

Tendring District Council

Sustainability Appraisal (SA)

of Tendring District Local Plan Pre- Submission Focussed Changes

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Introduction

This report forms part of the Sustainability Appraisal (SA) of the Tendring District Local Plan. It appraises the focussed changes to the Local Plan that are set out in the document: Tendring District Local Plan Pre-Submission Focussed Changes Major Changes to the Written Statement, January 2014 (hereafter the Focussed changes document).

Within the Focussed changes document numerous changes to the Local Plan December 2011 draft are proposed. These changes are a result of public consultation and updates to the evidence base. Each change is justified within the Focussed changes document.

Each change represents a new option and it is essential that the changes are subject to SA and clearly compared to previous options to provide confidence that they are the most sustainable option and where necessary incorporate mitigation and enhancement measures. This report summarises the findings from the SA of the focussed changes. Appended to this report are the full appraisals, which include a clear comparison with the alternative options already appraised.

This report is split into two sections. The first section summarises the SAs of the notable major changes and section 2 summarises the SAs of the major changes. In some cases the notable major changes relate to multiple major changes and this is made clear in the report.

Minor changes are also proposed to the Local Plan. However, as these are minor and do not represent a major change and therefore a distinct option they have not been subject to SA. The National Planning Practice Guidance is clear that changes to the Local Plan that are not significant will not require further SA work. The guidance defines significant changes as those that 'substantially alters the draft plan and [are] likely to give rise to significant effects'.

Section 1: Notable major changes

Timeframe of the Local Plan

The NPPF requires local planning authorities to plan for the delivery of housing over a 15 year period and states that Local Plans should be drawn up over an appropriate time scale (preferably a 15-year time horizon) to take account of longer term requirements. A 15 year plan period would comply with the NPPF and ensure that the long term growth of the district is planned for. The updated evidence base (specifically the latest viability testing, SHLAA and SHMA) shows that the district's objectively assessed housing need can be met through planned urban extensions to the main towns in the district and a fair and proportionate level of growth of the district's smaller settlements over the next 10 years. However, the evidence has found that large scale expansion, possibly of Clacton, Harwich or west Tendring, would likely be necessary to meet housing need and employment growth post 2024. This level of development would require significant infrastructure improvements and so would need long term planning to ensure the delivery of sustainable new communities. Without a 15 year plan period to properly plan for large scale new communities there is a risk that housing will be delivered in the future without the necessary infrastructure to support it. Despite the Local Plan setting a 15 year plan period it does not include allocations for years 11-15. However, the Local Plan does state that it will be reviewed to ensure that growth for years 11-15 is planned for.

This option is the most sustainable and should be included in the Local Plan; a shorter plan period would fail to plan for Tendring's objectively assessed housing need and employment opportunities.

This incorporates major change MAJ1.1.

Spatial strategy

This focussed change will result in the fairest distribution of homes, with each settlement accommodating approximately a 6% increase in housing stock. This will help to remedy the shortage of affordable housing in rural areas through the provision of a 6% housing stock increase in the smaller rural villages and hamlets, as well as the urban settlements and key rural service centres helping to meet local needs. Whilst all options appraised will promote social cohesion by integrating new housing into existing urban areas this option will have the most positive impact as it directs housing to all areas of the district, helping to provide housing everywhere it is needed, ensuring that residents do not have to move out of their home town or village, including in rural areas. This option also ensures that housing need for the whole of the 15 year plan period is considered.

Broad areas of search are included to identify suitable areas for growth in the last five years of the plan period. Broad areas of search for each of the district's settlements were appraised as part of previous SA work, including sites on the edge of Colchester. Sites on the edge of Clacton and Harwich scored more favourably than sites on the edge of Colchester. Further SA work will be needed in the future to help identify the most suitable sites to deliver the district's housing in years 11-15 of the plan period.

Part of the changes to the spatial strategy includes removing Point Clear as a key rural service centre. Whilst St Osyth is a key rural service centre Point Clear has a separate character and identity as a small settlement and its removal from policy SD3 will ensure that levels of growth unsuitable to its scale and nature does not occur. The removal of Chisbon Heath and Elmstead Heath from policy SD4 will also ensure that unsuitable development does not occur in these small hamlets.

This is the preferred option as it will provide sufficient sites to deliver the district's housing need and will ensure a fair and proportionate spread across the district. Identifying broad locations for growth in years 11-15 of the plan period, which will be explored as part of the Local Plan review, will have a more positive impact than the alternative options on providing homes to support the growing population.

This also incorporates major changes: MAJ2.1, MAJ2.2, MAJ2.3, MAJ2.4 and MAJ2.5

Economic development strategy

All economic development options that have been considered and appraised by the Council will result in positive impacts on the district's economy. A number of employment opportunities will be promoted throughout the district, which will ensure that the population has good access to jobs appropriate to their skills level and accessibility. The seaside towns will be regenerated and tourism will be promoted, which will also improve the vitality and viability of town centres. Whilst it is stated that two of the options previously appraised (options 1 and 2) will provide 12,800 jobs and 7,000 jobs the latest evidence contained in the Economic Development Strategy 2013 suggests that this is not achievable and so this option is more realistic.

This option is the most sustainable and should be included in the Local Plan as it is based on the most up to date evidence and sets the framework to target growth locations, growth sectors and create the right conditions for economic growth. Under this option existing businesses will be supported and encouraged to modernise, diversify and grow. This option also recognises that one of the key objectives to improving the districts economy is to improve the skills of the existing population, which will also improve income equality.

This option should state that the Council will support and encourage proposals for port activities related to off-shore wind farms and industrial premises for renewable energy industries. Additionally, proposals for education and training facilities aimed at improving awareness of climate change and renewable technology should be encouraged.

This incorporates major change MAJ3.1.

Transport

Upgrades to the A133 and A120, improvements to the A137 and particularly a new road linking the A133 and A120 will have a significant positive impact on the district's economy by improving access to and around the district. It is highly likely that inward investment will increase under this option. However, it is uncertain whether any positive impacts will be secured within the plan period as a new link road is a long term proposal and at this stage the Council has confirmed its commitment to enter into discussions with relevant partners. Proposals are at a very early stage and options for possible sites have yet to be discussed. Positively however, this option does ensure that any proposals that would prejudice the aim of creating a new link road will not be supported.

Whilst a new link road will bring many positive economic benefits to the district a new road will result in the loss of large areas of greenfield land. Care will need to be taken to ensure that sensitive landscape areas and biodiversity rich areas are not adversely affected and the impact of light pollution is carefully considered.

This option is the most sustainable as it includes the positive impacts of previous options. In particular upgrading the district's roads to increase connectivity and reduce congestion and promoting sustainable modes of travel which will also reduce congestion, reduce greenhouse gas emissions and promote healthy lifestyles. This option however also

confirms the Council's commitment to exploring the option of a link road between the A133 and A120 and improvements to the A137, which will result in significant positive economic impacts.

This incorporates major change MAJ3.2.

Town Centre

Defining Town Centre's, Primary and Secondary Frontages and directing town centre uses to these areas will ensure that employment opportunities are made available in the most accessible locations. This option will protect and enhance the vitality and viability of all Town Centre's within the district. This option is the most sustainable as it provides a consistent approach across the districts Town Centres. This option will ensure that retail remains the predominant role and other town centre uses will only be supported providing that they will not affect the key role of the Town Centres as shopping areas. This option is based on the most up to date evidence included in the 2013 Town Centre Healthchecks and 2010 Retail Study.

This incorporates major changes: MAJ3.5, MAJ6.1, MAJ7.1, MAJ8.1, MAJ8.2, MAJ9.1, MAJ10.1.

Housing supply

All options on housing supply that have been considered by the Council and appraised will ensure the delivery of homes, including affordable homes, to support the growing population. The most positive impact will occur under this option, which should be included in the Local Plan, as it is based on the most up to date evidence. This option is informed by evidence in the Strategic Housing Market Assessment (SHMA) 2013 update and 2013 Strategic Housing Land Availability Assessment (SHLAA). The SHMA found that there is a need for 10,960 dwellings in the period 2013-2029, which is 685 per annum. However, this is significantly higher than average completions over the period 2001-2013 which equates to 378 per annum. The SHLAA considered the suitability, availability and achievability of sites and from the combined evidence a figure of 3625 for the period 2014-2024 was set. The SHLAA suggests that higher levels of growth could be achievable longer term and so 2000 dwellings are proposed for the period 2025-2029.

The 2013 update to the SHLAA concluded that the assessment of potential development sites suggests that in years 1-10 of the proposed Local Plan period, it will only be realistic to deliver approximately 1,500 new homes (a 5% increase in the town's housing stock) through existing urban capacity and through greenfield urban extensions in West Clacton and North Clacton and as such 1,374 dwellings are allocated.

As part of this focussed change land off Lotus Way, Jaywick is no longer allocated for residential development. Previous SA work as part of the SA of Third Party Sites concluded that this is a sustainable site. However, there are concerns over the genuine deliverability of new homes on these sites within the revised plan period and so whilst development in this location will still be supported through Policy COS10 to help regenerate this area of Jaywick, the Council cannot justify relying on these sites to contribute toward district-wide housing provision. These sites can therefore come forward as windfall sites within the Settlement Development Boundary.

The 2013 update to the SHLAA concluded that the assessment of potential development sites suggests that in years 1-10 of the proposed Local Plan period, it will only be realistic to deliver approximately 450 new homes (which would be approximately 5% increase in the

existing housing stock) through existing urban capacity and through greenfield urban extensions around Harwich and Dovercourt and as such 451 dwellings are allocated.

The 2013 update to the SHLAA concluded that the assessment of potential development sites suggests that in years 1-10 of the proposed Local Plan period, it will only be realistic to deliver approximately 450 new homes (a 5% increase in the existing housing stock) through existing urban capacity and through greenfield urban extension at Frinton and as such 454 dwellings are allocated.

The 2013 update to the SHLAA found that the trajectory suggests that in years 1-5 (2014-2019) sites around the Lawford, Manningtree and Mistley urban area could deliver around 200 homes and a further 250 homes in years 6-10 (2019-2024). The update found that land to the south of Lawford could yield nearly 800 new homes but whilst this level of growth would help to meet the need identified in the 2013 SHMA for this part of the district, it would be too overwhelming for the area's infrastructure and the existing town centre at Manningtree. The update suggested that a more modest level of growth of 150 homes over the 15 years would be more appropriate. Taking into account this suggested modest level of growth and the trajectory which suggests 450 dwellings over the 15 year plan period the Council has allocated land for 310 dwellings.

The 2013 update to the SHLAA concluded that the only realistic location for growth in Brightlingsea based on current evidence is land to the east of the town as landscape sensitivity becomes more of an issue to the north west of the town and development to the north would not relate as well to the existing town centre and built up area as development to the east. It concluded that an initial 160 homes in the first 10 years would be a realistic amount of housing initially while the housing market remains weak, with potential for further development post 2024 as part of the Local Plan review. As such the Local Plan allocates land for 188 dwellings with 68 of these to be delivered on sites that already have planning permission as of 1 April 2013.

The 2013 update to the SHLAA concluded that the assessment of potential development sites suggests that in years 1-10 of the proposed Local Plan period it will only be realistic to deliver approximately 260 new homes following the Council's fair, proportionate and sustainable approach to growth which allows a 6% increase in housing stock in the villages. In theory, there are sites available that could deliver nearly 900 dwellings but such a high level of growth is not likely to be acceptable or sustainable if villages are to retain their rural character and the limitations of primary school provision in rural areas is to be acknowledged. As such land is allocated for 267 dwellings in the key rural service centres.

Other options for housing supply have not been based on this up to date evidence base and so these alternative options should be rejected.

This incorporates major changes: MAJ4.1, MAJ4.2, MAJ4.3, MAJ6.4, MAJ7.2, MAJ8.3, MAJ9.2, MAJ10.2, MAJ11.1, MAJ14.1 and MAJ14.2.

Section 2: Major changes

Many of the major changes have been appraised as part of the appraisal of notable major changes, which are summarised in the preceding section. This section appraises those major changes that do not relate to any of the notable major changes.

Major Changes to Chapter 2: Delivering Sustainable Development

MAJ2.6 Policy SD8 'Transport and Accessibility'

The SA found little difference in sustainability terms between this option and those options previously appraised. All options promote sustainable modes of travel, which will reduce greenhouse gas emissions, reduce congestion and promote healthy lifestyles. This option, together with alternative options appraised, also states that development proposals will only be acceptable if the additional vehicle movements likely to result from the development can be accommodated within the capacity of the existing or improved highway network or would not lead to an unacceptable increase in congestion.

Whilst there are many similarities in sustainability terms between the options this option should be included within the Local Plan as it is inline with the NPPF.

Major Changes to Chapter 3: Planning for Prosperity

MAJ3.3 New Policy PRO1a 'Improving the Public Transport Network'

This option sets out the Council's support and encouragement towards improvements to the district's public transport network. Improvements to public transport will help to facilitate economic growth by making it easier for people to move around the district. Improvements within rural areas could have significant benefits to the rural economy and this should be referred to in the supporting text to the policy. Improvements to public transport will reduce levels of deprivation by providing greater access to jobs, services, leisure, retail, etc, to those without a car. An increase in the use of public transport will lead to less cars on the road and less congestion and greenhouse gas emissions.

This is a sustainable option that will result in many positive effects and should be included within the Local Plan.

MAJ3.4 Policy PRO2 'Improving the Communications Network'

Better telecommunications technology will help to secure inward investment, without this improvement business may move away from the district to areas where broadband is faster and mobile phone coverage is better. This option requires all new buildings to have access to super fast broadband and not just those that are allocated in the Local Plan, which will result in more positive impacts than the alternative options. The presence of high-speed broadband connections will increase the opportunity for home-working, reducing the need to travel to work. Under this option where super fast broadband is not possible S106 or CIL payments may be required to future proof to allow broadband once it becomes available. This option also restricts new telecommunications equipment close to sensitive community uses should as schools.

This option is the most sustainable and should be included in the Local Plan as it applies to all new development in the district, ensures that future proofing is an option where access to super fast broadband is not possible and restricts telecommunications equipment close to sensitive areas.

MAJ3.6 Policy PRO9 ‘Holiday Parks’

This option will result in positive impacts on the tourism industry through the inclusion of a more positive policy regarding new and extended holiday parks. This option includes less restrictive criteria in respect of occupancy conditions, whilst still ensuring that holiday parks remain as holiday accommodation and are not used as permanent residential accommodation. This option removes holiday parks from settlement development boundaries, which will reduce the likelihood and pressure for change of use to residential. Increasing tourism in the district will increase the amount of journeys into the district and in reality these are likely to be made by private car, particularly multiple day visits. As part of the tourism marketing strategy the Council should promote sustainable travel and promote cycling and walking as tourism activities. Many of the district’s tourist attractions are located at the coast and during the winter these sites are more susceptible to flooding. This risk will increase throughout the plan period according to climate projections. This option includes less restrictive criteria relating to occupancy conditions than alternative options but importantly does include a criteria requiring an adequate warning and evacuation plan to be agreed with the Environment Agency in advance in flood risk areas.

This option is more sustainable than the alternatives as it is more positively worded and so will have a more positive impact on the district’s tourism economy. Removing holiday parks from settlement development boundaries will reduce the likelihood and pressure for change of use and thus safeguard existing sites. However, the protection of nature conservation sites by, for example, requiring an occupancy restriction for tourist sites adjacent to nature conservation sites during the over-wintering period, which is one of the most sensitive for the international sites in the district, should be included in the policy.

MAJ3.7 Policy PRO10 ‘Camping and Caravanning’

This option will result in positive impacts on the tourism industry through the inclusion of a more positive policy regarding new and extended camping and caravan parks. This option includes less restrictive criteria in respect of occupancy conditions, whilst still ensuring that caravan parks remain as holiday accommodation and are not used as permanent residential accommodation. This option removes caravan parks from settlement development boundaries, which will reduce the likelihood and pressure for change of use to residential. Increasing tourism in the district will increase the amount of journeys into the district and in reality these are likely to be made by private car, particularly multiple day visits. As part of the tourism marketing strategy the Council should promote sustainable travel and promote cycling and walking as tourism activities. Many of the district’s tourist attractions are located at the coast and during the winter these sites are more susceptible to flooding. This risk will increase throughout the plan period according to climate projections. This option includes less restrictive criteria relating to occupancy condition than alternative options but importantly does include a criteria requiring an adequate warning and evacuation plan to be agreed with the Environment Agency in advance in flood risk areas.

This option is more sustainable than the alternatives as it is more positively worded and so will have a more positive impact on the district’s tourism economy. Removing camping and caravan parks from settlement development boundaries will reduce the likelihood and pressure for change of use and thus safeguard existing sites. However, the protection of nature conservation sites by, for example, requiring an occupancy restriction for tourist sites adjacent to nature conservation sites during the over-wintering period, which is one of the most sensitive for the international sites in the district, should be included in the policy.

Major Changes to Chapter 4: Planning for People

MAJ4.4 Policy PEO4 ‘Standards for New Housing’

This option is likely to ensure a greater mix and variety of dwelling standards to meet the needs of the population and improve quality of life. Dwellings will meet minimum size standards and will ensure that small dwellings that are difficult to use are not built in the district. Usable levels of private amenity space and parking spaces will be delivered under this option.

This is the most sustainable option as it will deliver homes to improve the quality of life of the district's residents and is based on usable and tested standards included in the adopted London Design Guide standards as recommended by Essex County Council.

MAJ4.5 Policy PEO5 'Housing Layout in Tendring'

This option will ensure that development is planned to a high standard of design that reflects the character of the district. It will ensure that green infrastructure, accessible public highways and measures to design out crime are delivered. This option refers to densities in keeping with the semi-rural nature of the district, which is a positive objective as it will ensure that development reflects the character of the district. However, care must be taken to ensure that in urban areas the density makes the most efficient use of land.

This option is the most sustainable as it is not unduly prescriptive, applies to all development and not just development over 50 dwellings, and requires design to be influenced by and reflect the local character of the district.

MAJ4.6 Policy PEO7 'Housing Choice'

This option will ensure that a mix of dwellings are delivered across all sites and will help to meet the projected housing need across the district. The delivery of a mix of housing types will help to tackle social cohesion and provide a balanced community.

This option is more sustainable than the alternatives considered as it reflects the current projected housing demand as set out in the 2013 update to the SHMA. The 2013 update to the SHMA shows that in every town in the district the highest demand projected is for 3 bedroom dwellings. This option requires at least 40% of dwellings to be 3 bedrooms, which will help to address this projected need, whilst still providing sufficient flexibility to allow developers to determine part of the housing mix based on current market demand.

MAJ4.7 Policy PEO8 'Aspirational Housing'

This option widens the definition of aspirational housing to include all types of housing and not just 4 bedroom dwellings. This reflects the recommendation in the 2013 update to the SHMA and latest viability testing (2013). By delivering a high proportion of aspirational housing within the mix of housing there is the hope that this will encourage high earners to live in the district, with the potential to invest in local business opportunities.

Under this option aspirational housing is supported outside of settlement development boundaries subject to meeting certain criteria. One criterion requires dwellings to meet a minimum of level 5 of the Code for Sustainable Homes, which will ensure the delivery of highly sustainable dwellings in the district. However, the government has announced its intention to wind down the Code for Sustainable Homes and so the policy should also refer to compliance with any successor to the Code. The development of dwellings on greenfield land outside of settlements will result in the loss of greenfield land, could affect landscape character and could increase car journeys. Priority should be given to the re-use of previously developed land. Applicants should be expected to demonstrate that any adverse

impacts on landscape character can be mitigated and that the site is accessible by sustainable modes of transport.

This option is more sustainable than the alternatives as it will ensure the greatest mix of aspirational housing by widening the definition to include all housing types, which also helps to secure the most efficient use of land. Additionally, it is based on the most up to date evidence (SHMA Update 2013 and viability testing 2013).

MAJ4.8 Policy PEO11 'Rural Exception Sites'

This option will contribute to the district's housing provision, including affordable housing provision, and the rural economy. The provision of local needs affordable housing will contribute to health and income equality and promote social cohesion. It allows an element of cross-subsidy as set out in the NPPF, which will make it more likely that landowners will release their land for rural exceptions schemes as it will make it more profitable for them. Rural exception schemes on the edge of settlements largely leads to the loss of greenfield land. Whilst greenfield development typically has an adverse effect on landscape quality this policy does require development to ensure that it has no significant material adverse impact on landscape or the form and character of the settlement it adjoins.

This option is sustainable and should be included in the Local Plan as it will deliver rural exceptions sites and reflects the NPPF.

MAJ4.9 Policy PEO15 'Traveller Sites'

This option will ensure that proposals for new traveller sites are assessed using a relevant range of criteria based on government guidance. This will help to ensure that new traveller sites are accessible, well designed, safe, avoid environmentally sensitive sites and flood risk areas. The latest Essex Gypsy and Travellers Accommodation Assessment has identified that there is a need for 10 pitches in the district and from April 2013 there were 11 authorised pitches in the district. Whilst this option does state that where possible new sites should use previously developed land, to ensure the protection of greenfield land consideration should be given to re-wording the policy to require proposals on greenfield land to demonstrate that there are no suitable previously developed sites available within the area.

This option should be included in the Local Plan as it is based on the most up to date evidence and position regarding traveller sites.

MAJ4.10 Policy PEO17 'Living Accommodation for Family Members'

Previous SA work found that providing living accommodation for family members within the curtilage of a residential dwelling helps to meet the housing needs of the district, as young people in need of housing may be finding it difficult to get onto the housing ladder in difficult economic times and older relatives can be cared for within the curtilage of the family home, which is particularly important with an increasingly ageing population. This makes efficient use of land, as this living accommodation will be built within the existing curtilage of a residential dwelling and this can also help to contribute to health and income equality, promoting social cohesion by allowing people to stay within their existing communities. Previous SA work also appraised the no plan option.

Whilst the findings of previous SA work remain current, under permitted development rights or through existing policies within the Local Plan the provision of annexes can still be achieved, thus delivering the positive effects identified in the SA. In light of this it is

considered that the draft policy and the no plan option have no differences and to avoid repetition the draft policy PE017 should be removed from the Local Plan.

MAJ4.11 Policy PEO22 ‘Green Infrastructure in Residential Development’

This option will ensure the delivery of new areas of open space to serve major development. Open space protects soil and groundwater quality, provides a habitat for wildlife, and provides opportunities for healthy lifestyles and social cohesion. This option prioritises the creation of larger, strategic open spaces that are more usable, more accessible and easier to maintain. However, whilst on-site open space is only required for developments over 10 hectares (ha) financial contributions will be required for sites under 10ha where open space provision in the area is inadequate to meet the needs of the new population. Financial contributions received could be spent on creating and/or improving strategic areas of open space, which would have a greater benefit to the existing and new community than the creation of multiple small areas of open space on small sites. This option requires open space to be designed to maximise biodiversity gains and the provision of strategic open space will reduce pressure on Natura 2000 sites. To secure a more positive impact a higher level of open space should be required where monitoring indicates that Natura 2000 sites are deteriorating as a result of visitor pressure.

This is the most sustainable option and should be included in the Local Plan as it ensures that major development provides open space on site and minor development contributes towards improvements to open space where necessary and prioritises the creation of larger, strategic open spaces that are more usable, more accessible and easier to maintain.

Major Changes to Chapter 5: Planning for Places

MAJ5.1 Policy PLA6 ‘The Historic Environment’

This option will ensure the conservation of the district’s historic environment. Proposals that would cause harm to an historic asset will be refused unless it can be demonstrated with appropriate and proportionate evidence that there are substantial public benefits that outweigh the harm or loss. Where necessary mitigation or compensatory measures will be required. Proposals that protect or enhance heritage assets or their settings will be treated favourably, which will help to enhance the district’s heritage assets and secure new uses for such assets. Historic Towns are reinstated, which identifies the most sensitive towns in the district where particular care will need to be taken in terms of the historic environment.

This option should be included in the Local Plan as, like the other options, it will ensure the preservation and enhancement of the historic environment but is less prescriptive and avoids repeating the NPPF. This option reinstates Historic Towns which adds an important locally distinctive element to the policy.

MAJ5.2 Policy PLA10 ‘Renewable Energy Installations’

This option will support renewable energy installations in the district. Growth in the renewable energy sector in the district could also encourage businesses to the area, attracted by the skilled workforce that this sector would support. Encouraging renewable energy installations aids a reduction in greenhouse gas emissions and pollution, through the reduction in the use of fossil fuels. Noise and visual pollution will be minimised as the policy requires that renewable energy installations should be located and designed in such a way as to minimise increases in noise and any negative visual impacts of the installations/schemes. The policy refers to the support of renewable energy schemes in exceptional circumstances within internationally and nationally designated sites, where it can be demonstrated that the designation objectives for the area will not be compromised and any

adverse impacts are clearly outweighed by the social and economic benefits of the energy installation. There is therefore a risk that environmentally protected sites could be harmed, however, the policy wording is such that the impacts will be carefully considered.

This option will ensure that the district's best and most versatile agricultural land is protected by requiring proposals to only use low grade agricultural land and requiring proposals on the best and most versatile agricultural land to demonstrate with evidence that lower quality land is not available or practical for this use and the benefits of the development outweigh any concerns over the loss of agricultural land. However, it is likely that solar farms companies will be discouraged from exploring options in the district owing to this requirement. Consideration should be given to taking a more flexible approach such as considering when the land was last farmed and what compatible uses could also take place on the land in addition to the solar farm, e.g. grazing. A more flexible approach would still protect best and most versatile agricultural land but would not discourage solar farms from locating in the district.

This option is the most sustainable and should be included in the Local Plan as it encourages the development of renewable energy technologies in the district but also protects the district's natural assets and best and most versatile agricultural land.

Major Changes to Chapter 6: Clacton-on-Sea

MAJ6.2 Policy COS5 'Warwick Castle Market Site'

Previous SA work appraised the no plan option and the option of a mixed use redevelopment on the Warwick Castle site. Whilst the mixed use redevelopment option was the most sustainable with many positive impacts a retail unit is currently under construction on the site and so the situation has moved on. The draft policy should therefore be removed from the Local Plan as it is not deliverable.

MAJ6.3 Policy COS9 'Anglefield Cliff-Side Hotel Proposal'

This option deletes the previous draft policy promoting a new hotel on this site. This option will ensure that the character of the conservation area is preserved and that open space is retained.

Whilst the alternative option to include a policy has the potential for positive economic impacts the delivery of the proposal is uncertain and allocation of the land could lead to pressure for an alternative proposal in the future which would adversely affect the conservation area. This option, to remove the policy, should therefore be included in the Local Plan.

MAJ6.5 Policy COS12 'Development at Rouses Farm, Jaywick Lane'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

Under this option 350 dwellings will be delivered on this site. The site is located adjacent to the Urban Settlement of Clacton-on-Sea and is highly accessible to services, facilities and public transport, which will reduce the need to travel. A new primary school and medical centre will be delivered under this option. The site is underlain by aquifers and may require SuDS on site. The loss of a large greenfield site will affect surface water drainage and SuDS will help to reduce the impact of this and so it is strongly recommended that SuDS are required. The previous option included an area of strategic green infrastructure to maintain

and enhance the gap between Jaywick and Clacton. However, this option does not include an allocation for parkland. Under this option open space will be delivered within the site for the enjoyment of residents and also to act as a landscape buffer to the west. However, the amount of open space to be delivered is likely to be less than the previous option, which allocated an area of strategic open space. It is recommended that a strategic area of open space be provided along the western boundary as per the previous option to protect landscape character, enhance biodiversity and for the enjoyment of residents. This option extends the area to the north of the site, compared to the previous option. The northern half of the site is more open but would fit better with the existing settlement pattern and would fit better than the southern half which represents more of an extension away from the existing urban edge and would also reduce the gap between Clacton and Jaywick.

The site is considered to be sustainable.

MAJ6.6 Policy COS13 'Development South of Clacton Coastal Academy'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

The site offers the potential for some 270 dwelling, however 180 dwellings will come forward on the site which is considered a more appropriate figure as it will allow relatively low density development, which is appropriate on the edge of Clacton. 180 dwellings will deliver a mix of housing types, including affordable housing and open green space. The site is located between the urban fringe of Clacton-on-Sea and the settlement of Jaywick. The site adjoins the defined settlement boundary of Jaywick, an 'other' settlement within the district. The site is currently undeveloped agricultural land but would have a neutral impact upon visual amenity due to the location and level of development surrounding the site. It is accessible to services, facilities and public transport. Contributions will be secured to ensure that there is sufficient capacity in the primary schools in the area and the Jaywick STW will be upgraded. The site is at small risk of surface water flooding and it is recommended that SuDS are required on site.

The site is considered to be sustainable.

MAJ6.7 Policy COS14 'Development East of Rush Green Road'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

Clacton-on-Sea is the District's largest settlement and is classified as an 'Urban Settlement' and identified as a regeneration area. Urban Settlements offer sustainable locations for growth due to their large centres of population and a wide range of services, facilities and public transport and notably one or more secondary schools. The delivery of 60 dwellings will deliver a mix of housing types, including affordable housing and a significant area of open green space to the south of the site for outdoor recreation. Contributions will be secured to ensure that there is sufficient capacity in the primary schools in the area and the Jaywick STW will be upgraded. The development of 60 dwellings on this greenfield site is likely to adversely affect biodiversity, however there is potential for biodiversity enhancement measures to be incorporated into the development and the new green infrastructure to the south. This could form part of a SuDS system. The site is currently within a local green gap, which maintains separation between Clacton and Jaywick. As a site on the edge of Clacton and with 20ha of green infrastructure to the south development is unlikely to have significant

adverse effects on landscape character. Appropriate landscaping along the boundaries of the site would have a positive impact on landscape character.

The site is considered to be sustainable.

MAJ6.8 Policy COS15 'Development East of Thorpe Road'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

Clacton-on-Sea is classified as an 'Urban Settlement' and identified as a regeneration area. Urban Settlements offer sustainable locations for growth due to their large centres of population and a wide range of services, facilities and public transport and notably one or more secondary schools. Under this option 350 dwellings and a mix of other uses will be delivered. Gorse Lane Industrial Estate and Oakwood Business Park are directly to the south of the site providing future residents with good access to employment opportunities. Public transport links should be improved to ensure that future residents have good access to Clacton town and the railway station. Under this option an element of employment uses is also proposed, although considering the adjacent business and industrial parks it is uncertain whether employment uses will be delivered on this site. The site is detached from existing residential areas and without improvements to public transport residents will heavily rely on the private car for the majority of journeys. The delivery of a mix of uses on this site is important owing to its location. The impact on social infrastructure and services is uncertain and needs to be addressed to ensure that development of this site will not place unacceptable burdens on existing infrastructure. Open space will be created and owing to the scale of development this should be a strategic site. SuDS should be required to protect soil and water quality, enhance biodiversity and reduce the risk of flooding. Badgers and Great Crested Newts have been identified in the northern half of the site. These are protected species and proposals will need to ensure that they do not adversely affect these species. There will be a negative impact on landscape character by encroaching into the countryside north of Clacton. Landscaping along the north, west and east boundaries will help to reduce this impact.

The site is considered to be sustainable.

MAJ6.9 Policy COS16 'Development South of Centenary Way'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

The site offers the potential for 112 dwellings and the development of 100 dwellings under this option will make efficient use of land. The site is located in the Urban Settlement of Clacton-on-Sea and is highly accessible to jobs, services, facilities and public transport. Contributions may have to be made to local schools to accommodate the housing growth and this option, which increases the dwellings by 30 from the previous option for this site, will result in greater pressure on school places. The land is of an urban fringe character and lends itself to either an extension of the residential development to the south or an extension to the Industrial Estate. The site was allocated in the previous Local Plan for employment development and at first glance it would appear that allocating the site for residential use would have a negative impact on the objective to harness the district's economy strengths. However, the 2010 Employment Land Study carried out by GVA Grimley, considered that it was not a natural expansion site to the Industrial estate and there has been no interest from the development industry. There is currently a local riding school using the site and

development would result in the loss of a leisure facility and an amenity to the local area. An alternative location must be secured for the riding school before planning permission is granted for development. The landscape impact of the development could be reduced by using effective screening to the north.

The site is considered to be sustainable.

MAJ6.10 New Policy COS19 'New Primary, Early Years and Childcare Provision in Clacton'

Two options have been appraised in relation to primary, early years and childcare provision in Clacton. The first option is to include a policy in the Local Plan which allocates land for two new primary schools in Clacton; west of Jaywick Lane and west of Thorpe Road. The two areas of land will be transferred to Essex County Council as the Education Authority prior to the occupation of any of the new dwellings allocated in Clacton. The alternative is the no plan option.

Primary schools in Clacton have reached capacity and under the no plan option new pupils from the proposed new development sites will not be easily integrated into existing schools. Whilst developers could make financial contributions towards improvements to existing schools given the scale of development proposed and the full capacity of existing schools this is not a sustainable solution. Essex County Council has found from the evidence that two new primary schools are required to serve new development in Clacton. This option allocates land for these new schools and ensures that land will be transferred to Essex County Council prior to the occupation of any new dwellings. This option will ensure that the new development proposed in Clacton has access to primary schools and early years provision. Under the alternative no plan option the impact is uncertain as given the full capacity of existing primary schools pupils could have to travel outside of the town to go to school where there is capacity. The provision of new primary schools to serve new development will help to promote social cohesion by ensuring that new residents can mix within local schools and early years centres.

This option is the most sustainable and should be included in the Local Plan as it ensures that two new primary schools will be delivered to serve the new development proposed in Clacton.

Major Changes to Chapter 8: Frinton, Walton and Kirby Cross

MAJ8.4 Policy FWK4 'Frinton and Walton Conservation Area

Previous SA work appraised the options of including a policy identifying a proposed extension to the Frinton and Walton Conservation Area and treating this area as part of the conservation area (option 1) and the no plan option (option 2).

The SA summarised that option 1 will protect different aspects that make the Frinton Ward unique by carefully considering all parts of a development proposal. The policy also protects important open spaces within the proposed conservation area extension and trees/hedges. These are important for nature conservation and so in addition to the protection of the historic environment biodiversity will also be preserved.

However, on reflection it is considered that there is a danger that option 1 would simply dilute the special interest that justifies designation as a conservation area. Whilst the remainder of the Frinton Ward has many pleasant qualities, as concluded in the Conservation Area Management Plan, it cannot be said to have the special architectural and historic interest that is necessary for designation as a conservation area. Option 2 should be the preferred option as without firm evidence there is no justification for option 1 and its

inclusion in the Local Plan could dilute the protection afforded to all conservation areas across the district, which would result in a major adverse impact on the district's heritage assets.

MAJ8.5 Policy FWK6 'The Martello Development'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

The site offers the potential for 250 dwellings and under this option 150 dwellings will be delivered in addition to a number of other uses including retail, a healthcare centre, strategic open space and a 20-bed hotel. The site is located adjacent to the Urban Settlement of Walton-on-the-Naze and is highly accessible to services, facilities and public transport. A contribution may have to be made to the expansion of local schools in the area. The site is currently a designated Caravan and Chalet Park (Policy ER18, Adopted Proposals Map 2007). The loss of a tourist facility is negative, particularly in Walton. However, the caravan park is no longer viable and a hotel is proposed as part of the mix of uses to ensure that an element of tourism use remains on the site. The majority of the site is located in Flood Zone 1 with a proportion of the site being located in flood zones 2 and 3. This development must demonstrate that it reduces the overall flood risk and does not increase the flood risk elsewhere. The site is close to Hamford Water, which is an internationally notified wildlife sites. It is not considered that there will be a direct effect on Hamford Water and this is supported by the appropriate assessment. However, indirectly there is the potential for adverse impacts from increased recreational disturbance. A strategic area of open space forms part of this option and this will provide an accessible natural greenspace and thus reduce pressure on Hamford Water. This area of open space will also help to protect landscape character. The site has been identified in the Walton-on-the-Naze Regeneration Framework as an 'Opportunity Site' and as such could provide the catalyst needed for the regeneration of Walton.

The site is considered to be sustainable.

MAJ8.6 Policy FWK7 'Walton Mere'

This option clarifies that leisure, recreation and tourism uses will be supported on the site. The delivery of this site will provide employment opportunities as part of the new tourism, leisure and recreation uses. This option confirms the objective to restore the Mere and enhance the area to bring about regeneration of Walton-on-the-Naze. Flood risk issues will be required to be addressed through the design of development and areas of open space within the development will provide attractive outlooks and minimize adverse landscape impacts. The site contains a saltmarsh habitat; dominated by common cord grass and providing shelter to roosting and nesting coastal wildfowl and waders. The area would be a natural extension to the SSSI; however, it is subject to too much disturbance to qualify. The option refers to the provision of a compensatory habitat. However, in the first instance any harm to natural assets should be avoided, and then if this is not possible mitigated before a compensatory habitat is considered. This should be made clear in the policy.

This is the most sustainable option and should be included in the Local Plan as it will result in the most positive economic benefits as its main objective is to restore the Mere and enhance the area to bring about regeneration of Walton-on-the-Naze.

MAJ8.7 Policy FWK8 'Station Yard and Avon Works, Walton'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

Walton-on-the-Naze is classified as an 'Urban Settlement' and identified as a regeneration area. The site is within the Settlement Development Boundary of Walton-on-the-Naze and within the urban regeneration area. The site has been identified as an 'Opportunity Site' in the Walton-on-the-Naze Regeneration Framework. 40 dwellings could come forward on the site as part of a mixed use scheme. The site is adjacent to the train station, which makes it very accessible. The site is close to the seafront and improving the public realm of the train station could help to encourage more tourist trips to Walton by train. Improvements to the public realm will help to reduce the fear of crime by providing a more attractive and safe environment. As a previously developed site there could be contamination issues which will need to be remediated. The need to develop on greenfield sites on the edge of the settlement will be reduced due to the development being within the urban which therefore indirectly helps to protect landscape character and biodiversity. The site is adjacent to the Walton Conservation Area and development will need to ensure that it protects the setting of the Conservation Area.

The site is considered to be sustainable.

MAJ8.8 Policy FWK9 'Development at Turpins Farm'

The amendments to this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

The site offers the potential for 240 dwellings and this option will allocate land for 160 dwellings. The site is located adjacent to the Urban Settlement of Frinton-on-Sea and is has good accessibility to services, facilities and public transport. A contribution should be made to the expansion of local schools in the area. Although the site is in the Local Green Gap (Policy EN2, Adopted Proposals Map 2007) it would not reduce the minimum width of the Local Green Gap. The provision of a green buffer and open space to the north of the site would minimise the impact of the development from the surrounding landscape and the views from Hamford Water. This site is unlikely to directly affect Hamford Water but an increase in population within the town will increase visitor disturbance to Hamford Water. The provision of open space within the site will provide residents with an accessible natural greenspace, which will reduce pressure on Hamford Water. This open space will also help to protect landscape character of the coast. The majority of the site is located in Flood Zone 1 with a small section to the north-west prone to surface water flooding. Development must ensure that it does not increase the risk of flooding.

The site is considered to be sustainable.

Major Changes to Chapter 9: Manningtree, Lawford and Mistley

MAJ9.3 New Policy MLM5a 'Development North of Stourview Avenue, Mistley'

The inclusion of this site and policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

This previously undeveloped site is located adjacent to an 'Urban Centre' but has poor links to public transport. The size of site means that it may accommodate some sixty dwellings, there will be space for affordable housing and some green space. The site promoter is

putting forward a healthcare unit on site and early discussions should be held with Realise Health and the Parish Council to ensure the delivery of this community facility. The site is located within the proposed extension to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and the coastal protection belt. However, a Landscape Assessment has been submitted by the promoter of the site which concludes that the site does not meet the criteria for AONB designation. Further the site achieved a low score on Natural England's natural beauty criteria. To the north of the proposal site is the Stour and Orwell Estuaries Ramsar site, Special Protection Area (LP Policy EN11a) and Site of Special Scientific Interest (LP Policy EN11b). However, the railway line restricts access to this site. Development has the potential to indirectly affect this SPA at The Walls, which is a popular recreation area approximately a 20 minute walk from this site, through increased levels of recreation. However, the provision of open space on this site will mitigate this potential impact. The Landscape Assessment acknowledges the potential of this site as a biodiversity resource and it is recommended that open space, with biodiversity enhancement measures is located along the northern and eastern boundary of the site.

This site is considered to be sustainable.

Major Changes to Chapter 11: Key Rural Service Centres

MAJ11.2 Policy KEY1 'Development South of Cockaynes Lane, Alresford'

Previous SA work appraised the options of a large mixed use development on land south and north of Cockaynes Lane, Alresford and the option of a smaller development on these sites. The SA found that the option of a smaller development would be more appropriate to the scale of the settlement than the larger option and would result in less of an impact on landscape character. The SA did not identify any significant adverse impacts other than the loss of greenfield land.

The Council has accepted locally raised concerns about the impact of development on the character and environmental attributes of Cockaynes Lane and accordingly has taken the decision to remove the proposed allocation from the Local Plan. Whilst the SA did not identify any adverse impacts this does not mean that the site should be allocated. Alternative sites are available in the district's key rural service centres that would meet the district's housing need and result in more positive impacts on sustainability objectives.

The allocation of land off Andrews's Close, Alresford was appraised as part of the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisal is repeated here.

The site would provide the opportunity for new housing, including affordable housing, along with new Green Infrastructure and improvements to biodiversity. The sustainability score is high (+11) and the site scored most highly in terms of access to alternative means of public transport. The setting of the village would be protected by retention and strengthening of existing boundary vegetation. The primary school, recreation ground and village hall are all located near by. The site would be well suited to a small level of planned growth related to local needs, sympathetic to local character, beneficial to the local community and deliverable without the need for major infrastructure investment.

The site is considered to be sustainable.

MAJ11.3 Policy KEY2 'Development off Holly Way, Elmstead Market'

The inclusion of these two sites and this policy were appraised as part of the addendum to the SA of Third Party Housing and Employment Sites. The full appraisal is included in that SA, however the summary of the appraisals are repeated here.

Land west of Church Road, Elmstead Market: This development site, located adjacent to the boundary of a key rural service centre, will deliver 20 dwellings. It is uncertain whether the development of this smaller site (than the previous site option) will deliver open space and improvements to the local school. However, the development of 20 dwellings on a smaller site would result in a lesser impact on landscape character.

Land off Meadow Close and Holly Way, Elmstead Market: This development site, located adjacent to the boundary of a key rural service centre, will deliver 20 dwellings. This option does not score as favourably as the previous option as it will not deliver alternative uses to housing and does not include the provision of green infrastructure. However, the development of 20 dwellings on a smaller site would result in a lesser impact on landscape character.

Major Changes to Chapter 12: Countryside and Smaller Rural Settlements

MAJ12.1 Policy COU1 'Plotland Development'

Under this option only the 1 for 1 replacement or extensions to existing plotland properties will occur. Proposals will have regard to flood risk, landscape and wildlife designations. The extension or replacement of properties represents an opportunity to include flood risk mitigation measures and to improve the landscape setting and this should be incorporated into the policy or supporting text. To avoid adverse impacts on designated wildlife sites it should be made clear that development will not be permitted if it is closer to wildlife sites than the existing property.

This option is the most sustainable and should be included in the Local Plan as it will ensure that further plotland development does not occur and replacement and extensions will bring positive impacts, whilst being simpler to interpret than the alternative option considered.

MAJ12.2 Policy COU3 'Conversion and Re-Use of Rural Buildings in the Countryside'

This option will allow the re-use of rural buildings for employment purposes, which will help to sustain and enhance the rural economy and promote regeneration. By their nature rural buildings are unlikely to be located close to centres of population, which is likely to lead to increased trips by the private car. However, the scale of development is required by this option to be appropriate to the rural setting. Tourist uses can be a good use of a rural building; these uses generate employment but are often not as intensive as residential or B1, B2 and B8 employment uses. Vacant rural buildings are often occupied by bats and barn owls, which are protected species and although these species are protected by legislation reference should be made in the supporting text. Many redundant farm buildings are curtilage listed and their re-use will protect the district's historic assets providing that the design is sensitive. This option will ensure that where development involves the re-use of a historic building it must clearly show that the historic fabric and character of the building will not be adversely affected and that all opportunities have been taken for enhancement. This option will also ensure that the replacement of redundant rural buildings that are important architecturally or historically will not be supported, therefore protecting the existing historical assets further. This option allows residential conversion if it can be demonstrated that alternative uses are not practical or would not be appropriate for amenity reasons. This is likely to lead to more proposals for residential conversion and it will be important to ensure that rural buildings retain their character.

This option is the most sustainable as it provides detailed criteria with which to carefully assess proposals for the conversion of redundant rural buildings and allows residential conversion where alternative uses would not be practical or suitable for amenity reasons. This will lead to the re-use of redundant buildings and improve the setting of such buildings.

MAJ12.3 Policy COU11 'Great Oakley Community Development'

This policy will facilitate the delivery of new housing to enable the development of a new village hall and car park in Great Oakley. The provision of a car park will significantly reduce congestion during school drop off/pick up, which will have a significant positive benefit locally. A new village hall at a more accessible location within the village than the existing hall will have significant positive impacts including promoting social cohesion. Whilst an area of open space will be lost to the development an element of open space will remain on the site and the location of a new village hall in this location will ensure a better relationship with the adjacent playing fields. There is existing development to the south and east and an element of open space will be retained to reduce the landscape impact.

As a package of proposals this policy is sustainable and will result in positive benefits to Great Oakley.