



# Tendring District Council Local Plan Review

## Integrated Sustainability Appraisal (ISA): Non-Technical Summary

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.

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

### 2.1 Sustainability Issues and ISA Objectives

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.

**Table 1: Key Sustainability Issues**

General Theme	Description and supporting evidence
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.
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).
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.
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.
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.
Housing	The proposed changes to the NPPF (2025) set new targets for each

General Theme	Description and supporting evidence
needs	Local Authority area. The current standard methodology for calculating housing need identifies a significant increase in annual housing requirements.
Employment opportunities	Tendring District is predominantly rural in nature; however the majority of businesses are located in an urban location.
Employment mix	Significant elements of the District's employment are in the care, tourism, and agricultural sectors. The District registers significant proportions of residents travelling outside to other local authority areas to find employment.
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%.
Activity	Sport England's Active Lives Survey indicates Tendring residents as being the least active in Essex.
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.
Wildlife designations	Tendring includes Habitats sites at the coast, 15 SSSIs, a National Nature Reserve, and over 100 Local Wildlife Sites.
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</p>

General Theme	Description and supporting evidence
	included in the Essex Coast RAMS. The entirety of Tendring is within this zone.
Landscape / AONB	Tendring includes the Suffolk and Essex Coast and Heaths AONB along the Stour River from Manningtree to Harwich.
Climate change	Sea level rise and subsidence will lead to more 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.
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.
Emissions	The largest proportion of CO2 emissions are within the transport sector, accounting for about half of total CO2 emissions, followed by the domestic sector.
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 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.
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,

General Theme	Description and supporting evidence
	Chelmsford, Colchester and Tendring.
Transport	The Plan Area is largely rural in nature and rural public transport services and interconnectivity is poor.

The above table has allowed the formulation of the ISA Objectives which can be found in the table below.

**Table 2: The Integrated Sustainability Appraisal (ISA) Objectives**

ISA Objective
1) To deliver a sufficient supply of homes for all including an appropriate mix of housing types
2) To promote economic growth and diversity across the District
3) To maximise the potential for sustainable transport uptake, including walking and cycling
4) To ensure resilient sustainable communities with better health, education, and social outcomes
5) To ensure that development is located sustainably and makes efficient use of land
6) To conserve and where possible enhance biodiversity and geodiversity designations, as well as natural habitats and protected species
7) To ensure that development delivers net gains in biodiversity, as well as green and blue infrastructure
8) To conserve and where possible enhance the historic environment (both above and

## ISA Objective

below ground), built and cultural heritage assets, and their settings

9) To conserve and where possible enhance the quality and character of landscapes and landscape features

10) To maintain and where possible improve water quality and the sustainable use of ground and surface water resources

11) To maintain and where possible improve air quality

12) To protect and improve soil quality, in particular the best and most versatile agricultural land

13) To ensure, where possible, that new development is carbon neutral and increase the production of energy from renewable sources where appropriate

14) To ensure that development does not lead to an increase in flood risk and is prepared for the impacts of climate change

## 3. The Appraisal of the Plan Review

### 3.1 'Whole Plan' Effects and Conclusions

The overall effects identified in this ISA Report are outlined within the following sub-headings, each of which corresponds to an Integrated ISA Objective.

#### 3.1.1 ISA Objective 1: Housing

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

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. Policy LP1 maintains a sufficient supply of 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. This can be seen as strengthening of the position of the corresponding adopted Local Plan policy.

#### 3.1.2 ISA Objective 2: Economic Growth

Short-Medium Term Effects	Long Term Effects
Positive effects	Significantly positive 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.

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 uses. 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.

### 3.1.3 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. 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 potentially experiencing unacceptable levels of congestion from the Plan's allocations. 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 potential for negative effects are highlighted in regard to the transport effects.

### 3.1.4 ISA Objective 4: Health and Education

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

The focus of 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.

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

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

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.

### 3.1.6 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 Habitats Regulations Assessment (HRA) accompanying the Plan Review at this stage. 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.

### 3.1.7 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.

### 3.1.8 ISA Objective 8: Historic Environment

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

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.

### 3.1.9 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.

### 3.1.10 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.

### 3.1.11 ISA Objective 11: Air Quality

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

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.

### 3.1.12 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.

### 3.1.13 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.

### 3.1.14 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.'

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.

## 3.2 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.

## 4. Next Steps

### 4.1 Consultation

This Report will be subject to public consultation alongside the Plan Review. 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: Effects of the Site Allocations

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 3: 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	Saltlings Quarter, Riverside Avenue (Manningtree, Mistley and Lawford)	Mixed	3.72	40
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

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
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
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

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
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 Holland)	Housing	1.38	10
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

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
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
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

Site reference	Site name	Use (as submitted)	Site size (ha)	Dwelling yield
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

## 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. The section focuses on those negative effects that are assessed at this stage.

### 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.

## 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.

## 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.

## 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.

## 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.





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