
Emerging Colchester Local Plan Part 2: Matters, Issues and Questions Consultation

Main Matter 1: Legal Requirements and Overarching Issues
Relating Solely to the Policies within CLP Section 2

March 2021

**Emerging Colchester Local Plan Part 2:
Matters , Issues and Questions Consultation**

**Main Matter 1: Legal Requirements and Overarching Issues
Relating Solely to the Policies withing CLP Section 2**

Project Ref:	32011/A5/P6/GP/SO	32011/A5/P6/GP/SO
Status:	Draft	Final
Issue/Rev:	01	02
Date:	March 2021	March 2021
Prepared by:	Gareth Pritchard/Ben Kwok	Gareth Pritchard/Ben Kwok
Checked by:	Gareth Wilson/Lucy Wood	Gareth Wilson/Lucy Wood
Authorised by:	Gareth Wilson	Gareth Wilson

Barton Willmore
St Andrews House
St Andrews Road
Cambridge
CB4 1WB

Tel: 01223 345 555

Ref: 32011/A5/P6/GP/SO
File Ref: 32011.P6.MM1.GP
Date: March 2021

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore Planning LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

- 1.0 Introduction
- 2.0 Question 1: Does CLP Section 2 Meet all other Legal Requirements?
- 3.0 Question 2: Consistent with National Policy?
- 4.0 Summary and Conclusions

APPENDICES

- 1 Review of the draft Sustainability Appraisal of the Colchester Borough Local Plan: Draft Publication Local Plan (Regulation 19) – Section Two (June 2017)

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of L&Q, Cirrus Land and G120 Land Ltd (the 'Promoters'). The Promoters were centrally involved in the Strategic North Essex Section 1 Plan (or Colchester Local Plan Section 1) (hereafter 'CLP 1') through their promotion of land west of Colchester, known as the Braintree/Colchester Garden Community. As such, they are key stakeholders in the overall Colchester spatial strategy.
- 1.2 The Promoters' involvement in the Colchester Local Plan Section 2 (hereafter 'CLP 2') has therefore been inherently limited due to their land interests being the subject of CLP 1. Representations were previously made to the Regulation 19 CLP 2 consultation and therefore through a combination of that and the involvement in CLP 1, we believe that their attendance in the Examination of CLP 2 is essential.
- 1.3 Furthermore, the Promoters remain fully committed to the delivery of a new community at Marks Tey and a Vision Document for approximately 1,000 dwellings with new primary school on land north of the A120/west of Marks Tey train station is appended to Main Matter Statement 2. This is a standalone site that can deliver housing in the plan period in a highly sustainable location. It would also form part of a future larger new settlement west of Marks Tey, should the Council determine this to be an appropriate spatial strategy in the future.
- 1.4 The area proposed for approximately 1,000 dwellings has already been considered by the Council as part of the wider WST05 area in the Settlement Boundary Review (April 2017), and has been subject to Council appraisal as part of the wider CLP process.
- 1.5 This statement is made in respect of Matter 1: Legal Requirements and Overarching Issues relating solely to the policies within CLP 2 and directly in response to the two questions raised by the Inspectors in the Matters, Issues and Questions consultation closing 6th April 2021.

2.0 QUESTION 1: DOES CLP SECTION 2 MEET ALL OTHER LEGAL REQUIREMENTS?

Has CLP Section 2 been subject to a Sustainability Appraisal (SA) and have the requirements for Strategic Environmental Assessment been met? Is it clear how the SA included the final plan and dealt with mitigation measures?

- 2.1 **Appendix 1** of this statement provides a review by Barton Willmore of the SA for CLP 2.
- 2.2 Whilst we do not contend there are any fundamental flaws in the SA itself, there are areas which should be improved in order to be robust and support the Local Plan. These are set out in full in **Appendix 1**.
- 2.3 In particular, the baseline conditions on which the SA has been undertaken is dated and must be updated to accurately reflect the current position in Colchester. This is acutely the case with regards to changes brought about by Covid-19, but also through increased awareness of the need to mitigate climate change in order to support a Plan spanning to 2033.
- 2.4 **Appendix 1** also provides a review of the Tey St Andrews site against the SA and demonstrates that the site is suitable for development, and can be brought forward within the CLP 2.

3.0 QUESTION 2: CONSISTENT WITH NATIONAL POLICY?

Does CLP Section 2 contribute to the achievement of the three dimensions of sustainable development – economic, social and environmental?

- 3.1 We believe that on the whole generally CLP 2 is consistent with national policy insofar as it relates to the National Planning Policy Framework (NPPF) 2012 rather than 2019.
- 3.2 However, our concerns are the NPPF 2012 does not go far enough in terms of addressing climate change and biodiversity net gain which are key matters which cannot be kicked into the long grass for another Local Plan review. As such, we believe the Council should still seek to go beyond the NPPF 2012 requirements around net zero carbon and net gain.
- 3.3 As we outline in our other Matters Statements, we believe due to the delays in the CLP 2 and changes to CLP 1 there is now a shortfall in housing, and therefore the CLP 2 does not meet the development needs without windfall sites. As such, we believe it would be prudent to allocate more housing sites in CLP 2.

Has it been positive prepared and is it aspirational but realistic?

- 3.4 We believe that CLP 1 was an aspirational but realistic Plan which when previously read with CLP 2 created an aspirational spatial strategy for Colchester and North Essex over the long term.
- 3.5 As a result of the changes to CLP 1, the collection of plans (CLP 1 and CLP 2) are no longer as aspirational as they were. As such, the housing and infrastructure that goes with it is reduced, and housing need in the long-term is pushed into a future plan period.
- 3.6 Now due to a shortfall or more balanced housing delivery over the plan period there will not be the same level of choice and flexibility in housing across the borough over the plan period.
- 3.7 As with the above, we believe the CLP 2 could be bolder in terms of climate change and sustainability which would be realistic given the progress made over the last four years since CLP 2 was submitted for examination. This is clear in legislative changes for zero-carbon by 2050 and we support the proposed modification for 10% net gain given that the Environmental Bill is expected to receive royal ascent later this year.

4.0 SUMMARY AND CONCLUSIONS

4.1 This Statement has been produced on behalf of L&Q, Cirrus Land and G120 Land Ltd in response to the questions posed by the Inspectors in Main Matter 1. We have the following key points to make:

- We believe that whilst not fundamentally flawed the SA requires some amendments and updating particularly around its baseline which is now considered to be out of date.
- The SA should also reflect the greater need to address climate change and the fundamental shift in behaviour which has been caused by the Covid-19 pandemic.
- Whilst broadly speaking we believe that the CLP 2 is in accordance with national policy, matters such as climate change can no longer be kicked into the long grass, and therefore further consideration should be given to addressing climate change through planning policy. Further, we support the proposed modification for 10% biodiversity net gain.

4.2 The Promoters vision for land north of Marks Tey for a site of approximately 1,000 new homes, a local centre, primary school, employment and significant ecological enhancements is appended to Main Matter Statement 2. **Appendix 1** to this statement assesses the site and demonstrates that it is strongly performing against the SA, and therefore capable of being allocated.

Appendix 1

Tey St Andrews

**Review of the draft Sustainability Appraisal of the Colchester Borough
Local Plan: Draft Publication Local Plan (Regulation 19) – Section Two
(June 2017)**

March 2021

Tey St Andrews

Review of the draft Sustainability Appraisal of the Colchester Borough Local Plan: Draft Publication Local Plan (Regulation 19) – Section Two (June 2017)

Project Ref:	32011/A5/Reports/Environmental Planning	
Status:	Draft	Final Draft
Issue/Rev:	01	01
Date:	March 2021	March 2021
Prepared by:	BK	BK
Checked by:	LW	GP

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888



COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

1.0 Introduction

- 1.1 This report presents a review of the draft Sustainability Appraisal (SA) process supporting the draft Colchester Borough Council (CBC) Draft Local Plan 2017-2033. The review has focused on the latest available draft SA report (which incorporates Strategic Environmental Assessment (SEA)), which was prepared by CBC in conjunction with Place Services (Essex County Council) (HBC).
- 1.2 CBC adopted a Core Strategy in 2008, Site Allocations in 2010 and Development Policies in 2010, which are now collectively known as the Colchester Borough Local Plan. In 2013, work commenced on a two staged review of the Local Plan. The first stage included a Focused Review which was adopted in July 2014. The second stage is a full review of the Local Plan which sets a framework for future development in Colchester Borough to 2033 and beyond. This Development Plan includes strategic visions and objectives, shown through strategic policies; site allocations; and policies used to determine planning applications throughout the Borough.
- 1.3 The CBC Local Plan is formed of two distinct sections. Section One of the Local Plan provides allocations and policies to be included in each of the three Local Plans prepared by Braintree, Colchester and Tendring Councils. This is in recognition of meeting growth aspirations through cross-boundary solution. Two of three new settlements were removed, with a single Colchester/Tendring Garden Community proposed to be allocated for development. Section Two provides specific policies and allocations for Colchester Borough.
- 1.4 In turn, two SA reviews have been produced for consultation in response to the two Sections of the Local Plan. This SA Review responds to Section Two of the Colchester Borough Local Plan (June 2017). Whilst the review has focused on this report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.
- 1.5 A Scoping Report was prepared and consulted upon for five weeks between 1st July – 5th August 2014. An Issues and Options paper was prepared and consulted upon from 16th January -27th February 2015.
- 1.6 The full SA review is included at Appendix 1. It uses a 'traffic light' scoring system to identify areas that would benefit from improvement (amber) and those elements of the SA process that are considered to comply fully with the requirements (green). One aspect of the SA was found to be deficient (red) and several areas require improvement (amber) for the appraisal to be robust.

- 1.7 The site-specific appraisal is included at Appendix 2 and has been undertaken by Barton Willmore utilising the same matrix methodology and SA Objectives used to consider the alternative site options within the SA Report for inclusion within the draft Plan. The matrix assessment with a colour coded key is a method often used for the assessment of site options in SAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. The appraisal provides commentary on the score that we consider should be awarded for each objective indicator question. The appraisal draws upon the Tey St Andrews Vision Document (appended to Main Matter Statement 2), Tey St Andrews Climate Change Strategy (appended to Main Matter Statement 3) and the Tey St Andrews Sustainable Transport Strategy (appended to Main Matter Statement 18). The appraisal will be updated with additional evidence, if appropriate at a later date.

2.0 Review of SA

Purpose of Review

- 2.1 A review of the SA documents has been undertaken against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act"), which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan.
- 2.2 A Local Plan must be prepared in accordance with Section 39 of the Act *"with the objective of contributing to the achievement of sustainable development"*. It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.
- 2.3 This review has sought to identify any areas of the SA that would benefit from further focus or clarity to make it robust.

Review Summary

- 2.4 The SA was found to be deficient in one area:
- **Baseline conditions** – no update has been undertaken since 2017. Since then, a number of factors have changed that may have altered the baseline which in turn informs the framework of SA objectives against which policies and sites are assessed. For example, a Climate Emergency was declared in 2019, the COVID-19 pandemic has changed town centres, travel patterns, air quality, social and economic priorities and the education baseline may have changed (noting that the forecast in the SA only extends to 2021).
- 2.5 Improvements are also recommended in the following areas:
- **Habitats Regulations considerations** – Given the need for assessments to be coordinated, it would be helpful to have more information on the HRA undertaken for the Local Plan. Reference is made to HRA for the Section One Plan but insufficient detail is provided on what consideration has been given to Section Two and how the HRA for Section One relates.
 - **Plans and Programmes** – requires updating to reflect the current situation, including the Climate Change Act and 25 Year Environment Plan. The SA process is also not transparent given that references are made throughout to a version of the Part One Plan SA that was then updated through Examination.
 - **Framework of SA Objectives** – the framework of SA objectives has not been reviewed or updated since 2017. Given the evolved baseline and more recent regulatory and policy

considerations such as the revisions to the NPPF, COVID-19, the Government's 10 Point Plan for a Green Recovery, the 25 Year Environment Plan, changes to the Climate Change Act (net zero) and Brexit, certain areas of the objectives and the criteria that determine the scoring should be revisited. COVID-19 has highlighted the importance of resilient infrastructure and being able to study and work remotely. The Net Zero target introduced by the 2018 amendment to the Climate Change Act has set a challenging goal for all industry sectors to minimise greenhouse gas emissions. Brexit, the housing crisis and regional inequality all continue to present challenges. It would therefore be appropriate for the framework of SA Objectives to be reviewed. Objectives and/or the supporting criteria that form the basis of the appraisal should be updated, where necessary, to reflect the current context and seek to futureproof the appraisal for future change. Given the importance of these issues and length of the plan period, these priorities should be reflected in the plan now.

- **Likely significant effects on the environment** – The appraisal of plans and policies would likely require updating if the framework of SA objectives and baseline conditions are brought up to date.
- **The Non-Technical Summary** – is thorough but in places includes acronyms and technical terms that would not be familiar to the non-specialist.

3.0 Site Appraisal

- 3.1 A site appraisal has been undertaken for Tey St Andrews (Appendix 2), to assess its performance against the SA Objectives used to consider the alternative site options within the SA Report. The Tey St Andrews site performed well overall against the ten SA Objectives. The site was awarded a positive (+ or ++) score in eight of the ten SA objectives and a neutral score (0) for two of the SA objectives. No negative (- or --) scores were awarded.
- 3.2 The vision for Tey St Andrews demonstrates the development will create a sustainable, net-zero carbon development that will pioneer new ways of living and embrace individual lifestyle choices, technological advances and the challenges presented by climate change. This will include inherent climate change mitigation measures, such as provision of a Community Forest, green corridors, Sustainable Drainage Systems (SuDS) and rewilding of natural habitats.
- 3.3 A mix of housing types and tenures would be provided, with a new local centre and a Climate Innovation Hub which will meet the day-to-day needs of new and existing residents of Marks Tey. The site is well placed for highly accessible links to local and national designations via sustainable and vehicular routes. However, the proposed development will also ensure it is largely self-sufficient in order to reduce the need for travel from the outset, where possible. Sustainable travel modes will be prioritised within Tey St Andrews and will be facilitated by a Mobility Hub which would allow interchange between sustainable modes. High quality walking and cycling facilities will encourage the uptake of walking and cycling.
- 3.4 The proposed development at Tey St Andrews has five key pledges: Achieving Net-Zero Carbon; Encouraging Health and Wellbeing; Being Biodiverse; Creating Beauty and Living Smart. The integration of these pledges from the inception of the proposed development will ensure that it is future-proofed and responds to the local context within Marks Tey and the wider Colchester Borough.

4.0 Conclusion

- 4.1 There are some areas of the SA which need improving in order to be robust and support the Local Plan. These are set out in full at Appendix 1 and summarised above. In particular, the baseline conditions on which the SA has been undertaken is dated and must be updated to accurately reflect the current position in Colchester. This is acutely the case with regards to changes brought about by Covid-19, but also through increased awareness of the need to mitigate climate change in order to support a Plan spanning to 2033.
- 4.2 The conclusion reached within this report, based on the site appraisal in Appendix 2 is that Tey St Andrews should be selected for inclusion within any proposed site allocations within the Section Two Colchester Local Plan should the Inspectors be minded to recommend that the Council allocate new sites for development. The pledges embedded within the proposed development demonstrate that Tey St Andrews is a sustainable and deliverable development which is aspirational in its goals to tackle climate change mitigation and adaptation.

APPENDIX 1:
SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

	Compliance Key	Notes
<p><i>This is a compliance review against the requirements of the Regulations. It has not been undertaken by a legal professional. The SA process has been reviewed against the SEA Regulations and requirements of the Planning and Compulsory Purchase Act 2004 on SA. The following reports have been considered:</i></p> <p><i>June 2017 Draft Publication Local Plan (Regulation 19) – Section Two Sustainability Appraisal Environmental Report</i> <i>June 2017 North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19) Draft Sustainability Appraisal</i> <i>July 2014 Colchester Borough Council Local Plan Sustainability Appraisal Scoping Report</i></p>		Meets requirements
		Potential risk of challenge. Improvements suggested
		High risk of challenge. Does not meet requirements
SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report		
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		<p>Section 1.1 outlines the contents of the plan and its relationship with the Section One and Section Two Plans. A brief overview of the objectives of the respective plan is given, however further explanation could be given with regards to the spatial overlaps between Section One and Section Two Plans. This section could re-emphasise this in terms of the allocations put forward in both Section One and Section Two being the same. As the SA has not been updated during evolution of the plan it does not accurately reflect the situation. For example, two potential Garden Communities have been removed from consideration but this is not captured in the report due to its age.</p> <p>Section 2.6 provides an overview of the relevant plans, programmes and sustainability objectives. Section 2.6 also cross-refers to Annex 2 of the Section One Local Plan SA (2017), which is also out of date as an updated version was consulted on and therefore reference must be made to the most recent Section One Local Plan and corresponding SA (Including the Additional SA of the North East Authorities Section 1 (July 2019) and North Essex Section One Local Plan Sustainability Appraisal: Proposed Main Modifications (August 2020)). It should be noted here that this document is titled: 'North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Regulation 19) <i>Draft Sustainability Appraisal (SA): Annex A – Plans and Programmes</i> (June 2017), however within the introductory section for this document it is also stated to be Annex A of the Section Two SA for CBC.</p> <p>Given the time period which has lapsed since publication of the draft 2017 Section Two SA Report, the next iteration of the SA will need to include the updated policy position. Furthermore, whilst a review of relevant plans and programmes relevant to Section Two of the Local Plan was undertaken for the 2014 Scoping Report with specific regard to CBC, it might be necessary to provide further detail as to the relationship of the Local Plan with each tier of the relevant plans, programmes and sustainability objectives.</p>
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		<p>Section 2.7 provides a summary of the baseline environment and key issues which includes general characteristics relating to the economy and social factors, whilst also outlining the relevant environmental baseline. There are notable omissions with specific regard to CBC. In particular, the social characteristics baseline at 2.7.3 does not provide any discussion of the baseline of the Borough's physical and mental health profile. These are key indicators of wider social factors and should be considered. The education baseline is out of date for the Plan period, noting that it only forecasts to 2021.</p> <p>There are specific areas of the baseline data which are out-dated and should be amended to include the most recent data sources. For example, at Paragraph 2.7.2 a reference is made to a '2001 Journey to Work Census'. Whilst the nature of the Covid-19 Pandemic has altered work patterns in terms of favouring working from home, reliance on a 20-year old statistic is not representative of the current baseline for which the Plan is to be implemented.</p> <p>Parts of the economic baseline are also likely now out of date. This includes retail provision. There has been a notable trend towards online retail in the last few years, a trend which has been accelerated by COVID-19. Various provisions have also been made to allow rapid land use change from office to residential use, for example, and town centres are changing in character as a result of all these trends.</p> <p>The data on climate (climatic factors) also warrants revision as an earlier iteration of the IPCC Report is referenced (2016) and the UK has a more recent carbon budget. In addition, whilst the 2010 Climate Risk Assessment is referred to, a Climate Emergency was declared in 2019 and an action plan published. This is of material importance to land use planning.</p> <p>To assist with the interpretation of this information, the next iteration of the SA report could include visual aids such as a constraints map.</p> <p>Section 2.8 provides a brief summary of the likely evolution of the baseline environment without implementation of the Local Plan.</p>
3. The environmental characteristics of areas likely to be significantly affected.		<p>As above. Section 2.7.4 provides a summary of the environmental characteristics of the Borough.</p> <p>A baseline update should be undertaken for the next iteration of the SA Report to take account of current travel and working patterns, the importance of the declared Climate Emergency in particular due to the COVID-19 pandemic and the latest baseline position on education. An updated picture of health, wellbeing and climate change data should also be included, in particular through drawing upon the latest climate science and projections.</p>

<p>4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.</p>		<p>Covered in Section 2.7.4 which includes reference to sites designated pursuant to Directives 79/409/EEC and 92/43/EEC (namely, the Mid-Essex Estuaries Special Area of Conservation (SAC), the Mid-Essex Special Protection Area (SPA), the Blackwater Estuary SPA and Abberton Reservoir SPA).</p> <p>There is no further detail of any Habitats Regulation Assessment (HRA) being undertaken in relation to the emerging Local Plan. Section 3.3.13 mentions HRA work done to support the Section One Plan but no explicit mention is made of HRA work done to support the Section 2 Local Plan. cursory mentions are made to HRA in places. It would be helpful for the SA Report to state that no further HRA work has been done for the Section 2 Plan as the outcome of the assessment for the Section 1 Plan showed that recreational pressure from growth could be mitigated.</p> <p>The only mention of HRA with regard to work to be progressed can be found within Chapter 13: Summary and Conclusions which states: “<i>Work is being undertaken on a Habitats Regulation Assessment for the Local Plan that explores the likelihood of significant environmental effects and these findings will be factored into the Plan as appropriate.</i>”</p> <p>As no substantive discussion of HRA is included within the Section Two SA, it is also assumed that there is no evidence that cumulative effects have been assessed in relation to European Sites, which would have been the case for in-combination effects for the HRA, for legal compliance.</p>
<p>5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>		<p>Section 2.6 contains the relevant plans, programmes and sustainability objectives. As mentioned above, the objectives of each plan are not provided but instead the titles of each plan and programme are listed. Reference must be updated to the supporting Annex 2 of the Section One Local Plan SA (2017 and as amended by subsequent documents including the Additional SA of the North East Authorities Section 1 (July 2019) and North Essex Section One Local Plan Sustainability Appraisal: Proposed Main Modifications (August 2020)) which includes an overview of the objectives of each plan, noting that this SA was updated through its Examination.</p> <p>Whilst it is acknowledged that the review of the relevant plans and programmes is a ‘work in progress’, as above, given the time period which has lapsed since publication of the draft 2017 Section Two SA Report, the next iteration of the SA will need to include the updated policy position.</p>
<p>6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—</p> <p>(a) biodiversity;</p> <p>(b) population;</p> <p>(c) human health;</p> <p>(d) fauna;</p> <p>(e) flora;</p> <p>(f) soil;</p> <p>(g) water;</p> <p>(h) air;</p> <p>(i) climatic factors;</p> <p>(j) material assets;</p> <p>(k) cultural heritage, including architectural and archaeological heritage;</p> <p>(l) landscape; and</p> <p>(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).</p>		<p>Covered in Sections 5-10 with regards to the appraisal of the different tiers of policy (sustainable growth policies, environmental assets policies, places policies and development management policies).</p> <p>The cumulative and synergistic effects are covered in Section 11 and encompass the tiers of policy discussed above.</p> <p>The SA Appraisal Framework and Site Assessment Pro Forma is outlined in Section 3. This sets out the sustainability themes against the objectives of the SA, relative to the assessment criteria and indicators.</p> <p>All of the issues listed from (a) to (l) within the SEA Regulations are covered within the SA Framework.</p> <p>Some of the SA objectives should be revisited to reflect the evolved baseline conditions and areas of priority, as discussed under Point 2 above. Comments on Table 3 SA Framework as follows:</p> <p>Objective 2. To ensure that development is located sustainably and makes efficient use of land – assessment criteria include reducing need for development on greenfield land. It is not as simple as this. Large settlements with internalisation, sustainable transport, GI and low-zero carbon strategies can be sustainable. Piecemeal development does not provide scale to include necessary infrastructure upgrades and does not always promote sustainable behaviours.</p> <p>Assessment criteria - Will it provide good accessibility by a range of modes of transport? Arguably the car should be a last resort. It would be better worded “does it prioritise walking and cycling then travel by sustainable means with private car as the last choice?” This would also tie in better with objective 4 which includes these indicators.</p> <p>Objective 3. To achieve a prosperous and sustainable economy that improves opportunities for local businesses to thrive, creates new jobs and improves the vitality of centres – indicators include amount of development for retail, office and leisure in the town centre. This could be revised to consider co-location of facilities and the changing nature of town centres. Also, working from home, flexible space etc is also much more important now than it was in 2017. The Green Economy should also be added in as a priority area given the Government’s 10 Point Plan for a Green Recovery, Brexit and the declared Climate Emergency.</p> <p>Table 4 includes the SA Site Assessment Pro Forma (how sites will be scored against the objectives). In general, it should be more flexible to accommodate modern lifestyles, co-location of uses and travel patterns. Employment and retail are not just for town centres. Land uses and people’s lives are much more integrated now than when the report was prepared in 2017. Some of the impact descriptors are therefore not that useful for differentiating between sites.</p> <p>These points are important for how policies are scored. For example, Policy SG1 currently gives no consideration for containment / internalisation that would reduce the impact of unsustainable travel from new settlements.</p> <p>The consideration of temporal effects (i.e. short-term, medium-term and long-term) is not consistent throughout the Appraisal itself and only offers an extremely high-level assessment of the relevant policies. The assessment of temporal effects is provided within the appraisal of each policy, under the heading: ‘Significant, Secondary and Temporal Effects’. The Pro Forma does not provide justification of the specific scores accredited with awarding a score with regards to temporality. At 3.2 ‘temporal’ is described as ‘<i>whether effects will change over the Plan period</i>’ which is not sufficiently detailed in consideration that the Plan period will run to 2033.</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>		<p>Covered in Sections 5-10 with regards to the appraisal of the different tiers of policy (sustainable growth policies, environmental assets policies, places policies and development management policies). Also included in Appendix 1 for the Garden Communities options.</p> <p>Mitigation measures may likely need revising if the SA framework is updated and the appraisal of policies revised.</p>

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.		This is covered within the appraisal of the preferred content of the plan, with alternatives discussed within each policy / site allocation. Appendix 1 of the Section Two SA also provides reasons as to selecting alternatives with regard to site allocation options. This includes Appraisal of the Garden Communities options.
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.		Covered at Section 14 which states that the Local Plan will be subject to monitoring through the Borough Council's Authority's Monitoring Report (AMR) requirements. This is considered sufficient at this stage.
10. A non-technical summary of the information provided under paragraphs 1 to 9.		A Non-Technical Summary (NTS) is provided as a separate appendix to the Section Two SA. The NTS is written on the whole in less technical language than that within the Section Two SA itself, however the purpose of an NTS is for it to easily understood by all. It is also acknowledged that the NTS summarises the circa 500 page Stage Two SA in to a circa 50 page NTS. However, there are several incidences where technical acronyms and definitions are referenced, without prior explanation of what the acronym is. Examples of this include references to: 'PDL' and 'NPPF'. This could act as a barrier to the NTS and the SA, being accessed by everybody. The NTS does summarises key parts of the SA process, including conclusions and next steps. Clearer explanation could be provided for establishing the SA Objectives and the refining of alternative, particularly in consideration that the reader of the NTS may not refer to the technical documents such as the 2014 SA Scoping Report, where this information is available and not explicitly referenced.
Planning and Compulsory Purchase Act 2004 - Section 19 Requirements for SA		
Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306. PPG paragraph references provided below, where relevant.		
A Setting the context and objectives, establishing the baseline and deciding on the scope		
Identifying relevant policies, plans and programmes		See comments above under SEA Regulations point 1.
Collecting baseline information		See comments above under SEA Regulations point 2 & 3.
Identifying environmental and sustainability issues		See comments above under SEA Regulations point 4. Further detail on the HRA process should be included within the SA Report for completeness, recognising that these assessments should be coordinated. It There is also no evidence that cumulative effects have been assessed in relation to European sites in the SA Report, which would have been the case for in-combination effects in the HRA, for legal compliance.
Identifying appraisal objectives		The SA Appraisal Framework and Site Assessment Pro Forma is outlined in Section 3. This sets out the sustainability themes against the objectives of the SA, relative to the assessment criteria and indicators. A review and update of the SA Objectives should be undertaken for the next iteration of the SA Report. Suggestions for amendments/additions to reflect the current context are set out below: Objective 1 Housing – ensure that adequate provision is made in houses for home/remote working (on a full time or part time basis). Also consider mixed neighbourhoods, co-locating housing with other uses to promote mental wellbeing and social/economic benefits. Objective 5 Communities – include technology, allowing for remote interaction and access to services. Considering access to services for the elderly and other vulnerable groups if restrictions are in place that prevent mixing with people / moving around. It could also include discussion on tackling mental health problems in the Borough. Objective 6 Inequalities - enabling remote learning and interaction to reflect the need for resilience to pandemics and other health/environmental crises. Also link to the relevant environmental objectives and/or add in reference to clean air, appropriate noise levels etc that are important for health. Include links to housing objective and/or add question on mixed housing in one location and/or co-location of uses to bring mental/social health benefits. Objective 10 Climate Change – could include more additional indicators with regards to the Net Zero target implemented under the Climate Change Act.
Consulting on the scope of the appraisal		The required consultation has been undertaken for the SA Scoping Report and the current stage of the Plan.
B Developing and refining options and assessing effects		
Developing and refining the alternative options for the plan		See detailed commentary within response to SEA Regulations point 8.
Paragraph: 018 Reference ID: 11-018-20140306		

Predicting and evaluating the significant effects of the options and alternatives		See detailed commentary within response to SEA Regulations point 8.
Considering ways of mitigating adverse effects and maximising beneficial impacts		See detailed commentary within response to SEA Regulations point 7.
Proposing measures to monitor significant effects Paragraph: 025 Reference ID: 11-025-20140306		See detailed commentary within response to SEA Regulations point 9.
C. Preparing the Sustainability Report - Including the SEA Requirements		
		Deficiency with regard to baseline data,
D. Seek representations on the SA report from consultation bodies and the public		
Paragraph: 020 Reference ID: 11-020-20140306		The SA Report and the SA Scoping Report have been issued to statutory consultation bodies and the public. The report includes details of consultation and signposts where further amendments will be made as the Local Plan progresses.
E. Post adoption reporting and monitoring		
Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be done after adoption of the Local Plan.

APPENDIX 2: **SITE APPRAISAL**

Site Appraisal – Tey St Andrews, Marks Tey, Colchester

Score	Description
?	It is uncertain what effect the option will have on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA Objective(s)
-	The option is likely to have a negative effects on the SA Objective(s).
N/A	Not Applicable/
0	The option is likely to have a negligible or no effect on the SA objective(s).
+	The option is likely to have a minor positive effect on the SA objective(s).
++	The option is likely to have a significant positive effect on the SA.

SA Objective	Assessment Criteria (Policy Based)	Assessment Criteria (Local Plan Sites)	Score considered appropriate	Comments
1. To provide a sufficient level of housing to meet the objectively assessed needs of the Borough to enable people to live in a decent, safe homes which meets their needs at a price they can afford	<ul style="list-style-type: none"> Will it deliver the number of houses needed to support the existing and growing population? Will it provide more affordable homes across the Borough? Will it deliver a range of housing types to meet the diverse needs of the Borough? 	<ul style="list-style-type: none"> Is the site proposed for residential development? Potential yield for site – from developable site area and SHLAA Accommodation type if known 	++	<p>The development will have a positive contribution to housing.</p> <p>The development will provide circa 1000 residential units as a sustainable new neighbourhood. The development would include an appropriate level of affordable homes, to meet the needs in the community as well as a mix of types of housing.</p> <p>A new local centre comprising a mix of uses and a transport hub fronting the A120 that responds to the day-to-day needs of new and existing residents of Marks Tey is also proposed.</p> <p>The site is located within proximity of existing local facilities and public transport at Marks Tey. These amenities include education facilities, community facilities, outdoor space, food retail and a pharmacy. However, Tey St Andrews will also be designed to ensure that the proposed development is self sufficient in terms of providing adequate levels of these local facilities. This is reflected in a key theme of the proposed development: 'close to home' which ensures that residents can meet their daily needs within Tey St Andrews.</p>
2. To ensure that development is located sustainably and makes efficient use of land	<ul style="list-style-type: none"> Will it promote regeneration? Will it reduce the need for development on greenfield land? Will it provide good accessibility by a range of modes of transport? Will densities make efficient use of land? Will a mix of uses be provided? Will it see a loss of the best and most versatile agricultural land? 	<ul style="list-style-type: none"> Is the site located within or adjacent to an area that could benefit from regeneration? Is the site PDL or Greenfield? Distances to town/local centres with a range of existing facilities Likely density, to be determined by site location Proposal by / discussions with landowner (if known) ALC Map 	+	<p>The site is currently under active management as arable fields. There is no detailed Agricultural Land Classification (ALC) data available for the site, however survey data available in the locality shows land quality to be typified as Subgrade 3a, with areas of Grade 2. Therefore, it is likely that the site will similarly be of best and most versatile (BMV) quality of Grades 2 and 3a.</p> <p>The site is located adjacent to the existing village of Marks Tey and approximately 10km west of Colchester. Tey St Andrews has a key pledge of achieving net-zero carbon, which will in part be achieved through provision of a range of facilities close to home. Therefore, whilst the proposed development will result in a loss of agricultural land, the proposed development will have a positive contribution to housing supply whilst future-proofing the development to ensure it is resilient to challenges brought about by the Covid-19 pandemic and climate change.</p>

SA Objective	Assessment Criteria (Policy Based)	Assessment Criteria (Local Plan Sites)	Score considered appropriate	Comments
3. To achieve a prosperous and sustainable economy that improves opportunities for local businesses to thrive, creates new jobs and improves the vitality of centres	<ul style="list-style-type: none"> Will it improve the delivery of a range of employment opportunities to support the growing population? Will it maintain an appropriate balance between different types of retail uses and other activities in the Borough's centres? Will it help sustain the rural economy? 	<ul style="list-style-type: none"> Is the site for employment use? Proposals in context of town/local centres hierarchy Employment proposal – location within village (development) boundaries 	++	<p>The proposed development includes around 1000 new homes, a 2 Form Entry Primary School, a Local Centre with retail, community and small scale employment uses and an abundance of public open spaces.</p> <p>A Climate Innovation Hub is proposed which will comprise a mix of uses, innovative housing including Passivhaus design principles, Primary School and a Transport Hub. Local co-working spaces, pocket cafes and working-from-home will create mixed use blocks that will help foster social integration. As a design principle for Tey St Andrews is to ensure that daily needs of residents are catered for within a walkable neighbourhood, some small-scale employment opportunities will be provided at Tey St Andrews.</p> <p>There will also be positive contributions for employment opportunities during the construction phase of the proposed development.</p>
4. To achieve more sustainable travel behaviour, reduce the need to travel and reduce congestion	<ul style="list-style-type: none"> Will it reduce the need to travel? Will the levels of sustainable travel increase? Will it improve sustainable transport infrastructure and linkages? 	<ul style="list-style-type: none"> Is the site well located in relation to town centre facilities and services and public transport? (Walking) distance to public transport modes – adopted from SLAA Scale based 	++	<p>Tey St Andrews will maximise its potential for sustainable travel choices through good design and placemaking. This will be achieved through prioritising users and modal shift (starting with pedestrians and ending with private car use). Tey St Andrews will provide on site facilities to reduce the need to travel off site, but also encouraging sustainable travel through providing high quality walking and cycling facilities. A Mobility Hub will allow interchange between sustainable modes, with existing facilities including those at Colchester and Stanway. Bus services will be provided, with potential for bus priority measures on the B1408 towards Colchester. Marks Tey rail station is also within walking or cycling distance.</p> <p>With Covid-19 shifting commuting patterns, space could be provided within the Climate Innovation Hub to enable flexible working-from-home to reduce the need for commuting to other places.</p>
5. To build stronger, more resilient communities with better education and social outcomes	<ul style="list-style-type: none"> Will it provide equitable access to education, recreation and community facilities? Will it place pressure on school places, including early years? Will existing open spaces be protected and new open spaces be created? Will it improve the skills of the Borough's population? Will there be an increase in community facilities? 	<ul style="list-style-type: none"> Distances to primary school – adapted from SLAA Commissioning School Places in Essex 2014-2019: capacities and forecast pupil numbers for each school (NOTE: impacts are for single site assessments only. Cumulative impacts in an area are likely to be more reflective of capacity issues) Would the site see a loss of open space Access to further education Will the proposal see an increase in community facilities 	++	<p>Tey St Andrews will provide on-site facilities to reduce the need to travel off site, including a 2FE Primary School and the potential for primary healthcare facilities.</p> <p>The site currently comprises arable land under active management. Tey St Andrews will create a distinctive and healthy place that embodies best practice urban design principles. This includes new areas of high quality open space that are accessible, with a multi-functional network of green infrastructure. This will include spaces that cater for a range of uses (including recreation, formal play, allotments, attenuation and ecological enhancement). Residents will be able to access these areas via informal pedestrian routes and car-free routes. A community woodland is also proposed which will provide further opportunities for recreation.</p> <p>Therefore, usable open space within the proposed development will create a betterment for the local area.</p> <p>Community facilities will also be created, which will foster stewardship and community-oriented activities such as through provision of allotment areas.</p>

SA Objective	Assessment Criteria (Policy Based)	Assessment Criteria (Local Plan Sites)	Score considered appropriate	Comments
6. To improve and reduce inequalities in health and wellbeing and tackle crime issues by keeping our communities safe and promoting community cohesion	<ul style="list-style-type: none"> Will it provide equitable access to employment opportunities? Will it encourage healthy lifestyles? 	<ul style="list-style-type: none"> Distance to Strategic Employment Zone or Colchester Town Centre (whichever is closest) adapted from SLAA. Does the site conform to Natural England ANGSt (numerous criteria, all or some applicable)? ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace: of at least 2 hectares in size, no more than 300 metres (5 minutes' walk) from home; at least one accessible 20 hectare site within two kilometres of home; one accessible 100 hectare site within five kilometres of home; and one accessible 500 hectare site within ten kilometres of home. 	++	<p>The proposed development recognises the need to facilitate health-oriented planning and development, through applying healthy design principles tailored to the context of the local area. Encouraging Health and Wellbeing is one of the five pledges of the design vision. A Health and Wellbeing Strategy will inform the design of the proposed development as it progresses, paying particular attention to Colchester's health needs.</p> <p>The proposed development will create a distinctive and healthy place that embodies best practice urban design principles. This includes new areas of high quality open space that are accessible, with a multi-functional network of green infrastructure. This will include spaces that cater for a range of uses (including recreation, formal play, allotments, attenuation and ecological enhancement). Residents will be able to access these areas via informal pedestrian routes and car-free routes. A community woodland is also proposed which will provide further opportunities for recreation.</p> <p>The development will be designed to provide safe areas of public realm and open space which will create a place for residents and communities to mix. Pedestrian and cycling routes will run throughout the site to create safe modes of transport for non-motorised users. A lighting strategy will be prepared for the scheme and appropriate lighting will be implemented throughout the design, which will assist in reducing fear of crime and creating a safe built environment.</p>
7. To conserve and enhance the townscape character, and the heritage and cultural assets of the Borough	<ul style="list-style-type: none"> Will it protect and enhance the heritage and cultural assets of the Borough? 	<ul style="list-style-type: none"> Are there any of the following (including their settings) on site (?) and will there be any impacts within the vicinity (in-house assessment)?: Listed Buildings Scheduled Monuments Registered Parks and Gardens Conservation Areas Are there any known archaeological deposits on the site? Are there any locally listed heritage assets (and at risk) on the site? 	0	<p>There are no World Heritage site, Scheduled Monuments or Historic Battlefield sites recorded on the site.</p> <p>Within a 500m radius of the site, the following built heritage assets have been identified:</p> <ul style="list-style-type: none"> 115 and 117 Coggeshall Road (Grade II Listed Buildings); The Red Lion Public House (Grade II Listed Building); Motts Farmhouse and associated Barn (Grade II Listed Buildings); The Old Rectory (Grade II Listed Building); Church of St Andrew ((Grade I Listed Building); The Knaves Farm group of listed buildings, comprising Knaves Farmhouse, Barn to south of Knaves Farmhouse and Range south of Barn to south of Knaves Farmhouse (Grade II Listed Buildings); and The Old rectory (Great Tey Road) (Grade II Listed Buildings). <p>Initial work at the site has identified there is a moderate archaeological potential for Medieval remains, a low to moderate potential for Prehistoric and Roman remains, and a generally low potential for all other past periods of human activity. Any archaeological remains present within the site boundary have been identified as mostly likely to be of overall low/local significance.</p> <p>The site has been identified as making a varying contribution to the significance of several built heritage assets as an element of their historic agricultural landscape context. Any future proposed development has the potential to alter the significance of relevant built heritage assets through the alteration of their setting.</p> <p>A suitably designed proposed development could be achieved without resulting in substantial harm to the significance of any built heritage asset.</p>
8. To value, conserve and enhance the natural environment, natural resources and the biodiversity of the Borough	<ul style="list-style-type: none"> Will it retain or enhance the existing character, form and pattern of the Borough's landscapes, buildings and settlements? Will it protect and enhance the local 	<ul style="list-style-type: none"> Is it in the AONB The visual prominence and intervisibility of relevant Landscape Character Areas? The contribution to distinctive settlement setting of relevant 	0	<p>A number of ecology surveys have been completed for the site. The site primarily comprises undeveloped arable land under active management. There is a small wooded belt, with species rich hedgerows. There are also small areas of grassland, scrub and tall ruderal vegetation.</p> <p>The Marks Tey Brickpit Site of Special Scientific Interest (SSSI) lies immediately adjacent to the north east of site, with the Stonefield Strip Local Wildlife Site (LWS) also located immediately adjacent to the northern site boundary. Therefore, the site lies within a SSSI Impact Risk Zone.</p>

SA Objective	Assessment Criteria (Policy Based)	Assessment Criteria (Local Plan Sites)	Score considered appropriate	Comments
	distinctiveness and contribution to a sense of place? <ul style="list-style-type: none"> Will it promote high quality green infrastructure within existing and new development? 	Landscape Character Areas? <ul style="list-style-type: none"> Is the site within an SSSI Impact Risk Zone? Is the site within the Coastal Protection Belt? Is the site within/on/adjacent to NNR/LNR/LoWS/SINC sites Findings of HRA in regards to proximity of sites and likelihood of significant effects to SPAs, SACs, Ramsars Is the site within/on/adjacent to Ancient Woodland / TPOs. Is the site in a groundwater source protection zone? Proximity to AQMA? Is the site contaminated land? 		<p>The site is relatively flat and open in the west and south with undulations in the north and east. There is containment by vegetation to the south and east and there is an open character to the west. The Site is within and is typical of Landscape Character Area (LCA) B2 Easthorpe Farmland Plateau, the key characteristics of which include small patches of deciduous woodland.</p> <p>The southern and eastern parts of the Site are well visually contained and not apparent in short or long distance views. The northern and western parts are visible from Great Tey road to the west and from the opposite side of the Roman River valley to the east. The provision of strategic tree planting on the western Site boundary could limit intervisibility with Little Tey Farm, Motts Farm and Great Tey road. Tey St Andrews proposes a landscape-led approach with an embedded framework to create a new settlement, whilst respecting the sensitive landscape of the Roman River valley and the Marks Tey Brickpit SSSI.</p> <p>Tey St Andrews is not located within an AONB or Coastal Protection Belt.</p> <p>The site is not located within an AQMA.</p> <p>The site is located within a Source Protection Zone (3).</p> <p>The site is currently used for agricultural purposes and is not believed to be contaminated.</p>
9. To make efficient use of energy and reduce, reuse or recycle waste	<ul style="list-style-type: none"> Will it reduce pollution and greenhouse gas emissions? Will it help to reduce reuse and recycle resources and minimise waste 	<ul style="list-style-type: none"> Is the use adjacent to sensitive receptors (a hospital/school)? Distance to a recycling centre for household waste? 	++	<p>The development is not anticipated to produce waste to the extent that the creation or disposal of which would give rise to significant adverse effects. No demolition is required. The CEMP would detail the mitigation measures to be implemented during the construction phase to minimise waste and ensure that it is stored, managed, collected, reused, recycled and disposed of appropriately. Operational waste would be disposed of in line with the Council's requirements and managed in accordance with all applicable legislation. The design of the development will include appropriate areas for refuse and recycling points.</p> <p>Waste is also one of the key themes identified within the Climate Change Strategy, which outlines the following measures:</p> <ul style="list-style-type: none"> Net cut and fill balance across the site Site Waste Management Plan for construction phase Some modular build Just in time delivery "Take back" scheme with suppliers Maximise use of recycled/second-hand construction materials where feasible Seek to source a proportion of materials locally (within 20km radius) All buildings to provide appropriate storage for sorting different types of recyclables and waste, including food waste for composting <p>A discussion on reducing greenhouse gas emissions and the measures embedded within the design and additional mitigation measures is provided in response to SA objective #10 below.</p>
10. To reduce climate change impacts, support mitigation, encourage adaptation and protect water quality	<ul style="list-style-type: none"> Will it reduce the risk of flooding? Will it affect the amount of water available for extraction? Will it improve water quality? 	<ul style="list-style-type: none"> Would development on the site be located within Flood Zones 2, 3(a&b)? Would the site be located in an area of high/medium/low/very low risk of flooding from surface water (EA Maps) Infrastructure concerns as evidence 	++	<p>The proposed development has aspirations to be net-zero carbon and ensure adaptability and resilience to climate change. A Climate Change Strategy has been prepared to outline the approach to delivering a sustainable, net-zero carbon development. Net-zero carbon is also one of the five pledges of the design vision of Tey St Andrews and considers both climate change mitigation (reducing the proposed development's contribution to climate change) and climate change adaptation (ensuring that the development is resilient to the changing climate).</p> <p>The Climate Change Strategy for Tey St Andrews covers the four main sources of household emissions:</p> <ul style="list-style-type: none"> Building & Infrastructure Design and Performance; Connectivity; Energy Supply; Waste.

SA Objective	Assessment Criteria (Policy Based)	Assessment Criteria (Local Plan Sites)	Score considered appropriate	Comments
		<p>by consultation with Anglian Water</p> <ul style="list-style-type: none"> Are there water bodies on or adjacent to the site? 		<p>A number of innovative and ambitious proposals have been considered at Tey St Andrews, which includes:</p> <ul style="list-style-type: none"> Internalised trips – 30% fewer trips off site than would be expected from the proposed type and quantum of development; The provision of active and sustainable travel options plus a range of employment opportunities offered on site (home working, flexible working in a local hub and employment on designated larger scale employment plots, to include opportunities in the tech and Green Economy sectors); The potential to include pre-fabricated / modular units; Embedding circular economy principles and site-based agriculture including community food growing; A flexible energy strategy so that the proposed development is self-sufficient for zero carbon energy sources and/or can connect to an increasingly decarbonised grid; Creating a Community Forest with “re-wilded” areas incorporated in the green infrastructure strategy; Smart systems integrated throughout to monitor and manage environmental conditions on site, to maximise climate change mitigation through efficient and less wasteful resource use and ensure that the development itself responds to changing climatic conditions for the safety and comfort of site users. These smart systems could integrate emerging technologies through the use of other systems such as the Internet of Things; Provision of a Climate Innovation Hub which will comprise a mix of uses, innovative housing adhering to Passivhaus principles, primary school and a Transport Hub. <p>A portion of the site lies within Flood Zone 2/3 to the north, owing to the existing Roman River. However, no development is proposed in this area.</p> <p>Proposed measures included to mitigate the effects generated by the construction phase would include the implementation of a suitably worded CEMP and the incorporation of suitably designed Sustainable Drainage Systems (SuDS). Proposed measures to mitigate the effects generated by the operational phase of the development would include the implementation of an appropriate drainage strategy and allowing for the appropriate provision of management and maintenance for all drainage infrastructure by individual property owners, site management and Anglian Water as appropriate. Green Infrastructure and Blue Infrastructure principles will be embedded within the design of the proposed development to reduce surface water runoff, this includes a Community Forest and rewilded areas, SuDS, tree planting in all streets where feasible and permeable surfaces where feasible.</p> <p>Following implementation, the mitigation measures outlined above will ensure that there are no significant adverse effects on the water environment during the construction and operational phases of the development.</p>

bartonwillmore.co.uk

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
INFRASTRUCTURE &
ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS