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Appendix to Additional Sustainability Appraisal of North Essex Local Plan Section 1

Comments made in response to Method Scoping Statement consultation

Prepared by LUC
July 2019

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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
GIS & Visualisation

LUC LONDON
43 Chalton Street
London
NW1 1JD
T +44 (0)20 7383 5784
london@landuse.co.uk

Offices also in:
Bristol
Edinburgh
Glasgow
Lancaster
Manchester



Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD
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Comments made in response to Method Scoping Statement Consultation

- 1.1 The scope and methodology of the additional SA Work was set out in a Method Scoping Statement, which was reviewed by the Inspector and subsequently amended based on his advice¹. This amended version of the Method Scoping Statement was subject to formal public consultation between 14 December 2018 and 1 February 2019. The comments raised during this public consultation are summarised in Table 1.1. Where appropriate we have provided a response to each point raised.

Table 1.1: Consultation Comments and Responses

Summary of Comment	Response
Will the Method Scoping Statement (MSS) be amended following this consultation?	The MSS will not be amended as it set out the proposed methodology at the point at which it was published. The final methodology utilised, and how this takes account of the consultation responses is set out in this SA Addendum Report.
It should be considered that as a result of the additional SA, it is possible that the need for or scope/role of the Section 1 Plan could change considerably, and garden communities may no longer be proposed.	The implications of the Additional SA Work and other emerging evidence (e.g. on viability) for the Section 1 plan are a matter for the NEAs. Any changes proposed to the plan will be subject to SA in due course.
Section 2 SAs should be revised to ensure they are consistent with the new SA.	The implications of the Additional SA Work and other emerging evidence (e.g. on viability) for the Section 2 plans are a matter for the NEAs.
The inspector should be re-consulted after having sight of all consultation responses.	The Inspector has not indicated a desire to be re-consulted following consultation on the Method Scoping Statement. The NEAs are providing the Inspector with monthly updates.
Several commenters raised concerns about public consultation not being sufficient.	Provision for consultation is set out in the MSS at paragraphs 2.29 and 2.55. This Additional SA Report will be subject to consultation in accordance with statutory processes.
Results should be published for public consultation at the end of Stage 1 and 2.	This is not necessary, the final results are provided in this Additional SA Report which will be consulted upon in accordance with statutory requirements.

¹ See Inspector's letters dated 21 November 2018 and 10 December 2018.

Summary of Comment	Response
The concerns and requests raised by the inspector are being ignored.	Disagree - the methodology set out within the MSS has been developed to address the concerns raised by the Inspector. The inspector has been consulted on the MSS and not raised any fundamental issues. Since the consultation on the MSS and undertaking the check and challenge workshop the SA methodology has been amended to include more detailed stage 1c assessments. This amendment is considered to be in line with the Inspector's requests, and to address the concerns he has raised.
The proposals will be biased towards strategic solutions rather than proportionate growth. Non-strategic proportionate growth should be assessed.	The MSS sets out that proportionate growth will be tested in Task 8. The spatial strategy alternatives tested in Stage 2 of the SA (see task 9 of the MSS) includes 'proportionate growth' in order to take account of the Inspector's recommendations in his letter of 8th June 2018. No bias is made towards one spatial strategy over another.
The proposed spatial strategy by Ted Gittins should be appraised	As set out under Task 8 of the MSS, the Additional SA Work considers spatial strategies as advised by the NEAs. The Spatial Strategy Options Paper, which sets out the rationale and justification of the spatial strategies assessed, is included as an appendix to the Additional SA Report.
The SA unjustifiably constrains the assessment of reasonable alternatives in that it refers only to sites of 2,000+ capacity; smaller sites could provide reasonable alternative growth locations (e.g. Brook Green, Tiptree, Wivenhoe, and Witham). This limits assessment of, and consultation upon, reasonable alternatives, including dispersed development. Sites of 100+ dwellings should be assessed. The additional SA work must assess all types/sizes of development that could contribute to the housing requirement. There are several sites which were assessed and discounted under the process of preparing the Section 2 plans, on the basis that some of the housing need would be met by new Garden Communities. These should be considered as they constitute reasonable alternative options to the Garden Communities. The SA should assess the number and location of sufficient dwellings for the full housing need for the plan area, rather than only 7500 dwellings as the Section 2 sites have not been found sound.	Paragraph 2.24 of the MSS sets out the criteria used to select the strategic sites assessed within the Additional SA Work. 2,000 dwellings or more is considered an appropriate scale of site option to consider within a strategic Local Plan document, as explained in the MSS. Smaller site options are more appropriately considered through the Section 2 plans. In line with the Inspector's recommendations, Stage 2 of the SA also appraises a proportionate growth spatial strategy option, which considers the likely significant effects of a more dispersed pattern of growth. The Inspector has not indicated a need to revisit the submitted, Section 2 plans. While it is accepted that the Additional SA Work and other new evidence may indicate the need for changes to the Section 2 plans, should this occur, those changes would be subject to further SA in due course.
Different site capacities should be tested at Stage 1b.	Different scales of development at each strategic site are considered in detail in the Stage 1c assessments.

Summary of Comment	Response
Strategic sites should be tested at 5,000 dwelling capacity, the new settlement threshold argued by the NEAs and agreed by the Inspector.	The NEAs have contacted the site promoters, who have commented on the site information forms, these set out the different capacity options for each site which would be. The strategic sites have been appraised on this basis, which is felt to be more appropriate than blanket testing each site at 5,000 dwellings.
Concerned that SA method defers some of the considerations in paragraph 122 of the Inspector's letter to Stage 2.	LUC believes that the method utilised by the SA is appropriate. The Inspector's letter of 21 November 2018 to the NEAs commenting on their proposals for taking the Section 1 Local Plan Examination forward does not raise any concerns about the division of tasks between Stages 1 and 2 of the SA.
Several comments from site promoters set out that the boundary of their site was incorrect.	Subsequent to the MSSS consultation, site boundaries were confirmed with promoters via the site information forms.
Liaison has not occurred with all site promoters, therefore paragraph 2.18 of the MSS is inaccurate. Lightwood should be able to explain their proposals to NEAs / LUC to ensure they are fully understood, as per the 8th June Inspectors Letter para 126. Furthermore, LUC should accept a full suite of documents on each proposal and be briefed on them, including future business space occupier/employer.	LUC believes that the engagement undertaken with site promoters and statutory organisations is appropriate, reasonable and in accordance with the requirements of the SEA Regulations and Inspector's letter on the 8 th of June. To summarise, engagement with site promoters has included / will include: • Formal consultation on method scoping statement (MSS); • Face-to-face drop-in sessions to explain the MSS; • Invitation to the check and challenge workshop; • Opportunity to amend site information forms setting out details of their proposals; • Formal consultation on the Additional SA Report (this report).
The additional SA work should be suspended until viability, transport infrastructure and employment opportunities studies have been undertaken and published.	In order to ensure timely delivery of the SA report and resumption of the examination, the SA has been undertaken using draft findings of such evidence where it was available, and findings were updated following the receipt of more up to date and eventually the final versions of such reports.
A suitable traffic modelling exercise and rapid transit plan to be included in assessment (analysis of current capacity and impact of proposals on the transport network is needed).	Available evidence on key capacity constraints in the strategic transport network has been considered in Stage 1c and Stage 2 of the Additional SA.
It is not clear as to why Monks Wood is being assessed at 2,000 as this has not been promoted.	Sites are being assessed at various sizes as requested by the Inspector in his letter of 8 June 2018.

Summary of Comment	Response
A means of assessing viability at different stages of development is needed. In particular, the proposed garden communities must be demonstrated as being viable in accordance with the Inspector's letter of 8th June 2018.	The Additional SA Work takes into account information regarding viability / deliverability of site options including requisite mitigation as advised by the NEAs, as set out in the MSS in paragraph 2.45. This information has been provided within site information forms, which were prepared by the NEAs in accordance with correspondence with the promoters of each site. In addition, the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update Report by Hyas Associates (June 2019) provides further evidence in relation to the sites coded NEAGC1, NEAGC2 & NEAGC3 (the three garden communities proposed in the submitted Section 1 Local Plan).
The NEAs need to assess the likelihood and timing of key infrastructure items (rapid transit system; upgraded A120; diverted and widened A12 between Kelvedon and Copford) being funded and the SA should assess each spatial strategy with and without these items.	The Additional SA Work takes into account information regarding viability / deliverability of site options including requisite mitigation as advised by the NEAs, as set out in the MSS in paragraph 2.45. This information has been provided within site information forms, which were prepared by the NEAs in accordance with correspondence with the promoters of each site. In addition, the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update Report by Hyas Associates (June 2019) provides further evidence in relation to the sites coded NEAGC1, NEAGC2 & NEAGC3 (the three garden communities proposed in the submitted Section 1 Local Plan).
Omission of employment land means the SA fails to assess the economic pillar of sustainability. This also fails to address the Inspector's concerns.	The submitted Section 1 and 2 plans in combination set out employment allocations. The Inspector has not raised concern in relation to the SA of employment sites and therefore there is no requirement for the additional SA Work to assess these. Where employment is proposed within sites, this has been taken account of in the Stage 1c site assessment and assessments of spatial strategy alternatives.
All settlement promoters should demonstrate minimum land value as in contract.	All strategic site promoters were asked by the NEAs to confirm that the site can viably deliver policy compliant sustainable development and all necessary environmental mitigation, whilst also achieving a benchmark land value in accordance with national planning policy and guidance, at the dwelling capacities being considered by the SA. Account is taken of this information in appraising the sites.
Deliverability of all sites should be taken into account	The Additional SA Work takes into account information regarding viability / deliverability of site options including requisite mitigation as advised by the NEAs, as set out in the MSS in paragraph 2.45.

Summary of Comment	Response
The deliverability of development on the CAUSE sites should be investigated.	The Additional SA Work takes into account information regarding viability / deliverability of site options including requisite mitigation as advised by the NEAs, as set out in the MSS in paragraph 2.45. This information has been provided within site information forms, which were prepared by the NEAs in accordance with correspondence with the promoters of each site, including CAUSE.
Rapid Transit Service should not be assumed from the commencement of the development.	RTS is considered in the spatial strategies review, which is described under task 9 of the MSS.
It is not clear if the scope for mitigation is a matter of the LUC 'system' or a matter for the NEAs to decide. Stage 1 of the assessment methodology should assume some mitigation for environmental criteria, as it does for the accessibility criteria.	In terms of appraisal criteria relating to access to services and facilities, Stage 1b of the appraisal applies consistent, high level assumptions (see para. 2.37 of Method Scoping Statement) about likely new provision which would serve to mitigate otherwise negative effects. This was subsequently appraised in more detail at Stage 1c, in accordance with the site assessment assumptions and framework. In terms of appraisal criteria relating to environmental harm, a potential for harm is identified where 5% or more of a site falls within the relevant zone of influence for environmental effects, recognising that it is likely to be possible to avoid significant effects when a smaller proportion of a site falls within a zone of influence. Where relevant, the SA recognises that environmental harm is uncertain and will depend on the layout and design of specific proposals that come forward. This was subsequently appraised in more detail at Stage 1c, in accordance with the site assessment assumptions and framework.
Comments that various strategic sites should not be included on the basis that infrastructure 'cannot cope'.	The Additional SA Work takes into account information regarding viability / deliverability of site options including requisite mitigation as advised by the NEAs, as set out in the MSS in paragraph 2.45. This information has been provided within site information forms, which were prepared by the NEAs in accordance with correspondence with the promoters of each site.
It is wrong to use the sub-heading 'non-garden community options' as all sites could be developed in accordance with garden community principles, so long as they are big enough, options should be called 'new settlement alternatives'.	It is agreed that this terminology is misleading, but was intended in part to help readers differentiate between the submitted garden community proposals and the alternative sites. Consistent assumptions have been applied to all strategic sites regardless of their different site codes. The assumptions which all strategic sites are consistently assessed against are set out in the Additional SA report.

Summary of Comment	Response
NEAGC1 is annotated as ALTGC1 on figures 2.1-2.3 in the MSS.	Sites ALTGC1 and NEAGC1 occupied the same boundary, however, as set out in table 2.2 of the MSS, were to be tested at different site capacity. Subsequent to the MSS being published, option ALTGC1 was integrated into NEAGC1, as a different site capacity. The overlapping boundary was the reason why the ALTGC1 annotation covered the NEAGC1 annotation on the figures in the MSS.
All sites must be appraised consistently.	Consistent assumptions have been applied to all strategic sites regardless of their different site codes. The assumptions which all strategic sites are consistently assessed against are set out in this report.
The assessment lacks consideration of community cohesion.	Community Cohesion is considered as part of SA Objective 1. Paras 2.34 and 2.49 of the MSS together set out this will be considered in the Stage 2 assessment. Subsequent to consultation on the Method Scoping Statement, an additional, more detailed 'Stage 1c' assessment has been added to the methodology which considers the effects of strategic site alternatives in relation to all SA objectives.
SA objective 2 should be scoped in at Stage 1b.	Subsequent to consultation on the Method Scoping Statement, an additional, more detailed 'Stage 1c' assessment has been added to the methodology which considers the effects of strategic site alternatives in relation to all SA objectives.
The MSS is unclear as to how assessments will take account of cross-border sites.	Although not clear within the consultation comment, 'cross-border sites' are considered to be those which extend outside of the NEA boundary, rather than those which cross the district boundaries of the three NEAs. The SA of site options spanning the NEA boundary will assess the development that would be provided for by the Section 1 plan, i.e. that development falling within the NEA plan area but the supporting narrative will recognise the potential for cumulative effects with strategic development provided by other plans, particularly where that development would be contiguous with sites in the NEA plan area.
Disagree with the SA assumption that no strategic sites will provide new primary health care facilities.	Subsequent to consultation on the Method Scoping Statement, a threshold for provision of new primary healthcare facilities has been defined in consultation with North Essex and Mid Essex CCGs.

Summary of Comment	Response
Representatives of North Essex Garden Communities Ltd (NEGC) were present at the inception meeting, this should be reported in the MSS in task 1.	NEGC attended the inception meeting. As recorded in the meeting minutes, LUC made it clear at the meeting that NEGC's only role in the context of the SA should be to provide evidence to the NEAs and that LUC would communicate only with the NEAs and not with NEGC directly in order to ensure objectivity.
Table 2.2 is confusing – all alternative options within the Garden Community sites should be set out beneath them.	Suggestion on presentation noted.
The scoring system for Stage 1a should be set out in the MSS.	This Additional SA Report sets out the appraisal framework used at Stages 1a, 1b and 1c.
Scope of other evidence bases needs to be clarified.	This Additional SA Report sets out all of the evidence base documents which the Additional SA utilises.
ALTGC4 and ALTGC5 have been included in the assessment but never promoted as separate sites, although they overlap the NEAGC2. It is incorrect to assume these parcels could come forward unless as part of a wider garden community. Suggest their own parcels of land based on a phased approach.	Following the MSS consultation these two sites have been merged and the boundary revised. This was assessed as ALTGC4.
Need for legal opinion on whether SA complies with Environmental Assessment of Plans and Programmes Regulations 2004.	The NEAs Legal Support Team have reviewed this report. They consider it meets statutory requirements, and is suitable for public release.
Footnote 10 refers to 2018 NPPF rather than 2012 version.	Noted.
Distinction should be drawn between negative effects and significant negative effects in Stage 1a.	Subsequent to consultation on the Method Scoping Statement, an additional, more detailed 'Stage 1c' was added which appraises the significance of effects in relation to all SA objectives.
Proximity to a railway station or bus stop is a crude measure, this should consider the frequency of service and capacity of infrastructure.	It is considered that the frequency of bus services is too fluid to be considered in the SA and is likely to change in response to increased demand. The Stage 1c site appraisals note the frequency and capacity of rail services, where relevant.
Stage 1 of the assessment is less detailed / well informed than the SA work undertaken previously, and it will therefore be difficult to form a contrary view.	The Inspector's concerns with the previous SA work are not related to the level of detail but to its objectivity, the clarity of description of alternatives, and the clarity of the reasons for selecting the alternatives. These matters are all addressed by the Additional SA Work. Furthermore, subsequent to consultation on the Method Scoping Statement, an additional, more detailed 'Stage 1c' was added which appraises the significance of effects in relation to all SA objectives.

Summary of Comment	Response
Stage 1a should take account of the proportion of each site within each buffer.	Following initial results, the Stage 1a/1b, GIS-based appraisal was refined to require: At least 50% of a site to fall within the most preferable zone of influence for access to services and facilities (accessibility tests). Previously any intersection would have scored the site in the most preferable zone of influence. At least 5% of site to fall within the zone of influence of environmental assets (environmental harm tests) before the site was recorded in the least preferential zone of influence. Previously any intersection would have scored the site as being in the least preferable zone of influence.
The Stage 1a assessment should be more bespoke regards historic environment impacts	In the absence of a specialist heritage study, proximity-based assumptions have been made to provide some indication of the potential for effects on heritage assets.
The thresholds for sites which can provide town and local centres are unjustified and will favour larger development sites.	In consultation with the NEAs, the SA now assumes that all alternative strategic sites will provide new local centre facilities.
Oversight in SA MSS: no conformity with Neighbourhood Plans	Conformity of a strategic plan such as the Section 1 Local Plan with lower tier Neighbourhood Plans is not a matter for the SA.
The assessment results in testing sites at significantly different scales. This cannot be done consistently as larger sites will be more self-sustaining	The sites that have been proposed by various promoters are different sizes, the SA will consider the potential for sites to utilise existing services and the potential for mitigation to be provided.
The SA should take account of the detailed proposals being put forward through the planning system, where these intersect with the strategic sites.	In order to ensure that all reasonable alternatives can be assessed consistently and to reflect the strategic nature of the plan being assessed it is not appropriate for the Additional SA to take into account detailed proposals for individual sites. Instead, the SA is based on an outline of what is likely to be delivered at each site, as identified by the NEAs following appropriate engagement with site promoters.
Concerns that assumptions around services, facilities and infrastructure will not be consistent.	Since the consultation on the MSS and undertaking the check and challenge workshop the SA methodology has been amended to include more detailed Stage 1c assessments. This amendment is considered to be in line with the Inspector's requests, and to address the concerns he has raised.
The reasons for selecting the strategic sites are not justified.	The MSS summarises how the strategic sites have been identified in paragraph 2.24.

Summary of Comment	Response
Clarification required as to where buffer distances are measured from – the centre or edge of each site.	The definitions of the buffers themselves are dependent on the digital data available for the facility or environmental asset and the nature of that asset, for example listed buildings are only available as point data; in which case buffers are made around this point. For the GIS data which are areas (polygons) such as wildlife sites, buffers around are defined from the site boundary. It is important to note that following initial results, the Stage 1a/1b, GIS-based appraisal was refined to require at least 50% of a site to fall within the walking catchment of services and facilities (accessibility tests), or at least 5% of site to fall within the zone of influence of environmental assets (environmental harm tests). Previously, the method was based on any overlap of the site boundary with the relevant buffer.
Stage 1 does not allow for a sufficient consideration of mitigation proposed by developers and therefore should not be used to discount sites.	In terms of appraisal criteria relating to access to services and facilities, Stage 1b of the appraisal applies consistent, high level assumptions (see para. 2.37 of Method Scoping Statement) about likely new provision which would serve to mitigate otherwise negative effects. This was subsequently appraised in more detail at Stage 1c, informed by site information forms. In terms of appraisal criteria relating to environmental harm, a potential for harm is identified where 5% or more of a site falls within the relevant zone of influence for environmental effects. Where relevant, the SA recognises that environmental harm is uncertain and will depend on the layout and design of specific proposals that come forward.
It should be clarified how the results of Stage 1 will be colour coded.	The colour coding is set out in the tables on page 30 and 31/32 of the MSS.
Stage 1 SA criteria should take account of public transport and cycling distances not just walking distance.	Disagree - walking is the most sustainable form of travel and therefore forms an appropriate starting point for the assessment of accessibility.
Clarification should be provided as to how each of the SA criteria will result in a score against the original SA objectives.	Subsequent to consultation on the Method Scoping Statement, an additional, more detailed 'Stage 1c' assessment has been added to the methodology which considers the effects of strategic site alternatives in relation to all SA objectives. This stage 1c is informed by the performance of the sites against the SA Objectives.
Clarification should be provided as to how the strategic options will be selected by the NEAs following Stage 1.	This is set out in the Additional SA report.

Summary of Comment	Response
Concern about lack of environmental harm mitigation from Stage 1b	In terms of appraisal criteria relating to access to services and facilities, Stage 1b of the appraisal applies consistent, high level assumptions (see para. 2.37 of Method Scoping Statement) about likely new provision which would serve to mitigate otherwise negative effects. In terms of appraisal criteria relating to environmental harm at Stage 1a/1b, the potential for harm is identified where 5% or more of a site falls within the relevant zone of influence for environmental effects. Environmental effects have been subsequently appraised in more detail at Stage 1c, informed by site information forms. Where relevant, the SA recognises that environmental harm is uncertain and will depend on the layout and design of specific proposals that come forward.
There must be sufficient time to review the results of the SA	The SA will be subject to consultation in accordance with statutory requirements.
The SA should consider growth over the whole plan area for Section 1 and Section 2 plans and should not simply try to address the shortfall from the sites proposed in the Section 2 plans.	The Inspector has not indicated a need to revisit the submitted, Section 2 plans. While it is accepted that the Additional SA and other new evidence may indicate the need for changes to the Section 2 plans, should this occur, those changes would be subject to further SA.
Some commenters wished to portray their endorsement for the CAUSE Metro Plan proposals.	Noted.
Are the assumptions in this SA the same as in the previous SA?	Although the framework of SA objectives remains the same, the assumptions have been revised in accordance with the advice from the inspector, information provided by the NEAs, and other evidence bases, all of which is set out in this report.
Will this methodology be applied to the CAUSE Metro Plan sites?	The CAUSE Metro Plan sites have been assessed.
Confused as to why the Garden Community Framework is not being revisited with the new assessment criteria.	This is explained at paras. 2.9-2.11 of the MSS.

Summary of Comment	Response
Does not account for Stansted expansion.	A further assessment has been made of predicted future noise envelopes for Stansted, as set out in the Environmental Statement that accompanied the 2018 planning application for airport expansion. 'Onset of community annoyance' is described as being associated with the 57 dB LAeq, 16h noise contour. This noise contour does not extend into the NEA plan area either for the 'Do Minimum' scenario (expected increase in aircraft movements within currently permitted limits) or if the proposed airport expansion is permitted. As such, the potential aircraft noise effects of Stansted Airport do not need to be scoped back into the SA of strategic site options.
Para 2.21 incorrectly states that 1,106 properties will be allocated to Colchester; the Local Plan Document which states 1,106 dwellings in Stanway alone	Para. 2.21 of the MSS actually states that the Section 2 site allocation with the largest dwelling capacity is 1,106 dwellings. Upon review however, this is in fact the total Section 2 allocation to Stanway and comprises several smaller sites. The largest individual Section 2 allocation is for 1,000 dwellings by Policy SC2: Middlewick Ranges.
Error at para 2.23.	Para 2.23 sets out that the additional housing requirement above that allocated in the Section 2 sites and existing commitments is approximately 7,500 dwellings. This is not an error.
Evidence required for health and youth provision assumptions.	Delivery of health and youth facilities as mitigation for strategic sites is assumed in accordance with information from Essex County Council. Information provided by the North Essex and Mid Essex CCGs during the consultation has been utilised to update the SA assumptions in relation to health care facilities provided by new development.
Employment should be taken into account.	As set out in the MSS, existing employment centres are accounted for in the methodology. Evidence from the NEAs, informed by information from site promoters relating to provision of new employment is taken into account in the additional SA work.
How many houses will be built within the plan period?	The SA assessed the number of dwellings which may be provided within each strategic site in accordance with the capacity options set out in table 2.2, of the MSS, although these were amended to bring them up to date in relation to information received via the site information forms.
What does the SA mean in 2.44 regarding proportionate growth around existing settlements?	The MSS allows for a consideration of 'proportionate growth' and garden community alternatives as recommended by the inspector in his letter of 8 th June 2018. The MSS sets out that proportionate growth will be tested in Task 8.

Summary of Comment	Response
Why is an addendum being produced rather than a new SA?	The Inspectors letter of 8 June sets out that additional SA work may cure deficiencies of previous work; it is not considered necessary to restart the entire SA process.
Copford should be a Local Centre	The local centres identified to inform stage 1 are based on the settlement hierarchies in the emerging Section 2 plans. Copford is not identified at a suitable level within this hierarchy to be identified as a local centre.
Mitigation for noise (road), air pollution should be identified.	Mitigation for noise and air pollution will depend on site specific layout and design and therefore a consistent mitigation strategy cannot be applied to every site.
Assumptions in table 2.3 should include ECC's express priority for delivering Halstead bypass on the A131.	It appears that the commenters were referring to a previous draft of the MSS, the one which was sent to the Inspector for comment, rather than that published for consultation. On the basis of the Inspectors feedback, specific infrastructure assumptions were removed from the MSS. Standardised mitigation is applied in Stage 1b and site specific mitigation is applied in Stage 1c assessments, informed by the site information forms. This is set out in this Additional SA Report.
Timetable is out of date and references at 2.5 and Figure 2.4 should be updated.	It appears that the commenters were referring to a previous draft of the MSS, the one which was sent to the Inspector for comment. The consultation version of the MSS did not include a specific timetable to allow for post-consultation changes, the implications of which were not known at the time of publication of the consultation MSS.
Wish for the private meetings between the NEAs and LUC to be made public (para 2.30 and 2.37).	There is no requirement within the SA process to publish the minutes of meetings between the SA consultant and client authority.
MSS needs to be clearer about the proposals being considered, potentially by use of larger scale mapping. Maps at Figure 2.1 are not clear.	Noted. We hope the presentation of sites within this Additional SA Report is clear.
Infrastructure column in Table 2.3 is incomplete.	It appears that the commenters were referring to a previous draft of the MSS, the one which was sent to the Inspector for comment. On the basis of the Inspectors feedback, specific infrastructure assumptions were removed from the MSS
The Stage 1 assessment should be refined as 'any intersection' with a high harm buffer is too crude.	Following the consultation on the MSS, the Stage 1 assessment has subsequently been refined to allow a 5% tolerance for intersection with an environmental harm buffer, as set out in this Additional SA Report.

Summary of Comment	Response
Unclear how dwelling capacities in each site have been calculated.	Dwelling capacities have been identified using a standardised approach across all strategic sites, provided by the NEAs.
The habitats regulations assessment will need to be amended if there are subsequent changes to dwellings allocated within the Section 1 Local Plan.	Noted.
Propose Rivenhall/Witham GC as an alternative.	The MSS summarises how the strategic sites have been identified in paragraph 2.24. The sites proposed do not meet the criteria.
Do not agree with principle of fast tracking Metro Plan to Stage 2 assessment.	CAUSE Metro Plan will be subject to Stage 1 assessment, and in line with the advice of the inspector, will be considered in Stage 2 regardless of the Stage 1 outcome.
Land at Great Notley should be included as a strategic site as it comprises 2,000 dwellings.	This is a Section 2 Local Plan policy allocation that covers an area of different landownerships where it is not proposed to implement garden community principles. Following recent planning permissions, the remaining capacity is 1,690, which is well below the 2,000 dwelling threshold.
Assessment should take account of sites proposed in the Section 2 local plans.	The context provided by Section 2 allocations has been recognised in the 'Stage 1c' appraisal of strategic sites.
Concern about loss strategic gap to the east of Colchester	SA objective 14 relates to protection of landscape; all sites were assessed in relation to this in Stage 1.
The SA criteria are not sound.	The site assessment criteria are considered to be robust, and are used to inform Stage 1c assessments of each site.
Question whether the original scoping was legally carried out and inevitably creates concern for the updated scoping report	Questions of the legality of the original scoping work are a matter for the NEAs and their legal advisers.
Has there been appropriate consultation for the scoping of the Section 1 SA?	Publication of the MSS for consultation is judged to provide adequate consultation on the scope of the Additional SA.
Screening out Silver End on the basis of the A120 dualling not coming forward is inefficient – why include something that will come out?	These consultation comments relate to an example scenario described to explain how the assessment may be undertaken, and what it may conclude, rather than an actual result of the SA at the time of the MSS. The strategic sites have been identified in accordance with the information set out in paragraph 2.24 of the MSS. As the site at Silver End meets these criteria it is appropriate to assess it through the SA process.

Summary of Comment	Response
The methodology sets out a belief that the three original GCs are better than the other sites.	Disagree; the MSS is clear that all sites will be assessed consistently.
What are non-GC sites?	Non-GC sites are those identified in Table 2.2 of the MSS as 'SUE' or 'VE'. As set out in the MSS, all sites have been assessed consistently.
Why are village and town extensions so large?	The strategic sites have been identified in accordance with the information set out in paragraph 2.24 of the MSS.
The additional SA work is only assessing 22 sites as favoured by the NEAs, not most appropriate options.	The strategic sites have been identified in accordance with the information set out in paragraph 2.24 of the MSS.
Some locations can generate more land value uplift, house prices and land values should be assessed.	Disagree. The role of SA is to review the sustainability merits of the policies and sites within a Local Development Document, not to review the viability of sites.
No assessment of the benefits of having more space in settlement footprint.	This point is not clear. All sites have been assessed using the same density calculations, provided by NEAs.
Scoring based on crow-fly distance of housing from a railway station is inadequate.	Stage 1a/b is a first assessment to identify the sustainability merits of each site and utilising a straight line approach is proportionate and valid. The more detailed Stage 1c assessments highlight any significant barriers to accessing relevant services and facilities which may not be addressed using a straight line assessment.
Larger sites are prioritised as para 2.40 sets out that larger sites can support high order transport services. Smaller settlements are not less able to support higher order transport facilities – there are many factors which affect ability to deliver transport facilities and these should be recognised.	Higher order services require a certain critical population mass to support them. Para 2.40 provides an example whereby critical mass gained from development of several sites may be able to support a higher order infrastructure asset.
The SA should recognise costs borne by others such as increasing commuter costs as a result of greater demand resulting from development.	The role of SA is to review the sustainability merits of the policies and sites within a Local Development Document, not to review whether commuting costs will increase, which is influenced by numerous factors, many of which are completely unrelated to development allocations in local plans.
Underused facilities should be accounted for.	The SA assumes that strategic developments will provide for the necessary new schools capacity. A review of general schools capacity is undertaken as part of the Stage 1c site assessment, which was added to the SA methodology after the MSS consultation.

Summary of Comment	Response
The output from task 8 should include a ranking of sites in terms of financial viability at different sizes and provide analysis of the differences.	The role of SA is to review the sustainability merits of the policies and sites within a Local Development Document, not to review the viability of sites.
The PM and NO2 increases associated with development must be calculated.	Disagree. The level of evidence used for the SA is proportionate and sufficient.
Additional evidence on the impact of the Garden Communities on existing centres is needed.	Where local centres and employment are provided within new communities, it is assumed that this will meet the needs of the strategic site, therefore it is not assumed that there will be impacts on existing centres.
Evidence is needed to demonstrate that jobs will be created.	It is self-evident that strategic scale development will create jobs in the construction phase; longer term economic benefits will be assumed where strategic sites provide new employment space.
Proper assessments of how the historic landscape could be affected are needed.	In the absence of a specialist heritage study, proximity-based assumptions have been made to provide some indication of the potential for effects on heritage assets.
An explanation of how the EIA and SEA regulations are dealt with should be included.	The MSS set out (and this Additional SA Report sets out) how the requirements of SA / SEA are dealt with. The EIA regulations will become relevant as sites progress towards planning application stage.
Methodology is for checking a plan, but not creating one.	The MSS sets out an approach to allow comparison of the sustainability of alternative sites and spatial strategies, which may be then taken forward within a local plan document.
The SA should use evidence rather than professional judgement	As set out in paragraph 2.47 of the MSS, the SA will be informed by the evidence which is available.
LUC have failed to consult with non-statutory consultees.	The statutory consultees have been consulted on the MSS and will be consulted again as set out at paragraph 2.55 of the MSS. It is considered that this comprises suitable consultation with the statutory consultees. The quoted legislation relates to planning applications, not SAs.
Concerned that there is no reference to the fact that the site of West of Braintree GC is partly within Uttlesford District Council area.	The West of Braintree site (NEAGC1) is within the NEA plan area. This SA takes into account the cumulative effects of development of NEAGC1 and the adjacent site in Uttlesford.
SA is retrospective (para 1.9)	The additional SA work is to meet the requirements of the Inspector's letter. It is not a retrospective exercise.
Registered Parks and Gardens should be taken into account in the assessment	The SA methodology has been revised since the MSS consultation to include consideration of Registered Parks and Gardens.

Summary of Comment	Response
The existing SA Framework is not appropriate.	The existing SA Framework has been subject to consultation and is considered appropriate for use.
SA14 should be linked to SA criteria for wildlife designations and heritage assets.	Disagree, these are not landscape designations.
Object to ALTGC7 - Site has congested access and is in community use for recreation.	Noted
Paragraph 1.17: Parish Councils should be considered as consultation bodies in the Examination hearings	Statutory consultees are set out in the SEA Regulations and do not include parish councils.
Methodology should allow for direct comparison with original SA.	Disagree. The purpose of the revised methodology is to overcome the issues raised by the Inspector in relation to the previous SA work. It is not necessary to directly compare the new SA work to the previous SA work.
Since the additional SA work will be using new criteria for the alternative sites, the output will not be comparable to the assessment of garden community options in the previous SA work (para 2.11).	The MSS sets out that the garden community sites and reasonable alternatives to them will be consistently assessed under the methodology proposed therein. There is no requirement to compare the old SA work to the new SA work.
Support SA and do not feel that any key areas have been completely omitted.	Noted
Lack of consideration within this plan for cumulative effects, considering the scope for and seeking opportunities to enhance the environment rather than maintaining the current condition, working to deliver landscape scale enhancement, proactive work to ensure infrastructure improvements are in place ahead of development.	Cumulative effects are taken into account in Stage 2 of the Additional SA.
No mention of challenge within methodology of delivering three GCs all at the same time.	The Additional SA Work will take into account information regarding viability / deliverability of site options including requisite mitigation as advised by the NEAs, as set out in the MSS in paragraph 2.45.
Haverhill has scope to be expanded into Braintree District.	Following the MSS consultation, an additional site, to the south of Haverhill has been added to the list of strategic sites and has been assessed consistently with the other sites.
The SA objectives contain ten environmental objectives, three economic and three social. These should be weighted so that environment, economy and social strands are assessed equally.	Disagree. The SA objectives will be used to identify potential implications of developing each site. It is not considered necessary to weight them.

Summary of Comment	Response
Methodology is flawed in that it refuses to acknowledge the social and cultural benefits that accrue from the opportunity for people to live in an attractive setting such as a conservation area.	The approach to assessment of landscape and townscape effects set out in the methodology chapter of the SA report is judged appropriate.
Assumption that development is harmful to the environmental asset is wrong.	The assessment identifies potential harm to environmental assets; uncertainty is recognised where judged appropriate.
The SA is based on an OAN for housing that is wrong because it doesn't account for hidden households – to suggest demand will create demand is fundamentally flawed.(para 2.37)	The OAN is identified through a different assessment. The Additional SA work is not required to assess the OAN.
Surprised that there is not much recognition of the impact on health facilities in the scoping reports.	The method has been updated to take account of information provided by the CCG in response to the consultation, specifically the thresholds for provision of new health centres is now included in the assessment.
SA should not be looking at individual sites first, it should look at a given strategy instead and then sites. Sites should be grouped into a set of coherent strategies.	The methodology follows the stages recommended by the Inspector. Spatial Strategies will be considered in Task 8.
Spatial strategy formulation is left to NEAs, but does not accord with full and proper engagement.	Spatial Strategy formulation is set out in this Additional SA Report which will be subject to consultation in accordance with statutory requirements.
Concerned with principle of 'housing led development' (para 2.31)	The principle of housing led development is set out in the draft Section 1 Local Plan and is not proposed by the Additional SA Methodology.
The proposed Rivenhall incinerator should be taken into account regarding impact on air quality.	It is considered that the proposed Rivenhall Incinerator will need to comply with appropriate air quality standards in order to gain consent, therefore it does not need to be taken into account in the additional SA work in terms of air quality.
Impact on existing communities should be given more weighting than that on new communities.	Impacts on existing human communities will be considered through SA objectives 1-5 and 6-14. It is not considered appropriate to weight the impact on different communities.
Concerned about impact of development on flood and drought mitigation.	SA objectives 11 and 12 relate to water supply and flood risk, therefore flood risk will be assessed.

Summary of Comment	Response
The SA should consider habitat connectivity.	The additional SA work is a high level assessment which takes into account designated nature sites. There is no known appropriate evidence base to assess habitat connectivity at this level although professional judgment was used in Stage 1c of the SA to identify where designated biodiversity sites could be isolated from surrounding habitats.
The Distance to Kelvedon station should be included within Table 2.2.	This was omitted from the table in error. The distance to all rail stations has now been removed from the table of strategic sites as it could be inferred (incorrectly) that this was a factor in their selection.
SA is fundamentally biased in regard to GCs due to the involvement of the NEA officers.	Disagree, the Additional SA work is being carried out by independent consultants with input from the planning authorities, which is standard practice.
A new call for sites should be undertaken.	A new call for sites is not considered to be necessary.
The assessment only considers proximity to large employment sites which creates bias against other employment locations.	As set out in appendix 1 of the MSS, the assessment criteria for employment centres considers proximity to employment areas and town centres. Evidence is not available to assess proximity to dispersed employment sites and it is considered appropriate, given the scale of strategic sites, to consider the locality to larger employment sites. Consideration was also given to the potential for strategic sites to provide new employment areas.
There is a lack of competing sites of comparable size – lack of reasonable alternatives.	The strategic sites cumulatively have the potential to provide more than the requisite 7,500 dwellings and are therefore reasonable alternatives to the garden communities.
The SA Criteria should consider distance to community centres, pubs, churches, civic amenity tips, sports facilities, libraries and other essential community infrastructure.	Whilst these are important community facilities, proximity to these in isolation is not considered to be sufficient to inform an assessment of sustainability. Proximity to town centres and local centres will identify the locations which feature a suitable concentration of these assets, other than recycling centres (which are not themselves considered to be a relevant asset for the purposes of measuring sustainability).
The Appendix 1 Assessment should include specific elements from the framework. We particularly wish to reference “Will it lead to rural expansion or development outside development boundaries\limits that increase coalescence with neighbouring settlements”, “Will it avoid the loss of high-quality agricultural land” and “Does it seek to minimize congestion at key destinations and areas that witness a large amount of vehicle movements at peak times”.	As all of the strategic sites include areas outside of settlement boundaries, there is no need to assess this within the SA criteria. Agricultural land is assessed within the SA criteria. Stage 1c appraises the potential for increased congestion as a result of the strategic sites being developed.

Summary of Comment	Response
Existing traffic congestion should be a major factor but is not part of the assessment. Therefore ignoring relevant sections of the new NPPF. Can an explanation be given as to why the SA has ignored the NPPF?	SA objectives 7 and 8 relate to transport / congestion / accessibility issues. The strategic sites and spatial strategy alternatives have been assessed against these topics.
The assessment criteria should include the following elements from the framework. "To ensure and improve the vitality and viability of town centres", "To achieve a prosperous and sustainable economy that creates new jobs, improves the vitality and viability of centres and captures the economic benefits of international gateways" (such as Harwich International Port) and "To achieve more sustainable travel behaviour, reduce the need to travel and reduce congestion".	The linkage from the SA criteria to the SA Framework is set out in appendix 1 of the MSS and all of these SA objectives have relevant SA criteria.
The SA refers to a 'strategic framework'. Can it be made clear what this framework is?	This refers to the SA framework, which is set out in the MSS and Additional SA report.
The SA lists existing town centres but there are significant admissions. For example, the Northern Gateway	As set out in Appendix 1, the town centres are based on the Section 2 settlement hierarchy policies. The Northern Gateway is not defined as a town centre.
North Essex struggles for employment opportunities and the SA does not address this key issue. Existing employment infrastructure (which should form part of the original framework and be a factor determining proportionate growth) such as Harwich International Port or the "Sunshine" coast tourism industry are omitted. We suspect that this is due to a lack of local knowledge	Employment sites are included in the assessment as set out in the MSS.
Connection to road and rail links should be included as part of the SA criteria.	The SA Criteria consider proximity to railway stations. Details of connection to the public highway are more appropriately assessed at the scale of individual planning applications however the implications of each strategic site on the highway network will be assessed in accordance with SA objectives 7 and 8 as set out in the MSS.
SA should have a risk assessment	The SA includes uncertainty in relation to some effects to account for situations where it has not been possible to be definitive in coming to conclusions.
Linkage of assessment criteria to the SA Framework - Proximity to heritage assets, wildlife sites and woodland is likely to improve health. Numerous studies and surveys have shown that cultural heritage and access to the countryside benefit health.	Accepted that some indirect benefits may accrue but it is not considered necessary to amend the assessment approach to account for this.

Summary of Comment	Response
Updated list of relevant plans and programmes should be provided.	The baseline and policy context work in the original SA are judged to continue to form an appropriate basis for identifying the key sustainability issues facing the Plan area, as reflected in the framework of SA objectives.
Should provide an updated baseline against which to assess the Plan's proposals.	It is not considered necessary to carry out a full update of the baseline information in the original SA. The original baseline is judged to continue to provide an adequate basis for identifying the key sustainability issues facing the Plan area. Key elements of baseline information necessary to apply the appraisal methodology have been updated and are mapped in the Additional SA report.
Expect non-designated assets to be included.	The environmental assets included are judged appropriate to appraisal of a strategic plan.
Neighbourhood plan landscape assessment submitted to aid LUC.	Noted, however the assessment utilises landscape assessment work provided by the NEAs which provides a consistent basis to assess each of the strategic sites.
All sites will create urban sprawl if taken together.	The comment seems to assume all strategic sites will come forward for development which is not anticipated to be the case.
Need to look at the south of England as a whole.	The Section 1 plan is itself a strategic plan spanning three local planning authorities which mostly fall into the same housing market and therefore form a cohesive area to be strategically planned for.
Would expect some consistency of approach between the SA for Uttlesford and the NEA Section 1 plan given the cross border new town east of Braintree.	The SA outputs in relation to the Uttlesford Local Plan have been reviewed and taken into account if appropriate.
SA work is clear and comprehensive. Will engage with NEA if alternative spatial strategy affects Chelmsford.	Noted
Needed to be notified of the additional consultation – concerned other stakeholders may not have known about consultation.	The NEAs contacted all persons who attended the Section 1 local plan examination.
Part of the Andrewsfield Airfield has been registered as an asset of community value and this should be reflected in the Additional SA Work. It is also historically important.	The SA takes account of the presence of Andrews Airfield, however it is considered that any detailed noise assessment to inform the SA is more appropriately carried out as part of the planning application process.
Consideration should be given to providing development in locations where there is a lack of infrastructure, for example secondary schools – thus providing facilities for existing residents.	Paragraph 2.24 of the MSS sets out the criteria used to select the strategic sites assessed within the Additional SA Work.

Summary of Comment	Response
Proximity to designated landscapes (outside of existing settlements): What is the justification for the 5km radius in the medium rated likelihood of harm?	This is based on professional judgement.
A Methodological issue arises (not just with this SA methodology but essentially any similar methodology) around the extent to which it is possible to translate 15 very broad sustainability objectives in to a set of universally agreed criteria that can in turn be used to provide a definitive comparative assessment of the merits of alternative strategies.	LUC believes the methodology used in this SA is robust.
Infrastructure assumptions set out in paragraph 2.37 are questioned.	The infrastructure assumptions have been provided by the NEAs and are considered to be appropriate.
The statement that 'none of the sites will deliver rapid transit' under paragraph 2.37 is at odds with the sentence in paragraph 2.45 about a guided busway being provided.	Inaccurate comment – paragraph 2.37 relates to assumptions in Stage 1 of the methodology, paragraph 2.45 relates to potential spatial strategies that may be used to inform the assessment of sites following the Stage 1 assessment.
How will errors in the viability evidence be checked?	The SA does not check the viability evidence provided by the NEAs. If errors are identified which will require amendment to the SA, then this will be discussed with the NEAs.
How will errors in the facilities lists be checked?	Errors in the facilities lists are likely to be identified through public consultation.
In considering alternatives to the development of garden communities (Figs. 2.1 to 2.3), it is noted that some of the non-GC options(for example: parts of VE1 in Kelvedon), are already subject to proposed or approved plans for development	Noted
There is a discrepancy in the distances stated for "Proximity to: railway stations", On page 27, it is stated that "... a standard distance of 800m has been used..." However, on p. 30, this has been increased to 1000m.	The text on page 27 is an error. The appropriate distances are set out in the table in Appendix 1.
How will undiscovered archaeological remains be assessed?	Given that no information is available about undiscovered archaeological assets it is considered reasonable for the SA to not consider these.
The distance criteria are not realistic for those with mobility issues	The distance criteria serve to indicate the likely accessibility to the general public; there will always be exceptions to this.

LUC

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