

The logo for 'place services' is located in the top left corner. It consists of a solid blue square with the words 'place' and 'services' stacked vertically in a white, lowercase, sans-serif font.

**Great Dunmow Neighbourhood Plan**

**Strategic Environmental Assessment (SEA)**

**Environmental Report: Non-Technical Summary**

**September 2015**





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Annex A: Plans and Programmes

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## Glossary of Acronyms

ANGSt	Accessible Natural Greenspace Standard
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BARR	Buildings At Risk Register
CPZ	Countryside Protection Zone
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
EC	European Community
ECC	Essex County Council
EEC	European Economic Community
EU	European Union
IMD	Index of Multiple Deprivations
KSI	Killed or Seriously Injured
LDF	Local Development Framework
LoWS	Local Wildlife Sites
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PDL	Previously Developed Land
PPG	Planning Policy Guidance
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal incorporating the Strategic Environmental Assessment
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order
UDC	Uttlesford District Council

## **1 Introduction**

### **1.1 Background**

Uttlesford District Council, on behalf of the Great Dunmow Neighbourhood Plan Steering Group, commissioned Place Services of Essex County Council to undertake an independent Strategic Environmental Assessment (SEA) on the Great Dunmow Neighbourhood Plan.

### **1.2 The Neighbourhood Plan**

The Great Dunmow Neighbourhood Plan (referred to hereafter as the Plan) is a new type of planning document responding to the Localism Act of April 2012 which aims to give local people more say about what gets built in their area. Uttlesford District Council continues to be the Local Planning Authority (LPA).

The Plan provides a vision for the future of the parish, and sets out clear policies, principles and objectives to realise these visions, while focussing on its core purpose of promoting the correct use and development of land.

The Plan has been developed through extensive consultation with the people of Great Dunmow and others with an interest in the town.

The Plan is for the parish as a whole and looks at a wide range of issues, including:

- How development should be laid out and organised;
- How connectivity can be incorporated within the town and with the surrounding countryside, and how walking and cycling can be encouraged;
- How the heritage assets of Great Dunmow can be preserved and maintained;
- What open spaces, play facilities and community facilities are required;
- How the parish can fulfil its stewardship of the natural environment;
- What sports' facilities are required;
- What infrastructure is required;
- How healthcare and education provision will meet the changing demand for their services.

### **1.3 Strategic Environmental Assessment (SEA) and SEA Screening**

SEA originates from the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development.

National Planning Practice Guidance (NPPG) on Strategic Environmental Assessment requirements for neighbourhood plans states that, ‘In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a “screening” assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.’

A strategic environmental assessment may be required, for example, where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Uttlesford District Council, in line with their duty to assist, have deemed that the content of the emerging Neighbourhood Plan is such that an SEA should be undertaken due to the likelihood of significant effects on the environment. This is due to the Plan allocating sites for development. Although the sites in question have already been considered and dealt with through a sustainability appraisal of the Local Plan, the Local Plan in question was not found to be sound at Examination in Public.

#### **1.4 The Aim and Structure of this Report**

This Environmental Report:

- Tests the neighbourhood plan objectives against the SEA framework
- Explores the neighbourhood plan options using reasonable alternatives
- Evaluates the likely effects of the neighbourhood plan and alternatives
- Considers ways of mitigating adverse effects and maximising beneficial effects
- Proposes measures to monitor the significant effects of implementing the neighbourhood plan



## 2 Key Sustainability Issues and Problems and SEA Objectives

The identification of key sustainability issues and problems facing the district assist in the finalisation of a set of relevant SEA Objectives which would set the framework for the appraisal of the Plan.

The appraisal will then be able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the Plan's proposed policies. The following table outlines the key issues and subsequent SEA objectives for the Plan Area. It also explains the situation likely to affect the Plan Area should there be no Neighbourhood Plan.

**Table 1: Key Sustainability Issues and Problems**

Key Issues	Description / Supporting Evidence	State of environment in absence of Plan	SEA Objective
The natural environment	Great Dunmow parish is geographically in possession of extremely high value ecological sites, including the Chelmer Valley, ancient woodlands, and the Flitch Way, each of which contributes to important wildlife corridors permitting the migration of animals and insects around the town.	Applications could come through that are approved contrary to any natural environment related (including designations) policy direction in the Plan.	1) To retain, enhance and conserve the biodiversity, the water environment and the character of the landscape in the Great Dunmow Neighbourhood Plan Area.
	Consideration should also be given to non-designated value in regards to ecology on a site-by-site basis in order to protect and enhance species and habitats, including those that are protected. This could include Greenfield sites and areas of habitat considered to enrich appreciably the habitat resource within the context of local areas, such as species-rich hedgerows, municipal parklands or individual veteran trees.	Such resources might be lost if not covered within the policy direction of the Plan.	
Landscape character and quality	The Great Dunmow Neighbourhood Plan identifies a wildlife corridor of Ancient Woodland to the north-west of the settlement. The quality of the approaches to Great Dunmow have been identified as very important to the maintenance of the quality of the town's landscape, setting and	The quality of locally valued and protected landscapes might be harmed if not covered within the policy direction of the Plan.	

Key Issues	Description / Supporting Evidence	State of environment in absence of Plan	SEA Objective
	<p>character by the Steering Group. These have been considered by the Neighbourhood Plan.</p>		
<p>Water quality, supply and sewerage</p>	<p>In regards to land use planning water quality raises a range of challenges from development, including point source pollution from required sewage treatment, water abstraction to supply people and industry and diffuse pollution from urban sources.</p>	<p>Water quality might deteriorate if not covered within the policy direction or through the infrastructure needs of allocations.</p>	
<p>The historic environment</p>	<p>There are 2 conservation areas within the plan area which are defined as historical settlements and buildings having 'special architectural or historical interest, the character of which is desirable to preserve or enhance'.</p>	<p>Applications could come through that are approved contrary to any historic environment related policy direction in the Plan regarding suitable distances to designations and their settings.</p>	
<p>Archaeology</p>	<p>The majority of archaeological sites and deposits in Uttlesford District remain buried, hidden and thus preserved. However, the known archaeological resource in the District is very varied and highly significant. This issue would also be relevant to the plan area.</p>	<p>Applications could come through that are approved contrary to any required archaeological surveys in specific areas.</p>	<p>2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow Neighbourhood Plan Area.</p>
<p>The historic environment and settings</p>	<p>There are 3 Scheduled Monuments within the Plan Area and 174 listed buildings within the Plan Area.</p>	<p>Applications could come through that are approved contrary to any historic environment related policy direction in the Plan regarding suitable distances to designations and their settings.</p>	

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Key Issues	Description / Supporting Evidence	State of environment in absence of Plan	SEA Objective
Road traffic emissions	Uttlesford District consumes more energy than the county average. More than half the District's 2,888.5GWh energy consumption is from petroleum products which is largely associated with road transport.	Access to services, and the related transport emissions, may not be considered as strongly without a clear policy direction, and sustainable allocations.	3) To reduce and control pollution
Air quality	The A120 dual carriageway provides a high speed connection to the M11 and the towns surrounding Great Dunmow.	Although there are no AQMAs in the Plan Area, the level of development occurring in the locality makes air quality a key consideration that should be dealt with through a plan-led approach.	
Flooding and drainage	The existing main drainage paths in Great Dunmow follow the following courses: The tributaries of the River Chelmer (from Canada Cottages, Stortford Road and Ash Grove); Along the parish boundary from Hogland's Wood; Along Waldgrooms through the Doctor's Pond; and from Merk's Hill Wood reservoir.	Flooding issues are important regarding the type of sites that are being explored for allocation. Without suitable allocations, these issues may not be as well considered.	4) To reduce the risk of fluvial and surface water flooding and maintain water resource availability
Water resource availability	According to the Catchment Abstraction Management Strategy for the River Chelmer existing water resource availability in the District is either over abstracted which means abstraction is causing unacceptable damage to the environment at low flows, over licensed which means current actual abstraction is such that no water is available at low flows, or has 'no water available' which means that no water is available for further licensing at low flows.		

Key Issues	Description / Supporting Evidence	State of environment in absence of Plan	SEA Objective
Surface water flooding	Surface water flooding is more likely to occur within urban areas. Modelling of surface water in, Great Dunmow identifies drainage paths and potential areas that may be susceptible to surface water ponding. In numerous locations surface water reaches depths of more than 60 cm.		
Safe pedestrian and cycle access	The Essex County Council Rights of Way Improvement Plan has identified a lack of continuous paths, a lack of bridleways and a lack of byways. The issue of the continuity of paths is of particular significance to Great Dunmow There are also few dedicated cycle routes and evidence from the town's secondary school suggests that a minority of 2% cycle to school.	Access by sustainable means is best addressed through suitable allocations and policy content, and the Plan will speed up the application process in regards to specific criteria.	
Access to jobs and services	Uttlesford District Council has sought to make up for an historic shortfall in housing delivery to satisfy the requirements of its five year land supply, and a number of applications have been permitted on this basis, or have been granted permission on appeal by Her Majesty's Planning Inspectorate.	A locally specific policy and allocations document is more likely to address relevant accessibility issues across the Plan Area.	5) To ensure access to key services and encourage the use of sustainable methods of travel
	The Neighbourhood Plan Evidence Base indicates that bus services and access to them is relatively poor. The nearest railway station is Stansted / Bishop's Stortford, distances from the Plan Area of 6.1 miles and 9.8 miles respectively.		
Inclusive access to sports facilities	The Steeirng Group identify that swimming, gymnastics, netball and hockey are all faced with inadequate availability of facilities.	It is more likely that site allocations incorporate adequate open space and play areas through a planned approach.	6) To improve health and ensure appropriate provision for open space and recreational

Key Issues	Description / Supporting Evidence	State of environment in absence of Plan	SEA Objective
Access to natural greenspace	54% of households within Uttlesford do not have any access to natural greenspace. The District covers around 64,000ha of land but only 894ha of it is considered to be accessible natural greenspace.	Site allocations ideally should be in accessible areas to accessible natural greenspace, which is best addressed through a plan-led approach.	facilities.
Open space provision	Six play space areas currently exist in Great Dunmow: the Recreation Ground Play Area; Woodland's Park Play Area; Oakroyd Avenue Play Area; Lower Mill Field Play Area; Talberd's Ley Play Area; and the Skate Park. Compared to the level of provision expected by UDC's Open Space, Sport Facility, and Playing Field Strategy 2012, Great Dunmow South ward has a 7.3ha deficit, while the North ward has a 2.1ha surplus of play space, meaning an overall 5.2ha deficit.	Open space provision is most likely to be appropriate to the locality in a plan-led approach at this level.	
Appropriate housing	<p>There is a high level of home ownership (71.6%, including mortgaged properties), with correspondingly low proportions of social and private rented housing.</p> <p>Consultation with local people has revealed concerns about the affordability of housing in Great Dunmow, particularly for young people and families. People are also concerned about there being a range of housing types available; the perception is that many new developments have a large proportion of larger dwellings.</p> <p>Uttlesford District Council has also sought to make up for an historic shortfall in housing delivery to satisfy the requirements of its five year land supply, and a number of applications have been permitted on this basis, or have been granted permission on appeal by Her Majesty's Planning Inspectorate.</p>	An adequate distribution of site allocations through a plan-led approach at the required level is the best way to address identified local housing needs, rather than to rely on applications coming forward.	7) To provide appropriate housing to meet existing and future needs

Key Issues	Description / Supporting Evidence	State of environment in absence of Plan	SEA Objective
School capacity	<p>There are two local primary schools, St. Mary's and Dunmow Primary School, and both will be at capacity within the next five years.</p> <p>There is one secondary school, Helena Romanes' School, an academy, which has a capacity of 1,600 pupils, and which currently has nearly 1,400 pupils. The school will need to expand or relocate to cater for at least 2,000 pupils over the life of the Neighbourhood Plan. Uttlesford District Council are seeking to allocate land south of Stortford Road to enable relocation should that option be pursued.</p>	School and infrastructure capacity is a key consideration in allocating sites and overall levels of development. The subject is best addressed through a plan-led approach.	8) To ensure appropriate infrastructure and school capacity
Infrastructure capacity	Survey results (recorded in the Plan's Evidence Base) indicate a concern locally about the impact of new housing development and the pressure this will put on infrastructure, schools, medical facilities and infrastructure (including sewerage) capacities.		
Employment facilities / opportunities	Only 20 percent of employees working in Great Dunmow actually reside in the town. Over half travel to Great Dunmow from further than 5 miles away, coming from as far afield as Braintree and Brentwood.	There is a possibility that employment opportunities are located in inaccessible or inappropriate areas.	9) To ensure employment provision, economic growth and the promotion of the viability and vitality of the town centre
	The Employment Land Study reported that there is a shortage of commercial floor space of the right type, including both office space and warehousing.		
	The LPA's 2005 Local Plan allocated approximately 16ha of land for employment but only 18 percent (3.5ha) has been taken up. At the same time, there has been an overall decline in the amount of industrial floor-space and an increase in warehousing and offices.		

The above highlighted key sustainability issues and problems have formulated relevant SEA Objectives, which are shown in the final column. It is these objectives against which the Plan will be appraised.

### 3 How policies are appraised...

This SEA assesses the Plan’s policies against the SEA Objectives outlined in the SEA framework. The aim is to assess the sustainability effects of the Plan following implementation. The assessment looks at the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects in accordance with Annex 1 of the SEA Directive, as well as assessing alternatives and providing mitigation measures where appropriate. The findings are accompanied by an appraisal matrix which will document the effects over time.

The content of the appraisals responds to those ‘significant effects’ of the policy or element of the Plan subject to assessment. Assessment will also look at the following:

- Temporal effects;
- Secondary, Cumulative and Synergistic effects;
- The appraisal of Alternatives; and
- Proposed mitigation measures / recommendations

These, and ‘significant effects’ are further described in the following sub-sections.

#### 3.1 Description of ‘Significant Effects’

The strength of impacts can vary dependant on the relevance of the policy content to certain SEA objectives or themes. Where the policies have been appraised against the SEA Objectives the following key has been used to illustrate a range of possible impacts:

✓✓	Significantly Positive	X	Negative
✓	Positive	XX	Significantly Negative
/	Uncertain	0	No impact

Commentary is also included to describe the significant effects of the policy on the SEA objectives.

#### 3.2 Description of ‘Secondary, Cumulative and Synergistic Effects’

In addition to those effects that may arise indirectly (secondary effects), relationships between different policies will be assessed in order to highlight any possible strengthening or weakening of impacts from their implementation together. Cumulative effects respond to impacts occurring directly from two different policies together, and synergistic effects are those that offer a strengthening of more than one policy that is greater than any individual impact.

#### 3.3 Description of ‘Proposed Mitigation Measures / Recommendations’

Negative or uncertain impacts may be highlighted within appraisals. As such, mitigation measures may be needed and these will be highlighted in this section for each policy where relevant. In addition to this, this section will also include any recommendations that are not directly linked to negative or uncertain impacts, but if incorporated may lead to sustainability improvements.

## **4 How sites are appraised...**

In addition to the above SEA Framework formulated for the appraisal of the policy content within the Plan, a separate framework is required for the appraisal of the sustainability of preferred and alternative (non-preferred) site allocations within the document.

Sites will be subject to appraisal using a pro forma developed taking in the key issues of the area and all relevant available information across a range of sustainability criteria.

The Site Pro Forma can be found within the relevant section of the main Environmental Report.

### **4.1 Note on the Appraisal of Sites in this Document**

It should be noted that the appraisals in this document reflect the opportunities and constraints on sites as per the Site Pro Forma, and do not factor in any site level policy content. This is for the purpose of appraising preferred and non-preferred sites to the same level of detail in the SEA. Corresponding commentary provides a narrative of these opportunities and constraints and how far the policy content responds to the identified limitations of the site and makes the most of the site's possibilities.

It should be noted that the appraisals of sites in the SEA should not act as a barrier to development or be used in any context other than the SEA itself and for the purposes of assisting the allocation of sites within the Neighbourhood Plan. SEA is strategic in nature and this is reflected in the appraisal of sites. The allocation of sites should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process).



## 5 The Appraisal of the Plan’s Non-Site Allocation Policies

The Plan’s non-site allocation policies are:

- |  |   |
|--|---|
| <b>DS1:</b> TDA: Development Limits            | <b>NE4:</b> Screening                                 |
| <b>DS9:</b> Building for Life                  | <b>SOS1:</b> Identified Sports Facilities             |
| <b>DS10:</b> The Case for Space                | <b>SOS2:</b> Sporting Infrastructure Requirements     |
| <b>DS11:</b> Hedgerows                         | <b>SOS3:</b> Children’s Play Space                    |
| <b>DS12:</b> Eaves Height                      | <b>SOS4:</b> Cemetery Space                           |
| <b>DS13:</b> Rendering, Pargetting and Roofing | <b>GA1:</b> Core Footpath and Bridleway Network       |
| <b>DS14:</b> Integration of Affordable Housing | <b>GA2:</b> Integrating Developments (Paths and Ways) |
| <b>DS15:</b> Local Housing Needs               | <b>HSTC1:</b> Uses and Variety                        |
| <b>LSC1:</b> Landscape, Setting and Character  | <b>HSTC2:</b> Coach Park                              |
| <b>LSC2:</b> Important Views                   | <b>E1:</b> Employment Land                            |
| <b>LSC3:</b> The Chelmer Valley                | <b>E2:</b> Loss of Employment Land                    |
| <b>LSC4:</b> Local Green Space                 | <b>HEI1:</b> Medical Facilities                       |
| <b>LSC5:</b> Assets of Community Value         | <b>HEI2:</b> Secondary School Provision               |
| <b>NE1:</b> Identified Woodland Sites          | <b>HEI3:</b> Primary School Provision                 |
| <b>NE2:</b> Wildlife Corridors                 | <b>HEI4:</b> Conversion to Educational Use            |
| <b>NE3:</b> Street Trees on Development Sites  |   |

### 5.1 The Impacts of the Plan’s Non-Site Allocation Policies

The following table shows the general performance of the Plan’s non-site allocation policies.

**Table 2: General performance of the Plan’s non-site allocation policies**

Policy	SEA Objectives								
	1	2	3	4	5	6	7	8	9
<b>DS1</b>	✓	0	0	0	✓	0	✓	✓	✓
<b>DS9</b>	✓	✓	0	✓	✓	0	✓	✓	0
<b>DS10</b>	0	0	0	0	0	0	✓	0	0

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Policy	SEA Objectives								
	1	2	3	4	5	6	7	8	9
DS11	✓	/	0	0	0	0	0	0	0
DS12	0	✓	0	0	0	0	0	0	0
DS13	0	✓	0	0	0	0	0	0	0
DS14	0	0	0	0	✓	0	✓	0	0
DS15	0	0	0	0	0	0	✓✓	0	0
LSC1	✓✓	✓	0	0	0	0	0	0	0
LSC2	✓✓	✓	0	0	0	0	/	0	0
LSC3	✓✓	✓	0	✓	0	✓	0	✓	0
LSC4	✓	0	0	0	0	✓✓	0	0	0
LSC5	0	✓	0	0	0	✓	0	0	/
NE1	✓✓	✓	0	0	0	0	0	0	0
NE2	✓✓	0	0	✓	0	✓	0	/	0
NE3	✓	0	0	✓	0	0	0	0	0
NE4	✓	0	0	✓	0	0	0	0	0
SOS1	✓	0	0	0	0	✓✓	0	0	0
SOS2	✓	0	0	0	0	✓	0	0	0
SOS3	0	0	0	0	0	/	0	0	0
SOS4	0	0	0	0	0	0	0	✓	0
GA1	0	0	0	0	✓	0	0	✓	0
GA2	✓	0	0	0	✓	0	0	✓	0
HSTC1	0	0	0	0	0	0	/	0	/
HSTC2	0	0	0	0	✓	0	0	0	✓
E1	0	0	0	0	✓	0	0	0	✓
E2	0	0	0	0	0	0	0	0	✓
HEI1	0	0	✓	0	✓	0	0	0	0
HEI2	0	✓	✓	0	✓	✓	0	✓	0
HEI3	0	✓	✓	0	✓	✓	0	✓	0
HEI4	0	✓	✓	0	✓	✓	0	✓	0

In summary:

- There will be no negative impacts arising from any of the Plan's non-site allocation policies.
- The policies are very specific to individual issues, with only a few policies focusing on a wider range of planning issues or sustainability themes.

- All SEA Objectives will experience positive impacts resulting from the Plan's policies.
- Positive cumulative impacts of the Plan's non-site allocation policies can be seen as most prevalent for biodiversity and landscape issues, with the various policies supporting and strengthening each other. This is most keenly realised for policies LSC1, LSC3, NE1 and NE2 regarding landscape, setting and character; identified woodland sites; and wildlife corridors.
- This is similarly the case for cultural heritage, with the majority of development standard and landscape setting and character policies combining to strengthen the Plan's protection and enhancement of the historic environment.
- The Plan will also see a cumulative strengthening of positive impacts related to health and open space, through complimentary policies surrounding sports and open spaces and also landscape, setting and character despite the possibility of conflict between the different uses of land. Infrastructure will also improve cumulatively through the approaches surrounding health and open space, transport and healthcare and education policies in the Plan.
- One instance of potential negative synergistic effects exists regarding the approaches of Policy LSC2 regarding Important Views and Policy DS1 regarding Development Limits. In this instance there is uncertainty surrounding how protecting important views and Policy DS1's stance that larger housing developments will not be supported in more central locations will impact on each other, given their generally conflicting interests

### **5.1.1 Summary of recommendations to the policies**

The following recommendations have been made regarding the Plan's non-site allocation policies:









- Policy: DS11: Hedgerows - With regard to Cultural Heritage (SO2) and where existing hedgerow field boundaries are being retained and integrated into proposals, it should be noted that 'laying' is not a form of hedgerow management that is traditional to, or characteristic of Essex. As a result, correct methods of such management, specifically 'coppicing', could be incorporated into the policy where relevant.
- Policy: SOS1: Identified Sports Facilities - It is recommended that further detail be included to assist developers to determine what would be classified as 'the same general location' regarding exceptional circumstances.
- Policy: SOS3: Children's Play Space - It is recommended that the policy is expanded to be explicit as to what restrictions or opportunities exist for development proposals in regards to children's play space.
- Policy: HSTC1: Uses and Variety - Separately from the Neighbourhood Plan process it is recommended that the Town Council and the District Council work together regarding the removal of those permitted development rights as highlighted in the policy in accordance with the procedures for Article 4 directions (as per Schedule 3 of The Town and Country Planning [General Permitted Development] [England] Order 2015).
- Policy: HSTC2: Coach Park - It is recommended that further information could be included within the policy or supporting text as to what information developers might need to submit to evidence that proposals would not be detrimental to the visual and/or environmental character and amenity of the area regarding noise, fumes and smell, litter, traffic, general disturbance.

- Policy: E1: Employment Land - Mitigation measures and / or the use of conditions can be effectively used to compensate for the impacts of development. Further information could be included within the policy or supporting text as to what information developers might need to submit to evidence that proposals would not be detrimental to the visual and/or environmental character and amenity of the area regarding noise, fumes and smell, litter, traffic and general disturbance, and under what circumstances benefits may outweigh any perceived negative impacts.
- Policy: E2: Loss of Employment Land - The policy could benefit from being supported by a statement on permitted development rights affecting employment land in different use class orders.
- Policies: HEI2: Secondary School Provision & HEI3: Primary School Provision - It is recommended that the policy or supporting text acknowledge that the County Council determine planning applications for schools. It is further recommended that the policy wording be amended to reflect that the Neighbourhood Plan Steering Group would only be able to support planning applications subject to the listed criteria, rather than be able to determine them.

## 5.2 The cumulative and synergistic effects of the Plan policies (non-site allocations)

This sub-section looks at the cumulative and synergistic effects of the Plans non-site allocation policies. The below table explores the amalgamated performance of the Plan’s policies and against specific SEA objectives. Commentary also identifies where specific policies have cumulative or synergistic effects with each other.

**Table 3: The extent of impacts identified in the policy appraisals per sustainability objective**

Sustainability Objective	Extent of impacts
Biodiversity / Landscape	
Cultural Heritage	
Pollution	
Flooding and water	
Sustainable Travel	
Health and Open Space	
Appropriate Housing	
Infrastructure	

Sustainability Objective	Extent of impacts
Economy / Town Centre	

- Positive cumulative impacts of the Plan’s non-site allocation policies can be seen as most prevalent for biodiversity and landscape issues, with the various policies supporting and strengthening each other. This is most keenly realised for policies LSC1, NE1 and NE2 regarding landscape, setting and character; identified woodland sites; and wildlife corridors.
- This is similarly the case for cultural heritage, with the majority of development standard and landscape setting and character policies combining to strengthen the Plan’s protection and enhancement of the historic environment.
- The Plan will also see a cumulative strengthening of positive impacts related to health and open space, through complimentary policies surrounding sports and open spaces and also landscape, setting and character despite the possibility of conflict between the different uses of land. Infrastructure will also improve cumulatively through the approaches surrounding health and open space, transport and healthcare and education policies in the Plan.

## 6 The Plan’s Site Allocation Policies

The following section looks at the appraisal of the site allocations as set out in the following policies. For the purposes of this section, the amount of development has been reiterated:

- Policy: DS2: TDA: The Existing HRS Site – 100 dwellings
- Policy: DS3: TDA: Land South of Stortford Road – 400 dwellings (including the safeguarding of Land adjacent to Buttleys Lane for secondary school use)
- Policy: DS4: TDA: Land West of Woodside Way – 850 dwellings, 21 ha open space, community centre, primary school
- Policy: DS5: TDA: Land West of Chelmsford Road (Smith’s Farm) – 300 dwellings, 70-bed care home, primary school, 1,400m<sup>2</sup> retail floorspace, 2.1ha employment provision
- Policy: DS6: TDA: Land West of Chelmsford Road (Smith’s Farm) (Waste Transfer Station)
- Policy: DS7: TDA: Woodland’s Park – 842 dwellings, open space
- Policy: DS8: TDA: Land at Brick Kiln Farm – 65 dwellings, 9.4ha open space

The appraisals of each of the above are explored in the following sub-sections.

### 6.1.1 Policy: DS2: TDA: The Existing HRS Site

Sustainability Objective	Extent of impacts	
1 Biodiversity / Landscape		
2 Cultural Heritage		
3 Pollution		
4 Flooding and water		
5 Sustainable Travel		
6 Health and Open Space		
7 Appropriate Housing		
8 Infrastructure		

Sustainability Objective	Extent of impacts	
9 Economy / Town Centre		

- The site will generally have positive impacts on the majority of the sustainability criteria, with very few constraints. These constraints relate to distances to the town centre and cycling routes, the aspirational distance to a large area of natural greenspace, local primary school capacity, and the fact that the site has not been promoted for mixed-use. Of these negative impacts, it should be noted that none are significant and the majority of these criteria are desirable from a sustainability perspective rather than essential. There is one exception to this however, regarding primary school capacity; however it is acknowledged that the dwelling yield of the site and its nature as an enabling development would not appropriate a new school or expansion. In addition to this, it is noted that new primary schools are allocated within the development proposals outlined in Policies DS5 and DS6, which effectively neutralises this impact. Impacts related to cycling routes are similarly neutralised through the policy content regarding the required provision of a footpath-cycleway running through the site from the bypass at Woodland’s Park Sector 4 to linking rights of way through the Woodland’s Park Sectors 1-3 sites.
- Of the uncertain or negligible impacts highlighted, these predominantly relate to nearby or adjacent ecological and historic environment designations and it should be noted that none are on the site. The cumulative impacts of these have the potential to be significant without suitable mitigation however these impacts are neutralised through the policy requirements of a 1.8 hectare landscape buffer to the north and west of the site to form a link with existing woodland and a separate 20m buffer adjoining the existing properties of Parsonage Downs. Natural England, in the consultation of the Scoping Report, stated that having considered the scale of these proposed developments and their location relative to designated nature conservation sites, Natural England is of the opinion that this allocation will not be likely to result in any measurable impact on any SSSI or European site. These proposed housing site may, however, support protected species and appropriate investigations are likely to be required as part of any subsequent application. In addition, potential negative impacts on the historic environment will not be realised through the policy requirement to protect the setting of the listed buildings, and the associated Conservation Area.

### 6.1.2 Policy: DS3: TDA: Land South of Stortford Road

#### Land South of Stortford Road

Sustainability Objective	Extent of impacts	
1 Biodiversity / Landscape		
2 Cultural Heritage		

Sustainability Objective	Extent of impacts
3 Pollution	
4 Flooding and water	
5 Sustainable Travel	
6 Health and Open Space	
7 Appropriate Housing	
8 Infrastructure	
9 Economy / Town Centre	

- The site will generally have positive impacts on the majority of the sustainability criteria, with very few constraints. These constraints relate to impact on landscape, the greenfield nature of the site, the aspirational distance to a large area of natural greenspace, local primary school capacity, and the fact that the site has not been promoted for mixed-use. Of these negative impacts, it should be noted that none are significant and many of these criteria are desirable from a sustainability perspective rather than essential. The exceptions to this however, regard primary school capacity and landscape impacts; however it is acknowledged that the dwelling yield of the site would not appropriate a new school or expansion and that landscape impacts will be mitigated through the requirements for buffers in the policy. In addition to this, it is noted that new primary schools are allocated within the development proposals outlined in Policies DS5 and DS6, which effectively neutralises the impact on school capacity.
- Of the uncertain or negligible impacts highlighted, these predominantly relate to nearby or adjacent ecological and historic environment designations and it should be noted that none are directly on the site. The cumulative impacts of these have the potential to be significant without suitable mitigation however these impacts are neutralised through the policy's requirement that protection of the Flitch Way through an effective buffer is forthcoming and also the protection of the setting of the Grade II Listed Folly Farm. Natural England, in the consultation of the Scoping Report, stated that having considered the scale of these proposed developments and their location relative to designated nature conservation sites, Natural England is of the opinion that this allocation will not be likely to result in any measurable impact on any SSSI or European site. These proposed housing site may, however, support protected species and appropriate investigations are likely to be required as part of any subsequent application It should be noted however that archaeological deposits are likely to exist on the site and these should be fully investigated as a condition to any successful application. Any potential negative impacts surrounding surface water flooding due to the watercourse through Staggs Farm and Stortford Road should also be identified and mitigated in a required Surface Water Drainage Strategy to accompany any



planning application.

- **Proposed Mitigation Measure / Recommendation** – It was previously recommended, through the iterative process of SEA, that ‘archaeological deposits are likely to exist on the site and these should be fully investigated as a condition to any successful application.’ This has now been factored into the policy criteria.

**Land adjacent to Buttleys Lane**

Sustainability Objective	Extent of impacts
1 Biodiversity / Landscape	Light Green, Grey, Red
2 Cultural Heritage	Light Green, Grey
3 Pollution	Light Green
4 Flooding and water	Light Green
5 Sustainable Travel	Light Green, Red
6 Health and Open Space	Light Green, White
7 Appropriate Housing	White
8 Infrastructure	Light Green, White
9 Economy / Town Centre	Light Green, White

- The site will generally have positive impacts on the majority of the sustainability criteria, with very few constraints. These constraints relate to impact on landscape, the Greenfield nature of the site, the quality of existing agricultural land and the distance to the town centre. Of these negative impacts, it should be noted that none are significant. Regarding the landscape impact, it should be noted that the site is safeguarded and not allocated within the Plan and that mitigation measures through supporting policy are therefore not included. Development of the site should seek to mitigate these. Negative impacts arising from the distance to/from the town centre are deemed acceptable for the use of the site; however sustainable transport links to the site from transport interchanges in the Plan Area are likely to be addressed in a design and access statement accompanying any forthcoming school application on the site.
- Of the uncertain or negligible impacts highlighted, these predominantly relate to nearby or adjacent ecological and historic environment designations and it should be noted that none are directly on the site. Of greatest concern however is the prevalence of the Flich Way

separating the site, and proposals should demonstrate that access arrangements from the two parts of the site will not negatively impact on this designation. It should also be noted that archaeological deposits are likely to exist on the site and is recommended that these should be fully investigated in a condition to any successful application.

- **Proposed Mitigation Measure / Recommendation** - Proposed mitigation measures are not made for the safeguarding of the site, due to its status in the Plan. Development of the site should however seek to mitigate negative landscape impacts through buffering and effective landscaping on site. Archaeological deposits are also likely to exist on the site and these should be fully investigated as a condition to any successful application.

### 6.1.3 Policy: DS4: TDA: Land West of Woodside Way





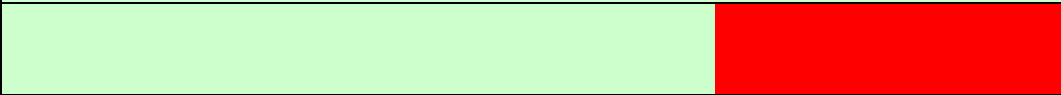


Sustainability Objective	Extent of impacts
1 Biodiversity / Landscape	Light Green (approx. 30%), Grey (approx. 50%), Red (approx. 20%)
2 Cultural Heritage	Light Green (approx. 75%), Grey (approx. 25%)
3 Pollution	Light Green (100%)
4 Flooding and water	Light Green (approx. 55%), Grey (approx. 45%)
5 Sustainable Travel	Light Green (approx. 70%), Red (approx. 30%)
6 Health and Open Space	Light Green (approx. 80%), Red (approx. 20%)
7 Appropriate Housing	Light Green (100%)
8 Infrastructure	Light Green (approx. 70%), Red (approx. 30%)
9 Economy / Town Centre	Light Green (100%)

- The site will generally have positive impacts on the majority of the sustainability criteria, with very few constraints. These constraints relate to the Greenfield nature of the site, the distance to the town centre, an aspirational target of 500ha of accessible natural greenspace within 10km and the capacity of the existing nearest primary school. Of these negative impacts, it should be noted that none are significant.
- The possible exception to this regards primary school capacity, although the site will provide a primary school on site through the yield of the site meeting Essex County Council's new primary school capacity threshold (700 new houses for one form of entry).
- The impact regarding the site's current Greenfield status can be considered unavoidable at

this scale of development and is not a barrier to the site and proposal being considered sustainable. The negative impact for the site’s distance to the town centre will similarly be neutralised though public transport contributions and the provision of footpaths and cycleways.

- Of the uncertain or negligible impacts highlighted, these predominantly relate to nearby or adjacent ecological and historic environment designations and it should be noted that none are directly on the site. The cumulative impacts of these have the potential to be significant, additionally on the landscape, without suitable mitigation however these impacts are neutralised through a substantial strategic landscape buffer of natural and semi-natural green space to the north and west edges of the site, including screening to join up existing woodlands and wildlife sites. This can be considered a positive approach. It should be noted however that archaeological deposits are likely to exist on the site and it would be hoped that these are fully investigated.
- It would also be hoped that any potential negative impacts surrounding surface water flooding at the southern edge of the site along Stortford Road, at the north edge along the parish boundary and by Hoglands Wood would also be identified and mitigated in the a Surface Water Drainage Strategy.
- **Proposed Mitigation Measure / Recommendation** - It is recommended that the site policy criteria reflect the fact that planning permission has already been granted for this site. The policy criteria can be considered redundant in light of the site’s status.

**6.1.4 Policy: DS5: TDA: Land West of Chelmsford Road (Smith’s Farm)**

Sustainability Objective	Extent of impacts
1 Biodiversity / Landscape	
2 Cultural Heritage	
3 Pollution	
4 Flooding and water	
5 Sustainable Travel	
6 Health and Open Space	
7 Appropriate Housing	
8 Infrastructure	

Sustainability Objective	Extent of impacts	
9 Economy / Town Centre		

- The site will generally have positive impacts on the majority of the sustainability criteria, with very few constraints. There will be significantly positive impacts associated with the allocation of 2.1ha of employment land and 1,400 sqm of retail floorspace. Constraints relate to the Greenfield nature of the site and agricultural land, aspirational targets for accessible natural greenspace within certain distances and the capacity of the existing nearest primary school. Of these negative impacts, it should be noted that none are significant.
- The possible exception to this regards primary school capacity, although the site will assist in the provision of increased primary school capacity on site in conjunction with Policy DS4. The impact regarding the site's current Greenfield status can be considered unavoidable at this scale of development and is not a barrier to the site and proposal being considered sustainable. There is similarly no scope for the site to mitigate the loss of grade 2 agricultural land which again should not be considered a barrier to development.
- Of the uncertain or negligible impacts highlighted, these predominantly relate to potential negative impacts surrounding flooding at the entrance of the site from Chelmsford Road and along the course of Hoblongs Brook and also the fact that part of the site is within Flood Risk Zone 2. It would be hoped that surface water impacts would be identified and mitigated in a Surface Water Drainage Strategy.
- **Proposed Mitigation Measure / Recommendation** - It is recommended that the site policy criteria reflect the fact that planning permission has already been granted for this site. The policy criteria can be considered redundant in light of the site's status.

#### 6.1.5 Policy: DS6: TDA: Land West of Chelmsford Road (Smith's Farm) (Waste Transfer Station)







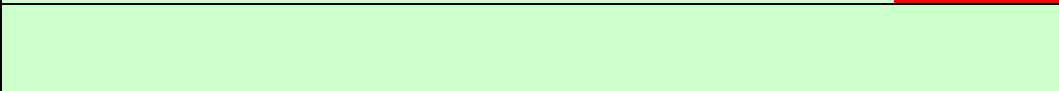


Policy DS6 has not been subject to appraisal in this report.

- ECC Waste Local Plan Replacement Preferred Approach 2015 states, in Preferred Approach 2 (Safeguarding and Waste Consultation Zones), that, 'The network of Local Authority Collected Waste facilities comprising the Integrated Waste Management Facility at Tovi EcoPark, Basildon and supporting transfer stations are to be safeguarded for the life of the planning permission or unless it can be demonstrated that they are no longer required for the delivery of the Joint Municipal Waste Management Strategy.' In addition, The Joint Municipal Waste Management Strategy for Essex 2007-2032 and the Essex Waste Partnership Final Business Case identified the need for the integrated waste management facilities and supporting network of LACW transfer stations make a significant contribution to providing that LACW capacity and are therefore allocated as strategic sites. Each preferred site for allocation has come through the Call for Sites.
- The site in question corresponds to site W9 in the RPA, which is allocated and safeguarded as a Waste Transfer Station for the above purpose and is consistent with the proposed allocation within the Neighbourhood Plan. The site has planning permission for this use. The allocation of, and determination of planning applications regarding waste management

facilities form part of the remit of Essex County Council as the Waste Planning Authority for the area.

- This explains why Policy DS6 has not been subject to appraisal within this SEA of the Great Dunmow Neighbourhood Plan. For an assessment on the sustainability of the site in the specific context of its proposed use, please see the Sustainability Appraisal of the ECC Waste Local Plan Replacement Preferred Approach 2015.
- **Proposed Mitigation Measures / Recommendation** - It is recommended that the policy is removed from the Neighbourhood Plan as the site has planning permission and the determination of planning applications for waste management facilities are the remit of Essex County Council as the relevant Waste Planning Authority.

### 6.1.6 Policy: DS7: TDA: Woodland’s Park

Sustainability Objective	Extent of impacts
1 Biodiversity / Landscape	
2 Cultural Heritage	
3 Pollution	
4 Flooding and water	
5 Sustainable Travel	
6 Health and Open Space	
7 Appropriate Housing	
8 Infrastructure	
9 Economy / Town Centre	

- The site will generally have positive impacts on the majority of the sustainability criteria, with few constraints considering the scale of the proposal. These constraints relate to the Greenfield nature of the site, the presence of Ancient Woodland and TPOs on site, cycling routes through the site, aspirational targets of accessible natural greenspace within certain distances of the site, the capacity of the existing nearest primary school, and the fact that the site has not been proposed for a mix of uses. Of these negative impacts, it should be noted that none are significant.
- The possible exception to this regards primary school capacity, although it should be

acknowledged that those sites in Policy DS4 and DS5 site will provide a primary school on site as per their policy content. It should also be acknowledged that the site’s yield meets Essex County Council’s threshold for new primary school capacity (700 new houses for one form of entry).

- The impact regarding the site’s current Greenfield status can be considered unavoidable at this scale of development and is not a barrier to the site and proposal being considered sustainable. Those impacts related to Ancient Woodland and TPOs on site would need consideration; the former being adequately mitigated by a north-west strategic landscape buffer. It would be hoped that TPOs on site would be carefully factored into the development. These have been included as site criteria, through the iterative process of SEA.
- Of the uncertain or negligible impacts highlighted, these predominantly relate to nearby or adjacent ecological and landscape based constraints. The site is also adjacent to Hoglands Wood / Broomhills Local Wildlife Site on the eastern edge of the northern part of the site and it would be hoped that any resulting identified impacts would be mitigated. There is also an uncertain impact surrounding the site being adjacent to two Grade II listed buildings between the site and the existing Helena Romanes School.
- It would be hoped that any potential negative impacts surrounding surface water flooding along the boundary with Little Easton parish would also be identified and mitigated in a Surface Water Drainage Strategy.
- **Proposed Mitigation Measure / Recommendation** - It is recommended that the site policy criteria reflect the fact that planning permission has already been granted for this site. The policy criteria can be considered redundant in light of the site’s status.

**6.1.7 Policy: DS8: TDA: Land at Brick Kiln Farm**

Sustainability Objective	Extent of impacts
1 Biodiversity / Landscape	
2 Cultural Heritage	
3 Pollution	
4 Flooding and water	
5 Sustainable Travel	
6 Health and Open Space	
7 Appropriate Housing	

Sustainability Objective	Extent of impacts	
8 Infrastructure		
9 Economy / Town Centre		

- The site will generally have positive impacts on the majority of the sustainability criteria, with few constraints. These constraints relate to the Greenfield nature of the site, cycling routes through the site, aspirational targets of accessible natural greenspace within certain distances of the site, the capacity of the existing nearest primary school, and the fact that the site has not been proposed for a mix of uses. Of these negative impacts, it should be noted that none are significant.
- The possible exception to this regards primary school capacity, although it should be acknowledged that those sites in Policy DS4 and DS5 site will provide a primary school on site.
- The impact regarding the site’s current Greenfield status is not a barrier to the site and proposal being considered sustainable. The impact related to cycling routes on site will be overcome through their provision. The site can be considered suitable for housing only.
- Of the uncertain or negligible impacts highlighted, these relate to Ancient Woodland in proximity to the site, landscape impacts and impacts on ground water. The site is within 500m of two Ancient Woodlands to the east of the site – Markshill Wood and woodland to the east of Tower House - however these impacts are unlikely to be realised due to the scale of the development and the location of St Edmunds Lane between the site and the designations. Despite this, it would be hoped that mitigation of landscape impacts would be forthcoming.
- It would also be hoped that any potential negative impacts surrounding ground water quality / pollution would be identified and mitigated in a Waste Water and Surface Water Drainage Strategy.
- **Proposed Mitigation Measure / Recommendation** - It is recommended that the site policy criteria reflect the fact that planning permission has already been granted for this site. The policy criteria can be considered redundant in light of the site’s status.

## 7 The Cumulative and Synergistic Effects of the Site Allocation Policies

It should be noted that some sites already have planning permission. The principle of allocating these sites within the Neighbourhood Plan ensures that any cumulative impacts and pressures of allocating additional land for development can be explored in terms of what is additionally suitable in the Plan Area in regards to environmental, social and economic factors. This is considered a valuable exercise in determining which other sites can reasonably be allocated for development in Great Dunmow, looking at potential benefits and constraints. This has also assisted in formulating relevant site policy criteria for those sites without planning consent.

The Plan Area is considered sufficiently compact that the above sites in unison will form the basis of the spatial analysis i.e. cumulative and synergistic impacts will be relevant across all sites. In those instances where there are likely to be specific impacts resulting from groups of sites in close proximity, these will be highlighted.

Impacts of these allocated sites in accumulation are explored on a thematic basis.

Please note that within Policy DS3 Land South of Stortford Road, the safeguarding of land adjacent to Buttleys Lane is included. For the purposes of assessing the impacts of development on this site for secondary school use, should it be forthcoming, it has been included and displayed as **LABL** for the purposes of this section.

### 7.1 Biodiversity, the water environment, landscape

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
1) To retain, enhance and conserve the biodiversity, the water environment and the character of the landscape in the Great Dunmow Neighbourhood Plan Area.	Impact on:							
	- SSSIs (and SSSI IRZs)	/	/	/	/	+	/	+
	- Special (Roadside) Verges	+	+	+	+	+	+	+
	- LoWS	/	/	/	/	+	/	+
	- Ancient Woodland	/	+	/	/	+	-	/
	Impact on Landscape	+	-	-	/	+	/	/
	Will any Tree Preservation Orders (TPOs) be affected?	/	+	+	+	+	-	+
	Is the site greenfield or brownfield?	+	-	-	-	-	-	-
Will the site result in a loss of high quality agricultural land?	/	/	-	/	-	/	+	

- There may be negative cumulative impacts on Ancient Woodland, with the majority of the allocated sites being located adjacent to this designation. The policy content accompanying allocations does however seek to mitigate impacts on the natural environment.
- There will be negative cumulative impacts on the loss of Greenfield land resulting from the allocations. This is not a particular criticism of the plan however, due to the lack of



brownfield land in the Plan Area that does not already have permission. The quality of the agricultural land is a mix of Grade 3 and 2, the former representing the majority which is not considered the best and most versatile soil.

- Regarding the allocations impact on biodiversity and the water environment it should be noted that the negligible / uncertain impacts on SSSIs are predominantly related to Impact Risk Zones, which require in some instances consultation with Natural England on land use proposals. There is therefore not considered to be a cumulative impact amongst the allocated sites, supported by Natural England in their consultation response to the SEA Environmental Report regarding sites DS2 and DS3 and the fact that sites within policies DS4, DS5, DS7 and DS8 have planning permission.
- There may be a negative cumulative impact on landscape through the allocations in unison, however it should be acknowledged that in many cases mitigation is possible on a site-by-site basis and that site policy content, where relevant, seeks landscape buffering in most instances.

## 7.2 Cultural heritage

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow Neighbourhood Plan Area	Could the site affect a (including its setting):							
	- Scheduled Monument?	+	+	+	+	+	+	+
	- Listed Building?	/	/	/	+	/	/	+
	- Conservation Area?	/	+	+	+	+	+	+
	Is the site in an area sensitive to change (Historic Environment)	+	/	/	/	+	+	+
Will there be any material harm caused to the form or alignment of protected historic lanes?	+	+	+	+	+	+	+	

- There will not be any cumulative negative impacts on the historic environment as a result of the policy allocations. Areas of concern however reflect the close proximity of a number of sites to Listed Buildings, however it should be acknowledged that individual impacts are isolated and mitigation measures exist in site policies.
- A number of the sites may also have cumulative negative impacts on archaeology and recommendations exist that these should be investigated.

### 7.3 Pollution

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
3) To reduce and control pollution	Will the proposal be affected by noise?	+	+	+	+	+	+	+
	Will it have an impact on air quality?	+	+	+	+	+	+	+
	Is it in a Groundwater Source Protection Zone?	+	+	+	+	+	+	/

- There will be no cumulative impacts regarding pollution.

### 7.4 Flooding

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
4) To reduce the risk of fluvial and surface water flooding and maintain water resource availability	Is the developable part of the site within:							
	- A fluvial flood risk zone?	+	+	+	+	/	+	+
	- An area at risk from surface water flooding?	+	/	+	/	/	/	+

- There will be no cumulative impacts regarding fluvial flooding through the allocations; however a number of sites are identified as having risk from surface water flooding. Despite this, impacts are generally likely to be isolated and relevant only to small areas within sites. Policy content also exists, where relevant, that requires surface water to be addressed at the planning application stage. In addition, planning permission has been granted for those sites in polices DS4, DS5, DS7 and DS8.

### 7.5 Access, sustainable travel

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
5) To ensure access to key services and encourage the use of sustainable methods of travel	Is the site within 800 metres walking and cycling distance of the town centre as defined?	-	+	-	-	+	+	+
	Is it located in access to existing cycling routes?	-	+	+	+	+	-	-
	Does the site have safe highway access?	+	+	+	+	+	+	+

- There will be no cumulative impacts associated with cycle routes where these will be incorporated within proposals. The impacts surrounding access are all highlighted as positive, although it should be noted that there are likely to be negative cumulative impacts on traffic generation as a result of the overall quantum of development in the Plan.

## 7.6 Health, open space, recreation

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
6) To improve health and ensure appropriate provision for open space and recreational facilities.	Is there capacity in the nearest GP surgery?	+	+	N/A	+	+	+	+
	Will the site be within:							
	- 300m of accessible natural greenspace of at least 2ha in size?	+	+	N/A	+	-	+	+
	- 2km of a 20ha accessible natural greenspace?	+	+	N/A	+	+	+	+
	- 5km of a 100ha accessible natural greenspace?	+	+	N/A	+	+	+	+
	- 10km of a 500ha accessible natural greenspace?	-	-	N/A	-	-	-	-
Will the site see a loss of open space for recreation?	/	+	+	+	+	+	+	

- There will be no direct negative cumulative impacts on health, open space and recreation, with positive impacts associated with open space provision requirements of proposals and site policy. It should be noted however that the quantum of development in the Plan is likely to put pressure on existing services, including those related to healthcare. Policy: HE11: Medical Facilities seeks to rectify this potential problem, and it is acknowledged that direct provision of such facilities is beyond the remit of the Plan.

## 7.7 Housing

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
7) To provide appropriate housing to meet existing and future needs	Will the site deliver affordable housing?	+	+	N/A	+	+	+	+

- There will be positive cumulative impacts regarding housing delivery in the Plan Area. It should also be acknowledged that an appropriate mix of inclusive housing options is either proposed or exists as policy criteria. This adds to this cumulative strengthening of impacts.

## 7.8 Infrastructure

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
8) To ensure appropriate infrastructure and school capacity	Is the site served by infrastructure?	+	+	+	+	+	+	+
	Is there capacity in the closest primary school?	-	-	N/A	-	-	-	-
	Is there capacity in the closest secondary school?	+	+	N/A	+	+	+	+

- There will be negative cumulative impacts on primary school capacities in the Plan Area as a result of the site allocations. It should be noted that primary schools are allocated within two of the sites and have been progressed through discussions by the LPA, subject to s106 agreements, however it should also be acknowledged that direct provision is beyond the remit of the Plan. The quantum of development in the Plan will lead to a total demand for primary school places of approximately 750-800 places and a figure of approximately 500 for secondary places. The ECC Commissioning School Places in Essex (2014-2019) document does however factor in housing growth and demand for school places will be monitored and proposals will be developed with local schools to determine a strategic plan to address the level of predicted growth expected from potential new housing.

## 7.9 Employment, economic growth, the town centre

SA Objective	Site Criteria	DS2	DS3	LABL	DS4	DS5	DS7	DS8
9) To ensure employment provision, economic growth and the promotion of the viability and vitality of the town centre	Will it result in the loss or gain of employment land?	+	+	+	+	++	+	+
	Is it within the town centre boundary as defined?	+	+	+	+	+	+	+
	Is site suitable for mixture of housing and another use(s) eg housing and employment or retail	-	-	N/A	+	+	-	-

- There will be positive cumulative impacts associated with retaining employment opportunities through the development of the sites not resulting in any loss of employment land. It should be noted however that only one of the sites is proposing any employment development and that this has planning permission. As a result of this it could be perceived that there may be negative impacts on employment opportunities in response to an increase of 2,700 dwellings in the Plan Area over the plan period.

## **7.10 General Themes**

It should be noted that there may be implications surrounding those sites within policies DS2 and DS3 as specified, should the re-location of the Helena Romanes School site not be forthcoming. The re-location of the school in itself is not within the specific remit of the Plan beyond DS3's current approach to safeguarding the site for this use. The re-location is in part possible due to the delivery of policies DS2 and DS3 regarding enabling development to part fund the re-location as well as s106 contributions collected through other policies / sites. A possible scenario is that sites within policies DS2 and DS3 (along with other sites in Great Dunmow) are delivered and the school is still not re-located by the relevant authority. The appraisal of each individual site explores the principle of development on each site's own merits, however it should be addressed within this section that a large amount of cumulative positive benefits exist with these sites in unison as a vehicle to deliver much needed secondary school capacity improvements in the Plan Area and beyond.

## 8 Alternative Sites considered

Alternatives have been identified from the District Council's SHLAA (2013/14) which looked at a total of 39 sites within Great Dunmow. Some of these sites constitute the allocations made within the Neighbourhood Plan. In addition, a number of the SHLAA sites have been built, others have planning permission and some were discounted from consideration due to viability, availability and suitability reasons.

It should be noted that there are no alternative sites within the Plan Area for the re-location of the Helena Romanes School. This is due to no sites being put forward for this use by landowners / developers. This is consistent with the District Council's call-for-sites (informing the previously mentioned SHLAA [2013/14]) from which alternative sites for development in this Neighbourhood Plan have been identified. In addition, no site identified within this process was of a sufficient housing yield to meet the County Council's threshold for a new secondary school to be provided. The status of the SHLAA sites not allocated within this Plan can be found in the following table.

SHLAA Site Reference (& potential SHLAA yield)	Reason for non-inclusion within the SEA & Neighbourhood Plan plan-making process
GTDUN 1 (12)	Included as alternative
GTDUN 2 (576)	Allocated in Neighbourhood Plan (Policy DS3, and Policy DS4)
GTDUN 3 (100)	Has planning permission
GTDUN 4 (41)	Included as alternative
GTDUN 5 (73)	Has planning permission
GTDUN 6 (842)	Has planning permission
GTDUN 7 (105)	Has planning permission
GTDUN 8 (65)	Has planning permission
GTDUN 9 (As above [GTDUN 8])	Has planning permission
GTDUN 10 (124)	Has planning permission
GTDUN 11 (400)	Allocated in Neighbourhood Plan (Policy DS3)
GTDUN 12 (158)	Included as alternative
GTDUN 13 (790)	Has planning permission
GTDUN 14 (370)	Has planning permission / Part allocated in Neighbourhood Plan (Policy DS5)
GTDUN 15 (147)	Suitability fail in SHLAA

SHLAA Site Reference (& potential SHLAA yield)	Reason for non-inclusion within the SEA & Neighbourhood Plan plan-making process
GTDUN 16 (6)	Completed
GTDUN 17 (25)	Completed
GTDUN 18 (7)	Completed
GTDUN 19 (48)	Suitability and achievability fails in SHLAA
GTDUN 20 (5)	Has planning permission
GTDUN 21 (11)	Included as alternative
GTDUN 22 (120)	Suitability fail in SHLAA
GTDUN 23 (14)	Included as alternative
GTDUN 24 (2)	Achievability fail in SHLAA
GTDUN 25 (8)	Included as alternative
GTDUN 26 (12)	Has planning permission
GTDUN 27 (6)	Completed
GTDUN 28 (32)	Completed
GTDUN 29 (8)	Completed
GTDUN 30 (10)	Included as alternative
GTDUN 31 (71)	Completed
GTDUN 32 (26)	Included as alternative
GTDUN 33 (35)	Included as alternative
GTDUN 34 (16)	Included as alternative
GTDUN 35 (7)	Completed
GTDUN 36 (100)	Suitability fail in SHLAA
GTDUN 37 (95)	Suitability fail in SHLAA
GTDUN 38 (43)	Suitability fail in SHLAA
GTDUN 39 (100)	Allocated in Neighbourhood Plan (Policy DS2)

The sites in grey above have been explored as alternatives sites for allocation within the

Neighbourhood Plan. These appraisals are assessed in the following table.



**Table 4: Appraisal of alternative sites**

SA Objective	Site Criteria	GtDUN 1	GtDUN 4	GtDUN 12	GtDUN 21	GtDUN 23	GtDUN 25	GtDUN 30	GtDUN 32	GtDUN 33	GtDUN 34
1) To retain, enhance and conserve the biodiversity, the water environment and the character of the landscape in the Great Dunmow Neighbourhood Plan Area.	Impact on:										
	SSSIs (and SSSI IRZs)	+	+	+	+	+	+	+	+	+	+
	Special (Roadside) Verges	+	+	+	+	+	+	+	+	+	+
	LoWS	+	+	+	+	+	+	+	+	+	+
	Ancient Woodland	+	+	+	+	+	/	+	+	+	+
	Impact on Landscape	/	+	/	+	-	+	+	/	-	/
	Will any Tree Preservation Orders (TPOs) be affected?	+	+	-	-	+	+	+	/	+	/
	Is the site greenfield or brownfield?	-	+	-	+	+	-	+	-	+	-
2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow Neighbourhood Plan Area	Will the site result in a loss of high quality agricultural land?	+	-	+	+	-	+	+	/	-	-
	Could the site affect a (including its setting):										
	Scheduled Monument?	+	+	+	+	+	+	+	+	+	+
	Listed Building?	+	+	--	/	+	+	/	/	+	/
	Conservation Area?	+	+	+	/	+	+	/	/	+	/
3) To reduce and control pollution	Is the site in an area sensitive to change (Historic Environment)	+	+	-	/	/	+	/	/	/	/
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+	+	+	+	+	+	+	+	+	+
	Will the proposal be affected by noise?	+	+	+	+	+	+	+	+	+	+
3) To reduce and control pollution	Will it have an impact on air quality?	+	+	+	+	+	+	+	+	+	+
	Is it in a Groundwater Source	+	/	/	-	+	/	/	+	+	+

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	Protection Zone?										
4) To reduce the risk of fluvial and surface water flooding and maintain water resource availability	Is the developable part of the site within:										
	A fluvial flood risk zone?	+	+	/	+	+	-	+	+	+	+
	An area at risk from surface water flooding?	/	/	/	+	+	-	+	+	+	+
5) To ensure access to key services and encourage the use of sustainable methods of travel	Is the site within 800 metres walking and cycling distance of the town centre as defined?	-	+	+	+	-	+	+	-	/	-
	Is it located in access to existing cycling routes?	+	-	-	+	-	-	-	-	-	-
	Does the site have safe highway access?	+	+	+	+	+	+	+	/	+	+
6) To improve health and ensure appropriate provision for open space and recreational facilities.	Is there capacity in the nearest GP surgery?	+	+	+	+	+	+	+	+	+	+
	Will the site be within:										
	300m of accessible natural greenspace of at least 2ha in size?	+	-	+	+	-	+	-	+	-	+
	2km of a 20ha accessible natural greenspace?	+	+	+	+	+	+	+	+	+	+
	5km of a 100ha accessible natural greenspace?	+	+	+	+	+	+	+	+	+	+
	10km of a 500ha accessible natural greenspace?	-	-	-	-	-	-	-	-	-	-
Will the site see a loss of open space for recreation?	+	+	+	+	+	+	+	+	+	+	
7) To provide appropriate housing to meet existing and future needs	Will the site deliver affordable housing?	-	+	+	-	-	-	-	+	+	+
8) To ensure	Is the site served by	+	+	+	+	+	+	+	+	+	+

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appropriate infrastructure and school capacity	infrastructure?										
	Is there capacity in the closest primary school?	-	-	-	-	-	-	-	-	-	-
	Is there capacity in the closest secondary school?	+	+	+	+	+	+	+	+	+	+
9) To ensure employment provision, economic growth and the promotion of the viability and vitality of the town centre	Will it result in the loss or gain of employment land?	+	-	+	-	+	+	+	+	+	+
	Is it within the town centre boundary as defined?	+	+	+	+	+	+	+	+	+	+
	Is site suitable for mixture of housing and another use(s) eg housing and employment or retail	-	-	-	+	-	-	-	-	-	-

## 8.1 Summary of sustainability effects of the alternatives and the reason for rejection

This sub-section addresses each alternative site in turn, and offers the reason for rejection of each site.

Site	Suitable Alternative to allocated site	Summary of Sustainability Effects	Reason for Rejection
GtDUN 1	DS9 (due to broad location in Plan Area)	The site does not have many constraints, and similarly not many that can not be overcome, with the exceptions of a loss of greenfield land and the impact on primary school capacity. The site is however of a size that its yield would not trigger the provision of affordable units.	The site's yield would not trigger the provision of affordable units. As a key issue identified through the plan-making progress and evidence of the NP, allocating land that will not provide affordable housing units will not meet a key aim of the Plan. The site would also not stimulate any capacity improvements to existing infrastructure and services.
GtDUN 4	DS6 and DS7 (due to broad location in Plan Area)	The site does not have many physical constraints, and similarly not many that can be overcome with the exception of a loss of Grade 2 agricultural land. The site however would add to primary school capacity issues and, for the proposed use, would see a significant loss of employment land in the Plan Area.	The site is currently employment land and the site has been proposed for housing development only.
GtDUN 12	DS6, DS7 and DS9 (due to broad location in Plan Area)	In terms of physical constraints the site may see the loss of TPOs on what is greenfield land. There would also be significantly negative impacts on the historic environment related to the listed farmhouse within the grounds of Dunmow Park. Development would also compound issues surrounding primary school capacity in the Plan Area.	The site lies within the grounds of Dunmow Park, a probable Domesday Manor site with a deer park certainly dating back to the medieval period. Likely to retain considerable medieval remains and of a later date. There will also be a negative impact on a listed farmhouse which is likely to be significant.
GtDUN 21	DS9 (due to being of a smaller dwelling yield)	The site may see a loss of a TPO on site and has a series of moderately negative impacts on historic environment indicators. The site will also have a negative effect on ground water, being within Source Protection Zone 1. The site will see a net loss of	The site's yield would not trigger the provision of affordable units. As a key issue identified through the plan-making progress and evidence of the NP, allocating land that will not provide affordable housing units will not meet a key aim of the Plan. There would also be a loss of

Site	Suitable Alternative to allocated site	Summary of Sustainability Effects	Reason for Rejection
		employment land, with no affordable housing gain.	employment land resulting from the proposal. The site would also not stimulate any capacity improvements to existing infrastructure and services.
GtDUN 23	DS6 and DS7 (due to broad location in Plan Area)	The physical constraints on the site respond to landscape sensitivity, a loss of Grade 2 agricultural land, and moderate impact related to the potential for unknown archaeological deposits. The proposal would not meet the threshold for affordable housing on site and would add to the capacity pressures of local primary schools.	The site's yield would not trigger the provision of affordable units. As a key issue identified through the plan-making progress and evidence of the NP, allocating land that will not provide affordable housing units will not meet a key aim of the Plan. The site would also not stimulate any capacity improvements to existing infrastructure and services.
GtDUN 25	DS9 (due to broad location in Plan Area)	The site may have a negative impact on Ancient Woodland and will see a loss of greenfield land in the Plan Area. There are also fluvial and surface water flooding issues on site. The proposal would also not meet the threshold for affordable housing on site and would add to the capacity pressures of local primary schools.	The site's yield would not trigger the provision of affordable units. As a key issue identified through the plan-making progress and evidence of the NP, allocating land that will not provide affordable housing units will not meet a key aim of the Plan. The site would also not stimulate any capacity improvements to existing infrastructure and services.
GtDUN 30	DS9 (due to being of a smaller dwelling yield)	There are likely to be a number of moderate constraints on the site regarding the historic environment. The proposal would also not meet the threshold for affordable housing on site and would add to the capacity pressures of local primary schools.	The site's yield would not trigger the provision of affordable units. As a key issue identified through the plan-making progress and evidence of the NP, allocating land that will not provide affordable housing units will not meet a key aim of the Plan. The site would also not stimulate any capacity improvements to existing infrastructure and services.
GtDUN 32	DS2, DS8 and DS9 (due to broad location in Plan Area)	There are likely to be a number of moderate constraints on the site, particularly including the historic environment and associated landscape. In addition, there may be transport implications of the proposal and the site may not have safe highways access.	The SHLAA document stated that care would need to be taken over the impact on the Conservation area and how the site would be accessed. The development would be out of keeping with the existing form of development in the adjacent conservation area which is low

Site	Suitable Alternative to allocated site	Summary of Sustainability Effects	Reason for Rejection
			density and forms the transition between the town and the countryside beyond along this northern approach. For these reasons the site was rejected for inclusion / allocation.
GtDUN 33	DS6 and DS7 (due to broad location in Plan Area)	The site is not overly constrained regarding the physical environment, with the exception of landscape, which will have a negative effect, and the loss of Grade 2 agricultural land. The site has compound issues regarding primary school capacity.	The site was rejected for allocation as it was considered only suitable in conjunction with adjoining sites, impacts related to noise, and its availability in the Plan period.
GtDUN 34	DS2, DS8 and DS9 (due to broad location in Plan Area)	There are constraints identified on the site related to a loss of greenfield, Grade 2 agricultural land. There are likely to be a number of moderate constraints on the site, particularly including the historic environment and associated landscape which are unlikely to be overcome on a site of its size. In terms of meeting the Plan's objectives, the affordable housing gain could be considered insufficient to outweigh the possible negative impacts on site.	The site was rejected due to being located on the extreme edge of the town. As such this site is not the most convenient location to access town centre services when compared to other sites.

## **9 Monitoring**

The significant sustainability effects of implementing a Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The Sustainability Framework contained in this report contains suggested indicators in order to monitor each of the SEA Objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the Sustainability Framework, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

Upon adoption the Plan will be accompanied by an Adoption Statement which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

## 10 Next Steps – Consulting on the SEA

This Environmental Report will be subject to consultation. There are three statutory consultees that are required to be consulted for all Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

In addition to these, Uttlesford District Council or the Great Dunmow Neighbourhood Plan Steering Group may wish to expand this list of consultees to include relevant stakeholders and interested parties.

All comments on the content of this Environmental Report should be sent to:

[planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk)

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