Yes
3) To maximise the potential for sustainable transport uptake, including walking and cycling	Yes	Yes	N/A
4) To ensure resilient sustainable communities with better health, education, and social outcomes	Yes	N/A	N/A
5) To ensure that development is located sustainably and makes efficient use of land	Yes	Yes	Yes
6) To conserve and where possible enhance biodiversity and geodiversity designations, as well as natural habitats and protected species	N/A	Yes	N/A

ISA Objective	Society	Environment	Economy
7) To ensure that development delivers net gains in biodiversity, as well as green and blue infrastructure	Yes	Yes	N/A
8) To conserve and where possible enhance the historic environment (both above and below ground), built and cultural heritage assets, and their settings	Yes	Yes	N/A
9) To conserve and where possible enhance the quality and character of landscapes and landscape features	Yes	Yes	N/A
10) To maintain and where possible improve water quality and the sustainable use of ground and surface water resources	N/A	Yes	N/A
11) To maintain and where possible improve air quality	N/A	Yes	N/A
12) To protect and improve soil quality, in particular the best and most versatile agricultural land	N/A	Yes	Yes
13) To ensure, where possible, that new development is carbon neutral and increase the production of energy from renewable sources where appropriate	N/A	Yes	Yes
14) To ensure that development does not lead to an increase in flood risk and is prepared for the impacts of climate change	Yes	Yes	N/A

### 2.4.1 The Compatibility of the ISA Objectives

A total of 14 ISA Objectives have been derived for the appraisal of the Plan review. They are based on the scope of the document, the themes required of SA, policy advice and guidance, and to the assessment of the current state of the environment.

It is useful to test the compatibility of ISA Objectives against one another in order to highlight any areas where potential conflict or tensions may arise. It is to be expected that some objectives are not compatible with other objectives; objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa.

It is considered that the majority of the ISA Objectives relevant to the content of the Plan review are broadly compatible or otherwise unrelated. There are however a number of potential incompatibilities identified, and these are discussed below:

- Protecting and enhancing biodiversity and development: The possibility of effects arising from any change in land use on biodiversity creates an incompatibility between Plan aims and the need to protect wildlife and habitats, either on-site or where pathways exist.
- Maintaining and enhancing water quality and development: There is a possibility that development can lead to adverse impacts on groundwater conditions. Those ISA Objectives that seek the protection of water quality for environmental purposes and ensuring housing and employment related development may therefore be incompatible in some areas of the District.
- The protection of the best and most versatile agricultural land and development: There is a possibility that development can lead to adverse impacts on the capacity of soils for future use. Those ISA Objectives that seek the protection of soils and ensure housing and employment development respectively may therefore be incompatible in some areas of the District.
- Economic growth and environmental effects: There is a potential incompatibility through a desire to maximise the potential for employment opportunities, through for instance a higher number of employment development sites, and the potential negative environmental effects in certain areas that could arise from that number.



### 3. Detailed Integrated Sustainability Appraisal (ISA) Frameworks

#### 3.1 How Local Plan Policies are Appraised

The following ISA Framework forms the basis of the methods used to evaluate the effects of the Local Plan review’s policy amendments and any ‘reasonable alternative’ options where relevant. Quantitative analysis is used where available; however, a number of assumptions are required in order to make qualitative and comparable judgements to assess options to the same level of detail. It is important that a level playing field is ensured for the assessment of options, with the same level of information being used in the assessment. Assumptions will be set out in the relevant sections of the ISA Environmental Report (the next stage in the process) in which specific elements of the Plan review are assessed.

The table below sets out the ISA Framework devised for the assessment of the Local Plan’s policy content.

Table 4: ISA Framework (Policies)

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
1) To deliver a sufficient supply of homes for all including an appropriate mix of housing types	1.To provide decent and affordable homes for all	<ul style="list-style-type: none"> <li>• Seek to provide the homes needed to support the existing and growing population?</li> <li>• Seek to provide more affordable homes across the District?</li> <li>• Seek to provide supported and specialist housing?</li> <li>• Seek to deliver a mix of housing types and tenures to meet the diverse needs of the District?</li> <li>• Seek to provide homes to meet any needs for Gypsy and Traveller communities?</li> </ul>	<ul style="list-style-type: none"> <li>• The number of net additional dwellings</li> <li>• Affordable housing completions</li> <li>• Percentage of residential completions that are of different types and tenures</li> </ul>
2) To promote economic growth and diversity across the District	3.Harness the District's economic strengths	<ul style="list-style-type: none"> <li>• Encourage rural diversification?</li> <li>• Encourage inward investment?</li> <li>• Encourage tourism opportunities?</li> <li>• Support the development and growth of the local economy and generate employment</li> </ul>	<ul style="list-style-type: none"> <li>• Number and percentage of businesses by industry type in key sectors.</li> <li>• Number or percentage employed</li> <li>• Investment in innovation</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
		<p>opportunities?</p> <ul style="list-style-type: none"> <li>• Encourage innovation and competitiveness within various industries located within the District?</li> <li>• Impact on long-term investment in infrastructure?</li> <li>• Ensure no conflict with other investment opportunities?</li> <li>• Contribute to the Cultural, Visitor and Tourism sector?</li> <li>• Seek to enhance the vitality and viability of town centres?</li> </ul>	<p>technologies</p> <ul style="list-style-type: none"> <li>• Employment land availability</li> <li>• Employment applications permitted</li> </ul>
3) To maximise the potential for sustainable transport uptake, including walking and cycling	4.Minimise transport growth whilst capturing the economic benefits of international gateways	<ul style="list-style-type: none"> <li>• Reduce the need to travel?</li> <li>• Increase sustainable modes of transport?</li> <li>• Promote the use of sustainable modes of transport?</li> <li>• Seek to provide appropriate infrastructure to</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of new dwellings within 30 minutes public transport time of local services</li> <li>• Percentage of journeys to work by private car</li> </ul>



Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
		<p>maximise the uptake of sustainable modes of transport, walking and cycling?</p> <ul style="list-style-type: none"> <li>Acknowledge that a range of transport options are required to meet the needs of different demographics?</li> <li>Ensure new developments enhance and provide a safe and accessible public realm?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of journeys to work by public transport, walking and cycling</li> <li>Provision of new public transport infrastructure including walking and cycling (through direct provision / conditions associated with contributions)?</li> </ul>
4) To ensure resilient sustainable communities with better health, education, and social outcomes	5.To build stronger more resilient sustainable communities with better education and social outcomes	<ul style="list-style-type: none"> <li>Seek to provide access to health, education, recreation and community facilities?</li> <li>Ensure healthier lifestyles and access to healthcare facilities?</li> <li>Protect existing open spaces and create suitable new open space?</li> <li>Seek to ensure that levels of educational attainment improve?</li> <li>Seek to reduce actual crime and the fear of crime through effective urban design</li> </ul>	<ul style="list-style-type: none"> <li>Provision of social infrastructure and services on allocated sites</li> <li>Contributions received towards community facilities</li> <li>GP waiting times and capacities</li> <li>Walking / cycling modes</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
		solutions?	<p>of transport uptake</p> <ul style="list-style-type: none"> <li>• New healthcare facility provision through growth</li> <li>• Health related statistics</li> <li>• Open space provision ha/1000 population</li> <li>• Contributions received towards open space provision</li> <li>• Percentage of total working age population educated to Level4 and above</li> <li>• Percentage of total working age population with no qualifications</li> <li>• Number of offences per 100,000 population</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
5) To ensure that development is located sustainably and makes efficient use of land	2.To ensure that development is located sustainably and makes efficient use of land	<ul style="list-style-type: none"> <li>• Reduce the amount of derelict, degraded and underused land?</li> <li>• Seek to ensure appropriate residential densities in urban areas, including higher densities in appropriate locations?</li> <li>• Seek the prioritisation of brownfield development?</li> <li>• Seek contaminated land to be remediated?</li> </ul>	<ul style="list-style-type: none"> <li>• Residential development densities</li> <li>• Development on brownfield land as opposed to greenfield</li> <li>• Remediation and development of contaminated land</li> </ul>
6) To conserve and where possible enhance biodiversity and geodiversity designations, as well as natural habitats and protected species	6.Protect and enhance natural, historic and environmental assets	<ul style="list-style-type: none"> <li>• Ensure a determination of 'no likely significant' (alone or in-combination) on Habitats Sites (as identified within the Habitats Regulations Assessment (HRA) of the Local Plan as it emerges)?</li> <li>• Seek appropriate mitigation or offsetting where necessary?</li> <li>• Have an identified effect on any designation of national, regional or local importance?</li> <li>• Avoid damage to sites, protected species</li> </ul>	<ul style="list-style-type: none"> <li>• Change in number and area of designated ecological sites.</li> <li>• Development proposals affecting protected species outside protected areas.</li> <li>• Achievement of Habitat Action Plan targets.</li> <li>• Achievement of Species</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
		<p>and habitats?</p> <ul style="list-style-type: none"> <li>• Maintain and improve biodiversity and geodiversity, avoiding irreversible losses?</li> <li>• Conserve or enhance species diversity and avoid harm to internationally and nationally protected, scarce and rare species?</li> <li>• Provide for positive management of existing habitats?</li> <li>• Conserve or enhance geological SSSIs?</li> <li>• Create, extend or enhance Local Geological Sites?</li> <li>• Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced?</li> </ul>	<p>Action Plan targets.</p> <ul style="list-style-type: none"> <li>• Development proposals affecting habitats outside protected areas.</li> <li>• Bird survey results. Reported condition of ecological SSSIs.</li> <li>• Number of planning permissions that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> </ul>
7) To ensure that development delivers net gains in biodiversity, as well as green and	6. Protect and enhance natural, historic and environmental	<ul style="list-style-type: none"> <li>• Lead to biodiversity net gains?</li> <li>• Expand the spatial extent of priority habitat within District?</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of major developments generating overall biodiversity enhancement.</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
blue infrastructure	assets	<ul style="list-style-type: none"> <li>Assist species to adapt to the anticipated effects of climate change? (i.e. through connecting habitats and, or providing greenspace)?</li> </ul>	<ul style="list-style-type: none"> <li>Hectares of biodiversity habitat delivered through site allocations or through policy approaches.</li> </ul>
8) To conserve and where possible enhance the historic environment (both above and below ground), built and cultural heritage assets, and their settings	6. Protect and enhance natural, historic and environmental assets	<ul style="list-style-type: none"> <li>Have an adverse effect on any designated or non-designated or potential heritage assets or their settings?</li> <li>Seek to ensure no loss, or erosion, of the historic character of the landscape?</li> <li>Have an adverse effect on known archaeological deposits?</li> <li>Change the condition of known or potential archaeological monuments and, or the ability to record unknown buried archaeology?</li> <li>Protect designated areas- nationally, regionally and locally?</li> <li>Protect areas of high archaeological potential?</li> <li>Suggest measures to conserve and enhance</li> </ul>	<ul style="list-style-type: none"> <li>Number of listed structures at risk</li> <li>Area of historic parks and gardens</li> <li>Size, condition and number of Conservation Areas</li> <li>Areas of significant archaeological and paleo-environmental potential</li> <li>Number of Conservation Area Appraisals completed, and enhancement schemes implemented</li> <li>Buried archaeology as</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
		<p>the local character and distinctiveness of historic townscapes and landscapes?</p> <ul style="list-style-type: none"> <li>Identify and protect the relationship between historic settlements and the wider landscape?</li> </ul>	<p>listed in the HER or considered to be likely within a particular site by County Archaeologists and, or Historic England.</p> <ul style="list-style-type: none"> <li>Applications submitted and refused due to adverse impact to the Historic Environment</li> <li>Applications submitted and allowed with conditions relating to the Historic Environment</li> <li>Site allocations supported or opposed by Historic England</li> </ul>
9) To conserve and where possible enhance the quality and character of landscapes and	6. Protect and enhance natural, historic and environmental	<ul style="list-style-type: none"> <li>Improve landscape and townscape character of the District and help to minimise adverse impacts to local amenity and overall landscape character?</li> <li>Conserve and enhance landscape character,</li> </ul>	<ul style="list-style-type: none"> <li>Changes in landscape of designated landscape (landscape conditions attached to new permissions)</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
landscape features	assets	<p>quality and distinctiveness, paying particular regard to the AONB and other designated areas of high landscape and, or historic sensitivity or value?</p> <ul style="list-style-type: none"> <li>• Contribute to an adverse cumulative impact of development on protected landscapes?</li> <li>• Provide for the restoration of land to an appropriate after-use and landscape character?</li> <li>• Provide opportunities for the creation of accessible greenspace where restoration is planned?</li> <li>• Seek opportunities to protect and enhance green and blue infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of Tree Preservation Orders (TPOs) affected</li> <li>• Number or extent of field boundaries affected</li> <li>• Amount of new development in AONB (and other designations)</li> <li>• Percentage of population having access to a natural greenspace within 400 metres of their home.</li> <li>• Length of greenways constructed</li> <li>• Hectares of accessible open space per 1,000 population</li> </ul>
10) To maintain and where possible improve	6.Protect and enhance natural, historic	<ul style="list-style-type: none"> <li>• Seek to sustain the highest water quality?</li> <li>• Take into account the Water Framework</li> </ul>	<ul style="list-style-type: none"> <li>• Water quality in rivers</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
water quality and the sustainable use of ground and surface water resources	and environmental assets	<p>Directive and proposed development impacts?</p> <ul style="list-style-type: none"> <li>• Seek to prevent pollution from field run off or other sources?</li> <li>• Likely to change the general quality assessment grades of surface and ground water quality?</li> <li>• Avoid adverse effects on existing patterns of groundwater flow and, or surface water flow?</li> <li>• Protect or enhance the quantity and quality of ground and surface waters?</li> <li>• Seek to address potential issues with disrupting groundwater flows?</li> <li>• Change potable and, or non-potable abstraction resources or disrupt aquifer continuity?</li> <li>• Maintain water availability for water dependant habitats?</li> </ul>	<ul style="list-style-type: none"> <li>• Groundwater quality</li> <li>• Potential effect on groundwater source protection zones</li> <li>• Condition of water bodies (Water Framework Directive)</li> <li>• Water use figures from water supplier(s)</li> <li>• Resource availability status for units of groundwater in Catchment abstraction</li> </ul>



Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
		<ul style="list-style-type: none"> <li>• Affect rates of abstraction and water use?</li> <li>• Affect grey water recycling?</li> <li>• Seek the introduction of natural systems which can improve surface water runoff into water courses?</li> <li>• Seek to ensure proposals enhance biodiversity in water courses?</li> </ul>	
11) To maintain and where possible improve air quality	6. Protect and enhance natural, historic and environmental assets	<ul style="list-style-type: none"> <li>• Take into account proposed development impacts within any AQMAs and their relevant Action Plans</li> <li>• Account for locations where air pollution levels are approaching the National Objectives thresholds</li> <li>• Seek to improve air quality?</li> <li>• Seek to mitigate effect levels of the 7 National Objective pollutants for local air quality (SO<sub>2</sub>, NO<sub>2</sub>, PM<sub>10</sub>, benzene, 1,3-butadiene, CO, Pb)?</li> </ul>	<ul style="list-style-type: none"> <li>• Achievement of emission limit values</li> <li>• Number of AQMAs and dwelling affected</li> <li>• Number of days of air pollution</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
12) To protect and improve soil quality, in particular the best and most versatile agricultural land	6.Protect and enhance natural, historic and environmental assets	<ul style="list-style-type: none"> <li>• Minimise risk of soil contamination?</li> <li>• Safeguard soil and protect quality and quantity?</li> <li>• Reduce the capacity of the soil to hold carbon?</li> <li>• Minimise the loss of greenfield land to development?</li> <li>• Minimise loss of the best and most versatile agricultural?</li> </ul>	<ul style="list-style-type: none"> <li>• Number and percentage of new development completed on greenfield land.</li> <li>• Number of permitted proposals on greenfield land.</li> <li>• Number of permitted proposals on best and most versatile agricultural land.</li> </ul>
13) To ensure, where possible, that new development is carbon neutral and increase the production of energy from renewable sources where	7.Reduce contributions to climate change	<ul style="list-style-type: none"> <li>• Ensure carbon neutrality?</li> <li>• Ensure energy efficiency?</li> <li>• Help to reduce greenhouse gas emissions and enhance energy efficiency?</li> <li>• Seek to reduce carbon emissions from transport / freight movements?</li> <li>• Seek to ensure the approval of renewable</li> </ul>	<ul style="list-style-type: none"> <li>• Consumption of electricity - Domestic use per consumer and total commercial and industrial use.</li> <li>• Consumption of energy.</li> <li>• Use of low carbon technologies.</li> <li>• Opportunities for utilizing</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
appropriate		energy proposals, where appropriate?	renewable or low-carbon energy supply systems
14) To ensure that development does not lead to an increase in flood risk and is prepared for the impacts of climate change	8.To conserve and enhance natural resources and reduce climate change impacts	<ul style="list-style-type: none"> <li>• Ensure no increased risk of flooding?</li> <li>• Mitigate the potential effects of fluvial flooding and reduce overall flood risk?</li> <li>• Mitigate the potential of surface water flooding and reduce overall flood risk?</li> <li>• Mitigate the potential for coastal flooding and reduce overall risk?</li> <li>• Mitigate the potential for groundwater flooding and reduce overall risk?</li> <li>• Minimise the risks and impacts of flooding having taken into account climate change including the consideration of 'nature-based' solutions?</li> <li>• Ensure that development requiring water to be discharged does not lead to flood risk regarding the receiving water courses?</li> </ul>	<ul style="list-style-type: none"> <li>• Flood Risk – Planning applications approved against Environment Agency or Lead Local Flood Authority advice.</li> <li>• Properties at risk of flooding from rivers.</li> <li>• Incidence of fluvial flooding (properties affected).</li> <li>• Incidences of surface water flooding</li> <li>• Incidences of coastal flooding</li> <li>• Incidences of groundwater flooding</li> <li>• Strategic Flood Risk</li> </ul>

Proposed ISA Objective (2025)	Previous relevant SA Objective	Key Questions / Objective sub-criteria (Does the policy...?)	Potential Indicator
			Assessment (SFRA) results.



### 3.2 How Local Plan Site Options are Appraised

In addition to the appraisal of the Plan review’s policy content within the ISA, any new site allocations or options (alternatives) are required to be assessed to identify any significant effects on the ISA Objectives.

The following table outlines the ISA framework proposed for the appraisal of potential allocation sites.

Table 5: ISA Framework (Sites)

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
1) To deliver a sufficient supply of homes for all including an appropriate mix of housing types	Housing supply	The site could be considered strategic for the purposes of meeting the District's housing targets over the plan period	The site has been promoted for housing and is in conformity with the Spatial Strategy and Settlement Hierarchy	Where applicable	Site is submitted for a non-residential use	N/A	N/A
	Type and tenure	Site is submitted for purely affordable housing	Site is submitted for housing of an identified need (type / tenure) in the Housing Needs Assessment (HNA)	Where applicable	Site is submitted for a non-residential use	N/A	N/A
2) To promote	Employ-	Proposal is for	Proposal is for	Where	Non-	Proposal sees	N/A

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
economic growth and diversity across the District	ment land	employment use	mixed-use incorporating employment opportunities	applicable	employment development	a loss of previously employment land	
	Regeneration	Site is for strategic employment land in an industry and area of identified need	Site is for employment land in an industry and area of identified need	Where applicable	Non-employment development	Proposal would see a minor or net loss of employment land in key business and regeneration area	Proposal would see the loss of strategic employment land
3) To maximise the potential for sustainable transport uptake, including walking and	Distances to town / village / neighbourhood centres	< or = to 400m	> 400-800m	401m-800m from boundary  OR Where applicable	Where applicable	> 800m – 1.4km	>1.4km

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
cycling	Distance to a bus stop / train station	< or = to 400m	> 400-800m	Where applicable	Where applicable	> 800m – 1.4km	>1.4km
4) To ensure resilient sustainable communities with better health, education, and social outcomes	Distance to GP services	< or = to 400m	> 400-800m	Where applicable	Non-residential proposals	> 800m – 1.4km	>1.4km
	Distance to primary school	< or = to 400m	> 400-800m	Where applicable	Non-residential proposals	> 800m – 1.4km	>1.4km
5) To ensure that development is located sustainably and makes efficient use of land	Brownfield land	N/A	Site is entirely or partly but predominantly on brownfield land	Where applicable	N/A	Site is entirely or partly but predominantly greenfield land	N/A
	Contaminated land	N/A	Development of site would see the	Where applicable	Site is not on contaminated	N/A	N/A



Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
			remediation of contaminated land		land		
6) To conserve and where possible enhance biodiversity and geodiversity designations, as well as natural habitats and protected species	Wildlife designations	N/A	N/A	Where applicable	The site would have no impact on a wildlife designation	The proposal would see the loss of functionally linked land (to a Habitats site)  OR The site is within or adjacent to a wildlife designation of local importance	The proposal would have a likely significant effect on the integrity of a Habitats site  OR The site is within a wildlife designation of international or national importance
	Biodiversity features	N/A	N/A	Where applicable	The site would have no impact on	The site is on or adjacent to	The site is known to include

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
					biodiversity features	priority habitat	protected species
7) To ensure that development delivers net gains in biodiversity, as well as green and blue infrastructure	BNG	The proposal will include over the minimum net gain requirement	The proposal will include the minimum net gain requirement	Where applicable	Where applicable	N/A (all proposals must provide BNG)	N/A (all proposals must provide BNG)
8) To conserve and where possible enhance the historic environment (both above and below ground), built and cultural heritage assets, and their	Designated heritage assets (above and below ground)	The proposal can be considered to enhance a designated asset on the at risk register	The proposal can be considered to enhance a designated asset	Where applicable	The proposal will have no effect on any designated assets	There is considered to be the potential for an impact on the significance of a designated asset or its setting, although mitigation is	There is considered to be an impact that could affect the significance of a designated asset or its setting with no mitigation

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
settings						possible.	suitable.
	Non-designated heritage assets (above and below ground)	N/A	N/A	Where applicable	The proposal will have no effect on any non-designated assets	There is considered to be the potential for an impact on the significance of a non-designated asset or its setting, although mitigation is possible.	There is considered to be an impact that could affect the significance of a non-designated asset or its setting with no mitigation suitable.
9) To conserve and where possible enhance the quality and character of landscapes and	Designations and landscape character	N/A	N/A	Where applicable	The proposal would have no landscape implications	The proposal is within an area identified as highly sensitive in the Landscape Character	The proposal is within the Suffolk Coast & Heaths AONB

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
landscape features						Assessment	
	Landscape principles / features	N/A	The proposal would lead to landscape enhancements	Where applicable	The proposal is within the development boundary	<p>The proposal would contribute to the coalescence of settlements</p> <p>AND/OR</p> <p>The site contains landscape features synonymous with the relevant Landscape Character Area</p>	<p>The proposal would significantly contribute to the coalescence of settlements</p> <p>AND/OR</p> <p>The site contains multiple landscape features synonymous with the relevant Landscape Character Area</p>

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
10) To maintain and where possible improve water quality and the sustainable use of ground and surface water resources	Ground-water	N/A - It is not considered possible for significant positive impacts to be ensured	N/A - It is not considered possible for positive impacts to be ensured	The site is partly within ground water Source Protection Zone III (Total Catchment).	There are no known constraints.	The site is located within ground water Source Protection Zone II (Outer Zone)	The site is located within ground water Source Protection Zone I (Inner Zone).
	Surface water	N/A - It is not considered possible for significant positive impacts to be ensured	N/A - It is not considered possible for positive impacts to be ensured	Where applicable	The site is not within an area identified as having any surface water nitrate or pesticide issues	The site is within an area identified as having medium priority surface water nitrate or pesticide issues	The site is within an area identified as having high priority surface water nitrate or pesticide issues
11) To maintain and where possible improve air	Air quality	N/A	N/A	Where applicable	All other sites	The proposal could lead to frequent car journeys through North	N/A (no AQMAs in Plan area)

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
quality						Road junction, Great Clacton (where there are potential exceedances in Air Quality Objectives)	
12) To protect and improve soil quality, in particular the best and most versatile agricultural land	Agricultural Land Classification / BMV	N/A	The site is on brownfield land.	The site is within land identified as Grade 3 (Good to Moderate) ALC	The site is within land identified as Grade 4-5 (Poor / Very Poor) ALC  OR The site is not located on current agricultural land	The site is within land identified as Grade 2 (Very Good) ALC	The site is within land identified as Grade 1 (Excellent) ALC

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
13) To ensure, where possible, that new development is carbon neutral and increases the production of energy from renewable sources where appropriate	Renewable energy generation	N/A	The proposal includes on-site renewable energy solutions	Where applicable	All other proposals	N/A	N/A
14) To ensure that development does not lead to an increase in flood risk and is prepared for the impacts of climate change	Fluvial flood risk	N/A	N/A	Where applicable	The site is within Flood Risk Zone 1	The site is within Flood Risk Zone 2	The Site is within Flood Risk Zone 3
	Surface water flood risk	N/A	N/A	The site is in an area identified as having a 'low' risk for surface water flood risk	The site is in an area identified as having a 'very low' risk for surface water	The site is in an area identified as having a 'high' risk for surface water flood risk	The site is in an area identified as having a 'very high' risk for surface water

Proposed ISA Objective (2025)	Sub criteria	Significantly Positive Effects (++)	Positive Effects (+)	Uncertain Effects (?)	Neutral Effects or No Effect (0)	Negative Effects (-)	Significantly Negative Effects (- -)
				OR  Where applicable	flood risk		flood risk



## 4.1 The Types of Effects Considered

The ISA of the Plan Review assesses the proposed Plan content against the ISA Objectives and key questions (criteria) outlined in the above frameworks. The aim is to assess the sustainability effects of the document following implementation. The assessment looks at the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects in accordance with Annex 1 of the SA Directive, as well as assessing alternatives and suggesting mitigation measures where appropriate. The findings are accompanied by an appraisal matrix which documents the effects over time.

The content to be included within the table responds to those 'significant effects' of the policy or element of the Local Plan review subject to assessment. Assessments also look at the following:

- Temporal effects;
- Secondary, Cumulative and Synergistic effects;
- The assessment of Alternatives; and
- Proposed mitigation measures / recommendations.

These, and 'significant effects' are further described in the following sub-sections.

### 4.1.1 Description of 'Significant Effects'

The strength of impacts can vary dependant on the relevance of the policy content to certain ISA Objectives or themes. Where the policies have been appraised against the ISA Objectives the basis for making judgements within the assessment is identified within the following key:

Possible impact	Basis for judgement
++	Strong prospect of there being significant positive impacts.
+	Strong prospect of there being minor positive impacts.
?	General uncertainty where there is a lack of current information (to be elaborated in commentary in each instance).
0	No impact.
-	Strong prospect of there being minor negative impacts and mitigation would be possible / issues can be rectified.

Possible impact	Basis for judgement
--	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation) / further work is needed to explore whether issues can be rectified.
N/A	Not applicable to the scope or context of the assessed content.

Commentary is also included to describe the significant effects of the policy on the sustainability objectives.

#### A NOTE ON 'UNCERTAIN IMPACTS / EFFECTS' IN THE ISA:

Within the following ISA Framework, a degree of impact is highlighted as 'uncertain.' It should be acknowledged that within the assessment of options 'uncertain' impacts can 'lean' towards either positive or negative impacts, and these additional degrees of impact will be highlighted within option assessments where relevant.

Additionally, it should also be acknowledged that 'uncertain' impacts will only be highlighted where 'positive' or 'negative' impacts cannot be predicted with any assurance or where there is a lack of reliable quantitative information that can be used to predict impacts (or when the only available information is considered qualitative / anecdotal).

### 4.1.2 Description of 'Temporal Effects'

The assessment of the Plan Review's content should recognise that impacts may vary over time. The ISA Report highlights where effects may change over time in those instances where evidence exists to support such judgements. Should no evidence exist, then temporal effects have been based on reasonable assumptions, which have been highlighted and signposted within this Report. Effects for each policy appraisal are highlighted as:

- S/T: Short Term (responding to the early to mid-term period of Plan period)
- M/T: Medium Term (responding to the latter stages of the Plan period)
- L/T: Long Term (responding to restoration / after-care and beyond the Plan period)

### 4.1.3 Description of 'Secondary, Cumulative and Synergistic Effects'

In addition to those effects that may arise indirectly (secondary effects), relationships between different elements of the Plan Review are assessed in order to highlight any possible strengthening or weakening of impacts from their implementation together.

Cumulative effects respond to impacts occurring directly from two different elements together, and synergistic effects are those that offer a strengthening or worsening of more than one element of the Plan that is greater than any individual impact. Additionally, any cumulative impacts with other plans or projects are highlighted within the assessment.

#### 4.1.4 Description of 'Reasonable Alternatives Considered'

Planning Practice Guidance states that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

#### 4.1.5 Description of 'Proposed Mitigation Measures / Recommendations'

Negative or uncertain impacts may be highlighted within assessments. As such, mitigation measures may be needed, and these are highlighted in this section for each policy where relevant. In addition to this, this section also includes any recommendations that may maximise sustainability benefits.

## 4. The Appraisal of the Plan Review's Policy Framework

### 4.1 Introduction to this Section

The appraisal of the Plan Review at this stage focuses on those amendments that are proposed to be made to the adopted Local Plan's policy framework. The adopted Local Plan has been subject to SA in its entirety and found sound at examination, so there is considered no reason to replicate previously assessed material where no change is proposed at this stage. This keeps the assessment focused on the amendments and any reasonable alternatives to them.

The appraisal of the Plan Review's amendments are set out on a chapter basis, and each amendment to those policies within each chapter includes discussion as to whether alternative approaches are required for consideration and subsequent appraisal.

### 4.2 The Sustainable Places Policies

#### 4.2.1 What changes are proposed to the adopted Local Plan policies?

The Sustainable Places policies have been updated to respond to various other policy changes proposed and also new allocations, notably the Garden Villages and strategic allocations which are required to meet the District's new housing and employment needs. The key policies proposed for amendment that can be considered to change the approach of the corresponding adopted Policy, as part of the Local Plan Review, are:

- Policy SPL1 Managing Growth;
- Policy SPL1a Presumption in Favour of Sustainable Development
- Policy SPL2 Settlement Development Boundaries; and
- Policy SPL3 Sustainable Design.

#### 4.2.2 New alternatives to consider at this stage

Alternatives exist regarding the proposed changes to Policy SLP1 Managing Growth in so far as alternative sites for allocation have been submitted for consideration through the Council's call-for-sites process or otherwise identified by the Council. These alternatives are considered elsewhere in this ISA Report, specifically in Section 5 which assesses those site options considered for allocation.

It is considered that no other alternatives exist in regard to the Sustainable Places policies that are proposed for amendment. It is considered that any additional alternative approaches

would not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan and could not be expected to yield any different effects.

#### 4.2.3 Assessment of the Sustainable Places Policies

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	+	+	+	+	+	?	?	?	?	?	?	?	?	?
M/T	+	+	+	+	+	?	?	?	?	?	?	?	?	?
L/T	++	++	+	+	+	?	?	?	?	?	?	?	?	?

Policy SPL1 is proposed to be changed to reflect an updated settlement hierarchy that includes the proposed new Garden Village allocations included within the Plan. Policy SPL2 is proposed for amendment to strengthen the position that new 'off-plan' development proposals will be restricted to locations within defined settlement boundaries, aside from in the new Garden Village allocations (these will be the subject of separate DPDs which will contain their own policies designed to guide the location of development in the broad location and define settlement boundaries at that stage). Policy SPL1a regards the 'presumption in favour of sustainable development' and is newly introduced at this stage, replicating the policy stance previously included within Policy SP1 of the adopted Section 1 Local Plan. The amendments proposed for Policy SPL3 reflect the addition of detail regarding tree-lined streets and consistency with other relevant policies and guidance.

The effects of the policy amendments can be expected to have significantly positive effects on ISA Objective 1 regarding the delivery of a sufficient supply of homes for all including an appropriate mix of housing types, due to housing needs being met through existing and new allocations, as well as commitments or resolutions to commit to developments that are advanced within the development management process. The focus of residual housing needs being met through strategic allocations (including Garden Villages) ensures that proportionate growth is consistent with the settlement hierarchy and pressures on smaller settlements are not exacerbated. Economic related objectives will also be met positively where many new allocations are identified as mixed-use. Due to the expected delivery of the strategic allocations however, and in many cases the requirement for them to be subject to Supplementary Planning Documents (SPDs) and masterplans, impacts are expected to be more significant in the latter stages of the Plan period. Nevertheless, when combined with the adopted Local Plan allocations and existing commitments, at the time of writing a steady supply of housing per annum can be expected throughout the revised Plan period.

The focus of development being distributed consistently with the settlement hierarchy, and a focus on those settlements that are the most sustainable in terms of meeting day to day needs, jobs, and services, can be expected to ensure positive implications on ISA Objective 3 (sustainable transport), 4 (sustainable communities), and 5 (ensuring that development is

sustainably located). Nevertheless, the allocation of new Garden Villages can be seen to direct growth to more peripheral locations, albeit those with good existing transport links, and such effects can be expected to be minimised in the long term. It should be acknowledged here however that the policy requirements and critical mass of the Garden Villages and strategic housing allocations enable new communities to be self-sustainable in regard to public transport and access to jobs and services ‘on-site.’

Impacts related to the ISA Framework’s environmental objectives are explored elsewhere in this Report in the appraisal of thematic policies on such themes, and the new site allocation policies themselves on a case-by-case and cumulative basis. Uncertain effects are therefore highlighted for ISA Objectives 6-14.

#### 4.2.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Sustainable Places policies at this stage.

### 4.3 The Healthy Places Policies

#### 4.3.1 What changes are proposed to the adopted Local Plan policies?

Proposals to amend a number of the Plan’s Healthy Places policies are included within the Local Plan Review at this stage. The key policies proposed for amendment that can be considered to change the approach of the corresponding adopted Policy, as part of the Local Plan Review, are:

- Policy HP1 Improving Health And Wellbeing;
- Policy HP1a Managing the Location of Hot Food Takeaways;
- Policy HP2 Community Facilities;
- Policy HP4 Cemeteries, Crematoriums and Burial Sites
- Policy HP5 Open Space, Sports And Recreation Facilities.

#### 4.3.2 New alternatives to consider at this stage

It is considered that no other alternatives exist in regard to the Healthy Places policies that are proposed for amendment. It is considered that any additional alternative approaches would not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan and could not be expected to yield any different effects.

### 4.3.3 Assessment of the Healthy Places Policies

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	?	?	?	++	?	?	?	?	?	?	?	?	?	?
M/T	?	?	?	++	?	?	?	?	?	?	?	?	?	?
L/T	?	?	?	++	?	?	?	?	?	?	?	?	?	?

The amendments proposed to Policy HP1 reflect a number of additional requirements. These cover: a new requirement that the Council will expect to see evidence of the principles that are set out in the Essex Healthy Places Guidance checklist in development proposals; and that the co-location of health care facilities with other community facilities will be supported, providing a stronger focus on public services for local communities, enabling greater integration with voluntary organisations, and promoting linked trips. Policy HP1a seeks the management of the location of hot food takeaways to be located in appropriate areas and generally not within walking distance of Children Nurseries, Primary and secondary schools, Colleges, Designated playgrounds and sport grounds aimed at young people, and/or youth centres. Outside of areas that are considered suitable within the Policy, a Health Impact Assessment (HIA) will be required of planning applications. The effects on ISA Objective 4 regarding health and social outcomes are assessed as significantly positive.

A new Policy HP4 is introduced that regards proposals for cemeteries, crematoriums and burial sites future expansion of Weeley Crematorium, Burrs Road Cemetery, Dovercourt Cemetery and Kirby Cross Cemetery as well setting out expectations in respect of the creation of new burial places such as woodland burial. These expectations relate to groundwater risk assessment, biodiversity enhancement, access, the preservation and enhancement of heritage and long-term management and maintenance and seek to ensure neutral impacts in regard to suitable mitigation. Additionally, other thematic environmental Plan policies include further criteria for developments.

The adopted Plan's previous Policy HP4 regarded the safeguarding of open space, and the provisions of that policy are now proposed for incorporation into the revised Policy HP5. The amendments proposed to Policies HP2, HP5 at this stage are considered minimal or minor in that they do not alter the position or requirements in regard to community facilities in the District.

Impacts related to the ISA Framework's other objectives are explored elsewhere in this Report in the appraisal of thematic policies on such themes. Uncertain effects are therefore highlighted for ISA Objectives 1-3 and 5-14.

### 4.3.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Healthy

Places policies at this stage.

## 4.4 The Living Places Policies

### 4.4.1 What changes are proposed to the adopted Local Plan policies?

Proposals to amend a number of the Plan's Living Places policies are included within the Local Plan Review at this stage. The key policies proposed for amendment that can be considered to change the approach of the corresponding adopted Policy, as part of the Local Plan Review, are:

- Policy LP1 Housing Supply;
- Policy LP2 Housing Choice;
- Policy LP4 Development Layout & Design;
- Policy LP5 Affordable Housing;
- Policy LP6 Rural Exception Sites
- Policy LP7 Self-Build And Custom-Built Homes;
- Policy LP9 Gypsy And Traveller Sites; and
- Policy LP11 HMO And Bedsits.

### 4.4.2 New alternatives to consider at this stage

It is considered that no other alternatives exist in regard to the Living Places policies that are proposed for amendment. It is considered that any additional alternative approaches would either not be in conformity to the housing supply requirements of the Standard Methodology (in accordance with national policy) or not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan (i.e. could not be expected to yield any different effects).

### 4.4.3 Assessment of the Living Places Policies

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	++	?	?	?	?	?	+	?	?	?	?	?	?	?
M/T	++	?	?	?	?	?	+	?	?	?	?	?	?	?



Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
L/T	++	?	?	?	?	?	+	?	?	?	?	?	?	?

The amendments proposed to Policy LP1 reflect the changes to housing supply set by national policy and the effects of this in real terms for the District is explored throughout the ISA Report in the assessment of new site allocations and the Spatial Strategy. Changes to Policy LP2 reflect the fact that housing mix policy should be amended to reflect the most recent Strategic Housing Market Assessment (SHMA). Similarly, Policy LP9 amendments are also required to address the most recent evidence which sets out an increased demand for pitches. Significant positive effects are assessed in regard to ISA Objective 1 and the delivery of a sufficient supply of homes for all including an appropriate mix of housing types. This is in consideration of Policy LP1 maintaining a sufficient supply of deliverable sites to provide for at least five years' worth of housing plus an appropriate buffer in accordance with national policy.

Policy LP4 (previously titled 'Housing Layout') is proposed for amendment to include Biodiversity Net Gain (BNG) requirements within housing layouts, as well as setting out additional and updated guidance that will be used to consider planning applications including those related to building for healthy lives and places, and Livewell Accreditation. Positive implications are assessed in regard to ISA Objective 7 (regarding biodiversity net gain) although separate policy on these requirements is included elsewhere in the Plan and assessed in more detail elsewhere in this ISA Report.

Changes proposed for Policy LP5 include affordable housing thresholds to be for developments of 10 dwellings or more (rather than 11 in the adopted Plan) and also for developments of over one hectare. Further amendments are proposed to include affordable housing requirements for when adjoining developments, when taken together exceed the above policy threshold. Lastly, the Policy is proposed to now include that 'in exceptional circumstances justified with case-specific evidence on viability, deliverability or lack of interest from registered providers, or where other material considerations provide, the Council may consider negotiating and agreeing a lower level of affordable housing or alternative approaches to the provision of affordable housing such as financial contributions towards off-site provision, the transfer of homes to the Council or a local housing trust at nominal cost or a combination of those approaches.' This can be seen as strengthening of the position of the corresponding adopted Local Plan policy albeit with added pragmatism that is intended to ensure that development is not stifled by viability concerns.

Amendments proposed to Policy LP6 carry forward the allowance for one in three homes on a rural exception scheme to be provided for sale or rent on the open market; but now also includes an alternative option by which a maximum of two in three dwellings could be provided as market housing where at least half of the market homes are going to be self-build or custom built homes. This is in alignment with the amendments proposed for Policy LP7 which includes measures to further promote self and custom build homes. These amendments include the suitability of smaller rural settlements should sites be located directly adjacent to the development boundary, or that they form at least half of the market homes being proposed as part of a rural exception scheme. Additionally, the Policy is

proposed to include that ‘to ensure delivery of genuine self-build and custom-build housing, the Council will seek to use appropriate mechanisms, such as planning conditions or legal agreements, to secure that any planning permissions granted for self-build or custom-built housing are occupied initially by the individuals or associations who have commissioned the build.’ Small positive impacts on ISA Objective 1 can be expected as a result.

The amendments proposed for Policy LP11 include a newly introduced criterion to the existing Policy, requiring that: cycle parking provision in accordance with EPOA cycle parking guidance and standards for HMOs or bedsits is included in new HMO and bedsit developments. Although necessary, the impacts on this will be marginal in regard to ISA Objective 3 regarding sustainable transport uptake.

Impacts related to the ISA Framework’s other objectives are explored elsewhere in this Report in the appraisal of thematic policies on such themes. Uncertain effects are therefore highlighted for ISA Objectives 2-6 and 8-14.

#### 4.4.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Living Places policies at this stage.

### 4.5 The Prosperous Places Policies

#### 4.5.1 What changes are proposed to the adopted Local Plan policies?

The majority of the adopted Local Plan’s Prosperous Places policies are not proposed to be amended as part of the Local Plan Review. The key policies proposed for amendment that can be considered to change the approach of the corresponding adopted Policy, as part of the Local Plan Review, are:

- Policy PP3 Village and Neighbourhood Centres;
- Policy PP6a Extensions to Existing Employment Sites in the Countryside;
- Policy PP7 Employment Allocations;
- Policy PP8 Tourism;
- Policy PP13 The Rural Economy;
- Policy PP15 Walton Mere; and
- Policy PP16 St Osyth Village Centre.

#### 4.5.2 New alternatives to consider at this stage

It is considered that no other alternatives exist in regard to the Prosperous Places policies

that are proposed for amendment. It is considered that any additional alternative approaches would not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan and could not be expected to yield any different effects.

#### 4.5.3 Assessment of the Prosperous Places Policies

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	?	++	0	0	?	?	?	?	?	?	?	?	?	?
M/T	?	++	0	0	?	?	?	?	?	?	?	?	?	?
L/T	?	++	+	+	?	?	?	?	?	?	?	?	?	?

Proposed amendments to Policy PP3 regard the inclusion of a requirement for new neighbourhood centres for the newly allocated strategic development sites of Hare Green, Horsley Cross, and Weeley Garden Villages. The effects on ISA Objective 3 and 4, regarding sustainable transport and social outcomes respectively, will be positive in the long term associated with their expected delivery in the latter stages of the Plan period. These effects may also be expected to be realised for the benefit of the any neighbouring settlements.

A new Policy PP6a is proposed that addresses extensions to existing employment sites in the countryside. The Policy sets out that proposals for the extension of existing employment sites (the area of use and any works) located outside defined settlement boundaries will be supported where a series of criteria are met. These include criteria related to: the demonstration of need and economic benefit; relationship to the existing site; design and environmental quality; access and infrastructure; and the protection of countryside and sensitive areas. The sub-criteria included within the Policy can be considered to directly address all relevant sustainability objectives, with neutral outcomes sought. Nevertheless, uncertainty is raised at this stage as effects would only be recognised on a site-by-site basis. It should further be acknowledged however that adherence to all other relevant thematic Local Plan policies will also be required of any forthcoming proposals that fall within the category of Policy PP6a.

Policy PP7 is proposed to now include three new employment allocations in addition to those carried forward from the adopted Local Plan. These are:

- Collierswood Farm, Land North of the A120 (78 hectares);
- Land North of the A120, Harwich Road (5.33 hectares); and
- Weeley Car boot site Land to the North of Colchester Rd, Weeley (2.03 hectares).

The detailed assessment of these new allocations is included within this ISA, alongside reasonable alternatives submitted for consideration. An additional proposed change to the Policy at this stage includes that 'employment land will also be allocated within the Strategic Allocated Mixed-Use (SAMU) sites to help create balanced and sustainable communities. This is alongside long-term employment land identified as part of the mix of uses proposed at the new Garden Villages which will be developed through a masterplanning process.' Policy PP8 Tourism is proposed to be updated to include that the Council will support appropriate proposals for leisure and tourism facilities as part of farm diversification schemes as well as new sustainable accommodation as part of any such proposals. Amendments proposed for Policy PP13 include the Council's inclusion of their support for a new development type to support growth in the rural economy, namely: 'the extension and enhancement of rural services and community facilities, including shops, pubs, post offices, and village halls.' Significant positive effects on ISA Objective 2 can be expected throughout the Plan period, especially in the long term associated with the delivery of the Plan's strategic allocations.

Policy PP15 Walton Mere is a new Policy proposed at this stage that supports the restoration of Walton Mere off Mill Street, Walton on the Naze for mixed-use development comprising a new boating lake and or fish nursery with tidal sluice, a new and improved saltmarsh wildlife habitat, a new sea wall, new pedestrian links with appropriate marine-related commercial and community uses, and an appropriate level of residential accommodation in the form of high-quality floating homes and houseboats that will help fund and enable the wider scheme.

Policy PP16 is also a newly proposed policy at this stage. The policy sets out support for the delivery of a new public car park close to St Osyth village centre to improve access to local shops, services, and community facilities. To assist in funding the provision of the car park, the Council will accept a moderate amount of new housing on land adjacent to the settlement development boundary and, in exceptional circumstances, within the Coastal Protection Belt provided a series of criteria are met. These criteria are largely reiterated through other Local Plan policies however notably includes requirements that the development is directly linked to the delivery of the car park through a legally binding mechanism, and that where development is proposed within the Coast Protection Belt, the Council is satisfied that the public benefits of delivering the car park and associated improvements clearly outweigh any harm to the landscape, character or function of the Coastal Protection Belt.

With this in mind, it is possible that there may be landscape and biodiversity implications in the delivery of any housing in this location beyond those identified for St Osyth in the assessment of new allocations within the settlement. Nevertheless, the site is not specified as an allocation as such and is not required to meet housing needs within the Plan area. Similarly it is not known whether any development for housing would meet the threshold for allocation in the Local Plan (i.e. of 10 dwellings or over). It can be expected that any housing delivery associated with the provision of a car park within St Osyth would be an 'off-Plan' consideration and a development management matter that would require landscape and biodiversity considerations to be considered thoroughly at that stage, including through project-level HRA. As such no effects are directly identified at this stage for Policy PP16. The same principle is considered applicable for Policy PP15.

Impacts related to the ISA Framework's other objectives are explored elsewhere in this Report in the appraisal of thematic policies on such themes. Uncertain effects are therefore highlighted for ISA Objectives 1 and 5-14.

#### 4.5.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Prosperous Places policies at this stage.

### 4.6 The Protected Places Policies

#### 4.6.1 What changes are proposed to the adopted Local Plan policies?

A number of amendments are proposed to the Protected Places policies through the Local Plan Review. The key policies proposed for amendment that can be considered to change the approach of the corresponding adopted Policy, as part of the Local Plan Review, are:

- Policy PPL1 Development and Flood Risk
- Policy PPL4a Biodiversity in Tendring;
- Policy PPL5 Water Conservation, Drainage And Sewerage;
- Policy PPL9a Non-Designated Heritage Assets;
- Policy PPL10a Operational Energy and Carbon (Net Zero) in Homes and Buildings;
- Policy PPL10b Embodied Carbon and Circular Economy in Homes and Buildings;
- Policy PPL10c Renewable Energy Installations;
- Policy PPL12a Thorpe Station and Maltings
- Policy PPL12b St Osyth Priory
- Policy PPL12c Protection of The Naze

#### 4.6.2 New alternatives to consider at this stage

##### 4.6.2.1 Alternatives regarding Policy PP4a Biodiversity Net Gain in Tendring

It can be considered realistic to discuss whether the approach of Policy PP4a (in requiring 20% BNG from applications from April 2027) may give rise to an alternative, at least in principle; specifically the application of minimum national requirements throughout the Plan period. The Council's approach to BNG and the uplift in requirements from April 2027 is

justified by a Viability Assessment of Biodiversity Net Gain in Essex (2024) commissioned by Essex County Council (ECC), in collaboration with the Essex Local Nature Partnership (LNP). The Viability Assessment is supported by the document 'Essex Biodiversity Net Gain Evidence for Need' (2024) produced by Place Services.

This Evidence for Need study concludes that the Government's mandated level of 10% net gain is only considered to be the minimum needed to avoid net loss, with most of the resulting effort simply compensating for habitat losses and that at 10% net gain, it is anticipated that 90% of delivery will be within the red line boundary, which will result in lower quality habitats and a lack of contribution to strategic priorities.

The Evidence for Needs study summarises that for BNG to be an effective mechanism for achieving the recovery of nature at a landscape level, a level of 10% is considered to be inadequate, and it is recommended that a minimum level of 20% be established across Essex as a responsible measure to increase confidence of meeting national and local targets for nature recovery. For the purposes of this ISA Report, it is considered that the effects of this uplift would only be resounding for environmental and social objectives and that the potential for positive significant effects exists regarding biodiversity in Essex and in each District.

With need established, the Viability Assessment explores the extra cost of 20% BNG in Essex and the impact on financial viability of development projects if 20% BNG were to be required. This can be considered the predominant reason for not implementing such a position. The Viability Assessment summarises however that the largest cost is implementing the obligatory 10% BNG and that the extra cost of 20% BNG is marginal, and not significant in terms of financial viability (at worst 15-35% higher per dwelling than the cost of delivering the mandatory 10% BNG).

The recently examined Uttlesford Local Plan has been found sound (subject to modifications) with this 20% BNG requirement included within its Policy framework unless it can be demonstrated at the application stage that the proposal would be unviable. For Tendring, this requirement is similarly set out within the Plan's Policy DI1 which includes viability as an exception criterion for infrastructure and impact mitigation measures and requires a full viability assessment to be submitted where this is the case.

For the purposes of this ISA at this stage, it is considered that any alternative regarding the application of the minimum national BNG requirements applying throughout the Plan period is not a reasonable alternative in the context of the District and more widely Essex. This consideration, as discussed above, is based on the merits and absence of significant demerits in applying the Policy's approach of 20% after April 2027, as evidenced by the Viability Assessment of Biodiversity Net Gain in Essex (2024) and the 'Essex Biodiversity Net Gain Evidence for Need' (2024).

#### 4.6.2.2 Alternatives regarding other Protected Places Policies

Regarding other Protected Place policies, it is considered that no other alternatives exist in that are proposed for amendment. It is considered that any additional alternative approaches would not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan and could not be expected to yield any different



effects.

### 4.6.3 Assessment of the Protected Places Policies

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	?	?	?	?	?	++	++	+	?	+	?	?	+	+
M/T	?	?	?	?	?	++	++	+	?	+	?	?	+	+
L/T	?	?	?	?	?	++	++	+	?	+	?	?	+	+

Policy PPL1 is proposed for an amendment that includes additional wording surrounding the application of the 'sequential test' for flooding, which includes that 'the area for this test will relate to the catchment area of the development proposed and should always be appropriate in nature and scale. Usually, this area will not extend beyond the town, city or local villages it relates to. Alternative sites could be two or more sites and do not need to be owned by the applicant.' No additional positive implications are assessed above those identified in the SA of the adopted Local Plan, as the purpose of the amendment is considered to offer clarity to developers rather than seek additional requirements from them.

Policy PP4a is a new policy introduced at this stage which sets out national requirements for Biodiversity Net Gain (BNG). For planning applications submitted to the Council on or before 31st March 2027, development proposals that qualify for BNG will be expected to deliver a minimum 10% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat (the minimum national requirement). From 1st April 2027 onwards, the Policy proposes that this requirement will be a minimum of 20%. The Policy sets out the Council's approach of supporting the setting up of 'Habitat Banks' in the District from which biodiversity units can be bought should certain criteria be adhered to. The establishment of Habitat Banks is encouraged in certain areas / locations within the District subject to applicants entering into legal agreements with Natural England. The approach is considered to have benefits in addition to on-site BNG, that is relevant to the District (which includes multiple and large coverage of wildlife designations and Habitats sites on the coast). As the Policy sets out, it can be expected that the approach would offer potentially significant benefits through the 'creation of bigger, better and more connected habitats that are resilient, manageable and contribute effectively to the aims and objectives of the Essex Local Nature Recovery Strategy.' Furthermore, Policy PPL4a is now proposed to incorporate those requirements of the adopted Plan's (previous) Policy HP3 to include green and blue infrastructure requirements. Additionally, the position regarding green and blue infrastructure is proposed for amendment to now include blue infrastructure, set out more complete definitions of green infrastructure and its benefits, and most notably include new criteria for development proposals.

As a result, positive implications are highlighted in regard to biodiversity (ISA Objective 6 and 7), specifically in relation to quality and net gains, where proposals would require illustration

as to how Local Nature Recovery Strategy mapping has informed design, ensuring improved connectivity both on site and across the district as a whole, and also how biodiversity enhancement and net gain measures will be incorporated, including the use of habitat restoration and natural regeneration. The amended policy now also includes that Green Infrastructure will be protected, managed and where necessary enhanced by aligning Green Infrastructure design with the Local Nature Recovery Strategy on development proposals. Significantly positive effects are identified in regard to ISA Objective 7 (biodiversity net gain) and also ISA Objective 6 (biodiversity enhancements) through a more joined up approach to net gains and existing habitats.

Amendments proposed to Policy PPL5 at this stage have been made in response to the Plan Review's updated Water Cycle Study (2025) and subsequent improvements to the Policy in regard to water efficiency. The amended Policy approach requires development proposals to demonstrate water efficient design through numerous criteria as well as the submission of a Water Efficient Design Statement. Furthermore, new residential development will be required to be designed to utilise no more than 100 litres per person per day of mains supplied water / potable water per person per day. There will be positive implications from this amendment on ISA Objective 10 regarding water supply.

Policy PPL9a is a newly introduced policy at this stage setting out that the Council will seek to ensure the retention, enhancement, and viable use of heritage assets of local importance, including those present on the Council's emerging Local Heritage List. Permission for a proposal that would result in harm to, or the loss of, a non-designated heritage asset will only be granted provided that a balanced judgement has been made that takes into account the scale of harm to, or loss of significance of the non-designated asset. The Policy sets out that this approach will also apply to Protected Lanes. This can be seen to ensure that at the local level, the potential for positive effects to be significant (i.e. through enhancement) can be maximised for ISA Objective 8 (the historic environment).

Policies PPL10a, PPL10b and PPL10c are proposed to effectively replace the adopted Policy PPL10 (Renewable Energy Generation and Energy Efficiency Measures). Policy PP10c seeks to expand the District's policy framework to include the requirements for suitable (both individually and cumulatively) renewable and low carbon energy generation proposals, PV development, and new or expanded heat networks. Proposals should also be accompanied by an Energy Statement that includes details for their maintenance, use of electricity generated, and how they would contribute to renewable energy in new development e.g. as a percentage of total consumption.

Policies PPL10a and PPL10b correspond to the Essex model suite of policies that have been collaboratively prepared by the Local Authorities in Greater Essex (led by the Climate and Planning Unit at Essex County Council, under the steer and guidance of the Essex Planning Officers Association) to support the development of common planning policies relating to energy use and generation, and carbon emissions from the construction and use of homes and buildings. Both policies are subject to Planning Policy Statements (2025), which set out the technical and legal evidence base for the approaches, with the intention for a single approach to be embedded into all Local Plans within Greater Essex.

PPL10a aims to ensure that all new homes and buildings achieve a consistent energy



efficiency and generation standard (net zero carbon in operation) that aligns with local and national climate targets and delivers high quality, healthy, efficient, climate resilient homes and buildings. PPL10b aims to ensure that all new homes and buildings are designed and constructed using materials and resources efficiently, minimising waste, and use high quality, natural and locally sourced, low carbon materials where possible.

Both approaches can be expected to ensure heightened positive effects above those identified within the adopted Local Plan's policy framework, with the potential for more significant transboundary and cumulative effects across Greater Essex in the future. Effects are not highlighted as significantly positive in the Plan period however, due to the nature of the policies essentially seeking to mitigate or minimise the effects of development.

Policies PPL12a, PPL12b and PPL12c seek the improvement, restoration, and / or protection of various assets of cultural and historic importance within the District. In the case of those at Thorpe and Sy Osyth Priory, the policies acknowledge the possibility of residential enabling development being required to secure the future of the assets. Regarding the Naze the policy supports appropriate development proposals for eco-tourism that could assist in promoting awareness and generating funding for the future protection of the asset. In all cases however, the Policies are likely to have positive standalone effects related to heritage, public transport (walking and cycling), health, biodiversity and geodiversity, flood defence, and also economic objectives.

Impacts related to the ISA Framework's other objectives are explored elsewhere in this Report in the appraisal of thematic policies on such themes. Uncertain effects are therefore highlighted for ISA Objectives 1-5, 9, and 11-12

#### 4.6.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Protected Places policies at this stage.

### 4.7 The Connected Places Policies

#### 4.7.1 What changes are proposed to the adopted Local Plan policies?

The key policies proposed for amendment that can be considered to change the approach of the corresponding adopted Policy, as part of the Local Plan Review, are:

- Policy CP1 Sustainable Transport and Active Travel
- Policy CP2 Improving and Maintaining The Transport Network; and
- Policy CP3 Improving The Telecommunications Network.

## 4.7.2 New alternatives to consider at this stage

It is considered that no other alternatives exist in regard to the Connected Places policies that are proposed for amendment. It is considered that any additional alternative approaches would not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan and could not be expected to yield any different effects. Similarly, the amendments proposed within the Policy are considered necessarily consistent with the approach of Essex County Council (as the highway authority) who have been consulted on and provided input into the wording of the Policy as proposed.

## 4.7.3 Assessment of the Connected Places Policies

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	?	+	++	+	?	?	?	?	?	?	?	?	?	?
M/T	?	+	++	+	?	?	?	?	?	?	?	?	?	?
L/T	?	+	++	+	?	?	?	?	?	?	?	?	?	?

The amendments to Policy CP1 have been proposed to expand the requirements for measures to reduce car dependence. The adopted Policy includes that all applications should include proposals for walking and cycling routes and new or improved bus-stops/services, whereas the amended Policy at this stage includes that: such improvements should be attractive; that proposals enhance connectivity to Public Rights of Way (PRoWs) and bridleways; are connected to public transport nodes; incorporate the measures of the Tendring District Cycling Action Plan, the Essex Walking Strategy 2021, and the Sunshine Coast Greenway objectives; and also recognise the health benefits of active travel. This can be seen to enhance the positive effects of the adopted Policy in regard to sustainable transport and also health objectives. There can be expected to be significant positive implications as a result of the added Policy requirements in regard to ISA Objective 3 (sustainable transport) and also to a lesser extent ISA Objective 4 (regarding health).

The proposed changes to Policy CP2 reflect the updated position in regard to those transport improvements required for the strategic development allocations proposed within the Plan, notably those at Hare Green, Horsely Cross, and Weeley. The Policy, as adopted, included a similar approach of setting out the improvements to the strategic road network in response to the Tendring Colchester Borders Garden Community alone.

The adopted policy sets out that the improvements required to accommodate the Garden Community were to be secured through the Housing Infrastructure Fund. The Policy is proposed to be amended to reflect that the improvements to the transport network required for the new strategic development allocations within the Plan are to be secured, as necessary, through planning conditions, legal agreements and/or through Community

Infrastructure Levy (CIL) as required. Although the Policy could be seen to increase the attractiveness of private car use, such a position is essential for inclusive accessibility and connectivity and the requirements of Policy CP1 seek to ensure modal shift to active travel modes.

Further amendments to the Policy regard the Council's use of planning conditions surrounding the repair of any damage to the public highway and public realm during construction periods, and also the use of planning conditions and legal agreements to ensure any changes to highway speed limits that may be required to necessitate or otherwise benefit new development proposals. Additionally, in response to Highways England comments, the amended Policy at this stage recognises the importance of providing appropriate lorry parking facilities and related driver amenities to support the strategic road network and the freight industry.

Policy CP3 amendments revolve around the latest technology regarding 5G and broadband speeds, notably that new development should be served by gigabit capable broadband, as opposed to being served by a 'superfast' broadband\* (fibre optic) connection as specified in the adopted Policy. The impacts of this are likely to be the same as specified within the SA of the Section Two Local Plan and are positive in so far as they respond to the latest iteration of the NPPF and the latest building regulations. Minor positive effects are assessed for ISA Objective 2, in regard to economic objectives, to reflect flexible working patterns and the need for the Plan to be updated to reflect modern standards.

Impacts related to the ISA Framework's other objectives are explored elsewhere in this Report in the appraisal of thematic policies on such themes. Uncertain effects are therefore highlighted for ISA Objectives 1 and 5-14.

#### 4.7.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Connected Places policies at this stage.

### 4.8 The Delivering Places Policies

#### 4.8.1 What changes are proposed to the adopted Local Plan policies?

The Delivering Places policies respond to the Plan's strategic allocations (mixed use, housing, and employment) as well as medium site allocations. The supporting text for the policies within this chapter set out the thresholds for what is strategic or of a medium scale for each of the above development types / uses and includes a site specific policy for each of the qualifying allocations.

The site allocations within the adopted Local Plan remain, and none are proposed to be removed from the Plan as part of the Plan Review. As such, the amendments to the Delivering Places policies proposed at this stage respond directly to those additional strategic allocations introduced within the Local Plan Review. The new strategic allocation policies proposed for inclusion within this chapter are:

- Policy SAMU5 - Development Off Deane's Lane and Oakley Road, Dovercourt
- Policy SAMU6 - Weeley Green Garden Village
- Policy SAMU7 - Redevelopment of Saltings Quarter, Riverside Avenue, Manningtree
- Policy SAMU8 - Hare Green / Tendring Central Garden Village
- Policy SAMU9 - Horsley Cross Garden Village
- Policy SAH1 - Vicarage Farm Off Main Road and South or A120, Harwich / Dovercourt
- Policy SAH2 - Development North of Thorpe Road, Kirby Cross
- Policy SAH3 - Development of Land Off Arthur Ransome Way, Walton
- Policy SAH4 - Development at Land East of Church Road, Brightlingsea
- Policy SAH6 - Development of Land East of Cockaynes Lane, Alresford
- Policy SAH7 - Land East of Admirals Green and North of Weeley Road
- Policy SAH8 - Development of Land East of Amerells Road
- Policy SAH9 - Development of Land South of Clacton Road, St Osyth
- Policy SAH10 - Land South of Colchester Road, Thorpe-le-Soken
- Policy SAH11 - Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken
- Policy SAE2 - Freeport East, Bathside Bay and the A120 Corridor<sup>1</sup>
- Policy SAE3 - Collierswood Farm A120 Strategic Business Park

#### 4.8.2 New alternatives to consider at this stage

Alternatives exist regarding the new Delivering Places policies in so far as alternative sites for allocation have been submitted for consideration through the Council's call-for-sites process. These alternatives are considered elsewhere in Section 5 of this Report allocation.

#### 4.8.3 Assessment of the Delivering Places Policies

The approach to assessing the new Delivering Places Policies is to identify whether the 'policy-off' effects identified in the assessment of each of the sites to which they relate are suitably addressed. Similarly, the assessment will explore whether some effects will also be

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<sup>1</sup> Not assessed within this ISA as planning permission has been granted and development has commenced.



addressed through compliance with other thematic Plan policies and requirements. This approach seeks to ensure that no gaps exist within the plan’s policy framework that would result in a negative effect going unmitigated and importantly also no missed opportunity for the maximisation of any sustainability benefits.

The table below sets out the negative or potentially negative impacts identified in the assessment of each site as well as the positives, and whether each effect is addressed by the Delivering Places policies (and subsequently what the effect would then be).

Table 6: 'Policy-on' Assessment of the Strategic Allocation Policies

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
SAMU5	Distance to a Town, Village, or Neighbourhood Centre	Not significant	The Policy includes that approximately two hectares of land is allocated within the wider site for a Neighbourhood Centre to include local shops, services and community facilities.	The requirement for a Neighbourhood Centre to be integrated into development is considered suitable mitigation. Positive effects can be expected as a result.
	Distance to GP Services	Not significant	The Policy includes that there will be a requirement for financial contributions towards community facilities such as health provision as required by the NHS/CCG either through the Community Infrastructure Levy or Section 106 Planning Obligations. It is possible that on-site provision could be forthcoming within the newly provided Neighbourhood Centre.	Although the Policy acknowledges that there is a need for the development to be supported by healthcare related infrastructure, it has to be acknowledged that the direct provision of services is not within the remit of the Local Plan or planning more widely. Impacts will therefore be uncertain until decisions on provision are decided by the service provider.
	Potential impact on a Habitats site	Not significant	Although requirements are provided within the Policy for related measures such as open space provision (which could alleviate some recreational impacts) and 20% BNG, the Policy does not make any direct reference to	Despite the absence of any direct requirements to address impacts on Habitats sites, sufficient policy exists within the adopted Plan (Policy PPL4)

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			the need for suitable assessments, such as project-level HRA, to be submitted alongside any forthcoming planning application.	that requires project-level HRA to be provided.  Furthermore, the requirements for a masterplan approach for the site allows for the further consideration of the site within a 'plan-led' system should any forthcoming masterplan be formally adopted as an SPD or DPD. If so, this will also be subject to mandatory HRA.
	Neighbouring Priority Habitats (biodiversity)	Not significant	Although BNG, open space, and landscape related criteria exist within the Policy, no such mention of the Priority Habitats, or direct mitigation of any potential impacts on them, are included.	The site borders coastal saltmarsh Priority Habitats to the east / south east. Although the potential for impacts are raised at this point, it can be considered that such areas can be avoided, and disruption minimised, through other Plan policies and the use of planning conditions. Nevertheless, the negative effects raised in the detailed assessment of the site are not directly mitigated.
	Presence of Listed Buildings	Not significant	The Policy includes a requirement for the delivery of opportunities for the protection and enhancement of the	It is considered that the impacts on the neighbouring Listed Buildings would be fully understood as any proposal

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	neighbouring the site		historic environment features and settings including the built and archaeological environment.	progresses, both through the Policy requirement and wider thematic policy requirements specific to the historic environment. Impacts can be expected to be neutral in principle, however, retain a degree of uncertainty at this stage pending specific findings.
	On-site features of landscape value	Not significant	The Policy states that the design and layout of the development must have regard to the surrounding landscape and deliver links with the existing landscape and access features.	As can be expected from a large greenfield site, many positive features of landscape value are included in the current undeveloped boundary. The loss of these is not inevitable and they can make a positive contribution to any future development. The Policy, without being specific about any such features, acknowledges this. The requirement for a future masterplan gives some further reassurance regarding local landscape characteristics being appropriately considered as any proposal progresses.



Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Landscape highly sensitive to development	Not significant	The Policy states that the design and layout of the development must have regard to the surrounding landscape, seeking to minimise visual impacts through the inclusion of mitigation measures to deliver links with the existing landscape and access features. As part of this, appropriate landscaping treatment along the southern and western edge the site is required to minimise visual impacts.	<p>The Policy is specific about the potential for landscape impacts along the southern and western edges of the site, particularly visual impacts. This can be seen to appropriately acknowledge the high sensitivity of the site to development.</p> <p>The requirement for a future masterplan gives some further reassurance regarding local landscape characteristics being appropriately considered as any proposal progresses.</p>
	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.
	Areas with a 'high' chance of surface water flood risk on site	Not significant	The Policy does not directly acknowledge any specific areas of surface water flood risk, however, does include a criterion that requires the formulation of a water and	The impacts regarding surface water flood risk can be considered broadly neutral through the application of the Policy, the requirement for a future masterplan, and also adherence to

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			drainage strategy to serve the new development.	wider thematic policy / policies in the Plan.
SAMU6	Distance to a Town, Village, or Neighbourhood Centre	Significant	Proposed amendments to Policy PP3 regard the inclusion of a requirement for a new Neighbourhood Centre for the Garden Village.	The requirement for a Neighbourhood Centre to be integrated into development is considered suitable mitigation. Positive effects can be expected as a result.
	Distance to GP Services	Significant	The Policy includes that there will be a requirement for financial contributions towards community facilities such as health provision as required by the NHS/CCG either through the Community Infrastructure Levy or Section 106 Planning Obligations. Similarly, the Policy sets out a requirement for financial contributions towards the expansion and/or upgrade of Weeley village hall to serve an expanded community and to provide flexible accommodation for a range community activities that could include health services.	Although the Policy acknowledges that there is a need for the development to be supported by healthcare related infrastructure, it has to be acknowledged that the direct provision of services is not within the remit of the Local Plan or planning more widely. Impacts will therefore be uncertain until decisions on provision are decided by the service provider.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
SAMU7	Borders a Habitats site	Not significant	Although requirements are provided within the Policy for related measures such as biodiversity and habitat creation, the Policy does not make any direct reference to the need for suitable assessments, such as project-level HRA, to be submitted alongside any forthcoming planning application.	<p>Despite the absence of any direct requirements to address impacts on Habitats sites, sufficient policy exists within the adopted Plan (Policy PPL4) that requires project-level HRA to be provided.</p> <p>Furthermore, the requirements for a masterplan approach for the site allows for the further consideration of the site within a 'plan-led' system should any forthcoming masterplan be formally adopted as an SPD or DPD. If so, this will also be subject to mandatory HRA.</p>
	Borders Priority Habitat	Not significant	Although habitat creation, open space, and landscape related criteria exist within the Policy, no such mention of the Priority Habitats, or direct mitigation of any potential impacts on them, are included.	The site borders Priority Habitat to the north associated with the Habitats site. Although the potential for impacts are raised at this point, it can be considered that such areas can be avoided, and disruption minimised, through other Plan policies and the use of planning conditions. Nevertheless, the negative effects raised in the detailed assessment of the site are not directly mitigated.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Site is within Flood Risk Zone 2	Not significant	<p>The Policy acknowledges the constraints of the site, requiring development that follows a comprehensive, phased masterplan approach that addresses site constraints such as flood risk.</p> <p>Furthermore, the Policy sets out that contributions should be made towards flood risk mitigation, in accordance with relevant policies in this plan, the NPPF, national legislation, and the Surface Water Management Plan for Critical Drainage Areas.</p>	The impacts regarding flood risk can be considered broadly neutral through the application of the Policy, the requirement for a future masterplan that addresses flood risk mitigation as a priority, and also adherence to wider thematic policy / policies in the Plan.
	Areas with a 'high' chance of surface water flood risk on site	Not significant	In addition to those measures identified above, the Policy requires proposals to explore opportunities to provide flood storage areas in addition to prioritising SuDS and water efficiency.	The impacts regarding flood risk can be considered broadly neutral through the application of the Policy, the requirement for a future masterplan that addresses flood risk mitigation as a priority, and also adherence to wider thematic policy / policies in the Plan.
SAMU8	Distance to a Town, Village, or	Significant	The Policy sets out that a new Neighbourhood Centre will be	The requirement for a Neighbourhood Centre to be integrated into

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Neighbourhood Centre		required of development within the core of the Garden Village. Additionally, proposed amendments to Policy PP3 regard the inclusion of a requirement for a new Neighbourhood Centre for the Garden Village.	development is considered suitable mitigation. Positive effects can be expected as a result.
	Distance to GP Services	Significant	The Policy sets out that Increased primary healthcare capacity will be provided to serve the new development as appropriate. This may be by means of new infrastructure or improvement, reconfiguration, extension or relocation of existing medical facilities; or through financial contributions to the delivery of health facilities at the Tendring Colchester Borders Garden Community.	Although the Policy acknowledges that there is a need for the development to be supported by healthcare related infrastructure, it has to be acknowledged that the direct provision of services is not within the remit of the Local Plan or planning more widely. Impacts will therefore be uncertain until decisions on provision are decided by the service provider.
	Distance to Primary School	Not significant	The Policy sets out a requirement for new primary schools and early-years facilities to be provided to serve the new development, with a connection, via the Rapid Transit System, to the	The Policy acknowledges the need for multiple Primary Schools to be delivered as part of the development. The Essex County Council Developer's Guide to Infrastructure Contributions

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			new Secondary School built at the Tendring Colchester Borders Garden Community.	<p>(2024) sets the threshold for a Primary School (two form entry being the preference from the authority) at 2,000 homes in a mixed-use development.</p> <p>For secondary schools to be provided (six form entry being preferred) a threshold of 4,500 is the general threshold.</p> <p>With these thresholds established, it can be considered that the Policy sets out an appropriate level of provision for schools. Nevertheless, the absence of a secondary school within walking and cycling distance of the new Garden Village community may have some inevitable negative consequences on traffic flows at peak times.</p>
	Potential loss of Priority Habitat	Not significant	The Policy sets out a requirement that new development avoid, protect and/or enhance biodiversity assets within and surrounding the site with a Biodiversity Net Gain requirement of 20%.	It can be considered that in specifying avoidance and enhancement, the Policy adequately and suitably seeks the mitigation of any effects on Priority Habitat on site. Nevertheless, a degree of uncertainty remains until that time that such features are specifically

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
				identified and appropriately integrated or enhanced through an effective Masterplan DPD.
	Multiple Listed Buildings on site	Significant	The Policy sets out that new development will be required to 'conserve and where appropriate enhance the significance of heritage assets (including any contribution made by their settings) both within and surrounding the site.'	It can be considered that in specifying enhancement, the Policy adequately and suitably seeks the mitigation of any effects on heritage assets on site. Nevertheless, a degree of uncertainty remains until that time that such assets are specifically identified and appropriately integrated or enhanced through an effective Masterplan DPD.
	Potential coalescence of Frating with Balls Green and Hare Green	Significant	<p>The Policy sets out that a DPD will be prepared for the Garden Village, containing policies setting out how the new community will be designed, developed and delivered in phases.</p> <p>The DPD will define the boundary of the new Garden Village and the amount of development it will contain. It will be produced in consultation with the local community and stakeholders and will include a concept plan</p>	<p>Although the potential coalescence, or merging, of Frating with Balls Green and Hare Green is not specifically mentioned, the Policy acknowledges that much of the work on landscape, layout, and design is more appropriately identified within the masterplan DPD and through further and extensive public consultation.</p> <p>Nevertheless the potential for significant negative effects cannot be</p>

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			showing the disposition and quantity of future land-uses and give a three dimensional indication of the urban design and landscape parameters which will be incorporated into any future planning applications.	ruled out at this stage, albeit with a large degree of uncertainty.
	Features of landscape value on site	Significant	The Policy does not specifically identify any features of landscape value that should be protected or enhanced.	<p>It can be considered that other thematic policies within the Plan adequately ensure that landscape features are appropriately considered. Further, it can also be considered that many features of landscape value are suitably addressed through the requirements for enhancements to biodiversity and heritage assets within the Policy.</p> <p>Nevertheless, a degree of uncertainty remains until that time that such features are specifically identified and appropriately integrated or enhanced through an effective Masterplan DPD.</p>



Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Potential loss of Grade 1 Agricultural Land / BMV	Significant	The Policy does not include any measures to mitigate the loss of Grade 1 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.
	Land within Flood Risk Zone 3 on site	Not significant	The Policy sets out that the delivery of smart, innovative and sustainable water efficiency/re-use solutions that foster climate resilience and a 21st century approach towards water supply, water and waste water treatment and flood risk management be integrated into development.	It can be considered that regarding flood risk generally, thematic policy will apply to some degree within any forthcoming development, with the addition of the enhanced elements and approaches of set out within the Policy.  Nevertheless, any approach of avoiding flood risk areas is considered more appropriately identified within the masterplan DPD and through specialist evidence base regarding flood risk.
	Areas with a 'high' chance of surface water flood risk on site	Not significant	The Policy sets out that the delivery of smart, innovative and sustainable water efficiency/re-use solutions that foster climate resilience and a 21st century approach towards water supply, water and waste water treatment and flood risk management be integrated into development.	It can be considered that regarding flood risk generally, thematic policy will apply to some degree within any forthcoming development, with the addition of the enhanced elements and approaches of set out within the Policy.  Nevertheless, any approach of avoiding flood risk areas is considered

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
				more appropriately identified within the masterplan DPD and through specialist evidence base regarding flood risk.
SAMU9	Distance to a Town, Village, or Neighbourhood Centre	Significant	<p>The Policy sets out the requirement for a new neighbourhood centre at the core of the Garden Village of an appropriate scale to serve the proposed development. It adds that the centre will be located where they will be easily accessible by walking, cycling and public transit to the majority of residents in the Garden Village.</p> <p>Further, proposed amendments to Policy PP3 regard the inclusion of a requirement for a new Neighbourhood Centres for the Garden Village.</p>	The requirement for a Neighbourhood Centre to be integrated into development is considered suitable mitigation. Positive effects can be expected as a result.
	Distance to GP Services	Significant	The Policy includes that 'increased primary healthcare capacity will be provided to serve the new development as appropriate. This may be by means of new	Although the Policy acknowledges that there is a need for the development to be supported by healthcare related infrastructure, it has to be acknowledged that the direct provision

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			infrastructure or improvement, reconfiguration, extension or relocation of existing medical facilities; or through financial contributions to the delivery of health facilities at the Tendring Colchester Borders Garden Community or in Manningtree.'	of services is not within the remit of the Local Plan or planning more widely. Impacts will therefore be uncertain until decisions on provision are decided by the service provider.
	Distance to Primary School	Not significant	The Policy sets out that 'a new Secondary School along with Primary schools and early-years facilities will be provided to serve the new development, with a connection, via the Rapid Transit System and/or other public transport links, to surrounding communities including the Colchester Borders Garden Community and Manningtree. The Secondary School at the Tendring Colchester Borders Garden Community and Primary School at the Hare Green Garden Community will have been constructed and in will be in operation, along with public transport links to those facilities,	<p>The Policy acknowledges the need for multiple Primary Schools to be delivered as part of the development. The Essex County Council Developer's Guide to Infrastructure Contributions (2024) sets the threshold for a Primary School (two form entry being the preference from the authority) at 2,000 homes in a mixed-use development.</p> <p>For secondary schools to be provided (six form entry being preferred) a threshold of 4,500 is the general threshold.</p> <p>With these thresholds established, it can be considered that the Policy sets</p>

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			before any dwellings at the new Tendring Central Garden Community can be occupied – allowing for development to be phased in a way that ensures all children have access to education ahead of the completion of new schools at Horsley Cross'	out an appropriate level of provision for both Primary and Secondary schools
	Potential loss of Priority Habitat	Not significant	The Policy sets out a requirement that new development avoid, protect and/or enhance biodiversity assets within and surrounding the site with a Biodiversity Net Gain requirement of 20%.	It can be considered that in specifying avoidance and enhancement, the Policy adequately and suitably seeks the mitigation of any effects on Priority Habitat on site. Nevertheless, a degree of uncertainty remains until that time that such features are specifically identified and appropriately integrated or enhanced through an effective Masterplan DPD.
	Multiple Listed Buildings on site	Significant	The Policy sets out that new development will be required to 'conserve and where appropriate enhance the significance of heritage assets (including any contribution	It can be considered that in specifying enhancement, the Policy adequately and suitably seeks the mitigation of any effects on heritage assets on site. Nevertheless, a degree of uncertainty remains until that time that such assets are specifically identified and

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			made by their settings) both within and surrounding the site.'	appropriately integrated or enhanced through an effective Masterplan DPD.
	Potential coalescence of Horsley Cross and Horsleycross Street	Significant	<p>The Policy sets out that a DPD will be prepared for the Garden Village, containing policies setting out how the new community will be designed, developed and delivered in phases.</p> <p>The DPD will define the boundary of the new Garden Village and the amount of development it will contain. It will be produced in consultation with the local community and stakeholders and will include a concept plan showing the disposition and quantity of future land-uses and give a three dimensional indication of the urban design and landscape parameters which will be incorporated into any future planning applications.</p>	<p>Although the potential coalescence, or merging, of Horsley Cross and Horsleycross Street is not specifically mentioned, the Policy acknowledges that much of the work on landscape, layout, and design is more appropriately identified within the masterplan DPD and through further and extensive public consultation.</p> <p>Nevertheless the potential for significant negative effects cannot be ruled out at this stage, albeit with a large degree of uncertainty.</p>
	Features of landscape value on site	Significant	The Policy does not specifically identify any features of landscape value that should be protected or enhanced.	It can be considered that other thematic policies within the Plan adequately ensure that landscape features are appropriately considered.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
				<p>Further, it can also be considered that many features of landscape value are suitably addressed through the requirements for enhancements to biodiversity and heritage assets within the Policy.</p> <p>Nevertheless, a degree of uncertainty remains until that time that such features are specifically identified and appropriately integrated or enhanced through an effective Masterplan DPD.</p>
	Potential loss of Grade Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.
	Land within Flood Risk Zone 3 on site	Not significant	The Policy sets out that the delivery of smart, innovative and sustainable water efficiency/re-use solutions that foster climate resilience and a 21st century approach towards water supply, water and waste water treatment and flood risk management be integrated into development.	<p>It can be considered that regarding flood risk generally, thematic policy will apply to some degree within any forthcoming development, with the addition of the enhanced elements and approaches of set out within the Policy.</p> <p>Nevertheless, any approach of avoiding flood risk areas is considered</p>

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
				more appropriately identified within the masterplan DPD and through specialist evidence base regarding flood risk.
	Areas with a 'high' chance of surface water flood risk on site	Not significant	The Policy sets out that the delivery of smart, innovative and sustainable water efficiency/re-use solutions that foster climate resilience and a 21st century approach towards water supply, water and waste water treatment and flood risk management be integrated into development.	It can be considered that regarding flood risk generally, thematic policy will apply to some degree within any forthcoming development, with the addition of the enhanced elements and approaches of set out within the Policy. Nevertheless, any approach of avoiding flood risk areas is considered more appropriately identified within the masterplan DPD and through specialist evidence base regarding flood risk.
SAH1	Distance to GP Services	Not significant	The Policy does not include any requirements to enhance healthcare provision in the broad area, however, does seek to maximise vehicular, pedestrian and cycle access.	Irrespective of the Policy's approach, it has to be acknowledged that the direct provision of services is not within the remit of the Local Plan or planning more widely. Impacts will therefore be uncertain until decisions on provision are decided by the service provider.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Single Listed Building on site	Significant	The Policy does not recognise the presence of a Listed Building on the site.	<p>The potential for significant effects on the heritage asset remains possible, subject to further assessment.</p> <p>It should be acknowledged however that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary.</p>
SAH2	Multiple nearby Listed Buildings	Not significant	The Policy sets out the requirement that the development must conserve, and where appropriate, enhance the significance and setting of the nearby Grade II Listed Blue House Farmhouse.	<p>The policy can be considered to adequately raise the issue of the nearby Listed Building and its wider setting.</p> <p>It should be acknowledged however that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary.</p>
	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.



Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Areas with a 'high' chance of surface water flood risk on site	Not significant	The Policy does not directly acknowledge or seek policy criteria to address the areas with a high chance of surface water flood risk on site.	Impacts can be considered negative in regard to the Policy directly, albeit with general uncertainty. Nevertheless, it can be considered that regarding flood risk generally, thematic policy will apply and a bespoke or enhanced approach to flood risk need not necessarily apply for all site allocation policies.
SAH3	Adjoining Priority Habitat	Not significant	The Policy sets out the requirement that the layout and design of development must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts.	The Policy can be considered to adequately and suitably address the presence of Priority Habitat.
	Site is within a Landscape Character Area that	Not significant	The Policy sets out that screening measures, such as locally appropriate tree belts and/or hedgerows, must be provided along site boundaries to	The Policy can be considered to adequately and suitably address the constraints regarding the sensitivity of the local landscape.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	is highly sensitive to development		ensure the development is sensitively integrated into the surrounding landscape. Furthermore, it adds that the design must give specific consideration to the site's topography, ensuring that layout and form respond appropriately to natural land features.	
	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.
SAH4	Distance to a Town, Village, or Neighbourhood Centre	Not significant	The Policy does not include any requirement for the delivery of any local shops or similar services.	<p>Although the impacts remain in regard to the site's distance from a local centre, it cannot be expected that provision would be reasonably required of a development of this scale.</p> <p>The Policy adequately and suitably addresses some constraints through the promotion of active travel and requiring improved connectivity.</p>

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Distance to GP Services	Significant	The Policy acknowledges that financial contributions towards community facilities, including health provision, will be necessary of development as required by the NHS/Clinical Commissioning Group (CCG), and secured via CIL or Section 106 Planning Obligations.	Commensurate to the scale of the development of the allocation, it can be considered that a proportionate approach to addressing healthcare provision needs is included within the Policy.
	Distance to Primary School	Not significant	The Policy sets out that the development shall provide financial contributions towards early years, primary, and secondary education provision, as required by the Local Education Authority. These contributions will be secured via Section 106 Planning Obligations or the Community Infrastructure Levy (CIL).	Commensurate to the scale of the development of the allocation, it can be considered that a proportionate approach to addressing school provision needs is included within the Policy.
	Potential loss of Priority Habitat	Not significant	The Policy sets out that proposals must seek to retain and enhance existing site features of ecological or amenity value and that where impacts are unavoidable, a clear hierarchy of avoidance, mitigation,	It can be considered that in specifying retention and enhancement, the Policy adequately and suitably seeks the mitigation of any effects on Priority Habitat on site. Nevertheless, a degree of uncertainty remains until that time

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			and compensation must be demonstrated.	that such features are specifically identified and appropriately integrated or enhanced.
	Nearby Listed Building and site partly within a Conservation Area	Not significant	The Policy does not recognise the presence of a nearby Listed Building.	The potential for negative effects on the heritage asset remains possible, subject to further assessment.  It should be acknowledged however that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary.
	Site is in a Landscape Character Area that is highly sensitive to development	Not significant	The Policy sets out that the design and layout must respond sensitively to the surrounding landscape character, with particular attention to screening and mitigation along the northern edge of the site; and landscape enhancement measures along Church Road and Samsons Road.  Furthermore, the Policy adds that development must respect and respond to the topography of the site,	The Policy can be considered to adequately and suitably address the constraints regarding the sensitivity of the local landscape.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			ensuring that built form integrates harmoniously with natural landforms.	
	Site contains features of landscape value	Not significant	<p>The Policy includes that proposals must seek to retain and enhance existing site features of ecological or amenity value, and that where impacts are unavoidable, a clear hierarchy of avoidance, mitigation, and compensation must be demonstrated.</p> <p>Furthermore it adds that all development proposals must demonstrate a comprehensive response to the site's topography, ensuring that design and layout decisions are informed by existing landform characteristics</p>	The Policy can be considered to adequately and suitably address the effects associated with on-site features of landscape value.
	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Part of site is within Flood Risk Zone 3	Significant	<p>The Policy includes that development must not result in any increase in flood risk either on-site or to adjacent land and that surface water drainage strategies should be designed to ensure that runoff rates and volumes are controlled to pre-development levels or better, with consideration given to sustainable drainage systems (SuDS) where feasible.</p> <p>The Policy adds that early engagement with Anglian Water is required to formulate a comprehensive water and drainage strategy to serve the development.</p>	Alongside thematic policy regarding flood risk, the Policy can be considered adequate and suitable in addressing the effects associated with on-site features of flood risk.
	Areas with a 'high' chance of surface water flood risk on site	Not significant	The Policy includes that development must not result in any increase in flood risk either on-site or to adjacent land and that surface water drainage strategies should be designed to ensure that runoff rates and volumes are controlled to pre-development levels or better, with	Alongside thematic policy regarding flood risk, the Policy can be considered adequate and suitable in addressing the effects associated with on-site features of flood risk.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			<p>consideration given to sustainable drainage systems (SuDS) where feasible.</p> <p>The Policy adds that early engagement with Anglian Water is required to formulate a comprehensive water and drainage strategy to serve the development.</p>	
SAH6	Distance to a Primary School	Not significant	The Policy sets out that 'development must deliver any site-specific infrastructure requirements identified in the IDP, which may include education provision, highway improvements, water and wastewater infrastructure, and community or open space facilities.'	The impacts associated with the distance to primary education are not directly minimised by the Policy. Raising the likelihood of contributions being sought regarding addressing primary school capacity however can be considered a proportionate approach given the size / dwelling yield of the allocation.
	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
SAH7	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.
SAH8	Distance to a Town, Village, or Neighbourhood Centre	Not significant	The Policy does not include any requirement for the delivery of any local shops or similar services.	<p>Although the impacts remain in regard to the site's distance from a local centre, it cannot be expected that provision would be reasonably required of a development of this scale.</p> <p>The Policy adequately and suitably addresses some constraints through the promotion of active travel and requiring improved connectivity.</p>
	Distance to GP Services	Significant	The Policy does not set out any requirements regarding healthcare provision.	<p>The impacts associated with the distance to GP services are not directly minimised by the Policy.</p> <p>The Policy does however indirectly address some effects through the promotion of active travel and requiring improved connectivity.</p>



Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Distance to Primary School	Not significant	The Policy sets out that 'development must deliver any site-specific infrastructure requirements identified in the IDP, which may include education provision, highway improvements, water and wastewater infrastructure, and community or open space facilities.'	The impacts associated with the distance to primary education are not directly minimised by the Policy. Raising the likelihood of contributions being sought regarding addressing primary school capacity however can be considered a proportionate approach given the size / dwelling yield of the allocation.
	Site adjoins Priority Habitat	Not significant	The Policy sets out that layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts	The Policy can be considered to adequately and suitably address the presence of Priority Habitat.
	Loss of Grade 2 Agricultural Land / BMV	Not significant	The Policy does not include any measures to mitigate the loss of Grade 2 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
SAH9	Site adjoins Priority Habitat	Not significant	The Policy sets out that layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts	The Policy can be considered to adequately and suitably address the presence of Priority Habitat.
SAH10	Site is partly within a Conservation Area	Not significant	The Policy includes a requirement that development should preserve the significance of the Thorpe-le-Soken Conservation area to the east of the site, including consideration of its setting.	<p>The potential for negative effects on the heritage asset remains possible, subject to further assessment, however neutral effects are sought. It could be considered that the potential for enhancements to the listed assets and their settings should be included within the Policy.</p> <p>It should be acknowledged however that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary.</p>

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
	Site contains Priority Habitat and Ancient Woodland Pasture	Not significant	The Policy include a requirement that proposals must include comprehensive landscape screening measures, incorporating locally appropriate tree belts and hedgerows along site boundaries to ensure sensitive integration with the surrounding landscape. In addition, development should deliver species-rich grassland habitats and other suitable features to support pollinators and enhance biodiversity across the site.	The Policy can be considered to adequately and suitably address the presence of Priority Habitat.
	Features of landscape value on site	Not significant	The Policy include a requirement that proposals must include comprehensive landscape screening measures, incorporating locally appropriate tree belts and hedgerows along site boundaries to ensure sensitive integration with the surrounding landscape. In addition, development should deliver species-rich grassland habitats and other suitable features to support	The Policy can be considered to adequately and suitably address the presence of landscape features on site.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			pollinators and enhance biodiversity across the site.	
SAH11	Site is partly within a Conservation Area	Not significant	The Policy requires the preservation of the significance of the Thorpe-le-Soken Conservation area, including consideration of its setting.	<p>The potential for negative effects on the heritage asset remains possible, subject to further assessment, however neutral effects are sought. It could be considered that the potential for enhancements should be included within the Policy.</p> <p>It should be acknowledged however that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary.</p>
	Site contains Priority Habitat and Ancient Woodland Pasture	Not significant	The Policy requires the implementation of landscape screening measures, including locally appropriate tree belts and hedgerows along site boundaries to soften visual impact and enhance ecological corridors, preservation and protection of existing protected trees within the site, improved management of	The Policy can be considered to adequately and suitably address the presence of Priority Habitat.

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			existing hedgerows and tree belts to strengthen ecological connectivity and biodiversity value.	
	Features of landscape value on site	Not significant	The Policy requires the implementation of landscape screening measures, including locally appropriate tree belts and hedgerows along site boundaries to soften visual impact and enhance ecological corridors, preservation and protection of existing protected trees within the site, improved management of existing hedgerows and tree belts to strengthen ecological connectivity and biodiversity value.	The Policy can be considered to adequately and suitably address the presence of features of landscape value within the site.
SAE3	Distance to a Town, Village, or Neighbourhood Centre	Significant	The Policy includes the need for the provision of shared social spaces, cafés, and informal meeting areas to foster collaboration.	Although the impacts remain in regard to the site's distance from a local centre, it cannot be expected that provision would be reasonably required of a development of this type.  The Policy adequately and suitably addresses the constraints

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
				proportionate to the needs of such an employment allocation.
	Distance to public transport	Not significant	<p>The Policy requires development to integrate with the Rapid Transit System and provide additional local public transport services to the site.</p> <p>Furthermore, the Policy sets out that foot and cycle ways should be provided throughout the development and connecting with the surrounding settlements and countryside, and that the Public Rights Of Way network across the site must be protected and enhanced.</p> <p>Additionally, the development should ensure safe, convenient pedestrian and cycle connections to the Garden Community and incorporate active travel priority routes and bus priority measures.</p>	The Policy adequately and suitably addresses the importance of public transport to support the strategic employment allocation.
	Site contains Priority Habitat	Not significant	The Policy does not directly recognise Priority Habitat on site, however, does insist that	It is uncertain as to whether the Policy adequately and suitably seeks the mitigation of any effects on Priority

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
			development achieve a minimum 20% Biodiversity Net Gain through robust landscape buffers, tree planting, and habitat creation.	Habitat on site. A degree of uncertainty remains until that time that such features are specifically identified and appropriately integrated or enhanced through an effective masterplan.
	Presence of three Listed Buildings to north of site	Not significant	The Policy sets out the need to preserve and enhance the setting of nearby heritage assets.	<p>The potential for negative effects on the heritage asset remains possible, subject to further assessment, however positive outcomes effects are sought from the Policy.</p> <p>It should be acknowledged however that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary.</p>
	Features of landscape value on site	Not significant	The Policy does not directly recognise landscape features on site, however, does insist that development achieve a minimum 20% Biodiversity Net Gain through robust landscape buffers, tree planting, and habitat creation.	It is uncertain as to whether the Policy adequately and suitably seeks the mitigation of any effects on landscape features on site. A degree of uncertainty remains until that time that such features are specifically identified and appropriately integrated or

Policy	Negative impacts raised in 'policy-off' site appraisal	Significance of effect raised in 'policy-off' site appraisal	Is there a suitable mitigating criterion in the site policy?	Are impacts appropriately mitigated?
				enhanced through an effective masterplan.
	Loss of Grade 1 Agricultural Land / BMV	Significant	The Policy does not include any measures to mitigate the loss of Grade 1 Agricultural Land / BMV.	Impacts are not considered possible to mitigate and the loss of high grade soils is an inevitable negative effect of development in this broad area.
	Areas with a 'high' chance of surface water flood risk on site	Not significant	The Policy sets out the requirement that development implements Sustainable Drainage Systems (SuDS), rainwater harvesting, and green roofs. It adds that the applicant must demonstrate adequate wastewater capacity, including any necessary phasing or alternative solutions, to the satisfaction of both the Council and Anglian Water.	Alongside thematic policy regarding flood risk, the Policy can be considered adequate and suitable in addressing the effects associated with on-site features of flood risk.



#### 4.8.4 Mitigation measures proposed

A recommendation is made at this stage, regarding allocation Policy SAH10 and Policy SAH11. Both sites are partly within or otherwise border a Conservation Area and the Policy requires the preservation of the significance of this asset, including consideration of its setting.

As set out in the above table, the potential for negative effects on the Conservation Area remains possible, subject to further assessment, however neutral effects are sought from the Policies. Although it should be acknowledged that thematic policy regarding heritage assets and the historic environment will apply to all development where necessary, it could be considered that the potential for enhancements (rather than just preservation) should be included within Policy SAH10 and Policy SAH11.

### 4.9 The Delivering Infrastructure Policy

#### 4.9.1 What changes are proposed to the adopted Local Plan policy?

No changes are proposed to the Plan's single delivering infrastructure policy: Policy DI1 Infrastructure Delivery and Impact Mitigation.

#### 4.9.2 New alternatives to consider at this stage

It is considered that no other alternatives exist in regard to the Delivering Infrastructure policy that is proposed for amendment. It is considered that any additional alternative approaches would not be distinctly different to the approaches proposed or considered to date in the assessment of the adopted Local Plan and could not be expected to yield any different effects.

#### 4.9.3 Assessment of the Delivering Infrastructure Policy

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
S/T	0	0	+	+	0	0	0	0	0	0	0	0	0	0
M/T	0	0	+	+	0	0	0	0	0	0	0	0	0	0
L/T	0	0	+	+	0	0	0	0	0	0	0	0	0	0

Policy ID1 has been assessed as having positive impacts on the provision of on-site and off-site infrastructure improvements and the procedures to address this through the development management process. The Policy can be expected to ensure positive implications regarding education, health, and public transport in regard to the requirements

of new development. It should be noted that the supporting text references the Plan's Infrastructure Delivery Plan (IDP) which addresses specific Plan relevant requirements surrounding water and drainage, energy, communications, leisure and green infrastructure, education, health and transport (including public transport).

#### 4.9.4 Mitigation measures proposed

No mitigation measures or recommendations are made in the assessment of the Delivering Places policy at this stage.

## 5. The Appraisal of the Plan's Site Allocation Options

### 5.1 How candidate sites were identified

As part of the plan making process, the Council have undertaken an extensive call-for-sites process and additionally welcomed site submissions as part of the Regulation 18 Local Plan Issues and Options consultation. A number of landowners, promoters and developers submitted sites for consideration for future housing and employment development and allocation within the emerging Local Plan Review.

### 5.2 How 'reasonable alternatives' were identified

#### 5.2.1 Sieving / sifting criteria

Certain locations were excluded at the outset and not subjected to detailed analysis due to strategic limitations or conflicts with existing Local Plan policies. These exclusions are outlined below:

##### 5.2.1.1 Reason 1 – Too Remote Sites

Sites that are clearly remote and disconnected from existing settlements, services, and infrastructure have not been analysed. Growth in such areas would undermine the plan-led approach and the Council's strategic vision for development.

##### 5.2.1.2 Reason 2 – Within a Strategic Green Gap

The Council aims to retain and potentially expand Strategic Green Gaps to preserve settlement identity and prevent coalescence. These include:

- Clacton-on-Sea and Little Clacton
- The Garden Community area
- Frinton, Walton & Kirby Cross
- Manningtree, Lawford & Mistley

Sites within these designated areas have been excluded from further analysis, as these gaps remain integral to the Local Plan strategy through to 2042.

##### 5.2.1.3 Reason 3 – Within a National Landscape Area (formerly AONBs)

These areas benefit from special landscape protection. Any future development would conflict with existing policy safeguards.

#### 5.2.1.4 Reason 4 – Within Safeguarded Open Space or a Local Wildlife Site

Development in these areas would result in the permanent loss of designated open space or wildlife habitat, failing to meet current policy exceptions that are carried forward within the Local Plan Review.

#### 5.2.1.5 Reason 5 – Within or very close to the Tendring–Colchester Borders Garden Community (TCBGC) Area

Sites within or adjacent to the TCBGC designation were excluded due to:

- Significant development already allocated or underway
- Expected substantial contribution to housing delivery through to 2042
- Limited capacity of the housing market and infrastructure to accommodate further growth beyond what is already planned

#### 5.2.1.6 Reason 6 – Sites with Extant Planning Permission

Sites already benefiting from planning permission have not been formally allocated, as doing so would serve no additional purpose.

#### 5.2.1.7 Reason 7 – Edge of Ardleigh

Areas between the TCBGC and Ardleigh were excluded due to:

- Existing strategic allocations
- Anticipated substantial housing delivery through to 2042
- Limited capacity of local infrastructure and services, especially during early phases of Garden Community development when key infrastructure may still be under construction – during these stages, the initial new growth and new residents moving in will put additional pressure on existing services in areas such as Ardleigh.

#### 5.2.1.8 Reason 8 – Edge of Elmstead

Similar to Ardleigh, areas between the TCBGC and Elmstead were excluded due to:

- Existing strategic allocations
- Anticipated substantial housing delivery through to 2042
- Limited capacity of local infrastructure and services, particularly during initial phases of Garden Community development – during these stages, the initial new growth and new residents moving in will put additional pressure on existing services in areas such as Elmstead.

#### 5.2.1.9 Reason 9 – Edge of Clacton (Greater Clacton Area)

Sites in this area were excluded due to:

- Significant development already allocated or underway, including over 3,500 new homes at Hartley Gardens, Rouses Farm, and Oakwood Park
- Expected substantial contribution to housing delivery through to 2042
- Limited capacity of the housing market and infrastructure to absorb additional growth beyond current allocations.

## 5.3 Site Assessment overview

The table below sets out the details and references for allocated sites proposed within the Plan review at this stage. The types of allocations are:

- Strategic Allocation Mixed Use Sites: Sites that are expected to accommodate homes, jobs and community assets;
- Strategic Allocation Housing Sites: Sites that are expected to principally deliver between 100-300 homes;
- Medium Site Allocation Sites: Sites that are expected to principally deliver between 10 -100 homes; and
- Strategic Allocations for Employment: Sites expected to deliver jobs.

**Table 7: Allocated Sites**

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
Strategic Allocation Mixed-Use Sites ('SAMU' sites)				
SAMU8	Tendring Central Garden Village (Hare Green)	Mixed	496.91	1,700
SAMU5	Land South of Oakley Road (Harwich and Dovercourt)	Mixed	125.57	1,650
SAMU9	Horsley Garden Village (Horsley Cross)	Mixed	520.4	1,700
SAMU7	Saltings Quarter, Riverside Avenue (Manningtree, Mistley and Lawford)	Mixed	3.72	40

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
SAMU6	Weeley Garden Village (Weeley)	Mixed	52.87	900
Strategic Allocation Housing Sites ('SAH' sites)				
SAH6	Land east of Cockaynes Lane (Alresford)	Housing	6.7	100
SAH4	Land East of Church Road (Brightlingsea)	Housing	10.97	300
SAH2	Land north of Thorpe Road, Kirby Cross (Frinton, Walton, Kirby Cross)	Housing	32.84	420
SAH3	Land off Arthur Ransome Way, Walton (Frinton, Walton, Kirby Cross)	Housing	8.76	200
SAH7	Land east of Admirals Green and north of Weeley Road (Great Bentley)	Housing	10.29	120
SAH1	Vicarage Farm, Main Road (Harwich and Dovercourt)	Housing	4.41	150
SAH8	Land east of Amerells Road (Little Clacton)	Housing	4.58	100
SAH9	Land south of Clacton Road (St Osyth)	Housing	7.27	100
SAH11	Land North of Lifehouse Spa & Hotel (Thorpe-le-Soken)	Housing	6.09	110
SAH10	Land south of Colchester Road (Thorpe-le-Soken)	Housing	7.92	150

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
Medium Site Allocations ('MSA' sites)				
MSA7	Land south-west of Colchester Main Road (Alresford)	Housing	3.96	40
MSA8	Land adj Village Hall, Harwich Road (Beaumont)	Housing	0.98	20
MSA9	Land south of Windmill Road and east of Straight Road (Bradfield)	Housing	4.98	100
MSA5	Brightlingsea Telephone Exchange, 16 New Street (Brightlingsea)	Housing	0.09	15
MSA6	Land at Pannell Place (Brightlingsea)	Housing	1.24	10
MSA2	Land adjacent Branscombe Close (Frinton)	Housing	2.18	40
MSA10	Land south of Weeley Road (Great Bentley)	Housing	5.41	80
MSA21	Land east of Heckfords Road (Great Bentley)	Housing	4.1	80
MSA11	Land west of Parsons Hill (Great Bromley)	Housing	2.26	15
MSA12	Land south of Hall Road (Great Bromley)	Housing	1.3	10
MSA13	Land west of Main Road (Great Holland)	Housing	1.77	10
MSA14	Land east of Kirby Road (Great	Housing	1.38	10

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
	Holland)			
MSA15	Land north east of Wix Road (Great Oakley)	Housing	4.33	50
MSA16	Land south of Orchard Close (Great Oakley)	Housing	2.46	50
MSA1	Durite Works, Valley Road (Harwich and Dovercourt)	Housing	2.8	82
MSA17	Land north of Walton Road (Kirby-le-Soken)	Housing	0.86	10
MSA18	Land north of Kirby-le-Soken Evangelical Church (Kirby-le-Soken)	Housing	2.07	20
MSA19	Land west of Manningtree Road (Little Bentley)	Housing	0.66	12
MSA20	Land south of Shop Road (Little Bromley)	Housing	0.9	17
MSA3	Affinity Water, Mill Hill (Manningtree, Mistley and Lawford)	Housing	2.13	80
MSA4	Crisp Malting, School Lane, Mistley (Manningtree, Mistley and Lawford)	Housing	1.89	80
MSA22	Haulage Depot, Heath Road (Tendring Village)	Housing	0.77	10
MSA23	Land at Avocet Place (Thorrington)	Housing	4.18	60
MSA24	Land east of Bentley Road (Weeley Heath)	Housing	4.75	60



Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
MSA25	Land south of Mill Lane (Weeley Heath)	Housing	1.37	17
MSA26	Land south of Colchester Road (Wix)	Housing	1.16	20
MSA27	Abbey Bottom Farm (Wix)	Housing	1.78	20
MSA28	Land North of Rectory Road (Wrabness)	Housing	2.15	30
Strategic Allocations for Employment (SAE sites) and other employment allocations				
SAE3	Collierswood Farm, Land North of the A120	Employment	77.99	N/A
Site 146	Land North of A120 (Harwich)	Employment	5.33	N/A
Site 62	Weeley Car Boot site, Land to the North of Colchester Rd (Weeley)	Employment	2.03	N/A

The tables below show the impacts highlighted in the detailed assessment of the allocated sites. The impacts are based on the submitted red-line boundary of each site, and assessments have been undertaken on a level playing field with a consistent use of quantitative and qualitative information, including assumptions. Detailed assessment of the allocated and non-allocated reasonable alternative sites is included within Annex C to this Report.

Table 8: Assessment Summary – Allocated Sites (SAMU Sites)

ISA Obj.	Sub criteria	Site reference				
		SAMU 8	SAMU 5	SAMU 9	SAMU 7	SAMU 6
1)	Housing supply	++	++	++	+	++
	Type and tenure	?/+	?/+	?/+	?/+	?/+
2)	Employment land	++/+	++/+	++/+	?/+	++/+
	Regeneration	+	+	+	++	?/+
3)	Distance to centres	--	?/-	--	++	--
	Distance to public transport	++	++	++	++	++
4)	Distance to GP services	--	-	--	++	--
	Distance to primary school	-/-	+	-/-	++	++
5)	Brownfield land	-	-	-	+	-
	Contaminated land	?	?	+	?/+	?
6)	Wildlife designations	0/?	?	0/?	?/-	0/?

ISA Obj.	Sub criteria	Site reference				
		SAMU 8	SAMU 5	SAMU 9	SAMU 7	SAMU 6
	Biodiversity features	-	?/-	-	?/-	0
7)	BNG	+	+	+	+	+
8)	Designated assets	- -/-/?	-/?	- -/-/?	-/?	0/?
	Non-designated assets	?	?	?	?	0
9)	Landscape character	0/?	-/?	0/?	?	0/?
	Landscape features	- -	?/-	- -	0	?
10)	Groundwater	?	0	?	?	0
	Surface water	0	0	0	0	0
11)	Air quality	0	0	0	0	0
12)	ALC / BMV	- -/-	-	-/?	+	?
13)	Renewable energy	0/?	0/?	0/?	0/?	0/?

ISA Obj.	Sub criteria	Site reference				
		SAMU 8	SAMU 5	SAMU 9	SAMU 7	SAMU 6
14)	Fluvial flood risk	0/- -	0	0/- -	-	0/?
	Surface water flood risk	?/-	0/-	?/-	?/-	0

Table 9: Assessment Summary – Allocated Sites (SAH Sites)

ISA Obj.	Sub criteria	Site reference									
		SAH 6	SAH 4	SAH 2	SAH 3	SAH 7	SAH 1	SAH 8	SAH 9	SAH 11	SAH 10
1)	Housing supply	+	+	+	+	+	+	+	+	+	+
	Type and tenure	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+
2)	Employment land	0	0	0	0	0	0	0	0	0	0
	Regeneration	0	0	0	0	0	0	0	0	0	0

ISA Obj.	Sub criteria	Site reference									
		SAH 6	SAH 4	SAH 2	SAH 3	SAH 7	SAH 1	SAH 8	SAH 9	SAH 11	SAH 10
3)	Distance to centres	+/++	-/-	+/++	+	?	?	-	+	+	+
	Distance to public transport	+	+	++	++	+	++	++	++	++	++
4)	Distance to GP services	+	--	+	+	+	-	--	++	+	+
	Distance to primary school	?/-	-	++	+	+	++	-	++	+/++	+
5)	Brownfield land	-	-	-	-	-	-	-	-	-	-
	Contaminated land	?	?	?	?	?	?	?	?	?	?
6)	Wildlife designations	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
	Biodiversity features	0	-	0	?/-	0	0	?/-	?/-	-	-
7)	BNG	+	?	+	+	+	?	+	+	?	?
8)	Designated assets	0/?	-/?	-/?	0/?	0/?	- -/-/?	0/?	0/?	-/?	-/?

ISA Obj.	Sub criteria	Site reference									
		SAH 6	SAH 4	SAH 2	SAH 3	SAH 7	SAH 1	SAH 8	SAH 9	SAH 11	SAH 10
	Non-designated assets	0	0/?	0/?	0	0	0/?	0	0	?	?
9)	Landscape character	0/?	-/?	?	-/?	0/?	0/?	0/?	?	0/?	0/?
	Landscape features	?	?/-	?	?	?	0	?	?	-	-/?
10)	Groundwater	?	0	0	0	0	0	0	0	0	0
	Surface water	0	0	0	0	0	0	0	0	0	0
11)	Air quality	0	0	0	0	0	0	0	0	0	0
12)	ALC / BMV	-	-	-	-	-	?	-	?	?	?
13)	Renewable energy	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
14)	Fluvial flood risk	0	- -/?	0	0	0/?	0	0	0	0	0
	Surface water flood risk	0	?/-	0/?/-	0	?/0	0	0	?	0	0

Table 10: Assessment Summary – Allocated Sites (MSA Sites 1/2)

ISA Obj.	Sub criteria	Site reference (MSA...)													
		7	8	9	5	6	2	10	21	11	12	13	14	15	16
1)	Housing supply	+	+/?	+/?	+	+	+	+	+	+/?	+/?	+/?	+/?	+/?	+/?
	Type and tenure	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+
2)	Employment land	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Regeneration	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3)	Distance to centres	+	--	--	++	+/++	+	?	?	--	--	-/-	-	--	--
	Distance to public transport	+	++	+	++	++	++	+	+	++	++	++	++	++	++
4)	Distance to GP services	+	--	--	++	-	+	+	+	--	--	-/-	-	++	++
	Distance to primary school	-	--	+	++	-	++	+	+	++	++	-/-	-	++	++
5)	Brownfield land	-	-	-	+	-	-	-	-	-	-	-	-	-	-
	Contaminated land	?	?	?	+/?	?	?	?	?	?	?	?	?	?	?

ISA Obj.	Sub criteria	Site reference (MSA...)													
		7	8	9	5	6	2	10	21	11	12	13	14	15	16
6)	Wildlife designations	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
	Biodiversity features	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7)	BNG	+	+	+	+	+	+	+	+	+	+	+	+	+	+
8)	Designated assets	0/?	0/?	0/?	-/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
	Non-designated assets	0	0	0	?	0	0	0/?	0	?	0	0/?	0	0	0
9)	Landscape character	0/?	0/?	0/?	0	-/?	0/?	0/?	0/?	0/?	0/?	0	0/?	?	-/?
	Landscape features	?	?	?	0	0/?	?	?	?	0/?	?	0/?	?	?	?
10)	Groundwater	?	0	?	0	0	0	0	?	?	?	0	0	0	0
	Surface water	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11)	Air quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12)	ALC / BMV	-	-	-	+	-	?	-	-	?	-	?	?	?	-



ISA Obj.	Sub criteria	Site reference (MSA...)													
		7	8	9	5	6	2	10	21	11	12	13	14	15	16
13)	Renewable energy	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
14)	Fluvial flood risk	0	0	0	0	0	0	-/?	0	0/- -	0	0	0	0	0
	Surface water flood risk	0/?	0	?	0	0	0	?	0	?/-	0	?/-	?/-	0	0

Table 11: Assessment Summary – Allocated Sites (MSA Sites 2/2)

ISA Obj.	Sub criteria	Site reference (MSA...)													
		1	17	18	19	20	3	4	22	23	24	25	26	27	28
1)	Housing supply	+	+/?	+/?	+/?	+/?	+	+	+/?	+/?	+/?	+/?	+/?	+/?	+/?
	Type and tenure	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/+
2)	Employment land	?	0	0	0	0	?/-	?	0	0	0	0	0	0	0
	Regeneration	?	0	0	0	0	?/-	?	0	0	0	0	0	0	0

ISA Obj.	Sub criteria	Site reference (MSA...)													
		1	17	18	19	20	3	4	22	23	24	25	26	27	28
3)	Distance to centres	-	-	-	--	--	++	-	--	--	--	--	--	--	--
	Distance to public transport	++	++	++	++	++	++	++	++	++	++	++	+	++	++
4)	Distance to GP services	-/-	-	-	--	--	++	++	--	--	--	--	--	--	--
	Distance to primary school	+	-	-	--	--	++	+	--	--	+	?/-	--	--	--
5)	Brownfield land	?	-	-	-	-	+	+	+	-	-	-	-	-	-
	Contaminated land	?/+	?	?	?	?	?/+	?/+	?/+	?	?	?	?	?	?
6)	Wildlife designations	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
	Biodiversity features	-	0	?/-	0	0	0	?/-	0	0	0	0	0	0	?/-
7)	BNG	?	+	+	+	+	+	+	+	+	+	+	+	+	+
8)	Designated assets	0/?	0/?	-/?	0/?	-/?	-/?	-/?	0/?	0/?	-/?	0/?	0/?	0/?	-/?
	Non-designated assets	0	0	?	0	?	?	?	0	0	?	0	0	0	?

ISA Obj.	Sub criteria	Site reference (MSA...)													
		1	17	18	19	20	3	4	22	23	24	25	26	27	28
9)	Landscape character	0/?	-/?	-/?	0/?	0/?	0	?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
	Landscape features	?/-	?	?	?	?	0	0	-	?	?	?	?	?	?
10)	Groundwater	0	0	0	?	?	?	?	?	0	0	0	0	0	0
	Surface water	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11)	Air quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12)	ALC / BMV	+	?	?	-	-/-	+	+	+	?	?	-	?	?	?/-
13)	Renewable energy	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?
14)	Fluvial flood risk	0	0	0	0	0	0	0/-	0	0	0	0	0	?/-	0
	Surface water flood risk	?/-	0	-	?/-	?/-	?/-	?/-	0	?/-	0	0	0	?/-	?/-

Table 12: Assessment Summary – Allocated Sites (SAE / Employment sites)

ISA Obj.	Sub criteria	Site reference		
		SAE3	Site 146	Site 62
1)	Housing supply	0	0	0
	Type and tenure	0	0	0
2)	Employment land	++	++	++
	Regeneration	+	+	+
3)	Distance to centres	--	-	--
	Distance to public transport	-	?	++
4)	Distance to GP services	0	0	0
	Distance to primary school	0	0	0
5)	Brownfield land	-	-	-
	Contaminated land	?	?	?

ISA Obj.	Sub criteria	Site reference		
		SAE3	Site 146	Site 62
6)	Wildlife designations	0/?	0/?	0/?
	Biodiversity features	?/-	0	0
7)	BNG	+	+	+
8)	Designated assets	-/?	0/?	0/?
	Non-designated assets	0	0	0
9)	Landscape character	0/?	0/?	0/?
	Landscape features	-	?/-	-
10)	Groundwater	?	0	0
	Surface water	0	0	0
11)	Air quality	0	0	0
12)	ALC / BMV	--	?	?

ISA Obj.	Sub criteria	Site reference		
		SAE3	Site 146	Site 62
13)	Renewable energy	0/?	0/?	0/?
14)	Fluvial flood risk	0	--	0
	Surface water flood risk	0/-	?/-	?/0

## 5.4 Summary of the Plan Review Allocations' Potential Significant Effects

This section analyses the significant effects identified within the detailed site assessments of the allocated sites, and which are summarised in the above tables. The section focuses on those negative effects that are assessed at this stage.

### 5.4.1 Potential negative effects regarding: Distances / Access to Services

In a number of cases, various site allocations are distanced from Town, Village, or Neighbourhood Centres, and also GP services, and Primary Schools. This is considered an inevitable effect of allocating sites that are peripheral to existing settlements. It should be acknowledged however that in nearly all instances, aside from the allocated Garden Villages in Hare Green and Horsley Cross, the allocated sites are adjoining existing settlement boundaries. This is in conformity to the Council's site selection criteria, which includes that those candidate sites that are clearly remote and disconnected from existing settlements, services, and infrastructure did not progress for consideration as reasonable alternatives.

It can be considered in regard to mitigation that the Local Plan, and planning more widely, cannot influence market factors, such as the provision of shops, or the delivery of services such as GP services. The large scale allocations within the Plan, including the Garden Village allocations, can ensure the provision of new Primary Schools where dwelling thresholds are met, and the premises for GP services and those within local centres.

In regard to transport impacts more widely, these are discussed in the assessment of cumulative effects within this ISA Report.

#### 5.4.1.1 Suggested mitigation

No mitigation measures are highlighted at this stage. It is considered that the Plan's adopted and amended (as proposed) Policy framework can adequately ensure that access to services is achievable of all allocations.

### 5.4.2 Potential negative effects regarding: Flood Risk

In a small number of instances, site allocations are within areas with a chance of fluvial flood risk. In regard to site MSA27 in Wix, the site is predominantly within FRZ1, however access to the site via Harwich Road would be within an area of FRZ3 associated with a watercourse. Site SAH4 in Brightlingsea is also predominantly within FRZ1, however the northern part includes significant areas of land within FRZ3.

Employment Site 146 (Land North of the A120 Harwich Road) is entirely within FRZ3. Pending the findings of any flood risk assessment and the application of sequential testing, it may be that the employment development type is limited to a water compatible or a 'less vulnerable' use.

#### 5.4.2.1 Suggested mitigation

Adopted Local Plan policy additionally exists to ensure that flood risk matters would similarly be suitably considered at the planning application stage. Nevertheless it is recommended that suitable evidence at the Plan level is forthcoming to apply sequential testing and where necessary identify suitable mitigation on a case by case basis that can be included within any allocation specific policies.

### 5.4.3 Potential negative effects regarding: Heritage Assets and Landscape

Three of the allocated sites have been identified as having the potential for an impact on the significance of a designated asset or its setting that warrants the identification of significant effects in this ISA.

Site SAH1 is assessed as having the potential for an impact on the significance of a designated asset or its setting, due to the presence of a Listed Building within the red line boundary of the site, presumably where access would be required via Ramsey Road.

Site SAMU9 (the proposed Garden Village in Horsley Cross) has been assessed as having the potential for significant effects on designated assets and landscape. This is due to the presence of four Listed Buildings within the red line boundary of the site, the presence of a Protected Lane in the site's eastern part, and the proposal leading to the merging / coalescence of the small settlements of Horsley Cross and Horsleycross Street.

Site SAMU8 (the Garden Village proposal in Hare Green) is similarly considered to have the potential for an impact on the significance of a designated asset or its setting, due to the presence of seven Listed Buildings within the red line boundary of the site. Development could also subsume the settlement of Frating (which has a settlement boundary) and may lead to the merging of Frating with the small settlements of Balls Green and Hare Green (which do not have settlement boundaries).

In the case of these two proposed Garden Villages, the heightened potential for mitigation should be acknowledged at this stage. This is due both to the size of the sites, and the emergence of Masterplan SPDs post-adoption of the Local Plan Review. This will enable further public consultation on the schemes of both sites as they emerge, which can be expected to include mitigation for environmental effects.

Nevertheless, in all of the above cases, uncertainty surrounding the significance of the impacts is also highlighted at this stage.

#### 5.4.3.1 Suggested mitigation

Mitigation of the above effects and even the possibility of enhancement of assets where possible, would only be fully understood at the stage where a detailed scheme is proposed. At this strategic stage, it is considered that the Plan Review's Policy Framework will ensure that any impacts are fully understood at that stage. Nevertheless, it is recommended at this stage that more detailed Heritage Impact Assessments are undertaken to justify the



allocations and more broadly that further evidence is commissioned to influence site selection. At the time of writing it is understood that this evidence has been commissioned, and the findings will be factored into the ISA when available.

#### 5.4.4 Potential negative effects regarding: Soil Quality

Sites MSA12, MSA20, and SAE3 are all assessed as having the potential for the loss of Grade 1 (excellent) agricultural land. The majority, but not all, of site SAMU8 also contains Grade 1 agricultural land. Grade 1 agricultural land is the best and most versatile land in the District and also nationwide.

It should be considered that the land in question for all the above sites has been submitted for consideration for alternative (i.e. non-agricultural) uses and that there is no guarantee that Grade 1 agricultural land is used for agricultural purposes. In the case of the proposed Garden Village site SAMU8, it is possible that some of the land that is Grade 1 could be avoided as part of open space or green infrastructure requirements.

##### 5.4.4.1 Suggested mitigation

Development of Grade 1 agricultural land would likely lead to its permanent loss, which cannot be mitigated.

#### 5.4.5 Potential negative effects regarding: Habitats sites

The assessment of sites in this ISA has been undertaken on the basis that both preferred allocations and reasonable alternatives need to be appraised on a level playing field. Therefore, the effects of Habitats sites for all options have been assessed with 'uncertainty' due to the evidence base document that is best placed to make appropriate judgements, the Habitats Regulations Assessment (HRA), only assessing the Preferred Options.

Detailed impacts of the allocations are identified within the HRA. That assessment raises that there will likely be significant negative effects resulting from the Plan Review. These include the in-combination effects (Likely Significant Effects) on Habitats sites from all allocations through recreational pressure on the coast. These effects are known, and the adopted Plan includes suitable Policy for mitigation in accordance with the adopted Essex Coast RAMS SPD.

Additionally however, site specific impacts are raised for impacts on Habitats sites more directly. The potential for significant effects are raised for:

- SAMU5 – The site is located immediately adjacent to Hamford Water SPA, Ramsar site and SAC. Therefore, the proposals could result in adverse impacts from impacts upon functionally linked land, disturbance during the construction and operation phase, recreational disturbance, water quality and air quality impacts.
- SAMU7 - The allocation is located within an employment area of Manningtree, which is located immediately adjacent to the Stour and Orwell Estuaries SPA and Ramsar site. Therefore, there is considered potential impacts upon the Habitats

sites from water quality, air quality and disturbance during the construction and operation phases.

- SAH3 - The site allocation is located within 200m of Hamford Water SPA, Ramsar site and SAC. Therefore, the proposals could result in adverse impacts from impacts upon functionally linked land, disturbance during the construction and operation phase, recreational disturbance, water quality and air quality impacts.
- MSA4 - The development is located within 100m of the Stour and Orwell Estuaries SPA and Ramsar. Therefore, there is considered potential impacts upon the Habitats sites from water quality, air quality and disturbance during the construction and operation phases.

Additionally, negative effects are highlighted for:

- SAMU6 – There is the potential for impacts upon functionally linked land within the on-site arable land.
- SAMU8 – There is the potential for impacts upon functionally linked land, as well as water quality impacts with the site adjacent to Tenpenny Brook and Bentley Brook.
- SAMU9 - There are potential impacts upon functionally linked land, as well as water quality impacts.
- SAH4 - There is the potential for impacts upon functionally linked land, as well as water quality as the site is adjacent to a Statutory Main River which feeds into the Colne Estuary.
- SAH6 – There is the potential for impacts upon functionally linked land.
- SAH9 – The site could result in impacts from adverse water quality, due its proximity to a Statutory Main River, which feeds into the Colne Estuary.
- SAH10 – There is the potential for impacts upon functionally linked land, in nearby waterbodies.
- SAH11 – There is the potential for impacts upon functionally linked land within the on-site arable land.
- MSA7 - There is the potential for impacts upon functionally linked land.
- MSA27 - The site is immediately adjacent to a Statutory Main River, which feeds into the Stour Estuary. Therefore, there is potential for impacts from adverse water quality upon the relevant Habitats sites.
- Site 161 - The proposed employment allocation includes a large area of arable land, which could provide functionally linked land for qualifying features of the Colne Estuary SPA and Ramsar and The Stour and Orwell Estuaries SPA and

Ramsar site.

- Site 146 - The proposed employment allocation is adjacent to Ramsey Brook. Therefore, there are impact pathways which could result in water quality impact upon the Stour and Orwell Estuary SPA and Ramsar.

#### 5.4.5.1 Suggested mitigation

It should be noted that the Habitats Regulations Assessment (2025) serves to screen the impacts of the Plan Review at this stage and does and cannot set out any mitigation measures that could be embedded into the Plan to address any of the above impacts. This will be undertaken for the Plan Review at the Regulation 19 stage through an Appropriate Assessment (AA). At that stage, the effects raised in the ISA will have to be updated.

## 6. Cumulative, Synergistic and Transboundary Effects

### 6.1 Cumulative and Synergistic Effects

#### 6.1.1 Social Effects

The Plan Review's policies can be seen to offer social benefits through enhancements to policies surrounding public transport and active travel, open space provision, and indirectly those associated with biodiversity net gain.

It can however be expected that with more growth proposed in the District, the demand on social infrastructure is a concern for existing communities. This section explores the cumulative effects of the Plan Review within the remit of the Local Plan and planning in general. It should be noted that at this Regulation 18 Preferred Options stage, extensive consultation will be undertaken on the Plan Review's proposals with a wide range of service providers and that effects may be subject to change in future iterations of the ISA.

##### 6.1.1.1 Transport Impacts

The Preferred Options Local Plan Transport Evidence – Assessment Case (2025) report undertaken by Essex Highways concludes that several locations have been identified as experiencing unacceptable levels of congestion in comparison to the 'Reference Case' model (i.e. without the newly proposed allocations of the Plan Review) notably at:

- A12 Junction 29
- Harwich Road approach to the A120
- A133/ Colchester Road roundabout
- A137 in Manningtree
- Colchester Road and Elmstead Road approaches to the A133.

The report further concludes that sustainable transport measures partially contribute to a reduction in level of effects. These are discussed in more detail in the Tendring Local Plan Review Sustainable Travel Assessment (2025) which concludes that:

- The Horsley Cross Garden Village would require significant investment in sustainable transport without any rail or high frequency bus network, and that a rapid bus connection would be required;
- The Hare Green Garden Village site is located in a location with reasonable sustainable travel options, with proximity to Great Bentley Rail Station; and
- Site allocations of 300 homes or less are deemed unlikely to have a significant

impact on the highway network however there is the opportunity for greater connectivity to existing bus links and walking and cycling connections to amenities. It adds however that it is unlikely that these developments will generate enough revenue to develop these connections in their entirety so additional funding will be required to realise the sustainable intentions of these developments.

With the above considered highway mitigation measures to alleviate congestion to acceptable levels at these locations will be required. The Preferred Options Local Plan Transport Evidence – Assessment Case (2025) report adds that these measures will be identified and assessed in an updated assessment at the Plan Review's Regulation 19 stage.

Negative cumulative effects are highlighted in regard to the transport effects of the Plan Review at this stage and in lieu of the aforementioned mitigation measures that will be refined and developed to accompany the Plan at the Regulation 19 stage. This is considered an appropriate stage to identify such effects as at this Regulation 18 stage as the allocations may change as a result of the Plan Review's public consultation.

Nevertheless, it can be expected that mitigation measures will be forthcoming on a site-by-site basis through the Plan Review's amendments to Policy CP2. The Policy is proposed to be amended to reflect that the improvements to the transport network required for the new strategic development allocations within the Plan are to be secured, as necessary, through planning conditions, legal agreements and/or through Community Infrastructure Levy (CIL) as required. Further requirements include that planning applications for new major development likely to have significant transport implications (i.e. are above 50 dwellings) will require a vision-led Transport Statement or, where appropriate, a Transport Assessment. These assessments will identify the sustainable transport measures that will be required to ensure that the site is accessible by a choice of modes other than the private car, and should also assess the residual impact of the development traffic on the highway network, including identifying appropriate mitigation to ensure there is no detrimental impact on the safety and capacity of the highway network.

#### 6.1.1.2 School Capacities

The Garden Village allocations and those strategic allocations at Harwich and Dovercourt have requirements for new primary schools to be provided, and in the case of Policy SAM9 at Horsley Cross a new secondary school. These new communities can therefore be expected to be self-sustainable in their need for supporting education infrastructure.

The Essex County Council Developers' Guide to Infrastructure Contributions (2024) sets out that the primary school yield from qualifying houses is thirty pupils per one hundred homes (0.3 per dwelling). For secondary schools, the yield (excluding 6th form students) is 20 pupils per 100 (0.2 per dwelling). The following table sets out the broad potential demand that can be expected from the remaining Plan Review's allocations (i.e. those that do not meet the dwelling threshold for new schools to be provided on-site). The demand arising from the Plan Review's new allocations is estimated at approximately 1,100 Primary School places and 730 Secondary School places.

Essex County Council's 10 Year Plan - Meeting the demand for mainstream school places in

Essex 2025-2034 (January 2025) forecasts capacity in schools in Tendring. This is used by the Plan's Infrastructure Delivery Plan (2025) to calculate that the Plan's new allocations (minus those required to provide schools on-site) cannot be met by existing forecast Primary School capacity in any of the cluster areas of the District except the south (Clacton) which is not proposed to experience much additional growth in the Plan Review. Particularly negative effects are identified within the west<sup>2</sup> and central<sup>3</sup> areas.

There can be expected to be cumulative negative effects on school capacities as a result of growth, however it should be noted that for the majority of allocations in the Plan Review, notably those over 20 dwellings, developer contributions will be required for primary and secondary education needs, as well as Early Years and Childcare as set out in the Essex County Council Developers' Guide to Infrastructure Contributions. These contributions can be used to extend existing facilities wherever possible or provide a new facility.

### 6.1.2 Economic Effects

The Plan Review's allocation of six new sites, three employment allocations and three strategic mixed use allocations that will provide employment uses on-site, can be expected to have cumulatively significant positive economic effects. As Policy PP7 sets out, the allocations support sustainable economic growth and are in locations that offer strong connectivity, integration with housing growth, and alignment with identified growth sectors. The allocations are proposed for development in use classes B2, and B8, Eg(ii) and Eg(iii).

### 6.1.3 Environmental Effects

It can be expected that the potential effects arising from the majority of the Plan Review's allocations are relevant only on a site-by-site basis, and no cumulative effects arise from any number of allocations in unison. For instance, no two allocations affect the same heritage asset, and the spatial distribution of the sites can not be expected to have any cumulative effects on any specific landscape feature or area (pending any forthcoming specialist evidence).

Nevertheless, some cumulative effects are highlighted from the suite of allocations. These are discussed below per theme.

#### 6.1.3.1 Habitats sites

The Plan Review's Habitats Regulations Assessment and Appropriate Assessment (2026) concludes that all allocations are within the Zone of Influence of the Essex Coast RAMS, and cumulatively all residential development resulting from them could result in adverse impacts (a Likely Significant Effect) regarding recreational disturbance. A suitable mechanism exists in the Plan and subsequent Essex Coast RAMS SPD to mitigate these in-combination effects, in the form of a tariff applicable per net new dwelling of all development to fund appropriate mitigation. Similarly all development proposals will be subject to a project-level

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<sup>2</sup> Covering: Alresford; Thorrington; and Brightlingsea allocations

<sup>3</sup> Covering: Weeley Heath; Little Clacton; Thorpe-le-Soken; and Great Bentley allocations



HRA at the application stage.

### 6.1.3.2 Water supply and wastewater treatment

The Tendring Water Cycle Study (2025) undertaken by AECOM identifies that, regarding domestic water consumption, the Plan area is classified as water stressed by the Environment Agency and that whilst Anglian Water have measures to maintain a surplus of supply in the long term, this will require the cumulative demand from new housing to be managed. As a result of this, the Study recommends that a 'stricter' Policy than adopted would significantly contribute to managing and maintaining a surplus of supply and be in keeping with Government plans to address water scarcity in response to the Environment Act 2021.

The Study's wastewater assessment shows that proposed allocations should be restricted to a water use of 85 litres per person per day (l/p/d) as this would significantly improve the available capacity at Water Recycling Centres (WRCs) across Tendring. WRCs recycle used water (sewage) so that it can safely return to the environment or be reused. The Study's recommendation is identified as possibly leading to a situation where no new infrastructure capacity is required to accommodate allocations in some areas. In response to these findings, the Plan includes a restriction, albeit of 100 l/p/d from new development (following recommendations from Plan's Viability Study (2025)), within Policy PPL5.

Additionally, the Study identifies that there is no (or limited) capacity in some WRCs (Manningtree, and Clacton Holland Haven) and there are no current improvement plans proposed. Although limited development is proposed in these areas as a result of the Plan Review's new allocations, the Plan's amended Policy PPL5 includes some of the requirements recommended within the Water Cycle Study across the District; those being for 'developers to undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development.' Policy PPL5 requires proposals to demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre (sewage treatment works).

Cumulative effects can therefore be considered broadly neutral, albeit with a degree of uncertainty, where planning permission would presumably not be granted for any development (allocations or otherwise) should adequate provision for sewage treatment not exist or not be supplied, and similarly they cannot demonstrate or supply water efficiency.

## 6.2 Transboundary Effects

Transboundary effects are those that can be felt outside the Plan area and off-site from individual schemes or commitments. These are explored in more detail in the following sub-sections.

### 6.2.1 Relationship with Neighbouring Authorities

Colchester City Council, which borders Tendring to the west, has recently prepared their own

Regulation 18 Preferred Options Local Plan (review). Excluding the allocation of the Tendring Colchester Borders Garden Community (TCBGC), which is an allocation carried forward from both adopted Local Plans, the distribution of allocations within Colchester's Plan review directs development mainly to the urban area of Colchester, and the larger settlements of the Plan area in conformity to the settlement hierarchy (notably Tiptree, Marks Tey and Langham).

These settlements are considered distanced from the allocations included within the Tendring Local Plan Review and it is considered that there are minimal cumulative issues with the allocations of the two Plans on the majority of ISA Objectives. Furthermore, and in support of this consideration, options were omitted from Tendring's site selection process in a sifting exercise in the following areas (all in close proximity to the border of Tendring and Colchester):

- Within or very close to the Tendring–Colchester Borders Garden Community (TCBGC) Area;
- The edge of Ardleigh (areas between the TCBGC and Ardleigh); and
- The edge of Elmstead (areas between the TCBGC and Elmstead).

Nevertheless, effects from growth from the two authority areas is likely to have significant negative effects on Habitats sites on the Essex Coast; effects identified in both adopted Local Plans in-combination and mirrored at this stage through the findings of the HRA. As previously mentioned however, a suitable mechanism exists in both Plans and subsequent Essex Coast RAMS SPD to mitigate these in-combination effects, and this is due to for revision in 2026 to factor in the higher growth needs of all relevant Essex districts.

Regarding transport impacts, there can be expected to be negative effects of growth in Tendring experienced within Colchester; Tendring is a peninsular and all westbound journeys are directed through the Colchester administrative area, and the proposed allocations of Hare Green Garden Village and Horsley Cross Garden Village are both located on the A120. Furthermore, the urban area of Colchester represents the largest settlement in the broader area with a large range of services and jobs and with a strong sphere of influence in regard to retail and leisure opportunities. The identifies the potential for negative impacts regarding congestion within Colchester at 'Greenstead Roundabout, Colne Causeway & Clingoe Hill' and 'A12 Junction 29 / A120 (eastern)' as a result of the Plan Review's allocations without suitable mitigation.

## 6.2.2 Infrastructure Projects / Schemes

A number of Nationally Significant Infrastructure Projects (NSIPs) are proposed in the region that extend within Tendring or are otherwise off the Tendring coast. The effects through construction or operation are not fully known at this stage, however the potential for negative effects on a range of social and environmental objectives is raised cautiously at this stage, as are any benefits to local communities in regard to job creation or net gains required through mitigation or off-setting. These NSIPs are summarised in the sub-sections below.



#### 6.2.2.1 Five Estuaries & North Falls Wind Farms

These NSIPs are an extension to the existing wind farm approximately 35km off the Tendring coast. They involve a new array of turbines plus links to landfall at a point between Clacton and Frinton. This area is not known at this time but may be in the area of Holland on Sea. Similarly, the project will require the construction of a substation and an underground link to the National Grid at a location also yet to be determined.

It can be considered that there are the potential for negative cumulative effects from any such substation with new development allocations in Great Holland, potentially through construction should they be phased at similar times, however impacts are not known at this stage.

#### 6.2.2.2 Norwich to Tilbury

This NSIP is a National Grid link from their Norwich Main substation, through Essex to Tilbury substation in Thurrock. The proposal requires a new sub-station around Ardleigh. The NSIP represents mainly overhead power lines to transmit power from the offshore developments off the Essex/Suffolk coast, plus Sizewell C, on to London.

The impacts of Norwich to Tilbury on the Plan Review's allocations are considered minimal at the strategic level, with no allocations proposed to Ardleigh. Nevertheless, the landscape implications of the NSIP can be considered likely to be negative within the Plan area.

#### 6.2.2.3 Tarchon Energy Interconnector

Tarchon Energy is an interconnector project that will create a direct power link between Germany and Great Britain, connecting the two countries' energy markets and increasing the security and reliability of their electrical systems. The interconnector will be a combination of land and subsea cables approximately 750km in length and will allow 1.4GW of electricity to move in either direction. The implications of this NSIP are not fully known at this stage, however links are proposed to be within Tendring. The effects of this on the Plan Review's allocations are similarly unknown.

## 7. The Plan's Spatial Strategy & Reasonable Alternatives at this stage

### 7.1 The Spatial Strategy

The Plan sets out that national policy requires the Local Plan to plan for the delivery of 1,063 new homes in Tendring every year from 2026; an increase from the 550 homes requirement in the adopted Local Plan. The Plan Review therefore needs to allocate significantly more land beyond adopted Local Plan housing allocations and sites with planning permission. In consideration of notions of spatial distribution, this will affect the spatial strategy as it is set out in the adopted Local Plan.

Consistent with the Sustainability Appraisal of the emerging neighbouring Colchester City Council Local Plan (Regulation 18 Preferred Options), all Spatial Strategy options include the Tendring Colchester Borders Garden Community, which is addressing the longer term needs of both Tendring and Colchester, since the principle for this has already been established in the adopted joint Strategic Section 1 Local Plan. As the aforementioned Sustainability Appraisal indicates, the exact amount of growth to be provided to 2042 has not been established at the point of this appraisal in either authority's administrative area, although a planning application is expected to be submitted soon and in time for the Regulation 19 stage Local Plan. However, all the spatial strategy options assessed in this Interim ISA Report have been included on the basis that 1,825 homes will be delivered on this site within the revised plan period, as well as the quanta of the other strategic allocations that are yet to come forward within the adopted Local Plan. These include those allocations in the below table.

**Table 13: Adopted Local Plan Allocations carried forward (with new Local Plan Review policy references)**

Previous LP reference	New LP Review reference	Address	Settlement	Hectares	Number of homes
SAMU3	SAMU3	'Oakwood Park' Land to The South of Holland Road	Clacton	48.98	900
SAMU2	SAMU2	'Hartley Gardens' Land between St. John's Road and Little Clacton Road	Clacton	162.5	1,700

Previous LP reference	New LP Review reference	Address	Settlement	Hectares	Number of homes
MSA6	MSA30	Land off Waterworks Drive	Clacton	2.3	90
MSA8	MSA31	Land adjoining Harwich & Parkeston Football Club Main Road	Harwich	0.63	24
MSA11	MSA32	Station Yard and Former Avon Works, off Station Road	Frinton, Walton, Kirby Cross	1.17	40
SP7	SAMU1	Tendring Colchester Borders Garden Community	New Garden Community	704.53	1,825 <sup>4</sup>
MSA1	MSA29	Land at Weeley Council Offices Thorpe Road	Weeley	0.81	24
SAMU4	SAMU4	Rouses Farm, Jaywick Lane	Clacton	43.02	95

## 7.2 Options considered to date

### 7.2.1 Constant Factors / Considerations

A number of consistent and constant factors have been made in the identification of new spatial strategy options for the Plan Review. These are considered reasonable and realistic in determining where any additional homes should be located to ease those pressures on existing settlements that are already experiencing proportionate growth within the Plan area as allocated within the adopted Local Plan or are otherwise commitments within consented

<sup>4</sup> In plan period (7,500 homes in total)

planning applications or those with resolutions to permit. These factors are set out below

#### 7.2.1.1 Growth in Harwich

Within the adopted Local Plan, Harwich, Clacton and the Tendring Colchester Borders Garden Community are each categorised as Strategic Urban Settlements. These are the largest settlements in the District and could logically be expected to accommodate the greatest levels of growth.

The Tendring Colchester Borders Garden Community is expected to deliver 7,500 new homes, Clacton has around 5,000 new homes planned, whereas Harwich is only currently expected to deliver an additional 715 new homes over the coming years.

Harwich & Dovercourt is therefore a location for significant growth in all four of the spatial strategy options with the expectation that around 2,000 new homes could be delivered in the area, capitalising on the town's existing infrastructure and economic potential, particularly with the Freeport status and port developments.

For the purposes of this ISA, this is considered a reasonable consideration, and any deviations away from this position could be considered notionally unreasonable in line with the adopted Local Plan's settlement hierarchy and distribution strategy.

#### 7.2.1.2 Proportionate Growth

To be able to deliver the number of homes required over the extended Plan period to 2042, the Plan Review acknowledges that all areas of the District will need to accommodate a degree of new development. Larger villages with a fair range of jobs, shops, services and facilities, and access to rail services are better placed to accommodate more development than those without railway stations.

The Plan adds that in turn, medium-sized villages with less in the way of jobs, shops, services and facilities should see lower levels of development; and smaller and more remote villages might only reasonably be expected to accommodate small increases in housing. In each of the four Spatial Strategy options explored to date, development is expected across each part of the District although the scale of development varies in some settlements.

Relevant to the settlement hierarchy (and in consideration of the discounting further growth in those higher tier settlements that will already experience high levels of growth within the adopted Local Plan) a proportionate level approach to the distribution of housing growth would see a higher number of allocated homes within the medium-sized towns in the District.

For the purposes of this ISA, this is considered a reasonable consideration, and any deviations away from this position could be considered notionally unreasonable against established tenets of what is sustainable. Nevertheless, this ISA explores to some degree whether the strategy put forward within the Plan Review at this stage can be considered to support the proportionate growth of settlements.

#### 7.2.1.3 Garden Villages

Even with what is considered to be high levels of growth in many parts of the District,

including those allocations that can be considered suitable, achievable and available in Harwich and through the proportionate expansion of existing settlements, there is still a shortfall in the number of homes required in the Plan period. The Plan identifies that in order to deliver the Government's housing requirement for Tendring, a number of 'Garden Villages' are required. These are intended to be identified at this stage of the plan-making process, with subsequent DPDs produced that ensure that critical infrastructure can be provided within the red line boundaries identified in the Plan Review, as well as new jobs, shops and other ancillary services that are desirable for sustainable places.

Each of the four Spatial Strategy options identified by the Council at this stage include the creation of entirely new Garden Villages that could deliver around 3,200 homes in the period up to 2042 and potentially expand in the decades that follow.

The locational criteria applied by the Council is for Garden Villages to be delivered in strategically important locations on the District's transport network. The suggested locations reflect ideas that have been put forward in the past, either by the Council or by landowners and developers. The number of Garden Villages varies between options and is relative to the level of growth elsewhere in the District.

## 7.2.2 The Options

The Spatial Strategy Options that have been considered to date (introduced at the Issues and Options stage) are included within the table below. As can be seen from the Plan Review's allocations at this stage, the preferred option is Option B representing a central triangle of garden villages to meet residual housing needs.

**Table 14: Spatial Strategy options**

Option	Description
Option A - A120 and Railway Focus	<p>In addition to significant growth at Harwich, and smaller scale development around villages across the District, this option proposes the establishment of two new Garden Villages of between 1,500 and 5,000 homes – one in the Frating/Great Bromley/Hare Green area and one at Horsely Cross, as part of an A120-focussed growth strategy delivering road connectivity improvements.</p> <p>Medium levels of growth are also proposed at the larger villages with a railway station, and similar levels at Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea.</p>
Option B – Central Triangle of Garden	<p>In addition to significant growth around Harwich, and smaller scale development around villages across the District, this option (like Option A) proposes two new garden villages – one at Frating/Great Bromley/Hare Green and one at Horsely Cross, as part of an A120-</p>

Option	Description
Villages	<p>focussed growth strategy delivering road connectivity improvements.</p> <p>A further new garden village achieved through expansion at Weeley is proposed, benefitting from the village's central location in the District, with good rail and road connections, and delivering development of a scale (around 1,500 homes) that will secure new facilities the appropriate infrastructure improvements to ensure the needs of existing and future residents can be met.</p> <p>Villages on the Clacton railway line will experience a level of growth proportionate to their existing size, while medium levels of growth are also proposed at Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea.</p>
Option C – A133/B1033 Garden Villages	<p>In addition to significant growth around Harwich, and smaller scale development around villages across the District, this option proposes three new garden villages – one at Frating/Great Bromley/Hare Green (as per Options A and B), one at Weeley, and one at Thorpe-le-Soken, as part of an A133/B1033 focussed strategy, delivering improvements to the capacity of the A133 and a possible bypass around Thorpe.</p> <p>Other large villages with railway stations would experience a level of growth proportionate to their existing size, while medium levels of growth are also proposed at Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea.</p>
Option D – Four Garden Villages	<p>In addition to significant growth around Harwich, and smaller scale development around villages across the District, this option proposes four new garden villages – one at Horsley Cross, one at Frating/Great Bromley/Hare Green, one at Weeley, and one at Thorpe-le-Soken.</p> <p>This option combines the strategy from the previous options, promoting growth on the A120 corridor towards Harwich, and the A133/B1033 corridor towards Clacton, Frinton and Walton.</p> <p>Other large villages with railway stations and the medium towns of Frinton and Walton; Manningtree, Lawford and Mistley; and Brightlingsea will experience moderate levels of growth.</p>

### 7.3 Consideration of site options identified as suitable, achievable and deliverable / developable and the use of assumptions

At this stage, sites can be considered for further analysis of whether the options (A-D above) can be considered reasonable and realistic. Sites submitted for consideration have been subject to rigorous assessment by the Council; in undertaking this ISA; and also by topic / thematic specialists that have inputted into both processes. Sites have subsequently been discounted and only a selection of suitable, achievable and deliverable sites have been considered for allocation.

This process allows some assumptions to be made regarding the Spatial Strategy options, for instance whether some settlements in the settlement hierarchy would have to receive more planned growth than others under the various option scenarios, and whether there are sufficient sites to meet the option's ideas of geographic dispersal. Any such assumptions are included within the assessment of the options in this sub-section.

### 7.4 Narrative regarding other notional options

#### 7.4.1 Continuing the existing spatial strategy without Garden Villages

It can be considered that the option of not allocating Garden Villages to meet additional housing requirements is worthy of discussion, at least notionally. This notion is discussed here, with the added consideration of where growth might be directed in their absence.

The table below explores the total number of dwellings identified per settlement type from those sites that were submitted and subsequently deemed 'reasonable alternatives' for progression as genuine, realistic options for allocation.

**Table 15: Consideration of suitable sites (excluding allocated Garden Villages and the Tendring Colchester Borders Garden Community)**

Option	Homes in Strategic Urban Settlements	Homes in Smaller Urban Settlements	Homes in Rural Service Centres	Homes in Smaller Rural Settlements
The Plan Review's Strategy (new allocations)	1,882	1,185	880	541
Total quanta	2,782-3,981	2,717-3,260	5,102-8,056	3,857-6,081



Option	Homes in Strategic Urban Settlements	Homes in Smaller Urban Settlements	Homes in Rural Service Centres	Homes in Smaller Rural Settlements
submitted in each settlement type from call-for-sites				
Percentage of homes allocated against total submissions that pass the Council's sieving criteria <sup>5</sup>	67.7% - 47.3%	43.6% - 36.4%	17.3% – 10.9%	14.3% - 8.9%
Plan Review's new allocations plus adopted Local Plan allocations carried forward	4,596	1,225	880	541

The table indicates that a higher number of homes are allocated on sites within the higher tiers of the settlement hierarchy and in accordance with the established settlement hierarchy. In addition, these homes are allocated in areas where there are a lower number of reasonable alternatives, as larger numbers of submitted options were submitted in lower tier settlements, in particular Rural Service Centres.

In the absence of Garden Villages being allocated, it can be expected that were growth directed to the most sustainable settlements, it would likely be disproportionate in those higher tier settlements. This considers not only the Plan Review's allocations but also those carried forward from the adopted Local Plan. Without the Garden Village allocations, which total approximately 4,300 homes in the plan period, urban settlements are unlikely to be able to accommodate the numbers through submitted sites, irrespective of the suitability and sustainability of those sites. In short, currently discounted sites would have to be allocated in addition to those that already are, leading to likely cumulative pressures on infrastructure and potentially significant on-site issues would have to be overcome (i.e. the reasons that have led to their rejection at this stage).

The total growth numbers in the final row of the above table allow the calculation that, without Garden Villages and the 4,300 homes the preferred strategy allocates within them, approximately 63% of new homes are allocated within urban settlements, 17% in smaller

<sup>5</sup> i.e. preferred site allocations plus 'reasonable alternatives' for the purposes of this ISA



urban settlements, 12% in rural service centres, and about 7% in smaller rural settlements. If this distribution pattern were continued with the same percentages applied to the shortfall of 4,300 homes were Garden Villages not allocated, there would be a broad increase in the need for allocations in each settlement type of:

- Urban Settlements: an additional 2,709 homes (therefore a total of 7,305 homes across two settlements)
- Smaller Urban Settlements: an additional 731 homes (therefore a total of 1,956 homes across three settlements)
- Rural Service Centres: an additional 516 homes (therefore a total of 1,396 homes across five settlements)
- Smaller Rural Settlements: an additional 301 homes (therefore a total of 842 homes across 14 settlements)

To direct growth to lower tier settlements would have sustainability issues, with many sites discounted on the basis of their level of existing services, poor sustainable transport links, and impacts on character and settlement form. These reasons for rejection would have to be dismissed.

The assessment of individual reasonable site options is included within this Report, however for the purposes of exploring Spatial Strategy options, it is useful to summarise the constraints per settlement and the broad reasons for the non-selection of the reasonable alternative sites where these are consistent on a settlement basis. In summary, these reasons are included within the table below.

**Table 16: Summary of constraints per settlement**

Settlement / type	Constraints and broad factors limiting further growth
Urban Settlements	
Clacton	Within the adopted Local Plan, and through existing commitments, Clacton has around 5,000 new homes planned. It is therefore not considered suitable to allocate any additional sites within Clacton as part of the Local Plan Review as to do so could lead to overdevelopment.
Harwich	Of the sites considered reasonable alternatives in Harwich, only one site has not been allocated, representing 800-1,999 homes. This site (also considered elsewhere in this Report in the discussion regarding Garden Village alternatives) is not considered suitable for

Settlement / type	Constraints and broad factors limiting further growth
	development as it is unclear whether it is available, and the land is also protected within the adopted Local Plan as a Strategic Green Gap.
Smaller Urban Settlements	
Brightlingsea	<p>Of the sites considered reasonable alternatives in Brightlingsea, the dwelling yield amounts to between 182 and 220 homes across three sites. Irrespective of the reasons for the non-selection of these sites, which range from landscape to heritage and access issues, Brightlingsea has seen moderate growth in recent years and is considered geographically constrained, bounded by the River Colne to the southwest and Brightlingsea Creek to the southeast, with only a single road providing access in and out.</p> <p>Additionally, a Coastal Protection Belt (CPB) designation exists to the east, southeast, southwest, and west which further limits opportunities for future expansion, as well as public transport options being limited, with infrequent bus services and no railway connection.</p>
Frinton, Walton and Kirby Cross	<p>Of the sites considered reasonable alternatives in Frinton, Walton and Kirby Cross, the dwelling yield amounts to between 720 and 758 homes across four sites. The majority of this yield responds to a single site submitted for 600 homes. This site is not considered suitable for development due to issues regarding disproportionate growth, access (due to the presence of the railway line) and landscape issues.</p> <p>More widely, Frinton, Walton, and Kirby Cross face notable constraints on growth. The Strategic Green Gap designation between this area and Kirby-le-Soken restricts expansion in a north-western direction, preserving separation between settlements. Additionally, the railway line connecting the settlement with Thorpe-le-Soken creates a buffer that limits southward expansion and access.</p>
Manningtree, Mistley and	Of the sites considered reasonable alternatives in Manningtree, Mistley and Lawford, the dwelling yield amounts to between 630 and 1,097 homes across four sites. A large amount of this yield responds

Settlement / type	Constraints and broad factors limiting further growth
Lawford	<p>to a single site submitted for 400 homes. This site is not considered suitable for development due to issues regarding disproportionate growth, and access issues.</p> <p>More widely, the settlements of Manningtree, Lawford, and Mistley have heritage and environmental constraints, including two sizeable Conservation Areas, a significant number of listed buildings, and the River Stour with its floodplain to the north. This is considered to limit opportunities for sensitive, coherent, and sustainable growth.</p>
Rural Service Centres	
Alresford	<p>Of the sites considered reasonable alternatives in Alresford, the dwelling yield amounts to between 270 and 410 homes across three sites.</p> <p>Irrespective of the suitability of these sites, the village of Alresford has seen substantial growth in recent years, notably through two developments at Cockaynes Lane and one at St Andrews Close. It is considered that should further development be proposed there could be issues regarding the character of the settlement and the surrounding countryside.</p>
Great Bentley	<p>Of the sites considered reasonable alternatives in Great Bentley, the dwelling yield amounts to between 610 and 1,229 homes across nine sites.</p> <p>Irrespective of the suitability of these sites, over the past 5–10 years, Great Bentley has experienced substantial growth, predominantly concentrated to the north and north-east, with some expansion to the north-west.</p>
Little Clacton	<p>Of the sites considered reasonable alternatives in Little Clacton, the dwelling yield amounts to between 1,882 and 2,431 homes across 15 sites.</p> <p>Two of these sites amount to yields of 400 homes each. Of these two sites one is expected to come forward off plan (and is subject to a planning application) and the other falls entirely within a designated Strategic Green Gap.</p>

Settlement / type	Constraints and broad factors limiting further growth
	<p>In consideration of other submitted sites, these have been rejected on the basis of their individual constraints, which range from detachment (being distanced from the settlement's settlement boundaries), coalescence issues, incoherence with the existing built form, and landscape harm.</p>
St Osyth	<p>Of the sites considered reasonable alternatives in St Osyth, the dwelling yield amounts to between 200 and 600 homes across a single site with two area options.</p> <p>Both options for the site have been rejected as the site is located adjacent to a settlement (Point Clear) that is not within the settlement hierarchy and would represent its significant expansion. Additionally, St Osyth is considered constrained by physical, environmental, and infrastructure-related limitations.</p>
Thorpe-le-Soken / Thorpe Station and Maltings	<p>Of the sites considered reasonable alternatives in Thorpe-le-Soken / Thorpe Station and Maltings, the dwelling yield amounts to between 1,060 and 2,046 homes across 14 sites.</p> <p>A large amount of this yield responds to a single site submitted for 300-799 homes. This site is not considered suitable for development due to it being too remote from the settlement of Thorpe-le-Soken and being generally poorly related to existing services.</p> <p>More widely, Thorpe-le-Soken has recently seen expansion primarily to the northeast, particularly south of Landermere Road, with smaller-scale developments emerging along Frinton Road to the east. The Council is pursuing proportionate growth that is not detached from the existing settlement. In consideration of other submitted sites, these have been rejected on the basis of their individual constraints, which range from detachment (being distanced from the settlement's settlement boundaries), landscape harm, and highways / access implications.</p>
Smaller Rural Settlements	
Beaumont	No reasonable alternative sites were submitted in Beaumont.

Settlement / type	Constraints and broad factors limiting further growth
Bradfield	<p>Of the sites considered reasonable alternatives in Bradfield, the dwelling yield amounts to between 353 and 623 homes across 11 sites.</p> <p>Bradfield village is bounded by the Suffolk Coast and Heaths National Landscape Area located to the north of the village. In consideration of the submitted sites, these have been rejected on the basis of their individual constraints, which range from incoherence with the existing built form such as promoting ribbon development or back land development, detachment from the settlement boundary, and highways / access issues,</p>
Great Bromley	<p>Of the sites considered reasonable alternatives in Great Bromley, the dwelling yield amounts to between 1,290 and 1,508 homes across 5 sites.</p> <p>A large amount of this yield responds to a single site submitted for 1,100 homes. This site is not considered suitable for development due to it being too remote from any settlement boundaries and being generally considered an unsustainable location for the level of growth proposed.</p>
Great Holland	<p>Of the sites considered reasonable alternatives in Great Holland, the dwelling yield amounts to between 276 and 475 homes across 4 sites.</p> <p>Irrespective of the suitability of these sites, which have not been selected largely due to landscape harm, excessive development in Great Holland raises concerns about increased reliance on cars for daily activities; the settlement is constrained by its limited local services.</p>
Great Oakley	<p>Of the sites considered reasonable alternatives in Great Oakley, the dwelling yield amounts to between 430 and 1,128 homes across 3 sites.</p> <p>A large amount of this yield responds to a single site submitted for 300-799 homes. This site is not considered suitable for development due to significant landscape harm and similar harm on the character of the existing settlement.</p>

Settlement / type	Constraints and broad factors limiting further growth
	<p>More widely, Great Oakley has limited access to services and is constrained by several environmental and heritage factors: to the south, the Coastal Protection Belt (CPB) restricts development, and the surrounding landscape, characterised by a steep slope descending toward the CPB, adds further sensitivity. The village also features a distinctive and historic core, designated as a Conservation Area. Opportunities for expansion are considered limited. Areas further to the east of the village core and south of Harwich Road are particularly unsuitable, as development there would cause significant landscape harm and lead to fragmentation of the settlement.</p>
Kirby-le-Soken	<p>Of the sites considered reasonable alternatives in Kirby-le-Soken, the dwelling yield amounts to between 50 and 138 homes across 3 sites.</p> <p>The settlement is constrained due to the Coastal Protection Belt designation to the north, and has a Conservation Area, Tree Preservation Orders, and a designated Strategic Green Gap to the south. Of the reasonable alternative sites submitted, these have also been discounted by their individual constraints on issues such as access, landscape harm, and detachment from the settlement boundary.</p>
Little Bentley	No reasonable alternative sites were submitted in Little Bentley.
Little Bromley	<p>Of the sites considered reasonable alternatives in Little Bromley, the dwelling yield amounts to between 10 and 12 homes on a single site.</p> <p>Little Bromley is a small, rural, and predominantly linear settlement with few services. It is considered that the alternative site could be included and broadly has similar sustainability implications as the preferred option.</p>
Tendring Village	No reasonable alternative sites were submitted in Tendring.
Thorrington	Of the sites considered reasonable alternatives in Thorrington, the

Settlement / type	Constraints and broad factors limiting further growth
	<p>dwelling yield amounts to between 110 and 286 homes across 5 sites.</p> <p>Excessive development in the area is likely to lead to an increased reliance on cars for daily activities; the settlement is constrained due to its very limited services, and it is considered important to ensure that growth is proportionate. In consideration of other submitted sites, these have been rejected on the basis of their individual constraints, which range from detachment (being distanced from the settlement's settlement boundaries), incoherence with the existing built form, highways / access challenges, and landscape harm.</p>
Weeley & Weeley Heath	<p>Of the sites considered reasonable alternatives in Weeley and Weeley Heath, the dwelling yield amounts to between 549 and 1,007 homes across 18 sites.</p> <p>Weeley Heath is a small rural settlement with limited services, constrained by Weeleyhall Wood (a SSSI) to the north of the existing settlement boundary, and the A133 slightly further to the south. Little Clacton is located to the south-east of Weeley Heath – and development to the south is considered to lead to significant landscape harm, fragmentation of the settlement or coalescence between the two settlements.</p> <p>Weeley is a more sustainable settlement, with good transport links, including the B1441 Bypass, the A133 to the west, and a railway station to the south. Nevertheless, similar landscape issues arise in the broad area and detachment and highway access is also a constraint for many of the submitted sites.</p>
Wix	<p>Of the sites considered reasonable alternatives in Wix, the dwelling yield amounts to between 10 and 29 homes on a single site.</p> <p>The site has been rejected at this stage as it is outside the settlement boundary and is considered to have landscape implications (in so far as it would likely introduce additional layers of development in depth behind the linear pattern along Colchester Road).</p>
Wrabness	Of the sites considered reasonable alternatives in Wrabness, the



Settlement / type	Constraints and broad factors limiting further growth
	<p>dwelling yield amounts to 20 homes on a single site.</p> <p>The site has been rejected at this stage as it is considered that development would introduce linear development to the south of Rectory Road, within an area designated as Coastal Protection Belt. There also exist uncertainties regarding access and subsequent feasibility in light of the constraints.</p>
Little Oakley	<p>Of the sites considered reasonable alternatives in Little Oakley, the dwelling yield amounts to between 218 and 314 homes across 7 sites.</p> <p>No sites are allocated in Little Oakley within the Local Plan Review as the settlement has significant constraints to growth. To the north and northwest, the Strategic Green Gap designation prevents coalescence with Dovercourt and the Coastal Protection Belt to the south restricts expansion in this broad area. Of the sites submitted for consideration within Little Oakley, these constraints apply.</p>

As can be deduced from the reasons for rejection of reasonable alternative sites and the constraints per settlement, there are few realistic options available in any settlement that are not already allocated and that can be considered both compliant to the adopted Local Plan spatial strategy and / or its policy framework. The notional option of meeting housing needs through the expansion of existing settlements is therefore not considered a reasonable alternative.

#### 7.4.2 Brownfield sites and urban intensification

The majority of the submitted brownfield sites that 'passed' the Council's sifting criteria have been allocated; many of which are in smaller settlements where intensification is not considered appropriate in order to preserve local characteristics.

Intensification is considered only suitable within urban areas, and it can be seen that of those sites allocated within urban areas these have been done so with higher 'dwelling per hectare' yields than those allocations in smaller settlements. It should also be acknowledged the position that the Plan Review has taken for not allocating any more sites in Clacton (the main urban area within the District) above those allocated within the adopted Local Plan. With this in mind, few options exist for intensification outright.

Within Tier 1 of the Settlement Hierarchy only Harwich and Dovercourt exists as a reasonable option for urban intensification. Of the Plan Review's allocations within Harwich, the following dwellings per hectare (dph) can be calculated:



**Table 17: Dwellings per hectare of the Harwich allocations (as submitted)**

Site reference	Site name	Site size (ha)	Dwelling yield	Dwellings per hectare
MSA1	Durite Works, Valley Road	2.8	82	29.3
SAH1	Vicarage Farm, Main Road	4.41	150	34.0
SAMU5	Land South of Oakley Road	125.57	1,650	13.14

Irrespective of the principle of urban intensification in Harwich, the above sites are not without constraint, and these can be seen to limit opportunities for maximising dwellings per hectare on site. For MSA1, this includes the presence of Priority Habitat woodland which is required to be integrated into development. For SAH1, the presence of a Listed Building on site could lead to the need for land to mitigate any impacts. Site SAMU5 is within a sensitive landscape and requires the delivery of other supporting infrastructure as a strategic site, however intensification of some areas could be explored; either through supporting evidence at the Regulation 19 stage, or through the required masterplan process.

## 7.5 The assessment of the Spatial Strategy and Reasonable Alternatives

Within the assessment of the Spatial Strategy Options, it is useful to identify if any alternative Garden Village options exist under each option. Only one option has been submitted and explored through the site selection process that exists as an alternative to the Garden Village allocations proposed within the Plan Review.

Garden Villages within the Plan Review have been identified as being capable of delivering a minimum of 2,000 homes as well as the delivery of new jobs, shops, services and facilities along with infrastructure that that could benefit the wider district as a whole. A quantum of 2,000 is also the threshold for the delivery of a Primary School within the ECC Developers Guide to Infrastructure (2024) for a mixed-use development. The alternative site is included within the table below

**Table 18: Reasonable Garden Village alternatives (as submitted)**

Settlement	Reference	Address	Size (ha)	Dwelling capacity
Harwich and Dovercourt	CFS172	Land to West of Harwich Valley Development	41.64	800-1,999

The reasons for the rejection of this site are given by the Council as:

- The site is in four separate ownerships, and it is currently unclear whether it is available; and
- The land is also protected within the adopted Local Plan as a Strategic Green Gap (a criterion in the Council's sifting process).

With this site established as an unreasonable alternative, no suitable, available and developable sites exist that offer the same benefits as the Garden Village options allocated within the Plan Review: being of a suitable size to accommodate dwellings, jobs, a wide range of supporting infrastructure on site, and also any on-site mitigation; and having access to the strategic road network and / or rail services.

There are therefore implications as to whether the Spatial Strategy Options explored are genuinely reasonable alternatives at this stage. It can be considered that Spatial Strategy Options C and D cannot be considered 'reasonable alternatives' as no suitable Garden Village options have been submitted at Thorpe-le-Soken.

The table below notionally assesses the relative sustainability effects of the Plan Review's Spatial Strategy option against the only other reasonable alternative at this stage: Option A.

**Table 19: Assessment of the Plan Review's Spatial Strategy and Reasonable Alternatives**

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Option A – A120 and Railway Focus														
S/T	++	++	+	?/-	?/-	?	?	-/?	- -/ ?	?	?	?	?	?
M/T	++	++	+	?/-	?/-	?	?	-/?	- -/ ?	?	?	?	?	?
L/T	++	++	+	?/-	?/-	?	?	-/?	- -/ ?	?	?	?	?	?
Option B – Central Triangle of Garden Villages														
S/T	++	++	+/?	?/+	?	?	?/+	-/?	- -/ ?	?	?	?	?	?

Effect	1	2	3	4	5	6	7	8	9	10	11	12	13	14
M/T	++	++	+/?	?/+	?	?	?/+	-/?	- -/ ?	?	?	?	?	?
L/T	++	++	+/?	?/+	?	?	?/+	-/?	- -/ ?	?	?	?	?	?

### 7.5.1 Social and Economic Effects

Both Option A and the Plan Review's Spatial Strategy would see the allocation of a Garden Village at Hare Green and Horsley Cross: the largest two Garden Village options. The key difference between Option A and the Plan Review's Spatial Strategy (resembling Option B) is approximately 900 dwellings would be required to be met across settlements along the railway corridor to meet the shortfall of the Weeley Garden Village not being allocated. These settlements are identified as Alresford, Great Bentley, Weeley, Thorpe-le-Soken, Kirby Cross, Frinton & Walton. Sites with a sufficient dwelling yield have been submitted for consideration in these settlements and therefore it can be expected that housing related objectives would be positive for both Option A and the Plan Review's Spatial Strategy in the short-long term. Should the Plan Review's employment allocations be a constant for both options, then there would likely be similar positive effects for economic objectives

Of these settlements, the Plan Review allocates 140 dwellings in Alresford, 280 dwellings in Great Bentley, 77 dwellings in Weeley, 260 dwellings in Thorpe-le-Soken, and 660 dwellings in Kirby Cross, Frinton and Walton in line with a focus on proportionate growth. It can therefore be expected that Option A would see additional allocations within these settlements above what is proportionate. This would potentially harm local development patterns as well as local characteristics. As discussed above Alresford and Great Bentley have experienced significant growth in recent years, and numerous other constraints exist within and around the railway settlements that limit their opportunities for growth. It can therefore be expected that the impacts on the local infrastructure of these settlements could be negative, without the critical mass allowing on-site benefits that the Weeley Garden Village could potentially ensure. This would also likely be more positive implications regarding the sustainable use of land.

Nevertheless, in principle, Option A would maximise the opportunity for future residents to use the rail network to travel between towns and villages. The Plan Review's strategy seeks a lower number of homes in these settlements on the railway line, with a greater number of dwellings being delivered in key locations on the strategic highway network. In comparison, Option A could be seen to offer more positive effects on sustainable transport objectives, reducing in part the impacts on the highway network that could arise from further growth on the A120 and A133. A degree of uncertainty is highlighted for the Plan's Spatial Strategy, where all three Garden Villages have good access to the strategic road network, which may prove attractive for new communities.

## 7.5.2 Environmental Effects

The environmental effects of the Plan's Spatial Strategy and Option A are difficult to identify at the spatial level and without the consideration of specific sites, the permutations of which are numerous. Assumptions can be made however regarding the relative impacts of increasing allocations at the settlements mentioned above under Option A, in comparison to the allocation of land for a Garden Village at Weeley.

Great Bentley, Thorpe-le-Soken, and Frinton & Walton all contain Conservation Areas and can be considered historic settlements with defined settlement patterns as a result. The effects of increasing allocations in these settlements can therefore be considered more likely to give rise to negative effects on the historic environment as well as landscape, although a large degree of uncertainty must be raised in this assessment. Comparatively, there would be fewer effects from the Plan's Spatial Strategy, although both options can be seen to have negative impacts associated with the Garden Villages at Horsley Cross and Hare Green.

Effects regarding water supply and quality, air quality, soil quality, and flood risk are likely to be uncertain of such a strategic assessment, on the basis that they will only be known at the site level. The same is true of the objective ensuring that new development is carbon neutral. This again can only be identified of individual proposals.

## 8. Conclusions and Recommendations

### 8.1 Whole Plan Effects by Sustainability Theme

The overall effects identified in this ISA Report are outlined within the following sub-headings, each of which corresponds to a thematic Integrated ISA Objective. The conclusions are drawn from an analysis of the individual policy, chapter / section, and site allocation appraisals within this Report, as well as the cumulative, synergistic, and temporal assessment work undertaken.

#### 8.1.1 ISA Objective 1: Housing

Short-Medium Term Effects	Long Term Effects
<b>Positive effects</b>	<b>Significantly positive effects</b>

The effects of the Plan Review can be expected to have significantly positive effects regarding the delivery of a sufficient supply of homes for all, including an appropriate mix of housing types, due to housing needs being met through existing and new allocations as well as commitments and resolutions to commit to developments that are advanced within the development management process. Policy LP1 maintains a sufficient supply of deliverable sites to provide for at least five years’ worth of housing plus an appropriate buffer in accordance with national policy.

Due to the expected delivery of the strategic allocations, and in many cases the requirement for them to be subject to Supplementary Planning Documents (SPDs) and masterplans, impacts are expected to be more significant in the latter stages of the Plan period in line with their expected delivery.

Changes proposed for Policy LP5 include affordable housing thresholds to be for developments of 10 dwellings or more (rather than 11 in the adopted Plan) and also for developments of over one hectare. Further amendments are proposed to include affordable housing requirements for when adjoining developments, when taken together exceed the above policy threshold. Lastly, the Policy is proposed to now include that ‘in exceptional circumstances justified with case-specific evidence on viability, deliverability or lack of interest from registered providers, or where other material considerations provide, the Council may consider negotiating and agreeing a lower level of affordable housing or alternative approaches to the provision of affordable housing such as financial contributions towards off-site provision, the transfer of homes to the Council or a local housing trust at nominal cost or a combination of those approaches.’ This can be seen as strengthening of the position of the corresponding adopted Local Plan policy albeit with added pragmatism that is intended to ensure that development is not stifled by viability concerns.

### 8.1.2 ISA Objective 2: Economic Growth

Short-Medium Term Effects	Long Term Effects
<b>Positive effects</b>	<b>Significantly positive effects</b>

The Plan Review's allocation of six new sites, three employment allocations and three strategic mixed use allocations that will provide employment uses on-site.

As Policy PP7 sets out, the allocations support sustainable economic growth and are in locations that offer strong connectivity, integration with housing growth, and alignment with identified growth sectors. The allocations are proposed for development in the general industrial, storage and distribution, research and development, and industrial processes use classes (B2, B8, Eg(ii), and Eg(iii) respectively). The three solely employment allocations are earmarked for a total employment land area of 85.36 hectares, and this could be expanded by an additional 100-120 hectares with the delivery of the Garden Villages.

The Plan Review identifies that the solely employment allocations are proposed on a qualitative basis, reflecting their strategic importance rather than solely on quantitative need. As a result, the Plan Review can be expected to have significantly positive economic effects in the long term, associated with the expected delivery of strategic employment allocation SAE3 and the mixed-use Garden Village developments of SAMU8 and SAMU9.

### 8.1.3 ISA Objective 3: Transport

Short-Medium Term Effects	Long Term Effects
<b>Positive and negative effects</b>	<b>Positive and negative effects</b>

The amendments to Policy CP1 have been proposed to expand the requirements for measures to reduce car dependence. The amended Policy includes that: such improvements should be attractive; that proposals enhance connectivity to Public Rights of Way (PRoWs) and bridleways; are connected to public transport nodes; incorporate the measures of the Tendring District Cycling Action Plan, the Essex Walking Strategy 2021, and the Sunshine Coast Greenway objectives; and also recognise the health benefits of active travel. This can be seen to enhance the positive effects of the adopted Policy in regard to sustainable transport. There can be expected to be positive implications as a result of the added Policy requirements.

The Preferred Options Local Plan Transport Evidence – Assessment Case (2025) report undertaken by Essex Highways concludes that several locations have been identified as experiencing unacceptable levels of congestion in comparison to the 'Reference Case' model (i.e. without the newly proposed allocations of the Plan Review). The report further

concludes that sustainable transport measures partially contribute to a reduction in level of effects. These are discussed in more detail in the Tendring Local Plan Review Sustainable Travel Assessment (2025) which concludes that:

- The Horsley Cross Garden Village would require significant investment in sustainable transport without any rail or high frequency bus network, and that a rapid bus connection would be required; and
- Site allocations of 300 homes or less are deemed unlikely to have a significant impact on the highway network however there is the opportunity for greater connectivity to existing bus links and walking and cycling connections to amenities. It adds however that it is unlikely that these developments will generate enough revenue to develop these connections in their entirety so additional funding will be required to realise the sustainable intentions of these developments.

With the above considered highway mitigation measures to alleviate congestion to acceptable levels at these locations will be required. The Preferred Options Local Plan Transport Evidence – Assessment Case (2025) report adds that these measures will be identified and assessed in an updated assessment at the Plan Review’s Regulation 19 stage.

The potential for negative effects are highlighted in regard to the transport effects of the Plan Review at this stage and in lieu of the aforementioned mitigation measures that will be refined and developed to accompany the Plan at the Regulation 19 stage. This is considered an appropriate stage to identify such effects as at this Regulation 18 stage as the allocations may change as a result of the Plan Review’s public consultation.

8.1.4 ISA Objective 4: Health and Education

Short-Medium Term Effects	Long Term Effects
Uncertain effects	Uncertain effects

The focus of residual housing needs being met through strategic allocations (including Garden Villages) ensures that proportionate growth can be ensured in existing settlements, consistent with the settlement hierarchy, and infrastructure pressures (such as on healthcare and school capacities) on smaller settlements are not exacerbated.

The Garden Village allocations and those strategic allocations at Harwich and Dovercourt have requirements for new primary schools to be provided, and in the case of Policy SAM9 at Horsley Cross a new secondary school. These new communities can therefore be expected to be self-sustainable in their need for supporting education infrastructure.

The Plan’s Infrastructure Delivery Plan (2025) calculates that the Plan’s new allocations (minus those required to provide schools on-site) cannot be met by existing forecast Primary School capacity in any of the cluster areas of the District except the south (Clacton) which is



not proposed to experience much additional growth in the Plan Review. Particularly negative effects are identified within the west and central areas.

Overall, uncertain effects are highlighted pending further discussion with Essex County Council and healthcare service providers as part of the Regulation 18 Preferred Options consultation.

### 8.1.5 ISA Objective 5: Sustainable Use of Land

Short-Medium Term Effects	Long Term Effects
<b>Positive effects</b>	<b>Positive effects</b>

The strategic and mixed-use allocations of the Plan Review include the need for a range of infrastructure on site to enable suitable levels of self-sustainability commensurate to each allocation's size and dwelling yield.

Policy additionally sets out the mechanisms for infrastructure delivery, and the requirements for development regarding layouts, design, garden sizes, public transport connectivity and open space.

It can be expected that the sustainable use of land, as a resource, will be positive through the Plan Review's focus on strategic sites. These will be subject to further masterplanning and / or DPDs that allow the detailed considerations of forthcoming development to be planned. Nevertheless, it is recommended that additional work is explored to identify whether intensification of densities could be achieved on the strategic non-Garden Village allocations in more urban areas, in particular the allocation of site SAMU5 in Harwich and Dovercourt.

### 8.1.6 ISA Objective 6: Biodiversity

Short-Medium Term Effects	Long Term Effects
<b>Uncertain effects</b>	<b>Potentially significant negative effects</b>

Detailed impacts of the allocations are identified within the HRA. That assessment raises that there will likely be significant negative effects resulting from the Plan Review. These include the in-combination effects (Likely Significant Effects) on Habitats sites from all allocations through recreational pressure on the coast. These effects are known, and the adopted Plan includes suitable Policy for mitigation in accordance with the adopted Essex Coast RAMS SPD.

Additionally however, site specific impacts are raised for impacts on Habitats sites more directly. The potential for significant effects are raised for sites SAMU5, SAMU7, SAH3, and



MSA4 due to proximity to Habitats sites or the potentially loss of or impacts on land that is 'functionally linked' to Habitats sites.

Additionally, other site allocations are located in areas that may impact on functionally linked land to a lesser degree, and others include or may otherwise impact on Priority Habitat nearby. Uncertain effects are therefore assessed of the Plan Review in the short-medium term, with the potential for significant effects in the long term in line with the delivery of the abovementioned Strategic Allocations for Mixed-Use development.

### 8.1.7 ISA Objective 7: BNG and Green / Blue Infrastructure

Short-Medium Term Effects	Long Term Effects
<b>Significantly positive effects</b>	<b>Significantly positive effects</b>

Despite the potential for negative effects on biodiversity, net gains are required and can be expected of development proposals. Policy PP4a is a new policy introduced at this stage which sets out national requirements for Biodiversity Net Gain (BNG).

For planning applications submitted to the Council on or before 31st March 2027, development proposals that qualify for BNG will be expected to deliver a minimum 10% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat (the minimum national requirement). From 1st April 2027 onwards, the Policy proposes that this requirement will be a minimum of 20%. The Policy sets out the Council's approach of supporting the setting up of 'Habitat Banks' in the District from which biodiversity units can be bought should certain criteria be adhered to. The establishment of Habitat Banks is encouraged in certain areas / locations within the District subject to applicants entering into legal agreements with Natural England. The approach is considered to have benefits in addition to on-site BNG, that is relevant to the District (which includes multiple and large coverage of wildlife designations and Habitats sites on the coast).

As the Policy sets out, it can be expected that the approach would offer potentially significant benefits through the 'creation of bigger, better and more connected habitats that are resilient, manageable and contribute effectively to the aims and objectives of the Essex Local Nature Recovery Strategy.' Significantly positive effects are identified through a more joined up approach to net gains and existing habitats.

### 8.1.8 ISA Objective 8: Historic Environment

Short-Medium Term Effects	Long Term Effects
<b>Uncertain effects</b>	<b>Potentially significant negative effects</b>

Three of the allocated sites have been identified as having the potential for an impact on the significance of a designated asset or its setting that warrants the identification of significant effects in this ISA, sites: SAH1, SAMU9, and SAMU8. In the case of these two proposed Garden Villages, the heightened potential for mitigation should be acknowledged at this stage. This is due both to the size of the sites, and the emergence of Masterplan SPDs post-adoption of the Local Plan Review. This will enable further public consultation on the schemes of both sites as they emerge, which can be expected to include mitigation for environmental effects.

Nevertheless, in all of the above cases, uncertainty surrounding the significance of the impacts is also highlighted at this stage in the absence of detailed proposals for any of the site allocations and it is considered that the Plan Review’s Policy Framework will ensure that any impacts are fully understood at the planning application stage.

It is recommended that more detailed Heritage Impact Assessments are undertaken to justify the allocations and more broadly that further evidence is commissioned to influence site selection. At the time of writing it is understood that this evidence has been commissioned, and the findings will be factored into the ISA when available.

8.1.9 ISA Objective 9: Landscapes

Short-Medium Term Effects	Long Term Effects
Uncertain effects	Potentially significant negative effects

The majority of the sites within the Plan Review are located on greenfield land, and Tendring contains some landscape character areas that are highly sensitive to development, including a National Landscape Area / Area of Outstanding Natural Beauty associated with the River Stour.

Site SAMU9 (the proposed Garden Village in Horsley Cross) has been assessed as having the potential for significant effects on landscape as the proposal could lead to the merging / coalescence of the small settlements of Horsley Cross and Horsleycross Street. Similarly, site SAMU8 (the Garden Village proposal in Hare Green) could also subsume the settlement of Frating (which has a settlement boundary) and may lead to the merging of Frating with the small settlements of Balls Green and Hare Green (which do not have settlement boundaries).

In the case of these two proposed Garden Villages, the heightened potential for mitigation should be acknowledged due to the size of the sites, and the emergence of Masterplan SPDs post-adoption of the Local Plan Review. This will enable further public consultation on the schemes of both sites as they emerge, which can be expected to include mitigation for environmental effects.

At the Plan level, it is recommended that further evidence is gathered regarding the landscape implications of the allocated sites (a site specific Landscape Sensitivity

Assessment) in order to further shape allocation policies moving forward to the Regulation 19 stage.

### 8.1.10 ISA Objective 10: Water Quality

Short-Medium Term Effects	Long Term Effects
<b>Uncertain / positive effects</b>	<b>Uncertain / positive effects</b>

The Tendring Water Cycle Study (2025) identifies that, regarding domestic water consumption, the Plan area is classified as water stressed by the Environment Agency and that whilst Anglian Water have measures to maintain a surplus of supply in the long term, this will require the cumulative demand from new housing to be managed. As a result of this, the Study recommends that a 'stricter' Policy than adopted would significantly contribute to managing and maintaining a surplus of supply and be in keeping with Government plans to address water scarcity in response to the Environment Act 2021.

The Study's wastewater assessment shows that proposed allocations should be restricted to a water use of 85 litres per person per day (l/p/d) as this would significantly improve the available capacity at Water Recycling Centres (WRCs) across Tendring. In response to these findings, the Plan includes a restriction, albeit of 100 l/p/d from new development (following recommendations from Plan's Viability Study (2025)), within Policy PPL5.

Additionally, the Study identifies that there is no (or limited) capacity in some WRCs (Manningtree, and Clacton Holland Haven) and there are no current improvement plans proposed. Although limited development is proposed in these areas as a result of the Plan Review's new allocations, the Plan's amended Policy PPL5 includes some of the requirements recommended within the Water Cycle Study across the District; those being for 'developers to undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development.' Policy PPL5 requires proposals to demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre (sewage treatment works).

Plan level effects can therefore be considered broadly positive, albeit with a degree of uncertainty, where policy is significantly enhanced to improve water supply issues. Nevertheless, the baseline condition of the District in regard to WRC capacity and water quality in general is likely to be further stressed by increased growth.

### 8.1.11 ISA Objective 11: Air Quality

Short-Medium Term Effects	Long Term Effects
<b>Uncertain effects</b>	<b>Uncertain effects</b>

Any increase in growth is likely to lead to increases in road transport movements and flows. Tendring does not contain any areas that are of serious concern regarding air quality such as Air Quality Management Areas (AQMAs), although a single junction (junction and mini roundabout at North Road, Clacton on Sea) is a location where air pollution levels are concerning due to congestion. No development is proposed within the Plan Review in Clacton that would exacerbate this position.

The Plan Review, through an amended Policy CP1 Sustainable Transport and Active Travel, sets out numerous new criteria for new developments to adhere to, not limited to proposals for safe walking and cycling routes and enhanced connectivity to reduce private car use and reduce associated emissions. Additionally strategic and mixed-use allocations of the Plan Review include the need for a range of infrastructure on site to enable suitable levels of self-sustainability commensurate to each allocation’s size and dwelling yield including sustainable transport measures. Overall, uncertain impacts on air quality are raised at this stage.

8.1.12 ISA Objective 12: Soils and Agricultural Land

Short-Medium Term Effects	Long Term Effects
Negative effects	Negative effects

Development of Grade 1 agricultural land would likely lead to its permanent loss, which cannot be mitigated. Sites MSA12, MSA20, and SAE3 are all assessed as having the potential for the loss of Grade 1 (excellent) agricultural land. The majority, but not all, of site SAMU8 also contains Grade 1 agricultural land. Grade 1 agricultural land is the best and most versatile land in the District and also nationwide.

Negative effects are raised within this ISA as a result, although it should be considered that the land in question for all the above sites has been submitted for consideration for alternative (i.e. non-agricultural) uses and that there is no guarantee that Grade 1 agricultural land is used for agricultural purposes. In the case of the proposed Garden Village site SAMU8, it is possible that some of the land that is Grade 1 could be avoided as part of open space or green infrastructure requirements.

8.1.13 ISA Objective 13: Renewable Energy / Energy Efficiency

Short-Medium Term Effects	Long Term Effects
Positive effects	Positive effects

The Plan Review amends the policies of the adopted Local Plan regarding climate change.

The Plan’s policy framework now includes dedicated policies regarding operational energy and carbon (net zero) in homes and buildings; embodied carbon and circular economy in homes and buildings; and renewable energy installations.

These policies support proposals for renewable and low carbon energy generation and distribution networks; require development proposals to demonstrate the measures taken to minimise embodied carbon; and also require new buildings to be designed and built to be Net Zero Energy and Carbon in operation. They must also be ultra-low energy, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.

It can be expected therefore that positive effects on renewable energy and energy efficiency, relative to individual developments, would be positive as a result of the Plan Review.

8.1.14 ISA Objective 14: Flood Risk

Short-Medium Term Effects	Long Term Effects
Uncertain effects	Uncertain effects

The Plan Review can be seen to ensure the delivery of Sustainable Drainage Systems, water quality mitigation, and biodiversity enhancements through a range of relevant policies. Policy PPL1 is proposed for an amendment that includes additional wording surrounding the application of the ‘sequential test’ for flooding, which includes that ‘the area for this test will relate to the catchment area of the development proposed and should always be appropriate in nature and scale. Usually, this area will not extend beyond the town, city or local villages it relates to. Alternative sites could be two or more sites and do not need to be owned by the applicant.’ No additional positive implications are assessed above those identified in the SA of the adopted Local Plan, as the purpose of the amendment is considered to offer clarity to developers rather than seek additional requirements from them.

In a small number of instances, site allocations are within areas with a chance of fluvial flood risk and more have small parcels of land within them that are of a high chance of surface water flood risk. In all instances, these constraints are recognised on site and mitigation required as set out in their corresponding site allocation policy. Overall, uncertain effects are raised at this stage. It should be noted that at the time of writing additional evidence regarding flood risk is being prepared for the Plan and will be factored into this ISA at the Regulation 19 stage.

8.2 Recommendations and Mitigation

Much of the Local Plan is not proposed for amendment and has been previously subject to Sustainability Appraisal, with recommendations included throughout that process. At this Plan Review stage, iterative working has been undertaken by the authors of this ISA Report and the Council in preparing the Plan Review, enabling effects to be known and some mitigation / recommendations embedded at an early stage.

Despite this, a number of recommendations are made at this stage to enable the uncertain or 'potential' impacts highlighted in this Report to be fully understood. The recommendations are:

- It is recommended that additional evidence regarding flood risk is commissioned in regard to the site allocations and options to apply sequential testing and where necessary identify suitable mitigation on a case by case basis (this is being prepared for the Plan and will be factored into this ISA at the Regulation 19 stage).
- It is recommended that further evidence is gathered regarding the landscape implications of the allocated sites (a site specific Landscape Sensitivity Assessment) in order to further shape allocation policies moving forward to the Regulation 19 stage.
- It is recommended that detailed Heritage Impact Assessments are undertaken to justify the allocations and more broadly that further evidence is commissioned to influence site selection (at the time of writing it is understood that this evidence has been commissioned, and the findings will be factored into the ISA at the Regulation 19 stage).
- Related to the historic environment and heritage assets, it could be considered that the potential for enhancements (rather than just preservation) should be included within Policy SAH10 and Policy SAH11, consistent with other site allocation policies.
- It is recommended that additional work is explored to identify whether intensification of densities could be achieved on the strategic non-Garden Village allocations in more urban areas, in particular the allocation of site SAMU5 in Harwich and Dovercourt.

## 9. Next Steps

### 9.1 Consultation

This Interim Report will be subject to public consultation. There are three statutory consultees that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

Comments will be invited from the three consultees, the public and any interested parties and stakeholders.



# Appendix 1: Health Impact Assessment

## Screening Health Impacts

There is no statutory duty in place to undertake a HIA as part of undertaking a Local Plan, however the policies and allocations identified within the Plan Review may have the potential to impact on health, which could be a cause for concern amongst members of the public. HIA can have a strong role in the plan-making process, as well as for allocations within the Plan Review.

This Appendix:

- Screens the Plan area to determine if the Plan is likely to result in health impacts, paying specific mind to any local inequality issues;
- Provides recommendations throughout the decision making process, allowing for responses to be made to any issues that are raised;
- Seeks to maximise positive impacts, while minimising the negative impacts of the Plan.

## Health & Wellbeing Baseline Profile

The following baseline is considered relevant to the remit of the LTP4 and the scope of this HIA:

### Quality of Local Environment / Existing Communities

- Accessible local greenspace is an important contributor to good health. It not only provides a daily experience of wildlife but contact with nature boosts people's physical and mental health.
- Natural England has devised the Accessible Natural Greenspace Standard (ANGSt), which sets out the minimum amount of accessible natural greenspace that any household should be within reach of. Tendring has the highest proportion of households without access to natural greenspace in Greater Essex at 59%. Less than 1% of households in Tendring meet all of their Accessible Natural Greenspace requirements.

### New Development Planning & Improving the Local Environment

- Green infrastructure is essential in new developments, including sustainable urban drainage systems. Development should also design for future climate events, incorporating resilience to changing weather conditions and more frequent extreme weather events.



- Healthy Streets, Liveable Neighbourhoods and Walkable Neighbourhoods are planning approaches that can be developed in both new and existing communities.
- The provision of active travel routes and mobility hubs will help tackle the issue of car dependency and enhance last mile travel.
- There has been an increased frequency of extreme weather events. Significant parts of Essex including Tendring at long term risk from flooding, from surface water, or from rivers and seas
- New developments are best placed to adapt through the use of green infrastructure and SuDS, however existing communities need to be considered too, and how elements such as shading, cover and protection can be retrospectively included in their layouts.

## Human Health and Deprivation

- Health deprivation correlates with life expectancy and TRSE Health Risk levels. Tendring is the most health deprived district in Greater Essex. Of all the Local Authority areas in Greater Essex life expectancy is lowest in Tendring for both males (78.17) and females (82.02).
- Tendring and Basildon are the two most overall deprived Local Authority areas in Greater Essex, and both have more Lower Super Output Areas (LSOAs) that are deprived than the average for England and Wales.
- Sport England's Active Lives Survey collects data on the engagement in, and attitudes to, sport and physical activity. Activity is explored as:

1. Active for at least 150 minutes a week (adults)
2. Active for an average of 60+ minutes a day (under 16s)

Inactivity covers:

3. Active for less than 30 minutes a week (adults)
  4. Active for less than an average of 30 minutes a day (under 16s)
- Only 53.8% of the population in Tendring participate in activity of at least 150 minutes a week. This is below the Essex average.
  - Similarly, only 43.7% of the under 16 population are active for on average an hour a day. This is again below the Essex average.
  - In regard to adult inactivity (active for less than 30 minutes a week) this applies to 33% of the adult population: higher the Essex average. It should also be noted that trend data shows that there has not been any post-COVID 19 pandemic rises in activity within Tendring. All other local authority areas in Essex have seen activity

pick up, aside from Tendring and Chelmsford.

- At 32.5% inactivity in under 16s in Tendring is also higher than the Essex average.
- Tendring District has the highest mortality rate for preventable respiratory disease (aged 75+) and the highest levels of hypertension (all ages) in Essex.
- Regarding hospital waiting lists, the highest percentage of the local population on a hospital waiting list is 11% in Tendring and Colchester. This correlates to health deprivation in both places.
- Essex has high levels of overweight / obese adults and children, with 28% adults obese and 66% of adults being obese or overweight. In Tendring 22% of those aged 4-5 are obese (with the England average being 20.9%).

## Wellbeing

- Vulnerable people are at risk of exposure to high air and noise pollution, as many care homes and schools are located near the road and rail network.
- Fewer people feel safe after dark than during the day – between 2014 and 2022: 87% up to 91% during the day feel safe in Essex; and 49% up to 55% after dark.
- Anxiety and depression are prevalent in Basildon, Harlow and Tendring. Simultaneously, the percentage of adults that never walk are highest in Harlow (at 11%), and Tendring (at 8%).
- Coastal areas in Essex are struggling to maintain a healthy level of wellbeing for residents with a perceived need for improvement around safety, road collisions and community wellness.

## Independence / Sustainable Travel and Accessibility

- Older people are more at risk of isolation and social exclusion. People aged 70+ tend to be more reliant on reliable, accessible and affordable public transport; are more likely to have difficulty walking to a bus stop; and are more likely to be deterred from using public transport if there are no bus shelters, nearby bus stops, or seating provisions.
- Disabled people uses buses 20% more frequently than non-disabled people. Disabled people in rural areas are less likely to travel by rail due to a lack of staffing in stations and booking assistance services reduces independence by affecting ability to make impromptu journeys.
- Rising bus fares are affecting the accessibility of bus services for low income families, corresponding to a significant barrier to employment and education opportunities.

- People who can no longer drive due to health or age will be forced into transport poverty.
- There is generally poor access to key services by public transport in parts of Tendring. There is also high car access in rural areas.

## Health Objectives elsewhere in the ISA

An important component of the Plan Review is that new infrastructure and allocations will be required to deliver essential new housing and employment growth. This ISA Report factors in the requirements for Sustainability Appraisal (SA) which considers health as an important tenet of sustainability. Health has been identified within the SA element of this ISA Report as a 'Key Sustainability Issue' relevant to the Plan and the Plan area.

**Table 20: Health related issues as identified within the ISA**

General Theme	Evidence	State of the environment in the absence of the Local Plan
Ageing population	Tendring has a high population of people aged over 65. This age group is also predicted to increase over the Local Plan period. The highest median age of Local Authority populations in Greater Essex is in Tendring at 50 years. This is above the England and Wales median of 40.	As indicated by need, market forces alone cannot be expected to deliver all types of housing need in the District. The exploration of relevant policy and suitable housing requirements that explore type and tenure across the District enables growth that reflects need and ensures the delivery of such housing.
Life expectancy	Tendring has lowest life expectancies in Essex for both males and females at 78.17 and 82.02, respectively. These are also lower than the averages for Essex, the Eastern region, and England.	As indicated by need, market forces alone cannot be expected to deliver all types of housing need in the District. The exploration of relevant policy and suitable housing requirements that explore type and tenure across the District enables growth that reflects need and ensures the delivery of such housing.
Deprivation	Tendring is the overall most deprived district in Essex, and also for health related	Social integration is an important issue and can be aided through policy requirements that seek social

General Theme	Evidence	State of the environment in the absence of the Local Plan
	deprivation. Deprivation is higher than the England and Wales averages.	infrastructure and through sensitive and appropriate housing allocations within the District. A plan-led system is able to ensure proportionate growth is allocated to the most sustainable areas, or with a focus on regeneration, rather than being led by market forces alone as could perhaps be expected in the absence of a Local Plan.
Activity	Sport England's Active Lives Survey indicates Tendring residents as being the least active in Essex.	Ensuring that open space standards are met is a requirement of the adopted Local Plan, as are strategic solutions where necessary and thresholds are met. This is unlikely to change through the Plan review, however remains a key sustainability issue in the District,

This led to the formulation of a directly health related ISA Objective, which is included as part of this ISA's sustainability framework. The relevant excerpt from this framework is included in the table below.

**Table 21: Health related objectives in the Integrated Sustainability Appraisal Framework of this ISA**

SA Objective	Proposed guide questions to meet objective (does the Plan Review...)	Potential indicators for monitoring effects
4) To ensure resilient sustainable communities with better health, education, and social outcomes	<ul style="list-style-type: none"> <li>- Seek to provide access to health, education, recreation and community facilities?</li> <li>- Ensure healthier lifestyles and access to healthcare facilities?</li> <li>- Protect existing open spaces and create suitable</li> </ul>	<ul style="list-style-type: none"> <li>- Provision of social infrastructure and services on allocated sites</li> <li>- Contributions received towards community facilities</li> <li>- GP waiting times and capacities</li> </ul>

SA Objective	Proposed guide questions to meet objective (does the Plan Review...)	Potential indicators for monitoring effects
	new open space?  - Seek to ensure that levels of educational attainment improve?  - Seek to reduce actual crime and the fear of crime through effective urban design solutions?	- Walking / cycling modes of transport uptake  - New healthcare facility provision through growth  - Health related statistics  - Open space provision ha/1000 population

## The Screening of the Plan Review

In order to determine if the Plan Review requires a full independent Health Impact Assessment, a series of Screening themes have been identified. The following table includes the potential impacts surrounding each key health related theme, how the Plan Review addresses these impacts (directly or indirectly), and recommendations proposed that the Plan Review could integrate (if/where relevant).

Table 22: Screening of health impacts associated within the Plan Review

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
Housing	<p>The delivery of housing needs in Essex is reliant on supporting infrastructure. In Essex, if the housing needs contained in Tendring are met it will mean an unprecedented increase in the number of new houses built in the County over the next 15 plus years.</p> <p>Housing growth if well planned can create a number of direct and indirect opportunities for health and wellbeing in the County, including:</p> <ul style="list-style-type: none"> <li>- Provision of new and an improvement to the existing infrastructure which can have a positive impact on health, such as suitable garden sizes, direct provision of healthcare, and good opportunities for active travel to support physical</li> </ul>	<p>The Plan Review includes allocations that if delivered would meet national housing needs for the District. The strategic and mixed-use allocations of the Plan Review include the need for a range of infrastructure on site to enable suitable levels of self-sustainability commensurate to each allocation's size and dwelling yield.</p> <p>Policy additionally sets out the mechanisms for infrastructure delivery, and the requirements for development regarding layouts, design, garden sizes, public transport connectivity and open</p>	There can be considered to be overall positive impacts on both health and wellbeing through the plan Review.	No recommendations are made.

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>activity which contributes to the reduction of many related health conditions and increased general wellbeing of the population</p> <ul style="list-style-type: none"> <li>- Access to new green space, leisure and open spaces to support social cohesion, physical activity and mental wellbeing of the residents.</li> <li>- Supply of affordable housing to reduce homelessness and provide homes for those who cannot get onto the housing ladder.</li> <li>- Supporting the local economy and increasing the overall standard of living which in the long term should contribute to the reduction of health inequalities.</li> </ul> <p>It should be recognised that</p>	<p>space.</p> <p>Lastly it is important to note that the Plan Review sets out that developers are required to produce a Health Impact Assessment for developments of a qualifying size and use the Essex Healthy Places Checklist as part of their planning application. This will consider the positive and negative impacts on residents and the community.</p>		

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	there may be some potential risks to health and wellbeing as a result of development growth if these are completed to a low standard and not supported by the appropriate infrastructure.			
Construction	<p>Health impacts from construction can be divided into two categories: immediate impacts such as accidents; and accumulative and progressive impacts such as stress and pulmonary diseases. Impacts can be felt by surrounding communities. The different types of health impacts can be classified as:</p> <ul style="list-style-type: none"> <li>- Physical - includes noise, heat, vibrations, falls, and various forms of dust, aerosols and fine particles</li> <li>- Mental – mental health of</li> </ul>	<p>The strategic nature of the Plan is such that any health impacts from constriction need not be directly addressed through specific Policy. Nevertheless, conditions regarding construction hours, and the mitigation of impacts related to noise and dust can be ensured as part of any successful planning application.</p> <p>The Plan Review sets out that developers are required to produce a Health Impact Assessment for</p>	There can be expected to be neutral impacts on health and wellbeing regarding construction from new development.	No recommendations are made.



Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>workers associated with working environment</p> <p>Any impacts, whether negative or positive will be greater in relation to vulnerable population groups and concentrations of ill health. Therefore, special attention should be paid to these groups when developments come forward. This includes areas of health and economic deprivation and the concentration of people at old age.</p>	<p>developments of a qualifying size and use the Essex Healthy Places Checklist as part of their planning application. This will consider the positive and negative impacts of construction on residents and the community.</p>		
Development Design	<p>The location and design of development sites can have negative effects (direct or perceived) on surrounding communities through:</p> <ul style="list-style-type: none"> <li>- affecting visual qualities, reducing the visual</li> </ul>	<p>The Plan Review, through an amended Policy CP1 Sustainable Transport and Active Travel, sets out numerous new criteria for new developments to adhere to, not limited to proposals for safe walking</p>	<p>There are considered to be no negative impacts, and only positive implications associated with the Plan Review's design policy related to new development.</p>	<p>No recommendations are made.</p>

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>attractiveness and sense of place which may affect the general wellbeing of neighbouring communities</p> <ul style="list-style-type: none"> <li>- affecting opportunities for physical activity through the removal of public open spaces and existing walking/cycling routes used by the residents for exercise, dog walking and leisure. This could have a number of direct and indirect health impacts including increased prevalence of obesity and related conditions, respiratory conditions, cancers and mental health.</li> <li>- affecting the natural environment which will have indirect impacts on the health and wellbeing of nearby sensitive receptors.</li> <li>- the anticipation of likely</li> </ul>	<p>and cycling routes and enhanced connectivity.</p> <p>Additionally strategic and mixed-use allocations of the Plan Review include the need for a range of infrastructure on site to enable suitable levels of self-sustainability commensurate to each allocation's size and dwelling yield including sustainable transport measures.</p> <p>Policy LP4 of the Plan Review sets out that developments will need to: actively promote health and wellbeing through the integration and enhancement of green infrastructure; locate new public open space where it can be conveniently and</p>		

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>effects that the development can have on the local community and place creating anxiety amongst the residents, in particular those more vulnerable to change.</p> <p>New or improved infrastructure offers the potential for health and wellbeing improvements in Essex. Opportunities include:</p> <ul style="list-style-type: none"> <li>- Creation of new and enhancements to the existing walking and cycling routes and linking these routes with the wider routes outside of the site – creating opportunities for physical activity</li> <li>- Creation of new green spaces, leisure trails and parks – creating opportunities for social interaction, physical activity and enjoyment of nature and calm environment</li> </ul>	<p>safely accessed by all members of the community by walking and cycling; incorporate surface water management considerations; minimise the opportunities for crime and anti-social behaviour; ensure that the overall highway network is legible, permeable, with all roads connected wherever possible and fit for purpose; ensure internal road layouts can safely and comfortably accommodate emergency services, waste collection services, buses (where necessary) and other large vehicles; design developments in accordance with the EPOA Parking Guidance; deliver new dwellings that are designed to high standards</p>		

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>for people to rest and enjoy</p> <ul style="list-style-type: none"> <li>- Landscape and habitat enhancements – creation of an attractive and biodiversity rich environment to support mental health and wellbeing</li> <li>- Flood alleviation and planting of trees to reduce the impact of climate change on health and wellbeing of the local residents</li> <li>- Air quality improvements</li> </ul>	<p>of architecture; and provide for private amenity space of a size and configuration that meets the needs and expectations of residents.</p>		
Active Travel and Connectivity	<p>The active travel related health and wellbeing considerations generated by transport related elements of development could include:</p> <ul style="list-style-type: none"> <li>- Potential temporary disruptions of existing walking and cycling networks which can affect levels of physical activity</li> </ul>	<p>The Plan Review, through an amended Policy CP1 Sustainable Transport and Active Travel, sets out numerous new criteria for new developments to adhere to, not limited to proposals for safe walking and cycling routes and</p>	<p>There are considered to be no negative impacts, and only positive implications associated with the Plan Review's approach for active travel and connectivity.</p> <p>Neutral impacts can be expected, through</p>	<p>No recommendations are made.</p>

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>amongst the local residents.</p> <ul style="list-style-type: none"> <li>- Potential temporary disruptions of existing road networks which can affect accessibility and connectivity.</li> <li>- Creating opportunities for active travel and public transport access.</li> </ul>	<p>enhanced connectivity.</p> <p>Additionally strategic and mixed-use allocations of the Plan Review include the need for a range of infrastructure on site to enable suitable levels of self-sustainability commensurate to each allocation's size and dwelling yield including sustainable transport measures.</p> <p>Policy CP2 of the Plan Review regards Improving and Maintaining the Transport Network. This Policy sets out that proposals will not be granted planning permission if there would be an unacceptable impact on highway safety, or the residual cumulative impact</p>	<p>requirements for mitigation, regarding any temporary disruptions of the existing road network.</p>	

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
		<p>on the road network would be severe. Additionally, the Council will require, through planning conditions or approved Construction Management Plans, that developers repair any damage to the public highway or public realm caused during construction.</p> <p>More widely, the County Council's Local Transport Plan includes planned activities to work with organisations such as bus operators and active travel organisations and funders to make the case for new investment, as well as ensuring that Travel Plans (as submitted as part of proposals for major generators of travel such as existing workplaces, schools</p>		

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
		and proposed developments) address active travel choices.		
Public open space	<p>The delivery of some developments and supporting infrastructure can see the loss of open/green spaces. Alternatively, new functional spaces can be created through development, including new Country Parks, open space and sports pitch provision, and public realm improvements / wider connectivity associated with active travel infrastructure. Open spaces can have a positive impact on the mental health of the community.</p>	<p>Policy HP5 Open Space, Sports and Recreation Facilities sets out that the Council will work with partners and sports providers across the district to maintain, expand and improve the quality and accessibility of public open space, sports and recreational facilities of different types and will aim to achieve and exceed standards set out in the Council's latest Open Spaces Strategy. Developments on sites of 3 hectares or larger will additionally be required to provide on-site public open</p>	<p>There will be no negative impacts, and only positive implications, on both health and wellbeing through the creation of new, or improvements to the access of existing areas and networks of public open space.</p>	<p>No recommendations are made.</p>

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
		<p>space. This provision must include usable public open space and, where specified, play equipment, allotments, playing fields and built community sports facilities.</p> <p>Existing open space and sports and recreational facilities are safeguarded and protected in line with this Policy and also Policy HP2.</p>		
Employment and Economy	Development creating and supporting new jobs and general economic prosperity can be expected to help reduce deprivation in key areas, as well as health inequalities.	Policy PP7 sets out allocations to support sustainable economic growth. The allocations are proposed for development in the general industrial, storage and distribution, research and development, and industrial processes use classes.	There will be no negative impacts, and only positive implications, on supporting new employment growth	No recommendations are made.



Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
		The Plan allocates three new solely employment allocations which are earmarked for a total employment land area of 85.36 hectares and this could be expanded by an additional 100-120 hectares of employment land with the delivery of the Garden Village allocations. These allocations are above identified needs.		
Equality and social cohesion	Social interaction has an impact on people's overall health and well-being. Increased or enhanced connectivity, both existing and as part of new development, can ensure the promotion of community cohesion and the provision of benefits accessible to the whole community.	The Plan Review allocates strategic and mixed-use sites that will be designed through additional public consultation. These allocations seek to deliver self-sustainable communities with a focus on community cohesion and enabling the provision of	There will be no negative impacts, and only positive implications, on equality and social cohesion through the Plan's policy framework and allocations.	No recommendations are made.

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
		<p>benefits through a range of on-site services, jobs and supporting infrastructure.</p> <p>The site selection process of the allocations has been undertaken with the potential impacts on existing communities in mind and only proposes proportionate growth in the more sustainable settlements of the District as a result.</p>		
Climate change	<p>Any new development has the potential to increase the risks associated with climate change related events such as flooding. There are, however, opportunities to mitigate against and adapt to, some of these effects.</p> <p>Climate change related to extreme weather events could</p>	<p>The Plan Review can be seen to ensure the delivery of Sustainable Drainage Systems, water quality mitigation, and biodiversity enhancements through a range of relevant policies.</p> <p>The Plan Review also amends the policies of the adopted Local Plan</p>	There can be considered broadly neutral impacts through the provision of mitigation that addresses certain facets of climate change.	No recommendations are made.

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>affect the health and well-being of communities and the wider population. Development and solutions supporting or enabling growth such as new road infrastructure, can lead to an increase in vehicle emissions and associated health impacts.</p> <p>Sustainable Drainage Systems, water quality mitigation, biodiversity enhancements, and the protection of the best and most versatile agricultural land can all be considered relevant mitigation methods for some effects of development.</p>	<p>regarding climate change. The Plan's policy framework now includes dedicated policies regarding operational energy and carbon (net zero) in homes and buildings; embodied carbon and circular economy in homes and buildings; and renewable energy installations.</p> <p>These policies: support proposals for renewable and low carbon energy generation and distribution networks; require development proposals to demonstrate the measures taken to minimise embodied carbon; and also require new buildings to be designed and built to be Net Zero Energy and Carbon in operation. They must also</p>		

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
		be ultra-low energy, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.		
Environmental Hazards	<p>Air quality – New developments can have a cumulative impact on localised air quality. Mitigation measures can construction introduced during the working phase of a site to help limit these effects.</p> <p>Noise – development sites and new the construction of new infrastructure may create additional noise. Any new schemes should be sensitive to the prevailing acoustic environment and seek to mitigate their own effects.</p> <p>Flooding – All development and infrastructure schemes must</p>	<p>The strategic nature of the Plan is such that any health impacts from constriction need not be directly addressed through specific Policy. Nevertheless, conditions regarding construction hours, and the mitigation of impacts related to noise and dust can be ensured as part of any successful planning application.</p> <p>The Plan Review can however be seen to ensure the delivery of Sustainable Drainage Systems, water quality mitigation, and</p>	There can be considered broadly neutral impacts through the provision of mitigation that addresses the impacts of various environmental hazards on new and existing communities.	No recommendations are made.

Theme	Potential impact	How does the Plan Review address this (within its remit)?	Impact on health & wellbeing	HIA Recommendations
	<p>mitigate against detrimentally affecting flooding both on site and elsewhere. This ensures ensure the development will not have a detrimental impact on the health of local communities through flooding.</p> <p>Land stability – Developments and infrastructure schemes must ensure they will have no detrimental impact on land stability.</p>	<p>biodiversity enhancements through a range of relevant policies.</p> <p>The Plan Review sets out that developers are required to produce a Health Impact Assessment for developments of a qualifying size and use the Essex Healthy Places Checklist as part of their planning application. This will consider the positive and negative impacts of construction on residents and the community.</p>		

## Summary of Impacts

A series of Screening Questions have been utilised to assess if a more comprehensive HIA work is needed of the Plan Review. The Department of Health<sup>6</sup> provide a set of questions to help decision makers understand if their proposal will require a full HIA through a screening exercise, which also serves as a summary to the themes assessed in the table above.

Screening Question	If there will be no health impact, provide a brief explanation for your response	If there will be health impact(s) provide a brief explanation
Will the proposal / Plan have a direct impact on health, mental health and wellbeing?	It is considered that the Plan Review itself will not give rise to any such effects. The implications of any specific proposals within arising from the Plan's allocations and supporting infrastructure delivery, can be explored within the 'project-level' HIAs of qualifying proposals. Such impacts are therefore currently unknown and would not be understood until the planning application stage.	There is the potential for impacts to arise as a result of unmitigated development and the Plan seeks to ensure positive outcomes on health and wellbeing. Project level HIAs are further specified as required to be undertaken of qualifying proposals to prevent any identified negative impacts and promote positive impacts on the local and wider community.
Will policy / Plan have an impact on social, economic and environmental living conditions that would indirectly affect health?	It is considered that the Plan Review itself will not give rise to any such effects. The implications of any specific proposals within arising from the Plan's allocations and supporting infrastructure delivery, can be explored within the 'project-level' HIAs of qualifying proposals. Such impacts are therefore currently	There is the potential for impacts to arise as a result of unmitigated development and the Plan seeks to ensure positive outcomes on health and wellbeing. Project level HIAs are further specified as required to be undertaken of qualifying proposals to prevent any identified negative impacts and promote positive

<sup>6</sup> Health Impact Assessment of Government Policy, p.12, Department of Health, 2010

Screening Question	If there will be no health impact, provide a brief explanation for your response	If there will be health impact(s) provide a brief explanation
	unknown and would not be understood until the planning application stage.	impacts on the local and wider community.
Will the proposal / Plan affect an individual's ability to improve their own health and wellbeing?	The Plan Review actively seeks to improve the baseline position in regard to healthy lifestyles through supporting infrastructure requirements and promoting active travel.	N/A
Will there be a change in demand for or access to health and social care services?	There will be an uplift in demand for health and social care services as a result of the levels of growth included within the Plan Review.	<p>There will likely be impacts associated with increased growth in existing settlements, and the need for supporting healthcare infrastructure. These increases are addressed within the Plan Review within its remit and growth is proposed as proportionate in order to limit any impacts as far as possible.</p> <p>Relevant policy acknowledges that there is a need for the development to be supported by healthcare related infrastructure, and requirements for the provision of land or premises to operate such facilities is included within the Plan, or otherwise mechanisms are set out for the possible</p>

Screening Question	If there will be no health impact, provide a brief explanation for your response	If there will be health impact(s) provide a brief explanation
		<p>requirement for developer contributions which can be used to mitigate direct impacts.</p> <p>It has to be acknowledged that the direct provision of such services is not within the remit of the Local Plan or planning more widely. Impacts will therefore be uncertain until decisions on provision are decided by the service provider.</p>
Will the proposal / Plan have an impact on global health?	It is not considered that any single or cumulative allocations or policy approaches within the Plan Review would have an impact on the global scale. This is in response to the Plan area, reflecting the district.	N/A

## HIA Conclusions

The Plan Review seeks to improve healthy lifestyles through the protection, safeguarding and delivery of new infrastructure, as well as access, connectivity and Active Travel options. The Plan Review's approach can be expected to improve health and wellbeing in the long term, although the detail of any new healthcare provision is likely to come forward at the stage of detailed masterplans or planning applications.

All development that occurs in the District has the potential to impact on both health and wellbeing. It is considered that, where any impacts are recognised, priority is satisfactorily given to the preparation of a project level HIA within the Plan Review. This will allow the identification and mitigation of impacts related to detailed schemes to be understood prior to planning permission being granted. There are therefore no recommendations to make within this strategic HIA as a result.



# Appendix 2: Equalities Impact Assessment

## Introduction

An Equality Impact Assessment (EqIA) is an evidence-based approach designed to help ensure that policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities. The EqIA helps to ensure that:

- The local authority understand the potential effects of the Plan Review by assessing the impacts on different groups both external and internal;
- Any adverse impacts are identified, and actions identified to remove or mitigate them; and
- Decisions are transparent and based on evidence with clear reasoning.

Ultimately, this EqIA seeks to ensure that the Plan Review is non-discriminatory. For the purposes of this ISA Report, discrimination is defined as someone being treated less favourably or put at a disadvantage because of their protected characteristic. The different groups covered by the Equality Act are referred to as protected characteristics: disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sexual orientation, sex (gender), and age.

Discrimination is usually unintended and can often remain undetected until there is a complaint. Improving or promoting equality is therefore crucial to remove barriers and improve participation for people or groups with a protected characteristic.

## Building Evidence

Building the evidence is important to be able to make accurate judgements and identify any effects. At present and throughout the development of the Plan Review to date, there is little evidence of the potential effects on protected characteristic groups. Consultation will strengthen value judgements by building a consensus that can avoid obvious prejudices or assumptions.

## Consultation

Consultation will add evidence to this assessment and is key to demonstrating that the local authority are meeting equality duties, however consultation also needs to be proportionate and relevant. Nevertheless, under-consultation on the Plan Review has the potential to create barriers to participation. The Plan Review and this ISA Report are both available for public consultation.

## Provisional Assessment

At this initial stage, not all the evidence that is needed is available, so a provisional assessment has been included. Post-consultation on the Plan Review, a full impact assessment can be prepared.

EqlAs are about making comparisons between groups of employees, service users or stakeholders to identify differences in their needs and/or requirements. If the difference is disproportionate, then the policy may have a detrimental impact on some and not others.

In terms of identifying potential effects at this provisional stage, broad options are available. These are:

- No barriers or impact identified, therefore the Plan Review as drafted can proceed;
- The available evidence suggests an impact towards one or more groups;
- Elements of the Plan Review need changing to eliminate the impact; or
- Barriers and impact identified, however having considered all available options, there appears to be no proportionate way to eliminate the impact.

The table below show the provisional assessment at this stage.

**Table 23: EqlA – provisional assessment**

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
Disability	Yes	<p>In consideration of 'Health and Disability' deprivation in Essex, Tendring has the highest proportion of deprived areas in Greater Essex, and this is higher than the England and Wales average.</p> <p>In rural and deprived areas access to services is poor (as well as access to public transport itself); and there is considered a broad deficit of realistic</p>	<p>None are considered specifically required, subject to consultation.</p> <p>A recurrent theme throughout the Plan Review is one of inclusivity with design at the forefront of such aspirations. The Plan Review seeks to direct development to the most sustainable locations in line with the settlement hierarchy, ensuring shorter distances to jobs</p>

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
		<p>access opportunities for people with disabilities.</p> <p>Buses are used by disabled people 20% more frequently than non-disabled people. Disabled people in rural areas are less likely to travel by rail due to a lack of staffing in stations and booking assistance services reduces independence by affecting ability to make impromptu journeys.</p> <p>The elderly, disabled people, low-income families and rural areas are more affected by transport poverty. Travel times can be lengthy to many key services including healthcare and employment.</p> <p>Inappropriate housing can limit the lifestyles of disabled people.</p>	<p>and services. The strategic focus on Garden Villages allows modern standards in regard to accessibility to be factored into development at an early stage, enabling supporting infrastructure to be designed, built, operated and maintained so that it is accessible, easy and safe to use by everyone all the time. The requirement of masterplans allows further consideration of disabled needs through a plan-led system at the detailed design stage and through further public consultation.</p> <p>The Plan Review, and the adopted Plan more widely additionally requires Health Impact Assessments to be undertaken for qualifying development proposals<sup>7</sup> as well as the use of the Essex Healthy Places Checklist as part of their planning application. This will consider the positive and negative impacts of development proposals on residents and the</p>

<sup>7</sup> all development sites delivering 50 or more dwellings, all development in Use Class C2 (Residential Institutions) and all non-residential developments delivering 1,000 square metres or more gross internal floor space.

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
			<p>community.</p> <p>The Plan Review's Policy LP2 Housing Choice requires for developments comprising 10 or more dwellings a mix of dwelling sizes, types, and tenures. The Council will also support the development of bungalows, retirement complexes, extra care housing, independent living, starter homes, self-build and other forms of residential accommodation aimed at meeting the future needs of older and disabled residents as well as family housing. Support will also be given to innovative development proposals subject to consideration of other Local Plan policies.</p>
Gender reassignment	No known negative impact	N/A	N/A
Marriage or civil partnership	No known negative impact	N/A	N/A
Pregnancy and maternity / paternity	No known negative impact	N/A	N/A

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
Race	No known negative impact	N/A	N/A
Religion or belief	No known negative impact	N/A	N/A
Sexual orientation	No known negative impact	N/A	N/A
Sex (gender)	No known negative impact	N/A	N/A
Age	No known negative impact	<p>The highest median age of Local Authority populations in Greater Essex is in Tendring and of all the Local Authority areas in Greater Essex, life expectancy is lowest in Tendring for both males and females.</p> <p>In rural and deprived areas access to services is poor (as well as access to public transport itself); and there is a deficit of realistic access opportunities for older people and also the young.</p> <p>The elderly, disabled people, low-income families and rural areas</p>	<p>None are considered specifically required, subject to consultation.</p> <p>The Plan Review seeks to direct development to the most sustainable locations in line with the settlement hierarchy, ensuring shorter distances to jobs and services. The strategic focus on Garden Villages allows modern standards in regard to accessibility to be factored into development at an early stage, enabling supporting infrastructure to be designed, built, operated and maintained so that it is accessible, easy and safe to use by</p>

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
		are more affected by transport poverty. Travel times can be lengthy to many key services including healthcare and employment.	<p>everyone all the time. The requirement of masterplans allows further consideration of specific needs through a plan-led system at the detailed design stage and through further public consultation.</p> <p>The Plan Review, and the adopted Plan more widely additionally requires Health Impact Assessments to be undertaken for qualifying development proposals as well as the use of the Essex Healthy Places Checklist as part of their planning application. This will consider the positive and negative impacts of development proposals on residents and the community.</p> <p>The Plan Review's Policy LP2 Housing Choice requires for developments comprising 10 or more dwellings a mix of dwelling sizes, types, and tenures. The Council will also support the development of bungalows, retirement complexes, extra care housing, independent living, starter homes, self-build and other forms of residential</p>

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
			accommodation aimed at meeting the future needs of older and disabled residents as well as family housing. Support will also be given to innovative development proposals subject to consideration of other Local Plan policies.
Other (such as income)	Yes	Tendring is the most overall deprived local authority area in Greater Essex generally and for income and has more specific areas that are deprived than the average for England and Wales.	<p>The Plan Review's strategic focus on Garden Villages can be considered to maximise the opportunity for new affordable housing to be viable in the District through building at a scale that will require a range of house sizes, types and tenures to build successful communities. The requirement of masterplans allows further consideration of specific needs through a plan-led system at the detailed design stage and through further public consultation.</p> <p>Policy LP5 of the Plan review promotes a mix of housing tenure in the District and address the housing needs of people and families with lower incomes who cannot afford to buy or rent housing on the open market. In these</p>

Protected Characteristic Group	Is there the potential for an impact?	Example of evidence	Action to address negative impact
			<p>instances the Council will work with the development industry to provide new affordable housing.</p> <p>Further, development proposals and new allocations within the Plan Review involving the creation of 10 or more (net) homes or for any housing development on sites of one hectare or more, will be expected to deliver 30% of new dwellings, (including conversions) to be made available to Tendring District Council or its nominated partner(s) to acquire at a proportionate discounted value for use as affordable housing. This requirement will also apply in instances where two or more adjoining developments, when taken together, would exceed the above policy threshold of 10 or more (net homes) or one hectare or more; or where development is being proposed on part of what could reasonably be considered as a wider site where the wider development would exceed that policy threshold.</p>



## Evaluation

Question	Explanation / Justification
Is it possible the Plan Review could discriminate or unfairly disadvantage people?	There is no evidence to show that the Plan Review could discriminate or unfairly disadvantage people.

## Final Decision

Final Decision	Relevance	Explanation / Justification required
No barriers or impact identified, therefore the Plan Review as drafted can proceed	X	N/A
The available evidence suggests an impact towards one or more groups	✓	The Plan Review's evidence has led to a thread of inclusivity throughout, from the strategic level requirements of strategic policy to the site allocation requirements and development management policies. The Plan Review is considered at this stage, to ensure that there are benefits to the identified groups (disability, age, and income).
Elements of the Plan Review need changing to eliminate the impact	X	N/A
Barriers and impact identified, however having considered all available options, there appears to be no proportionate way to eliminate the impact.	X	N/A





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