



# Tendring District Council Local Plan Review (Regulation 19)

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

August 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 One 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.

### 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.

## 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                                                                                                                                                                                                    | 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 Plan-led 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 Plan-led 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                                               | 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                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 | Greater Essex is in Tendring at 50 years. This is above the England and Wales median of 40.                                                                                                                            | 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 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      | Tendring District is                                                                                                                                                                                                   | The link between homes and jobs is a                                                                                                                                                                                                                                                                                                                                                                                                                 |

| General Theme          | Description and supporting evidence                                                                                                                                                                                                     | State of environment in the absence of the Local Plan                                                                                                                                                                                                                                                                                                                                              |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| opportunities          | predominantly rural in nature; however the majority of businesses are located in an urban location.                                                                                                                                     | 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 agricultural sectors. The District registers significant proportions of residents travelling outside to other local authority areas to find employment. | The link between homes and jobs is a key tenet of sustainability, as is ensuring progressive growth in 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                                                                                                                          |

| General Theme                   | Description and supporting evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | State of environment in the absence of the Local Plan                                                                                                                                                                                                                                                                   |
|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 National Nature Reserve, and over 100 Local Wildlife Sites.                                                                                                                                                                                                                                                                                                                                                                                                                                                             | A plan-led system can ensure that sites are allocated away from wildlife 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</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. |

| General Theme    | Description and supporting evidence                                                                                                                                                                                                                                                                            | State of environment in the absence of the Local Plan                                                                                                                                                                                            |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | 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.                                                                                                                                                                                               | 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 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.                                              | 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.                                                                                                  |
| 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                                                                                                                                             | 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                                                                 |

| General Theme               | Description and supporting evidence                                                                                                                                                                                                                                                                                      | State of environment in the absence of the Local Plan                                                                                                                                                                                                             |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                             | domestic sector.                                                                                                                                                                                                                                                                                                         | 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 within Tendring for the last few years.                                                                                                 | 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.                                                               |
| 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 –                     | 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. |

| General Theme | Description and supporting evidence                                                                         | State of environment in the absence of the Local Plan                                                                                                                                                                                                                                                                                                                             |
|---------------|-------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | namely the districts of Uttlesford, Braintree, Chelmsford, Colchester and Tendring.                         |                                                                                                                                                                                                                                                                                                                                                                                   |
| 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 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 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 |

## ISA Objective

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 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 a thematic Integrated ISA Objective.

##### 3.1.1 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. The allocation of smaller to medium development sites supports housing market diversity, contributes towards national policy objectives relating to smaller sites, and assists in maintaining housing delivery throughout the plan period.

Due to the expected delivery of the strategic allocations, and in many cases the requirement for them to be subject to ‘comprehensive planning frameworks’ in the future, impacts are expected to be more significant in the latter stages of the Plan period in line with their expected delivery.

Policy LP5 includes 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.

### 3.1.2 ISA Objective 2: Economic Growth

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

The Plan Review includes new employment allocations and 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). Three new solely employment allocations are allocated for a total employment land area of 85.3 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 / negative / uncertain effects</b> | <b>Positive / negative / uncertain effects</b> |

Tendring is largely rural in nature and rural public transport services and interconnectivity are poor. Policy CP1 expands 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.

Follow-up transport modelling undertaken for the Regulation 19 Local Plan Review by ECC identifies 15 highway-related improvement schemes which are required to support proposed allocations and clusters where allocations can be expected to have inevitable negative cumulative effects. The modelling work also identified need for a Park and Ride/Park and



Choose (P&C) facilities scheme in relation to sites SAMU8 and SAMU9. It advised that a review of use of the proposed P&C East (serving East Colchester) take place and that consideration should be given to extra facilities or enhancing access. The Infrastructure Delivery Plan (2026) sets out that funding will come predominantly from developer contributions and that many of the proposed requirements, particularly those requiring specific improvements, will be required either to enable development to come forward or in the early stages of development.

Nevertheless, it can be expected that mitigation measures will be forthcoming on a site-by-site basis through the Plan Review’s Policy CP2. The Policy outlines 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.

Non-significant 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 over time and in the instances of SAMU sites, through ‘comprehensive development frameworks’ post-adoption of the Local Plan Review. It should be noted that in regard to poor sustainable transport coverage in the district, the Local Plan and the District Council more widely, cannot ensure that service delivery, such as buses, operate routes even if necessary supporting infrastructure is ensured and delivered of new development. To that extent, the remit of the Plan should be acknowledged and uncertain impacts highlighted in regard to sustainable transport improvement requirements.

3.1.4 ISA Objective 4: Health and Education

| Short-Medium Term Effects   | Long Term Effects           |
|-----------------------------|-----------------------------|
| Uncertain / neutral effects | Uncertain / neutral 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 the Garden Village allocations, also new secondary schools. These new communities can therefore be expected to be self-sustainable in their need for supporting education infrastructure.



Although the Plan’s Infrastructure Delivery Plan (IDP) (2025) calculated that the Plan’s new allocations at the Regulation 18 Preferred Options stage could not be met by existing forecast Primary School capacity in any of the cluster areas of the District except the south (Clacton), a review of the IDP (2026) following consultation with ECC (as the service provider) reassess these impacts.

At this stage, there can be expected to be some negative effects on school capacities as a result of growth in the West (Frating) cluster area, however capacity can be met or expansion of existing facilities ensured for the majority of the cluster areas. Impacts are therefore considered less significant than those identified in the previous Interim ISA Report.

It should further 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 fund ‘transitional costs’ such as the provision of temporary accommodation at existing schools, or transportation to other schools with capacity within two miles.

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 to meet residual housing needs. These will be subject to ‘comprehensive planning frameworks’ prepared through a future review of the Local Plan, or other successor development plan mechanism. This allows the detailed considerations of forthcoming development to be plan-led.

3.1.6 ISA Objective 6: Biodiversity

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



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.

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, SAMU8, MSA3, MSA4, MSA11, MSA12, MSA36, and MSA37 due to proximity to Habitats sites or impact pathways, 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.

The Plan however embeds all of the recommendations of the Appropriate Assessment (AA) (2026), into the policy framework. The AA concludes of all site allocations and policies within the Local Plan that an overall determination of ‘No Adverse Effects On site Integrity to identified Habitats sites with mitigation embedded’. At the Plan level, impacts can be considered generally uncertain as a result where much information as to specific and in-combination effects on Habitats sites will only be fully understood at the planning application stage through project-level HRA requirements.

3.1.7 ISA Objective 7: BNG and Green / Blue Infrastructure

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

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).

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                                                   |
|---------------------------|---------------------------------------------------------------------|
| <b>Uncertain effects</b>  | <b>Potentially significant negative effects / uncertain effects</b> |

Two 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: SAMU9, and SAMU8. Effects are highlighted in the long term in line with the expected delivery of these strategic sites. In the case of these two proposed Garden Villages however, 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 ‘comprehensive planning frameworks’ post-adoption of the Local Plan Review (prepared through a future review of the Local Plan, or other successor development plan mechanism). In both instances, the Plan’s policy framework requires enhancements to heritage assets to be sought. The ‘comprehensive development frameworks’ 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 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.

### 3.1.9 ISA Objective 9: Landscapes

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

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 associated with the River Stour and the Coastal Protection Belt.

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). The potential for significant effects is highlighted in the long term, in line with the expected delivery of these strategic sites.

In the case of these two proposed Garden Villages however, the heightened potential for mitigation should be acknowledged due to the size of the sites, and the emergence of ‘comprehensive planning frameworks’ post-adoption of the Local Plan Review (prepared through a future review of the Local Plan, or other successor development plan mechanism). 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 and the maximisation of any landscape benefits.

3.1.10 ISA Objective 10: Water Quality

| Short-Medium Term Effects    | Long Term Effects            |
|------------------------------|------------------------------|
| Uncertain / positive effects | Uncertain / positive effects |

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        |
|---------------------------|--------------------------|
| <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.

### 3.1.12 ISA Objective 12: Soils and Agricultural Land

| Short-Medium Term Effects | Long Term Effects       |
|---------------------------|-------------------------|
| <b>Negative effects</b>   | <b>Negative effects</b> |

Development of Grade 1 agricultural land would likely lead to its permanent loss, which cannot be mitigated. Sites MSA12 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       |
|---------------------------|-------------------------|
| <b>Positive effects</b>   | <b>Positive effects</b> |

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                  |
|------------------------------------|------------------------------------|
| <b>Uncertain / neutral effects</b> | <b>Uncertain / neutral effects</b> |

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. It should be noted that Chapter 3 of the Local Plan Review states that some settlements 'are at potential risk of coastal change over the next 100 years. TDC (together with the EA) will assess the

significance of this risk and whether the designation of any Coastal Change Management Areas would be appropriate. Whilst this Local Plan will not make these changes now, it may be necessary in future iterations to consider coastal change areas which may have direct implications for spatial growth in the future.'

Overall, uncertain effects are raised at this stage in response to the fact that many of the effects of the Plan Review are site-specific, related to site allocations, and would only be known at the planning application stage when detailed schemes are proposed. Positive implications (neutral effects) can however also be assumed through the Plan's policy framework, which ensures that impacts will be mitigated.

## 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 further evidence is gathered regarding the landscape implications of the proposed Garden Village sites SAMU8 and SAMU9 at the stage of / alongside. and to influence, the forthcoming 'comprehensive development frameworks' of the sites post-adoption of the Local Plan. It is not considered possible to identify landscape effects with certainty at this stage.
- Mitigation of heritage effects associated with sites SAMU8 and SAMU9 (the proposed new Garden Villages) 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 that more detailed Heritage Impact Assessments are undertaken alongside and in order to shape the forthcoming 'comprehensive development frameworks'.

## 4. Next Steps

### 4.1 Consultation

This ISA Environmental 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: 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 within the Local Plan Review**

| Site reference                                      | Site name                                                                | Use (as submitted) | Dwelling yield (plan period) | Dwelling yield (total, inc. beyond 2043) |
|-----------------------------------------------------|--------------------------------------------------------------------------|--------------------|------------------------------|------------------------------------------|
| Strategic Allocation Mixed-Use Sites ('SAMU' sites) |                                                                          |                    |                              |                                          |
| SAMU5                                               | Land South of Oakley Road (Harwich and Dovercourt)                       | Mixed              | 1,650                        | 1,650                                    |
| SAMU6                                               | Weeley Garden Village (Weeley)                                           | Mixed              | 900                          | 900                                      |
| SAMU7                                               | Saltings Quarter, Riverside Avenue (Manningtree, Mistley and Lawford)ms5 | Mixed              | 40                           | 40                                       |
| SAMU8                                               | Tendring Central Garden Village (Hare Green)                             | Mixed              | 1,700                        | 4,500                                    |
| SAMU9                                               | Horsley Garden Village (Horsley Cross)                                   | Mixed              | 1,700                        | 6,000                                    |
| Strategic Allocation Housing Sites ('SAH' sites)    |                                                                          |                    |                              |                                          |

| Site reference                        | Site name                                                             | Use (as submitted) | Dwelling yield (plan period) | Dwelling yield (total, inc. beyond 2043) |
|---------------------------------------|-----------------------------------------------------------------------|--------------------|------------------------------|------------------------------------------|
| SAH1                                  | Vicarage Farm, Main Road (Harwich and Dovercourt)                     | Housing            | 150                          | 150                                      |
| SAH2                                  | Land north of Thorpe Road, Kirby Cross (Frinton, Walton, Kirby Cross) | Housing            | 450                          | 450                                      |
| SAH6                                  | Land east of Cockaynes Lane (Alresford)                               | Housing            | 100                          | 100                                      |
| SAH7                                  | Land east of Admirals Green and north of Weeley Road (Great Bentley)  | Housing            | 120                          | 120                                      |
| SAH8                                  | Land east of Amerells Road (Little Clacton)                           | Housing            | 80                           | 80                                       |
| SAH9                                  | Land south of Clacton Road (St Osyth)                                 | Housing            | 100                          | 100                                      |
| SAH11                                 | Land North of Lifehouse Spa & Hotel (Thorpe-le-Soken)                 | Housing            | 70                           | 70                                       |
| Medium Site Allocations ('MSA' sites) |                                                                       |                    |                              |                                          |
| MSA1                                  | Durite Works, Valley Road (Harwich and Dovercourt)                    | Housing            | 82                           | 82                                       |
| MSA2                                  | Land adjacent Branscombe Close (Frinton)                              | Housing            | 40                           | 40                                       |
| MSA3                                  | Affinity Water, Mill Hill (Manningtree, Mistley and Lawford)          | Housing            | 80                           | 80                                       |
| MSA4                                  | Crisp Malting, School Lane, Mistley (Manningtree, Mistley             | Housing            | 50                           | 50                                       |

| Site reference | Site name                                                       | Use (as submitted) | Dwelling yield (plan period) | Dwelling yield (total, inc. beyond 2043) |
|----------------|-----------------------------------------------------------------|--------------------|------------------------------|------------------------------------------|
|                | and Lawford)                                                    |                    |                              |                                          |
| MSA5           | Brightlingsea Telephone Exchange, 16 New Street (Brightlingsea) | Housing            | 15                           | 15                                       |
| MSA6           | Land at Pannell Place (Brightlingsea)                           | Housing            | 20                           | 20                                       |
| MSA7           | Land south-west of Colchester Main Road (Alresford)             | Housing            | 40                           | 40                                       |
| MSA8           | Land adj Village Hall, Harwich Road (Beaumont)                  | Housing            | 12                           | 12                                       |
| MSA9           | Land west of Windmill Road (Bradfield)                          | Housing            | 20                           | 20                                       |
| MSA10          | Land south of Weeley Road (Great Bentley)                       | Housing            | 80                           | 80                                       |
| MSA11          | Land west of Parsons Hill (Great Bromley)                       | Housing            | 15                           | 15                                       |
| MSA12          | Land south of Hall Road (Great Bromley)                         | Housing            | 10                           | 10                                       |
| MSA13          | Land west of Main Road (Great Holland)                          | Housing            | 10                           | 10                                       |
| MSA14          | Land east of Kirby Road (Great Holland)                         | Housing            | 10                           | 10                                       |
| MSA15          | Land north east of Wix Road (Great Oakley)                      | Housing            | 50                           | 50                                       |

| Site reference | Site name                                     | Use (as submitted) | Dwelling yield (plan period) | Dwelling yield (total, inc. beyond 2043) |
|----------------|-----------------------------------------------|--------------------|------------------------------|------------------------------------------|
| MSA16          | Land south of Orchard Close (Great Oakley)    | Housing            | 50                           | 50                                       |
| MSA17          | Land north of Walton Road (Kirby-le-Soken)    | Housing            | 10                           | 10                                       |
| MSA19          | Land west of Manningtree Road, Little Bentley | Housing            | 12                           | 12                                       |
| MSA20          | Land south of Shop Road, Little Bromley       | Housing            | 10                           | 10                                       |
| MSA21          | Land east of Heckfords Road (Great Bentley)   | Housing            | 80                           | 80                                       |
| MSA22          | Haulage Depot, Heath Road, Tendring Heath     | Housing            | 10                           | 10                                       |
| MSA23          | Land at Avocet Place (Thorrington)            | Housing            | 60                           | 60                                       |
| MSA24          | Land east of Bentley Road (Weeley Heath)      | Housing            | 60                           | 60                                       |
| MSA25          | Land south of Mill Lane (Weeley Heath)        | Housing            | 17                           | 17                                       |
| MSA26          | Land south of Colchester Road (Wix)           | Housing            | 20                           | 20                                       |
| MSA28          | Land North of Rectory Road (Wrabness)         | Housing            | 30                           | 30                                       |
| MSA33          | Well House Site, Chestnut Way, Brightlingsea  | Housing            | 60                           | 60                                       |

| Site reference                                                                    | Site name                                                         | Use (as submitted) | Dwelling yield (plan period) | Dwelling yield (total, inc. beyond 2043) |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------|--------------------|------------------------------|------------------------------------------|
| MSA34                                                                             | Vicarage Field, Church Road, Brightlingsea                        | Housing            | 30                           | 30                                       |
| MSA35                                                                             | Land North of Robinson Road, Brightlingsea                        | Housing            | 25                           | 25                                       |
| MSA36                                                                             | Land North of Wix Road, Bradfield                                 | Housing            | 25                           | 25                                       |
| MSA37                                                                             | Land East of The Street, Bradfield                                | Housing            | 30                           | 30                                       |
| Strategic Allocations for Employment (SAE sites) and other employment allocations |                                                                   |                    |                              |                                          |
| SAE3                                                                              | Collierswood Farm, Land North of the A120                         | Employment         | N/A                          | N/A                                      |
| Site 146                                                                          | Land North of A120 (Harwich)                                      | Employment         | N/A                          | N/A                                      |
| Site 62                                                                           | Weeley Car Boot site, Land to the North of Colchester Rd (Weeley) | Employment         | N/A                          | 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 without mitigation. This assessment does not factor in the positive implications of policy criteria that would have to be met of any planning application, as set out within the Plan Review's Delivering Places policies. These 'policy-on' considerations are assessed within Section 6 of the ISA Report and considered in this Non-Technical Summary in Section 3.

### 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 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 and Secondary Schools, as well as the premises for GP services.

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

Two 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 potential significant effects in this ISA.

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).

For both SAMU 8 and SAMU9, the potential for significant negative effects cannot be ruled out at this stage, albeit with a large degree of uncertainty, until the 'comprehensive development framework' stage. It is recommended that landscape sensitivity work is undertaken at that stage / alongside, and to shape, the forthcoming 'comprehensive development frameworks'.

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 a 'comprehensive planning framework' post-adoption of the Local Plan Review (prepared through a future review of the Local Plan, or other successor development plan mechanism). 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 the above cases, uncertainty surrounding the significance of the impacts is also highlighted at this stage.

### Potential negative effects regarding: Soil Quality

Sites SAMU8 and MSA12 are assessed as having the potential for the loss of Grade 1 (excellent) agricultural land. The majority, but not all, of site SAMU8 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, green infrastructure, or strategic green gap purposes / requirements with the potential for agricultural uses retained.

### Potential negative effects regarding: Habitats sites

Detailed impacts of the allocations are identified within the Habitats Regulations Assessment and Appropriate Assessment (2026). This assessment identifies 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.

Additionally however, site specific impacts are raised for impacts on Habitats sites more directly. The potential for significant negative effects are also highlighted for allocations SAMU5, SAMU7, SAMU8, MSA3, MSA4, MSA11, MSA12, MSA36, and MSA37.

The Habitats Regulations Assessment Appropriate Assessment (2026) outlines various mitigation measures to ensure that there would be no Likely Significant Effect on the integrity of Habitats sites alone or in-combination with other plans and projects. These mitigation measures are already embedded into the Plan through iterative working and are referenced within the Appropriate Assessment (2026).

The Appropriate Assessment concludes that ‘therefore, this embedded mitigation ensures that appropriate scoping assessments, wintering bird surveys following appropriate methodology and proportionate mitigation measures will be secured for site allocations and employment sites where necessary, as well as any other development coming forward during the lifetime of the Local Plan.’





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