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Great Dunmow Neighbourhood Plan

Strategic Environmental Assessment (SEA)

Environmental Report

September 2015

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Annexes

Annex A: Plans and Programmes

Annex B: Baseline Information

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. These policies accord with Higher policy, namely the National Planning Policy Framework (referred to hereafter as the NPPF), and the saved strategic policies of the Uttlesford District Council Local Plan 2005 as required by the Localism Act. During the period of the District Council preparing a new Local Plan, a number of planning applications have been granted planning permission, so the Plan has been developed within the changing reality of the Great Dunmow's situation. In addition to those units otherwise expected to come forward during the Plan period, the Great Dunmow Neighbourhood Plan proposes the allocation of 500 additional houses across two sites at 'Land South of Stortford Road' (400units) and the 'Helena Romanes School Site' (100units). These two sites are not planned for in the adopted Local Plan (2005) and do not have planning permission.

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.’

‘The local planning authority, as part of its duty to advise or assist, should consider putting in place processes to determine whether the proposed neighbourhood plan will require a strategic environmental assessment. The qualifying body should work with the local planning authority to be sure that the authority has the information it needs.’

NPPG continues ‘if likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those Regulations. Whether a neighbourhood plan proposal requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed. 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 and through consultation with Place Services, 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 Background

The methodology adopted for the SEA of the Great Dunmow Neighbourhood Plan at this stage follows that of the Strategic Environmental Assessment process. Stage A (Screening) has been undertaken by Uttlesford District Council as the LPA. The following 5 sequential stages are documented below.

Table 1: Stages in the SEA Process and their purpose

Stage B: Setting the context and objectives, establishing the baseline and deciding on the scope
1 Identify other relevant policies, plans and programmes, and SEA objectives
2 Collect baseline information
3 Identify sustainability issues and problems
4 Develop the strategic environmental assessment framework
5 Consult the environmental assessment consultation bodies on the scope of the SEA
Stage C: Developing and refining alternatives and assessing effects
1 Test the neighbourhood plan objectives against the SEA framework
2 Develop the neighbourhood plan options using reasonable alternatives
3 Evaluate the likely effects of the neighbourhood plan and alternatives
4 Consider ways of mitigating adverse effects and maximising beneficial effects
5 Propose measures to monitor the significant effects of implementing the neighbourhood plan
Stage D: Prepare the Environmental Report
Prepare the Environmental Report
Stage E: Publish and consult the consultation bodies and the public on the Environmental Report
Publish and consult the consultation bodies and the public on the Environmental Report
Stage F: Post making reporting and monitoring
1 Prepare and publish post-adoption statement
2 Monitor significant effects of implementing the neighbourhood plan
3 Respond to adverse effects

2 Sustainability Context, Baseline and Objectives

2.1 Introduction

The following section outlines the plans and programmes, the baseline information profile for the Plan Area, together with the SEA Objectives and Site Pro Forma formulated.

2.2 Plans and Programmes (Stage B1)

The Great Dunmow Neighbourhood Plan includes policies and site allocations.

The Plan must also comply with existing policies, plans and programmes at national and local levels and strengthen and support other local plans and strategies. It is therefore important to identify and review those policies, plans and programmes and SEA objectives which are likely to influence the Plan. Local supporting documents which form the evidence base of the higher level planning documents have also been included within this list where relevant as they will shape policies and decisions in the District.

It is recognised that no list of plans or programmes can be definitive and as a result this report describes only the key documents which influence the Plan. Table 2 outlines the key documents, whilst a comprehensive description of these documents together with their relevance to the Plan is provided within Annex A.

Table 2: Key Documents

National Plans and Programmes
Planning Practice Guidance (March 2014)
The Localism Act 2011
National Planning Policy Framework (March 2012)
Building a Greener Future: Policy Statement (July 2007)
Community Infrastructure Levy An Overview, CLG (9th May 2011)
Underground, Under Threat - Groundwater protection: policy and practice (GP3)
Model Procedures for the Management of Land Contamination – Contaminated Land Report 11 (September 2004)
Natural Environment and Rural Communities Act 2006
Countryside and Rights of Way Act 2000
Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
Planning and Compulsory Purchase Act 2004
The Conservation of Habitats and Species Regulations, 2010

Sub-national Plans and Programmes
Essex Local Transport Plan 2011 (LTP3)
2011 Essex Biodiversity Action Plan
Commissioning School Places in Essex 2013-2018
Essex Wildlife Trust Living Landscape plans
The Essex Local Area Agreement – ‘Health and Opportunity for the People of Essex’ 2008 – 2011 (2010 Refresh)
Essex Rural Strategy: 2020 Vision for Rural Essex 2010
The Essex Strategy 2008 – 2018
Local Plans and Programmes
Uttlesford Adopted Local Plan (January 2005) + Saved Policy Direction (December 2007)
Uttlesford Pre-Submission Local Plan (2014) WITHDRAWN
Sustainability Appraisal of the Uttlesford Pre-Submission Local Plan (2014)
Uttlesford Futures Sustainable Community Strategy: A vision for our future – 2018 (June 2008)
Uttlesford District Council Infrastructure Delivery Plan, April 2014
Uttlesford District Council Strategic Housing Land Availability Assessment (2014)
UDC Statement of Community Involvement (July 2006) Annex published April 2009 incorporating changes introduced by the 2008 Regulations
UDC Housing Strategy 2012 to 2015
Uttlesford at Play - Play Strategy 2007-2011
ECC Development Management Policies Adopted by UDC (February 2011)
ECC Parking Standards: Design and Good Practice Adopted by UDC (September 2009)
Essex Wildlife Trust Living Landscape Statements
Local Reports and Assessments
Great Dunmow Town Design Statement - Design guidance for enhancing and protecting the character of Dunmow (2007-2008)
Great Dunmow Conservation Area Appraisal and Management Plan (November 2007)
Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment – on behalf

of EPOA (July 2014)
Employer and Business Survey (2009)
Employment Land Review (2011)
District Retail Study (2012)
Open Space, Sport Facility and Playing Pitch Strategy (2012)
Uttlesford District Historic Environment Characterisation Project (2009)
Historic Settlement Character Assessment (2007) - Great Chesterford, Great Dunmow, Henham, Newport, Saffron Walden, Stansted and Thaxted
Town and Village Profiles (January 2012) - Great Chesterford, Great Dunmow, Elsenham, Hatfield Heath, Newport, Saffron Walden, Stansted Mountfitchet, Takeley and Thaxted
Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments (September 2006)
Uttlesford Strategic Flood Risk Assessment (March 2008)
Uttlesford District Water Cycle Study - Stage 2: Detailed Strategy (November 2012)
Uttlesford Protected Lanes Assessment (March 2012)

2.3 Baseline Information (Stage B2)

Annex B details the complete Baseline Information profile for the plan area and where relevant the district relevant to the content of the Plan.

The following section outlines a summary of the key baseline information and therefore the current state of the environment for Great Dunmow.

2.3.1 Economy and Employment

- The district has the highest rate of economic activity at 74.4% compared to the county, region and country.
- Uttlesford District is predominantly rural in nature and as such a significant proportion of businesses are based within rural locations with only 15% defined as being urban based.
- The town centre contains a total of 108 units, of which 70 are located in Primary shopping frontages and 38 on secondary frontages. The largest percentage of these units fall under comparison shopping.
- 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.
- According to the 2011 census, 68 percent of people (6,000 population) in Great Dunmow are of working age. There are a further 10,500 people of working age in the surrounding villages.

- According to the Great Dunmow Business Survey there are 306 job-creating enterprises with a physical presence in the town, and 90 percent of these have been trading for 3 years or more. There are eight commercial or industrial centres employing about 120 employees.
- The 2011 Employment Land Study identified several important factors playing a role in the local economy. It identified the influence of the M11 as an important factor for Great Dunmow, evidenced by the town's industrial estates.
- The Employment Land Study also 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.

2.3.2 Housing and Population

- The parish of Great Dunmow has a population of about 8,800 people with a mean average age of 41 years (2011 census).
- There is a high level of home ownership (71.6%, including mortgaged properties), with correspondingly low proportions of social and private rented housing.
- One bedroom and studio flat apartments make up 14% of housing units in Great Dunmow. This compares to 7% across Uttlesford District (2011 census).
- Four or more bedroom properties make up 28% of housing units in Great Dunmow. This compares to 35% across Uttlesford District (2011 census).
- 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.
- Great Dunmow has a total of 2,400 units that are expected to come forward during the Plan period. These sites have planning permission, are included in the UDC Housing Trajectory, and are: Brick Kiln Farm (65 units), Woodland's Park (Sectors 1-3 [842 units]), Perkin's Garage (12 units), Barnetson Court (10 units), South of Ongar Road (100 units), North of Ongar Road (73 units), Woodland's Park (124 units), Land West of Woodside Way (790 units), Land West of Chelmsford Road – Smith's Farm (370 units [incl. 70 bed care home]), Canada Cottages (7 units) and Tower House, St. Edmund's Lane (7 units).
- The Great Dunmow Neighbourhood Plan proposes the allocation of 500 additional houses across two sites at 'Land South of Stortford Road' (400units) and the 'Helena Romanes School Site' (100units). These two sites are not planned for in the adopted Local Plan (2005) and do not have planning permission. In addition to the 2,400 units otherwise expected to come forward during the Plan period, Great Dunmow will therefore see housing growth of 2,900 units pending the adoption of the Neighbourhood Plan.
- Uttlesford District Council's adopted Local Plan (2005) allocates, for the Great Dunmow Parish, development at Woodland's Park and Smith's Farm, and 842 units remain to be built at Woodland's Park (Sectors 1-3). The 2005 Smith's Farm allocation (as employment land) has not been brought forward, and a subsequent planning permission releases the site for mainly residential (with some employment land), and an additional permission releases Land West of Woodside Way for housing. These two sites will contribute 1,140

new homes to the town.

- 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.

2.3.3 Health

- Life expectancy of residents within Uttlesford District is higher than the regional and national averages with men living for an average of 81.8 year and women on average living 85.1 years. In general, life expectancy is increasing within the District and nationwide. The implications of this will mean that as people live longer there will be increased pressure on services for the elderly.
- It is recognised that healthcare is beyond the control of the Neighbourhood Plan to determine future provision, but there is a commitment from the Town Council to continue to work with the various stakeholders to ensure that the best outcomes are achieved for Great Dunmow.
- There are two doctors' surgeries in Great Dunmow, Angel Lane and John Tasker House. John Tasker House has a list size of 13,541 with a capacity of 12,150, while Angel Lane Surgery has a list size of 9,200 with a capacity of 10,000. Neither surgery has official estimates for changes in list size up to 2020, but there is no space for expansion at John Tasker House Surgery and only limited space at Angel Lane Surgery. Great Dunmow caters for a wide catchment area, including Takeley, Barnston and Felsted, as well as the town itself. Primary care is changing rapidly to respond to financial and demographic pressures, and land use patterns need to reflect this.
- Accessible Natural Greenspace Standard (ANGSt) created by Natural England sets out the minimum amount of accessible natural greenspace that any household should be within reach of. As much as 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.

2.3.4 Transport

- Great Dunmow has a good walking infrastructure. There are however few dedicated cycle routes and evidence from the town's secondary school suggests that a minority of 2% cycle to school.
- 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, as the disruption to the progression of the Flich Way is a matter of long-standing community action and lobbying by residents.
- The Town Design Statement has raised the following issues facing footpaths and bridleways in Great Dunmow: directness; clear marking and destination information; personal safety (perceived and actual, in terms of lighting); surfacing; connectivity; and safety from traffic. Resolving these issues has been highlighted as a priority for the Neighbourhood Plan.
- The Neighbourhood Plan Steering Group identify that the the integrity of the Flich Way

could have been more thoroughly considered during both the construction of the original A120 bypass (B1256) and that of the new A120 bypass.

- The A120 dual carriageway provides a high speed connection to the M11 and the towns surrounding Great Dunmow.
- 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.
- Car parking at Stansted is deemed expensive, and there are no direct public transport links to Bishop's Stortford.

2.3.5 Cultural Heritage

- 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. There are approximately 4,064 in records of archaeological sites and finds recorded on the Essex Historic Environment Record (EHER) for Uttlesford District as of December 2010.
- There are 174 designated listed buildings within the Plan Area and the majority of them are grade II listed. This means they are nationally important and of special interest.
- There are 3 Scheduled Monuments within the Plan Area.
- There are 2 conservation areas within the Plan Area defined as historical settlements and buildings having 'special architectural or historical interest, the character of which is desirable to preserve or enhance'. The objective of the Conservation Area designation is to ensure that the character of the defined area is protected from developments which do not preserve or enhance its character.

2.3.6 Biodiversity and Nature Conservation

- There are no international or European designated sites within Uttlesford and no National Nature Reserves (NNRs).
- There are a number of Sites of Special Scientific Interest (SSSIs) in the District and one, High Wood, is partly inside the Great Dunmow Neighbourhood Plan Area.
- Great Dunmow parish is geographically in possession of extremely high value ecological sites, including the Chelmer Valley, ancient woodlands, and the Flich Way, each of which contributes to important wildlife corridors permitting the migration of animals and insects around the town.
- In addition to designated sites, 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.

2.3.7 Landscapes

- There are eight Landscape Character Areas (LCAs) in Uttlesford District as defined in a

Landscape Character Assessment relevant to the District and each one has a recognisable pattern of landscape characteristics. A more detailed landscape character assessment defined 20 smaller local LCAs within the eight previously defined. With the exception of one they were all identified as being between moderate to highly sensitive of change.

- There is a significant proportion of ancient woodland in the District. Hatfield Forest is an important survival of a medieval forest, comprising a mixture of wood pasture with pollards, coppice woods, timber trees, a warren, lodge and lake. The Great Dunmow Neighbourhood Plan identifies a wildlife corridor of Ancient Woodland to the north-west of the settlement.
- Protected lanes have significant historic and landscape values and because of their age they often have significant biological value too. There are a number of both grade one and two protected lanes within the District.
- 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 character by the Steering Group. These have been considered by the Neighbourhood Plan, and consist of:
 - North East. Key Positive Features: the openness of the approach from the Chelmer Valley; the small scale of the buildings on the northern edge of the town; the views of the tower of St. Mary's Church; the stands of trees on the high ground and around the church; the footpath route around the north east sector; the wide open landscape from the east; the distinct edge of the town at Church End; the views over the town and the features of the church tower and clock house.
 - South East. Key Positive Features: the setting of the Chelmer and the views of the church tower northwards; the distinct rural edge on the east side of St. Edmund's Lane; the important tree belts east of St. Edmund's Lane and the woodland around Merks Hall; the views out to open country south east over the Chelmer; the open landscape of the Chelmer and the slope rising to Dunmow Park.
 - South West. Key Positive Features: the importance of the landscape fringe to the northern edge of the A120; the value of Olives Wood and Ash Grove for biodiversity landscape and amenity; the hedge screening of the B1256; the role of the Flich Way in biodiversity and recreation; the footpath link over the B1256 into the heart of the town.
 - North West. Key Positive Features: the importance of Hoglands Wood, Broomhills and Frederick's Spring in biodiversity and landscape terms; the views to the undulating landscapes north east; the importance of trees in the landscape; the footpath network linking the town to the Eastons.

2.3.8 Water Environment

- The parish lies within the River Chelmer catchment area. The UDC Strategic Flood Risk Assessment (2008) categorises flood risk in Dunmow as predominantly Flood Zone 1 at 96.6%, with only 0.3% in Flood Zone 3a and 2.3% in the functional floodplain (Flood Zone 3b). Zone 3b (Functional Floodplain) includes: the gardens of Ford Cottages on the Braintree Road; Braintree Road; Riverside; Sewerage Treatment Works; Church End.
- According to the Catchment Abstraction Management Strategies for these four river catchments 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.

- 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.
- 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.

2.3.9 Climate, Air and Noise

- 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. In contrast only 2.6GWh of energy consumed is from renewable sources.
- At 8.7 tonnes, residents of Uttlesford District emitted the highest amount of CO₂ per capita in Essex, which itself reported a return of 6.4 tonnes.
- Road transport in Uttlesford District produces the highest amount of CO₂ per capita across the county alongside the Borough of Brentwood at 3.2 tonnes. This is above the countywide figure of 2 tonnes.
- Ambient or environmental noise is defined as noise which is either unwanted or harmful. It is created by human activities and includes noise emitted by transport including road traffic and air traffic, as well as from sites of industrial activity. Britain's third busiest international airport, Stansted Airport is located within the District and a major motorway, the M11 traverses through it down the eastern side. Both these forms of transportation generate ambient noise which can impact people living or working nearby.
- There are no AQMAs in the Plan Area.

2.3.10 Sport and Open Space

- Great Dunmow has a large recreational area running through the heart of the town, a few minutes' walk from the town centre and many residential areas in the town. This is the Chelmer Valley, which includes the main sports fields in the town on the Recreation Ground.
- The Steering Group identify that swimming, gymnastics, netball and hockey are all faced with inadequate availability of facilities.
- Great Dunmow has two sites of allotment gardens, one owned and managed by the Town Council, and the other privately. The Town Council facility has 95 plots and a waiting list of 7 plots.
- 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. Development proposals for Land West of Woodside Way

and Smith's Farm include provisions for play space which will pass into the stewardship of the Town Council in due course.

2.3.11 Education

- There are two local primary schools, St. Mary's and Dunmow Primary School, and both will be at capacity within the next five years.
- 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. The Great Dunmow Neighbourhood Plan has aspirations to allocate land south of Stortford Road to enable relocation should that option be pursued.
- 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 and medical facilities.

2.3.12 Data Limitations

Not all relevant information was available at the local level and specific to the Neighbourhood Plan area and as a result there are some gaps within the data set. It is believed however that the available information shows a comprehensive view on sustainability within the Plan Area. New data that becomes available will be incorporated in the SEA.

It should be noted that while the baseline will be continually updated throughout the SEA process, the information outlined within this report represents a snapshot of the information available at the beginning of April 2015.

2.4 Key Sustainability Issues and Problems and SEA Objectives (Stage B3 and B4)

The outcome of Stages B3 – B4 of the SEA Process is the identification of key sustainability issues and problems facing the district which assist in the finalisation of a set of relevant SEA Objectives which would set the framework for the appraisal of the Plan during its preparation. The objectives are also derived from the review of plans and programmes and a strategic analysis of the baseline information.

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 stages which led to the formulation of the SEA Objectives, which were based on the key issues for the Plan Area.

Table 3: 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 character by the Steering Group. These have been considered by the Neighbourhood Plan.	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
Water quality, supply and sewerage	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.	Water quality might deteriorate if not covered within the policy direction or through the infrastructure needs of allocations.	
The historic environment	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'.	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.	
Archaeology	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.	Applications could come through that are approved contrary to any required archaeological surveys in specific areas.	2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow Neighbourhood Plan Area.
The historic environment and settings	There are 3 Scheduled Monuments within the Plan Area and 174 listed buildings within the Plan Area.	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.	

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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	<p>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.</p> <p>The Employment Land Study reported that there is a shortage of commercial floor space of the right type, including both office space and warehousing.</p> <p>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.</p>	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 above highlighted key sustainability issues and problems have formulated relevant SEA Objectives, which are shown in the final column. This definitive list can be found in the following table alongside their relevance to the environmental, social or economic themes of sustainable development.

Table 4: The SEA Objectives

SEA Objective	Environmental	Social	Economic
1) To retain, enhance and conserve the biodiversity, the water environment and the character of the landscape in the Great Dunmow Neighbourhood Plan Area	✓		
2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow Neighbourhood Plan Area	✓		
3) To reduce and control pollution	✓	✓	
4) To reduce the risk of fluvial and surface water flooding and maintain water resource availability	✓	✓	
5) To ensure access to key services and encourage the use of sustainable methods of travel		✓	✓
6) To improve health and ensure appropriate provision for open space and recreational facilities.		✓	
7) To provide appropriate housing to meet existing and future needs		✓	
8) To ensure appropriate infrastructure and school capacity		✓	✓
9) To ensure employment provision, economic growth and the promotion of the viability and vitality of the town centre		✓	✓

2.4.1 The Compatibility of the SEA Objectives

A total of 9 SEA Appraisal objectives have been derived for the appraisal of the Plan. They are based on the scope of the document, policy advice and guidance and to the assessment of the current state of the environment.

It is useful to test the compatibility of SEA Objectives against one another in order to highlight any areas where potential conflict or tensions may arise. The result of this internal compatibility of the SEA Objectives is shown in the figure below.

In the compatibility matrix the 9 SEA objectives are numbered in sequence along each axis and they represent a balance of economic, social and environmental factors.

The following key has been used to illustrate their compatibility:

✓	Where the objectives are compatible
/	Where it is uncertain the objectives are related
0	Where the objectives are not related
x	Where the objectives are incompatible

The matrix below illustrates the compatibility of the SEA Objectives.

Figure 1: Compatibility Matrix of the SEA Objectives

1									
2	✓								
3	✓	0							
4	✓	0	✓						
5	/	/	✓	0					
6	/	0	✓	✓	✓				
7	/	/	✓	✓	✓	✓			
8	0	0	0	0	✓	✓	✓		
9	0	0	0	0	✓	0	✓	✓	
	1	2	3	4	5	6	7	8	9

It is to be expected that some objectives are not compatible with other objectives. Objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa. The compatibility of the objectives relevant to the Plan are shown in the compatibility matrix above. Instances of uncertainty between objectives are explained further:

- **Objective 1 and Objective 6:** There is uncertainty surrounding the objective that seeks to retain, enhance and conserve the biodiversity, the water environment and the character of the landscape with the objective that seeks to improve health and promote social inclusion. This is where health related open space provision may not be compatible with the biodiversity value of sites in specific locations. It is also possible that the two aspects of open space could be compatible in specific circumstances, or through specific policy direction.
- **Objective 1 and Objectives 5 & 7:** There will also be uncertainty surrounding the objective that seeks to retain, enhance and conserve the biodiversity, the water environment and the character of the landscape with those objectives that seek to ensure access to key services and provide appropriate accommodation to meet existing and future needs. Where accommodation needs to be located carefully in order to maximise access to services and infrastructure, this could be to the detriment of biodiversity and landscape in specific locations.
- **Objective 2 and Objectives 5 & 7:** There is uncertainty regarding the compatibility of those objectives that seek to maintain and enhance the district's cultural heritage, assets and their surroundings and provide appropriate accommodation to meet existing and future needs. Where accommodation needs to be located carefully in order to maximise access to services and infrastructure, this could be to the detriment of cultural heritage assets (and their surroundings) in specific locations.

3 The SEA Framework (Stage B4)

The SEA Framework is an important tool in the SEA process. It provides the context against which the Plan's emerging policies can be assessed and sets out the SEA objectives with additional criteria / key questions that should be asked to decipher whether the suggested approach adheres to the principles of sustainability; and indicators which can monitor the impact of the documents.

Table 5: The SEA Framework (Policy Content)

SEA Objective	Relevant to Key Sustainability Issue / Problem...	Key Questions	Indicators
<p>1) To retain, enhance and conserve the biodiversity, the water environment and the character of the landscape in the Great Dunmow Neighbourhood Plan Area</p>	<p>Great Dunmow parish is geographically in possession of extremely high value ecological sites, including the Chelmer Valley, ancient woodlands, and the Flich Way, each of which contributes to important wildlife corridors permitting the migration of animals and insects around the town.</p> <p>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.</p>	<p>Does the Plan seek to protect:</p> <ul style="list-style-type: none"> - SSSIs (through appropriate consideration of Impact Risk Zones [IRZs]) - LoWSs - Protected lanes - Special Verges - Living Landscapes - BAP Priority Habitats (and species) <p>Does the Plan seek to locate development away from areas noted for their high sensitivity to change (from Essex Landscape Character Assessment)?</p> <p>Does the Plan seek to minimise any Tree Preservation Orders (TPOs) being affected?</p> <p>Does the Plan seek to direct development on Brownfield land?</p> <p>Does the Plan seek to protect high quality agricultural land?</p>	<p>Condition of SSSIs, NNRs, LoWSs.</p> <p>Number of developments with access arrangements via Protected Lanes.</p> <p>Number of developments located in areas of high sensitivity to change in the LCA.</p> <p>Proportion of new developments on brownfield land.</p> <p>Number of developments on the highest quality agricultural land.</p> <p>Loss of and designation of TPOs.</p>
<p>32</p> <p>2) To maintain and enhance the district's cultural heritage assets</p>	<p>There are 2 conservation areas within the plan area which are defined as historical</p>	<p>Does the Plan seek to protect:</p>	<p>Number of developments approved contrary to assessed impacts on Scheduled</p>

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<p>and their settings in the Great Dunmow Neighbourhood Plan Area.</p>	<p>settlements and buildings having ‘special architectural or historical interest, the character of which is desirable to preserve or enhance’.</p> <p>There are 3 Scheduled Monuments within the Plan Area and 174 listed buildings within the Plan Area.</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.</p>	<ul style="list-style-type: none"> - Scheduled Monuments? - Listed Buildings? - Conservation Areas? - Ancient Woodland? - Other historic or cultural features? - Known archaeological deposits? 	<p>Monuments, Listed Buildings, Conservation Areas, Ancient Woodland</p> <p>Number of developments on locations in the EHER</p> <p>Number of heritage assets on the at risk register.</p>
<p>3) To reduce and control pollution</p>	<p>The A120 dual carriageway provides a high speed connection to the M11 and the towns surrounding Great Dunmow.</p> <p>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.</p>	<p>Does the Plan seek to protect ground water source protection zones?</p> <p>Will it improve, or not detrimentally affect air quality?</p> <p>Will emissions be limited to levels that will not damage natural systems and affect human health?</p> <p>Does it ensure that National Air Quality Standards are met at relevant points?</p> <p>Does it seek to protect rural areas from increased traffic?</p> <p>Will it lead to no deterioration on the quality of water bodies?</p> <p>Does it promote the inclusion of Sustainable Drainage Systems in new developments?</p>	<p>Number of developments within GSPZs.</p> <p>Number of developments approved contrary to SHLAA noise impacts (Affected by noise at 35/76mppa).</p> <p>Number of developments approved with SuDS.</p> <p>Number of developments approved that remediate contaminated land.</p>

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		<p>Does it seek to reduce, or not detrimentally affect noise levels?</p> <p>Does it seek to protect soil quality, including the remediation of contaminated sites?</p>	
<p>4) To reduce the risk of fluvial and surface water flooding and maintain water resource availability</p>	<p>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.</p> <p>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.</p>	<p>Does the Plan have a suitable direction on surface water flooding issues?</p> <p>Does the Plan seek to ensure water resource availability?</p> <p>Does the Plan seek to direct sites away from: flood risk zone 2? flood risk zone 3a / b?</p>	<p>Recorded flood incidences on/next to developments</p> <p>Number of developments on FZ2 / 3a / 3b (and distance where nearby)</p>
<p>5) To ensure access to key services and encourage the use of sustainable methods of travel</p>	<p>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.</p> <p>The Essex County Council Rights of Way Improvement Plan has identified a lack of continuous paths, a lack of bridleways and a</p>	<p>Does the Plan ensure access is in close proximity to a public transport node?</p> <p>Does the Plan have a suitable direction on the accessibility of facilities?</p> <p>Does the Plan have a suitable direction on accessibility to convenience shopping?</p> <p>Does the Plan ensure safe highway access?</p>	<p>Distance of developments to public transport nodes</p> <p>Distance of developments to healthcare facilities</p> <p>Distance of developments to known convenience shopping</p> <p>Developments approved contrary to site</p>

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	<p>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.</p>		<p>assessment for highway access</p>
<p>6) To improve health and ensure appropriate provision for open space and recreational facilities.</p>	<p>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.</p> <p>54% of households within Uttlesford do not have any access to natural greenspace and the Steering Group identify that swimming, gymnastics, netball and hockey are all faced with inadequate availability of facilities.</p>	<p>Does the Plan consider distances to accessible natural greenspace?</p> <p>Does the Plan factor in the provision of or distance to recreational land?</p> <p>Does the Plan have a suitable direction on contaminated land (including proximity to refuse sites or industrial processes)?</p>	<p>Development's distances to ANG</p> <p>Number of developments with recreation land provision</p> <p>Distances from developments to existing recreation land</p> <p>Applications granted that remediate contaminated land</p>
<p>7) To provide appropriate housing to meet existing and future needs</p>	<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</p>	<p>Does the plan seek to ensure the delivery of affordable housing?</p> <p>Does the plan seek to ensure the delivery of lifetime homes?</p> <p>Does the plan seek to ensure the delivery of housing of a mix of different tenures?</p>	<p>Developments approved for affordable housing only.</p> <p>Amount of delivered affordable units.</p> <p>Tenure breakdown of housing from new development.</p>

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	<p>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>		
<p>8) To ensure appropriate infrastructure and school capacity</p>	<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> <p>Survey results (recorded in the Plan's Evidence Base) indicate a concern locally about the impact of new housing development</p>	<p>Does the Plan ensure adequate accessibility to a primary school?</p> <p>Does the Plan ensure adequate accessibility to a secondary school?</p> <p>Does the Plan factor in the capacity of primary schools to support the size of allocation?</p> <p>Does the Plan factor in the capacity of secondary schools to support the size of allocation?</p>	<p>Sites' distances to nearest primary school (and whether they conform to standards [800m])</p> <p>Sites' distances to nearest secondary school (and whether they conform to standards [4.8km])</p> <p>Capacity of nearest primary school to individual sites</p> <p>Capacity of nearest secondary school to individual sites</p>

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	<p>and the pressure this will put on infrastructure, schools, medical facilities and infrastructure (including sewerage) capacities.</p>		
<p>9) To ensure employment provision, economic growth and the promotion of the viability and vitality of the town centre</p>	<p>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.</p> <p>The Employment Land Study reported that there is a shortage of commercial floor space of the right type, including both office space and warehousing.</p> <p>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.</p>	<p>Will it increase vitality of existing centres?</p> <p>Does it promote and enhance the viability of existing centres by focusing development in them?</p> <p>Will new housing be supported by adequate local employment opportunities?</p> <p>Does it support small businesses to grow and encourage business innovation?</p> <p>Will it enhance the potential for tourism?</p> <p>Will it retain and improve the range of shopping, leisure and local services to meet the needs of the entire community?</p> <p>Will it lead to development having an adverse impact on employment for existing facilities?</p>	<p>Pedestrian footfalls in the town centre.</p> <p>Number of mixed-use developments approved in the Plan Area.</p> <p>Employment and retail floorspace breakdown of town centre.</p> <p>Number of new business start-ups.</p> <p>Travel to work methods of residents.</p> <p>Retail surveys.</p> <p>Floor space breakdown of employment sectors in Plan Area.</p>

3.1 The Appraisal of Policies

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.

For clarity, within this Environmental Report, assessments have been set out in the format as shown in Table 6.

Table 6: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term									
Medium Term									
Long Term									

The content included within the table 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.

3.1.1 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.

3.1.2 Description of ‘Temporal Effects’

The appraisals of the policies contained within the Plan recognise that impacts may vary over

time. Three time periods have been used to reflect this and are shown in the appraisal tables as S (short term), M (medium term) and L (long term). For the purpose of the Plan S, M and L depict:

(S) Short term and (M) Medium Term: Early stages of the plan period.

(L) Long term: Latter stages of the plan period

3.1.3 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.

3.1.4 Description of ‘Alternatives Considered’

Alternatives for the direction of policies will be appraised and chronicled alongside each appraisal, together with the reason for their rejection / non-progression. This sub-section may only be applicable in the latter stages of the plan, where preferred approaches are set out.

3.1.5 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.

3.2 The Site Pro Forma (Stage A4)

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 have been 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. In addition, the consultation of the Scoping Report allowed input from the Statutory Consultees and any other relevant stakeholders and interested parties.

It is worthy of note that in line with the pro forma, appraisals have not been intended to be a detailed project-level assessment of each site, such as that provided by an Environmental Impact Assessment (EIA), but aim to provide a strategic level assessment highlighting those broad impacts of the sites to inform the plan-making process.

The following table shows the site pro forma developed for the appraisal of the Neighbourhood Plan’s site allocations and alternatives.

3.2.1 Note on the Appraisal of Sites in this Document

The appraisals of sites in this document have been undertaken in line with the SEA Site Pro Forma which was subject to consultation in the SEA Scoping Report 2015. It should be noted that the appraisals in this document reflect the opportunities and constraints on the site as per this 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 will provide 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).

Table 7: The Site Pro forma

SA Objective	Site Criteria	Source	Significant positive (++)	Positive (+)	Negative (-)	Significant negative (- -)	Uncertain / Unknown / Negligible (!)	No impact (0)
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)	GIS mapping to reflect SSSI Impact Risk Zones / MAGIC Map	Proposal is outside SSSI IRZs	Proposal is in an SSSI IRZ but does not meet the requirements for Natural England consultation	N/A	Site is located in a SSSI	Proposal is in a SSSI IRZ and meets requirements for Natural England consultation	N/A
	- Special (Roadside) Verges	GIS mapping	N/A	Proposal would not affect any special verges	Proposal would see a loss of special verges	N/A	Where applicable	N/A
	- LoWS	GIS mapping	N/A	Proposal will not affect a LoWS	Proposal is partly on a LoWS	Proposal would see loss of LoWS	Proposal is adjacent to LoWS	N/A
	- Ancient Woodland	GIS mapping and Ancient Woodland Standing Advice	N/A	Site is not on or within 500m of ancient woodland.	Part of site would see the loss of ancient woodland	Proposal is entirely within ancient woodland	Any part of the site is within 500m of ancient woodland to warrant consultation	N/A

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							with the Forestry Commission	
	Impact on Landscape	SHLAA 2013/14 assessment of sites for Landscape impact	N/A	Site will have no impact on Landscape (SHLAA 2013/14 score: GREEN)	Site will have an impact on Landscape (SHLAA 2013/14 score: RED)	N/A	Site may have an impact on Landscape (SHLAA 2013/14 score: ORANGE)	N/A
	Will any Tree Preservation Orders (TPOs) be affected?	GIS mapping	N/A	No TPO(s) on site	TPO(s) on site	N/A	Adjacent to site	N/A
	Is the site greenfield or brownfield?	District Council SHLAA 2013/14	N/A	Brownfield	Greenfield	N/A	Mixed brownfield and greenfield	N/A
	Will the site result in a loss of high quality agricultural land?	Agricultural Land Classification	N/A	Urban area	Grade 2	N/A	Grade 3 Where applicable or in part	N/A
2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow	Could the site affect a (including its setting): - Scheduled Monument?	GIS Mapping, Place Services Historic Environment Team	Development proposal results in a Scheduled Monument	Site does not contain a Scheduled Monument or its	Site contains a Scheduled Monument or is within one's	Development proposal would equate to 'Substantial	Site is adjacent to a Scheduled Monument or its setting	N/A

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Neighbourhood Plan Area			being removed from the 'at risk' register	setting nor is adjacent to one	setting	Harm' to a Scheduled Monument		
- Listed Building?	GIS Mapping, Place Services Historic Environment Team	Development proposal results in a Listed Building being removed from the 'at risk' register	Site does not contain any listed buildings nor is adjacent to any	Site contains a listed building(s)	Development proposal would equates to 'Substantial Harm' to a Listed Building	Site is adjacent to a listed building(s)	N/A	
- Conservation Area?	GIS Mapping, Place Services Historic Environment Team	N/A	Site is not within the Conservation Area nor is adjacent to one	Site is within the Conservation Area	N/A	Site is partly within the Conservation Area / site is adjacent to a Conservation Area	N/A	
Is the site in an area sensitive to change (Historic Environment)	GIS mapping and Uttlesford District Historic Environment Characterisation Project 2009	N/A	Site is in an area with little sensitivity to change (1 score in HECP)	Site is located in an area highly sensitive to change (3 score in HECP)	N/A	Site is in an area with parts highly sensitive to change (2 score in HECP)	N/A	

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	Will there be any material harm caused to the form or alignment of protected historic lanes?	GIS mapping / Site information / site policy (where available)	N/A	Access is not via protected lane / access is via protected lane but would not require amendment to form or alignment	Access is via protected lane and would require amendment to form or alignment	N/A	Where applicable	N/A
3) To reduce and control pollution	Will the proposal be affected by noise?	District Council SHLAA 2013/14	N/A	Not affected by noise at 35mppa or 76mppa (SHLAA 2013/14 score: GREEN or N/A)	Affected by noise at 35mppa OR 76mppa (SHLAA 2013/14 score: RED)	Affected by noise at 35mppa AND 76mppa (SHLAA 2013/14 score: RED)	May be affected by noise at 35mppa or 76mppa (SHLAA 2013/14 score: ORANGE)	N/A
	Will it have an impact on air quality?	District Council SHLAA 2013/14	N/A	No air quality impact (SHLAA 2013/14 score: GREEN)	An air quality impact (SHLAA 2013/14 score: RED)	N/A	Possible air quality impact (SHLAA 2013/14 score: ORANGE)	N/A
	Is it in a Groundwater Source Protection Zone?	EA Mapping	N/A	Site is not within a GSPZ	Site is partly or wholly within Zone 1c - Inner zone subsurface	Site is partly or wholly within Zone 1 – Inner Zone	Site is partly or wholly within Zones 2 or 2c – Outer zone and outer zone subsurface	N/A

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					activity only		activity only	
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?	EA mapping	N/A	Zone 1 (no flood risk)	Zone 2	Zone 3a / 3b	Uncertain (to include commentary in appraisal where specific areas to be developed are unknown)	N/A
	- An area at risk from surface water flooding?	EA mapping	N/A	Very low risk	Medium risk	High Risk	Low risk / Uncertain (to include commentary in appraisal where specific areas to be developed are unknown)	N/A

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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?	Uttlesford District Council 2005 and 2014 (Pre-Submission) proposals map GIS and satellite mapping	N/A	Site boundary is within 800m of town centre as defined	Site boundary is not within 800m of town centre as defined	N/A	Where applicable	N/A
	Is it located in access to existing cycling routes?	Uttlesford Cycling Strategy 2014	Proposal is served by National or Regional Cycle Network or Off-Road Cycle Route	Proposal is served by bridleway or On-Road Cycle Route	Proposal is not served by an National or Regional Cycle Network, or Off-Road and On-Road Cycle Route, or bridleway.	N/A	Where applicable	N/A
	Does the site have safe highway access?	Uttlesford District Council SHLAA 2013/14	N/A	Site has safe highway access (SHLAA 2013/14 score: GREEN)	Site does not have safe highway access (SHLAA 2013/14 score: RED)	N/A	Site may not have safe highway access (SHLAA 2013/14 score: ORANGE)	N/A
6) To improve health and ensure appropriate	Is there capacity in the nearest GP surgery?	NHS	N/A	Yes	No	N/A	N/A	N/A
	Will the site be within:							

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provision for open space and recreational facilities.	- 300m of accessible natural greenspace of at least 2ha in size?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A
	- 2km of a 20ha accessible natural greenspace?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A
	- 5km of a 100ha accessible natural greenspace?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A
	- 10km of a 500ha accessible natural greenspace?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A
	Will the site see a loss of open space for recreation?	Uttlesford District Council 2005 and 2014 (Pre-Submission) proposals map	Site is to be designated / protected as open space for recreation of any kind	No loss of open space for recreation of any kind	Site will see a partial loss of a site protected as open space for recreation of any kind	Site will see the loss of a site protected as open space for recreation of any kind	Where applicable	N/A
7) To provide appropriate housing to meet existing and future needs	Will the site deliver affordable housing?	Affordable housing threshold for Gt Dunmow as per para. 6.29 of the Adopted Local Plan 2005 Potential SHLAA	Site would be solely for affordable housing provided through a social landlord	Sites of 0.5 hectares or of 15 dwellings or more	Sites less than 0.5ha or 15 dwellings	N/A	Where applicable	Non residential

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		2013/14 yield Would site be solely for affordable housing provided through a social landlord? (SHLAA 2013/14)						
8) To ensure appropriate infrastructure and school capacity	Is the site served by infrastructure?	Uttlesford District Council SHLAA 2013/14	N/A	Site is served by infrastructure (SHLAA 2013/14 score: GREEN)	Site is not served by infrastructure (SHLAA 2013/14 score: RED)	N/A	Site may not be served by infrastructure (SHLAA 2013/14 score: ORANGE)	N/A
	Is there capacity in the closest primary school?	Commissioning School Places in Essex	N/A	Forecast Surplus inc. adjustment for new housing	Forecast Deficit inc. adjustment for new housing	N/A	Forecast zero capacity inc. adjustment for new housing	N/A
	Is there capacity in the closest secondary school?	Commissioning School Places in Essex	N/A	Forecast Surplus inc. adjustment for new housing	Forecast Deficit inc. adjustment for new housing	N/A	Forecast zero capacity inc. adjustment for new housing	N/A
9) To ensure employment provision, economic growth and the promotion of	Will it result in the loss or gain of employment land?	Uttlesford District Council 2005 and 2014 (Pre-Submission) proposals map	Proposal would increase employment land provision	Would not see a loss of employment use through proposed use	Would see a loss of employment land for another use	N/A	Partial loss / unknown	N/A

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<p>the viability and vitality of the town centre</p>	<p>Is it within the town centre boundary as defined?</p>	<p>Uttlesford District Council 2005 and 2014 (Pre-Submission) proposals map</p>	<p>Development is within the town centre boundary and proposal incorporates use classes A1, A2, A3, A4 or A5 (assumption: permitted development from A class uses to C3 not desirable where located in a key shopping area, on the sustainability of that shopping area).</p>	<p>Residential development not within the town centre boundary as defined</p>	<p>Residential development (only) partly within the town centre boundary as defined</p>	<p>Residential development (only) entirely within the town centre boundary as defined</p>	<p>Where applicable</p>	<p>N/A</p>
	<p>Is site suitable for mixture of housing and another use(s) eg housing and employment or retail</p>	<p>Uttlesford District Council SHLAA 2013/14</p>	<p>N/A</p>	<p>Site is suitable for mixed-use (SHLAA 2013/14 score: YES)</p>	<p>Site is not suitable for mixed-use (SHLAA 2013/14 score: NO)</p>	<p>N/A</p>	<p>Where applicable</p>	<p>N/A</p>

3.3 Consultation on the Scoping Report

The Scoping Report was subject to consultation with the Statutory Consultees, Uttlesford District Council and invited local groups. For inclusion within his Environmental Report, those responses received by the Statutory Consultees can be found in the following table, along with the action or response for each.

Table 8: Comments received from Scoping Report consultation

Consultee	Comment	Response in the SEA
Natural England	Having examined the SEA Scoping Report, Natural England is satisfied that it adequately addresses all of the issues relevant to our statutory remit.	N/A
	In particular, Natural England notes that the Neighbourhood Plan proposes housing allocations at 'Land South of Stortford Road' (400units) and the 'Helena Romanes School Site' (100units). These two sites are not planned for in the adopted Uttlesford Local Plan (2005) and do not have planning permission. Having considered the scale of these proposed developments and their location relative to designated nature conservation sites, Natural England is however of the opinion that these allocations will not be likely to result in any measurable impact on any SSSI or European site. These proposed housing sites may, however, support protected species and appropriate investigations are likely to be required as part of any subsequent applications.	Noted.
Historic England	I note there is no reference to the Great Dunmow Conservation Area Appraisal and Management Plan (November 2007), which we believe is a relevant document that should be referenced in the SEA process.	Noted. The Great Dunmow Conservation Area Appraisal has been added to the list of relevant Plans and Programmes within the Environmental Report.
	Historic England agrees that the objectives set out in table 4 are appropriate, although in respect of objective two, we would suggest that the comma after 'heritage' on line two is	Noted. The suggested amendment has been made within the Environmental Report.

Consultee	Comment	Response in the SEA
	removed.	
	Historic England is specifically concerned with the impact of proposals on the Historic Environment and we consider that this aspect (the Sustainability Objectives) is adequately covered, and without repetition.	Noted.
	In Table 5 of the report, against SEA Objective 2, one of the indicators listed is the 'number of buildings on the at risk register'. Historic England publishes an annual report identifying heritage at risk, and this covers all asset types (scheduled monuments, buildings, conservation areas and registered parks and gardens). We therefore recommend that the reference to buildings on the 'at risk' register is changed to heritage assets on the 'at risk' register.	Noted. The suggested amendment has been made within the Environmental Report.
	Finally, with reference to Table 7 in the report, we note that against Object 2 the table identifies that both Significant Positive and Significant Negative are marked as not applicable. Historic England can foresee occasions when both might occur. For instance, we would equate Significant Negative (- -) to 'Substantial Harm' as set out in the National Planning Policy Framework, and it would be very possible for development on a site containing a scheduled monument or listed building to result in substantial harm to the significance of such a designated heritage asset in the event that the development required loss of all or part of that asset. Similarly a development proposal that resulted in a designated heritage asset being removed from the 'at risk' register for positive reasons would be a Significant Positive (++) .	Noted. The suggested amendments have been made within the Environmental Report.
Environment Agency	No response received.	N/A

4 The Appraisal of Policies

4.1 Objective: Sustainability and Deliverability

“The policies and positions in this Plan will contribute to the sustainable development of the Neighbourhood Plan Designated Area. The policies will be delivered in a manner which is considered, prioritised, and in line with the intentions of higher planning policy as well as the local community. This Plan is the means by which residents and businesses can get involved, and have a say, in the planning system.”

Table 9: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	0	0	0
Medium Term	0	0	0	0	0	0	0	0	0
Long Term	0	0	0	0	0	0	0	0	0

4.1.1 Significant Effects

The over-arching Sustainability and Deliverability Objective will have no impact on the SEA objectives. Specific effects will be looked at for individual policies, and policies in accumulation.

4.1.2 Temporal Effects

Effects will not change over time.

4.1.3 Alternatives Considered

No alternatives have been considered reasonable as the Objective looks at the principle of delivering sustainable development within the Plan Area.

4.1.4 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Objective.

4.2 Policy: DS1: TDA: Development Limits

“This Neighbourhood Plan defines the Town Development Area as shown in Figure 15, for the purpose of:

- Directing future housing growth in line with allocations set out in this plan*
 - Protecting the rural setting of Great Dunmow*
 - Containing the spread of town by promoting infill within existing built-up areas*
- All other areas will be treated as countryside.*

Development of sporting facilities outside the Town Development Area will be supported subject to adopted Local Plan and Neighbourhood Plan Policies.”

Table 10: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	+	0	0	0	+	0	+	+	+
Medium Term	+	0	0	0	+	0	+	+	+
Long Term	+	0	0	0	+	0	+	+	+

4.2.1 Significant Effects

The policy will have positive impacts on SEA objectives related to landscape (SO1), access (SO5), infrastructure (SO8), housing (SO7) and economic growth (SO9) through the principle of focusing development in locations within and contiguous to the existing settlement. Further and more specific effects will be explored within the appraisal of other policies and sites within this Plan where relevant to the Town Development Area.

4.2.2 Temporal Effects

Effects will not change over time.

4.2.3 Alternatives Considered

No alternatives have been explored for this policy. A scenario where no development limits exist would see proposals being subject to those development limits contained within Uttlesford District Council planning policy. Any scenario that explores different boundaries could not be seen as distinct enough to the preferred policy approach, with this accompanying assessment of the principle of setting development limits within the Plan Area.

4.2.4 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.

4.3 Policy: DS2: TDA: The Existing HRS Site

This site is released for the development of 100 residential units if Helena Romanes' School relocates to another site within the Great Dunmow parish.

All financial planning gain from this site is reserved to assist Helena Romanes' School's chosen relocation.

Development of this site for residential must be carried out in consultation with Great Dunmow Town Council and the Parsonage Downs Conservation Group. Development of this site must be carried out in accordance with the following particulars, in order to protect the setting and value-to-wildlife of Parsonage Downs, and of the wildlife corridor of which the school site and the Downs are a part.

Development of this site will provide a footpath-cycleway (as per policy GA1: Core Footpath and Bridleway Network) running through the site, north-south, from the bypass at Woodland's Park Sector 4 to linking rights of way through the Woodland's Park Sectors 1-3 sites.

Residential development (for 100 units) on the existing HRS site should:

- Be an enabling development, in order to part fund the development of a new secondary school on land adjacent to Buttleys Lane, South of Stortford Road;*
- It provides for the provision of cycleways / footpath links from the development to the primary and secondary schools and the Town Centre (in accordance with NP policy GA2);*
- Provide children's play spaces (LEAPs) and a 1.8 hectare landscape buffer to the north and west of the site to form a link with existing woodland habitats (landscaped in accordance with NP policy NE4: Screening);*
- Include a substantial 20m buffer adjoining the existing properties of Parsonage Downs – this buffer should include a buffer of native trees and hedgerows, and a shrub land area for wildflowers designed so that it can also be used as an informal walkway. The dual purpose of this buffer is firstly to add value to the wildlife corridor, and secondly to shield the existing properties from new development;*
- Arrange houses so that they centre on substantial open green spaces, which also connects to a green-strip pathway around the perimeter;*
- Protect the setting of the listed buildings to the east of the site, and the associated Conservation Area;*
- Be designed to mitigate adverse effects upon existing residential and community interests – this development may be required by legal obligation to provide or contribute towards wider and long term planning benefits reasonably association of any such impact.*

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by this Neighbourhood Plan and Uttlesford District Council. Implementation of the Master Plan will be regulated by legal obligation in association with the grant of planning permissions.

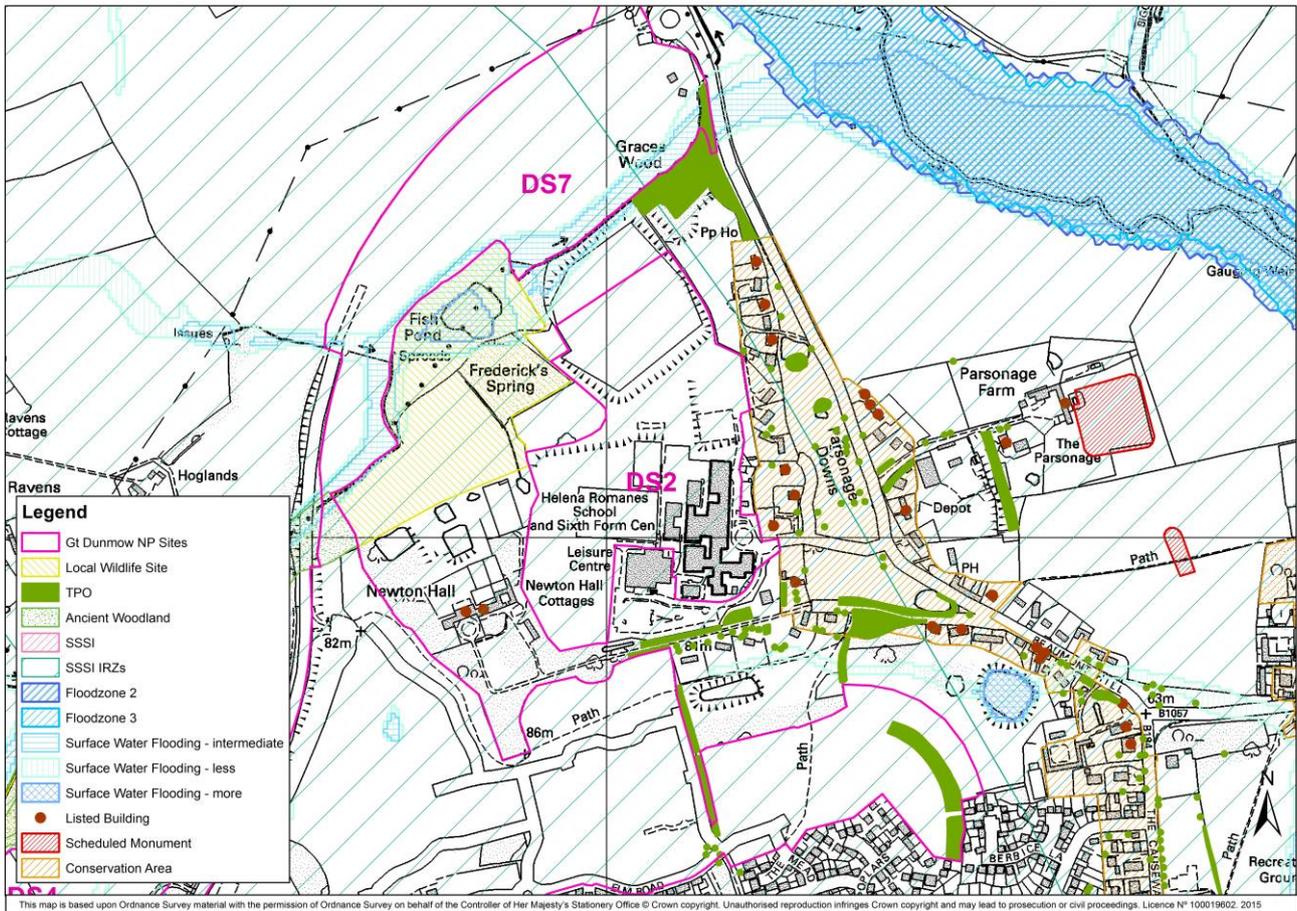


Table 11: Impact on SEA Objectives

SA Objective	Site Criteria	Impact
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	/ Adjacent on W edge to Hoglands Wood / Brownhills
	- Ancient Woodland	/ Within 500m of Hoglands Wood / Brownhills
	Impact on Landscape	+
	Will any Tree Preservation Orders (TPOs) be affected?	/ Trees in back gardens of properties adjacent to site on eastern edge and groups of trees adjacent to the south of the site.
2) To maintain and enhance the district's cultural heritage assets and	Is the site greenfield or brownfield?	+
	Will the site result in a loss of high quality agricultural land?	/ All Grade 3
	Could the site affect a (including its setting):	

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their settings in the Great Dunmow Neighbourhood Plan Area	- Scheduled Monument?	+
	- Listed Building?	/ Nine Listed Buildings adjacent (2 on west and 7 to the east)
	- Conservation Area?	/ adjacent on eastern edge to Gt Dunmow Conservation Area.
	Is the site in an area sensitive to change (Historic Environment)	+ Much of the site has been disturbed (Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	+
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?	/ Impact on leisure centre	
7) To provide appropriate housing to meet existing and future needs	Will the site deliver affordable housing?	+
8) To ensure appropriate infrastructure and school capacity	Is the site served by 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	Will it result in the loss or gain of employment land?	+
	Is it within the town centre boundary	+

centre	as defined?	
	Is site suitable for mixture of housing and another use(s) eg housing and employment or retail	-

4.3.1 Significant Effects

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal’s merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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.

4.3.2 Temporal Effects

The highlighted effects will not change over time.

4.3.3 Alternatives Considered

Site specific alternatives have been considered and their appraisal is presented elsewhere in this report. Two alternative principles of not including the HRS site as an allocation within the Neighbourhood Plan are explored as:

- Alternative 1 - DS2: not allocating the existing HRS site for 100 dwellings as part of an enabling development (assuming the re-location of the school will continue)
- Alternative 2 - DS2: the Helena Romanes School remains on site for the duration of the Plan period.

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative 1 – DS2	/	/	/	/	/	/	/	/	/
Alternative 2 – DS2	+	0	0	0	/	0	-	/	0

Alternative 1 – DS2: There will be uncertain impacts across the range of SEA objectives as a result of the alternative approach of not allocating the existing HRS site for 100 dwellings as part of an enabling development. Without a plan-led system, it is unsure what densities and supporting infrastructure (in line with Policy DS2 as worded) may come forward on the site. The principle of enabling development ensures the re-location of and presumed improvements to the Helena Romanes School should it be forthcoming. The absence of this policy and those others that facilitate the re-location of the school could see development proposals approved without the mitigation measures outlined in the policy and at a different dwelling yield. For this reason the alternative has been rejected.

Alternative 2 – DS2: There will be positive impacts on landscape (SO1) associated with less Greenfield land being developed, specifically that adjacent to Buttleys Lane, South of Stortford Road where the new school has been earmarked for re-location. A negative impact has been predicted for housing (SO7), though not allocating the current school site for housing. Although uncertain impacts can only be highlighted at this stage, there may be negative long term impacts associated with access to services (SO5) and infrastructure (SO8) through the school remaining in its current location. This is due to the capacity of the secondary school being highlighted as having only a small surplus when including adjustments for new housing, in the Commissioning School Places in Essex (2014-2019). It should be acknowledged that the current Helena Romanes School site is bounded by constraints which may make school expansion unviable and the fact that it serves a large proportion of the District. With that in mind this alternative has been rejected, in order to factor in future needs for school places within the Plan Area and beyond.

4.3.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

4.4 Policy: DS3: TDA: Land South of Stortford Road

The site is allocated for a mixed use development of 14ha of land for secondary school, 400 residential units and a health centre.

The following criteria must be met:

- Provision of 14 hectares of land as indicated on the plan for secondary education use.*
- The development provides for a mixed and balanced community to include at least 5% older person's and 1 and 2 bed bungalows across tenure;*
- It provides land and the provision of a new Health Centre of approximately 1800m² floorspace together with parking and an ambulance pick up / drop off point (and in accordance with NP policy HE11);*
- It provides for the provision of cycleways / footpath links from the development to the primary and secondary schools, the Town Centre, and the Flitch Way (in accordance with NP policy GA2);*
- It provides for open space within the development including informal recreation areas, the provision of children's play spaces (LEAPs and NEAPs) and a substantial strategic landscape buffer to the south along the boundary of the Flitch Way Country Park;*
- The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.*

Attention must be paid to protecting the setting of the existing properties west of Butley's Lane, and minimising the light pollution they will experience from development. Attention must likewise be paid to the Grade II Listed Folly Farm, to protecting its setting by ensuring a buffer zone separates this collection of buildings from new development.

Development of the site must be sympathetic to the fact that the site adjoins the town's Conservation Area.

Any successful application for development must be accompanied by a thorough assessment of the site's archaeological deposits.

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by this Neighbourhood Plan and Uttlesford District Council. Implementation of the Master Plan will be regulated by legal obligation in association with the grant of planning permissions.

*Land adjacent to Buttleys Lane (Land South of Stortford Road) is safeguarded for secondary Education use. **(FOR THE PURPOSES OF MAPPING, THIS SITE IS KNOWN AS LABL (LAND ADJACENT TO BUTTLEYS LANE)***

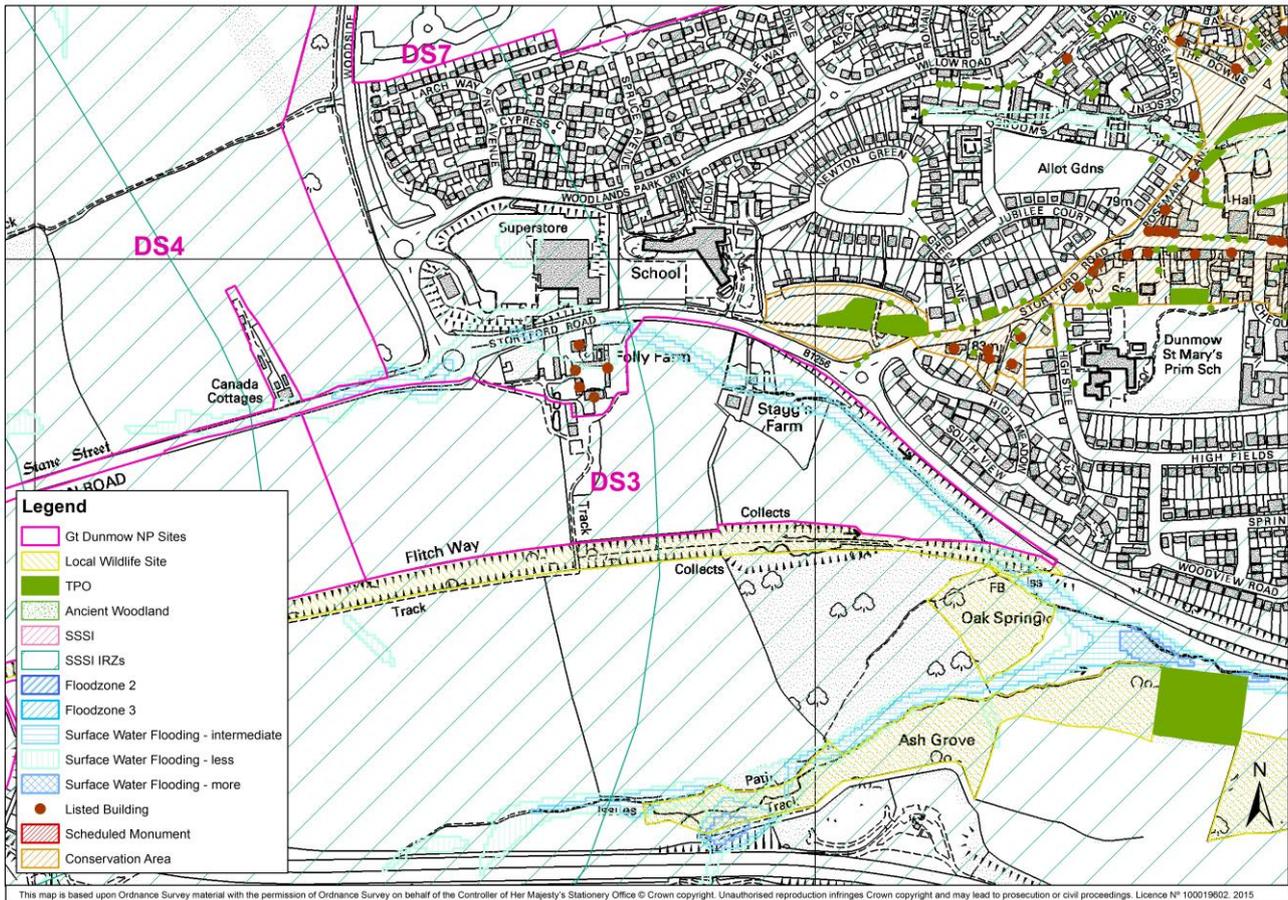


Table 12: Impact on SEA Objectives (Land South of Stortford Road)

SA Objective	Site Criteria	Impact
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	/ The Flich Way is along the south edge of site.
	- 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?	/ The western part of the site is Grade 2 the rest is Grade 3
	Could the site affect a (including its setting):	
	- Scheduled Monument?	+
	- Listed Building?	/ Five Listed Buildings at Folly Farm all Grade II
- Conservation Area?	+	
		The Great Dunmow Conservation

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		Area is across the road opposite Staggs Farm
	Is the site in an area sensitive to change (Historic Environment)	/ Expecting multi period archaeology to be found on this site (Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	+
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?	/ Along watercourse through Staggs Farm and Stortford Road
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?	+ The eastern half of the site.
	Is it located in access to existing cycling routes?	+ Stortford Road
	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 appropriate infrastructure and school capacity	Is the site served by 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	-

The Land adjacent to Buttleys Lane (Land South of Stortford Road) is safeguarded for secondary Education use. The assessment of the site’s sustainability is as follows

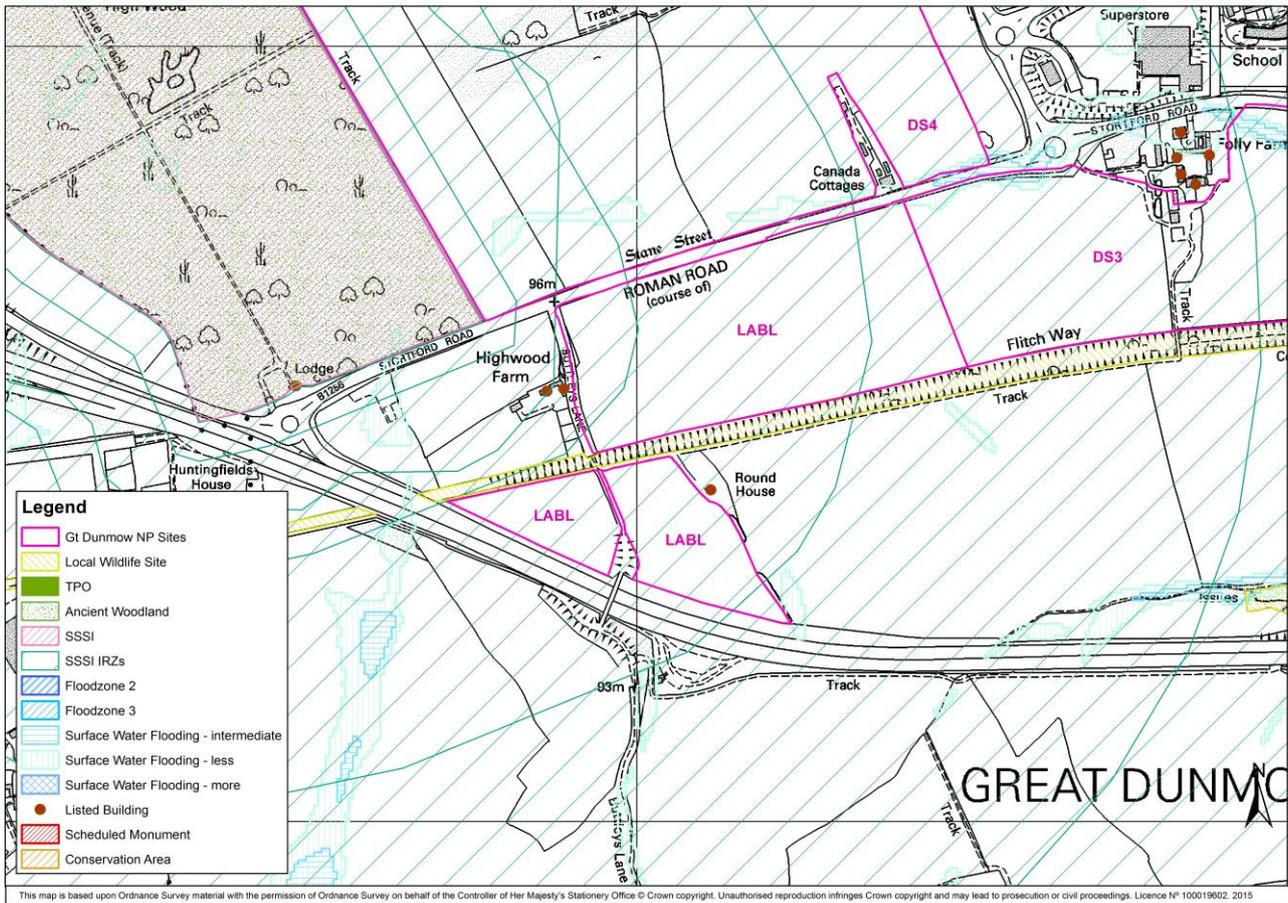


Table 13: Impact on SEA Objectives (Land adjacent to Buttleys Lane [LABL])

SA Objective	Site Criteria	Impact
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	/ The Flich Way which runs through the middle of the site.
	- Ancient Woodland	/ Within 500m of Highwood
	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	Will the site result in a loss of high quality agricultural land?	- All the land is Grade 2
	Could the site affect a (including its setting):	
- Scheduled Monument?	+	

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Neighbourhood Plan Area	- Listed Building?	/ Adjacent to 3 Grade II Listed Buildings
	- Conservation Area?	+
	Is the site in an area sensitive to change (Historic Environment)	/ Expecting multi period archaeology to be found on this site (Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	+
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?	+ Stortford Road
	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?	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?	+	
7) To provide appropriate housing to meet existing and future needs	Will the site deliver affordable housing?	N/A
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
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	N/A

4.4.1 Significant Effects

Land South of Stortford Road

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal's merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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 DS4 and DS5, 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. In addition, policy criteria reflects this SEA recommendation and has been factored in as part of the iterative process. 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, they are of the opinion that this allocation will not be likely to result in any measurable impact on any SSSI or European site. The 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. A policy criterion reflects this SEA recommendation and has been factored in as part of the iterative process. 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.

Land adjacent to Buttleys Lane

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal's merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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 Flitch 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

4.4.2 Temporal Effects

The highlighted effects will not change over time.

4.4.3 Alternatives Considered

Site specific alternatives have been considered and their appraisal is presented elsewhere in this report. The following alternative principles are explored below:

- Alternative 1 – DS3: including the site south of Stortford Road (for the relocation of the secondary school) as an allocation within the Neighbourhood Plan.
- Alternative 2 – DS3: the site remains undeveloped.
- Alternative 3 – DS3: Not safeguarding the land adjacent to Buttley's Lane for secondary education use
- Alternative 4 – DS3: Site DS2 remains as the HRS site for the duration of the plan period (also Alternative 2 - DS2)

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative 1 - DS3	/	/	/	/	/	/	/	/	/
Alternative 2 - DS3	0	0	0	0	0	-	-	/	0
Alternative 3 - DS3	/	/	/	/	/	/	/	/	/
Alternative 4 - DS3	+	0	0	0	/	0	-	/	0

Alternative 1 – DS3: There will be uncertain impacts across the range of SEA objectives as a result of the alternative approach of not allocating the land south of Stortford Road. Without a planned system, it is unsure what densities, tenure types, site mitigation measures and supporting infrastructure (in line with the Policy as worded) would be identified as suitable and necessary on

the site. The principle of housing on this site in conjunction with the re-located school site ensures that development meets a locally identified need. The absence of this policy and those others that facilitate the re-location of the school could result in development proposals being approved without the mitigation measures outlined in the policy and / or at a different dwelling yield. For this reason the alternative has been rejected.

Alternative 2 – DS3: There would be no impact on the majority of the SEA Objectives associated with the alternative of the site remaining undeveloped. There will however be (comparatively) negative implications on housing (SO7) through the resulting absence of 400 residential units in the Plan Area and also health (SO6) through the subsequent absence of a new Health Centre being provided, along with open space within the development, as per the policy criteria. An uncertain impact would be realised for infrastructure (SO8). This is due to the possible negative implications of the Helena Romanes School remaining at its existing location (with associated possible capacity issues in the later stages of the plan period and beyond) or alternatively the uncertainty of the Helena Romanes School being relocated to a currently unidentified site. For this reason the alternative has been rejected.

Alternative 3 – DS3: There will be uncertain impacts across the range of SEA objectives as a result of the alternative approach of not safeguarding the land adjacent to Buttley's Lane for secondary education use. The principle of the re-location of the Helena Romanes School on this site has been established and without safeguarding the site could be developed for another use. The safeguarding of the site is also required for the delivery of 500 dwellings being allocated within the Plan for development to meet a locally identified need. The absence of this policy and those others that facilitate the re-location of the school could result in development proposals approved without the mitigation measures outlined in the policy and at a different dwelling yield. As such this alternative has been rejected.

Alternative 4 – DS3: There will be positive impacts on landscape (SO1) associated with less Greenfield land being developed, specifically that adjacent to Buttleys Lane, South of Stortford Road where the new school has been earmarked for re-location. A negative impact has been predicted for housing (SO7), though not allocating the current school site for housing. Although uncertain impacts can only be highlighted at this stage, there may be negative long term impacts associated with access to services (SO5) and infrastructure (SO8) through the school remaining in its current location. This is due to the capacity of the secondary school being highlighted as having only a small surplus when including adjustments for new housing, in the Commissioning School Places in Essex (2014-2019). It should be acknowledged that the current Helena Romanes School site is bounded by constraints which may make school expansion unviable and the fact that it serves a large proportion of the District. With that in mind this alternative has been rejected, in order to factor in future needs for school places within the Plan Area and beyond.

4.4.4 Proposed Mitigation Measures / Recommendations

Land south of Stortford Road

Archaeological deposits are likely to exist on the site and these should be fully investigated as a condition to any successful application.

Land adjacent to Buttleys Lane

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.

4.5 Policy: DS4: TDA: Land West of Woodside Way

The land West of Woodside Way is allocated for 850 residential dwellings.

The following criteria must be met:

- The development provides for a mixed and balanced community to include 5% older persons 1 and 2 bed bungalows across tenure; and also a scheme for vulnerable adults (as part of affordable housing provision);

- It provide for a local centre including a community centre / sports hall, 2.1 hectares of land and construction of pre / primary school;

It provides for public transport contributions;

- It provides for the provision of cycleways / footpath links from the development to the primary and secondary schools, the Town Centre, and Tesco's (in accordance with NP policy GA2);

- It provides for a minimum of 21 hectares of open space within the development. This will include: provision of a mix of formal playing pitches (adult football / rugby / junior cricket / hockey) and informal recreation areas; children's play spaces (LAPs, LEAPs and NEAPs), 2 hectares of allotments across the allocation and a substantial strategic landscape buffer of natural and semi-natural green space to the north and west edges of allocation. Associated facilities like changing rooms and car parking should also be provided;

- The landscape buffer to the north and west of the site must include screening (in accordance with NP policy NE4: Screening) and be designed to join up existing woodlands and wildlife sites which form part of a wildlife corridor (as identified in NP policy NE2: Wildlife Corridors);

- The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.

Any successful application for development must be accompanied by a thorough assessment of the site's archaeological deposits.

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by this Neighbourhood Plan and Uttlesford District Council. Implementation of the Master Plan will be regulated by legal obligation in association with the grant of planning permissions.

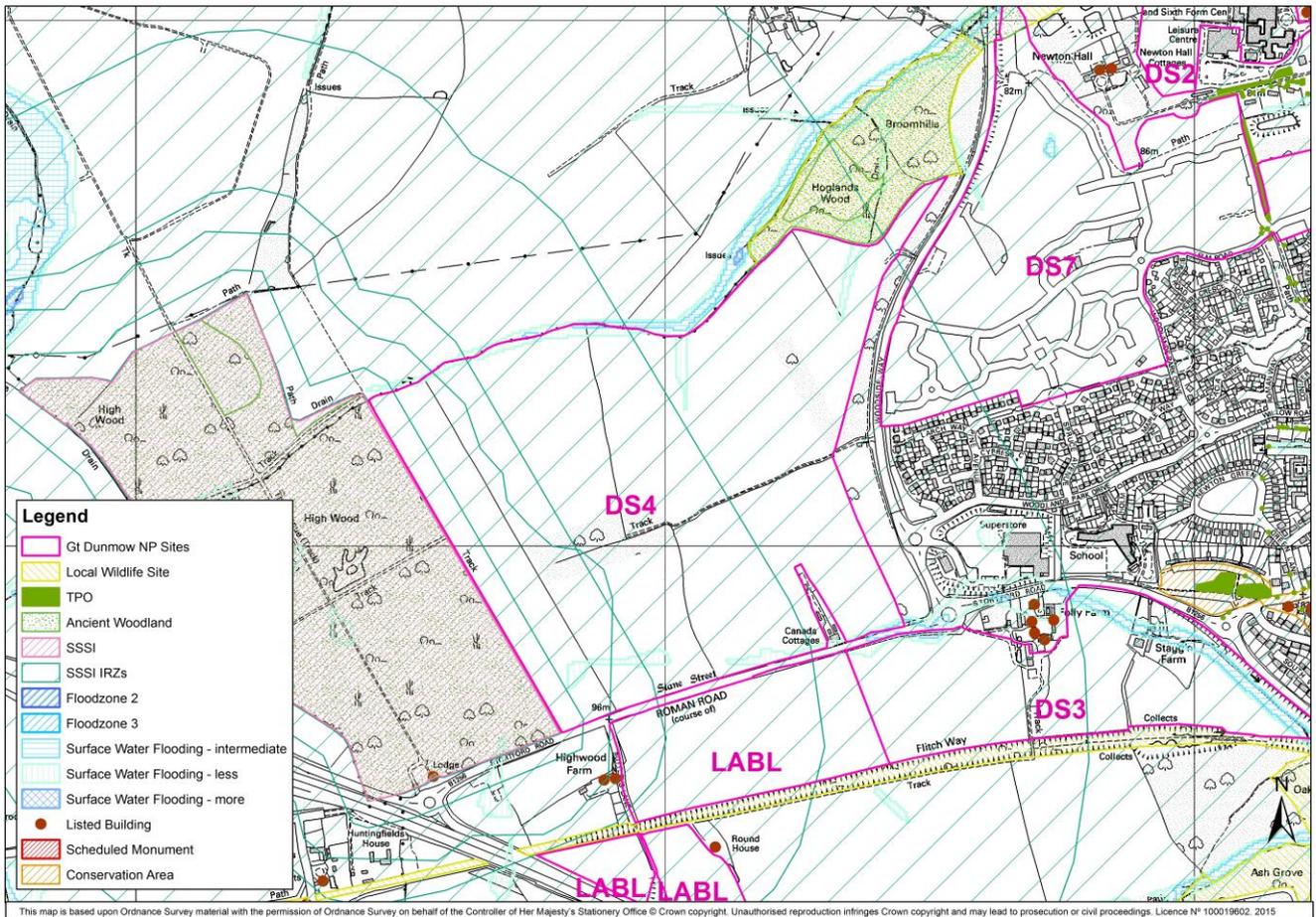


Table 14: Impact on SEA Objectives

SA Objective	Site Criteria	Impact
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	NE edge is adjacent to Hoglands Wood / Broomhills /
	Impact on Landscape	Adjacent on W edge to High Wood and on the NE edge to Hoglands Wood / Broomhills /
	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?	/	
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?	+

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	- Conservation Area?	+
	Is the site in an area sensitive to change (Historic Environment)	/ Expecting multi period archaeology to be found on this site (Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	+
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?	/ On S edge along Stortford Road and along N edge along Parish Boundary and by Hoglands Wood
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?	+ Stortford Road and Bridleway along W edge of site
	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?	+ Only the S edge of site
	- 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 appropriate infrastructure and school capacity	Is the site served by 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	+

4.5.1 Significant Effects

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal's merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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 as per the policy content, and 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 is similarly neutralised though the policy's requirements for 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 would be neutralised if the policy's requirement that a substantial strategic landscape buffer of natural and semi-natural green space will be incorporated to the north and west edges of the allocation, 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 would be fully investigated. A policy criterion reflects this SEA recommendation and has been factored in as part of the iterative process.

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 be identified and mitigated in a Surface Water Drainage Strategy.

4.5.2 Temporal Effects

The highlighted effects will not change over time.

4.5.3 Alternatives Considered

Site specific alternatives have been considered and their appraisal is presented elsewhere in this report. The alternative principle of not including the Land West of Woodside Way as an allocation within the Neighbourhood Plan is explored as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS4	0	0	0	0	0	0	0	0	0

There will be no difference of impacts across the range of SEA objectives as a result of the alternative approach of not including the Land West of Woodside Way as an allocation within the Neighbourhood Plan. This is due to the site already having planning consent. The principle of allocating the site 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 will also assist the Steering Group in formulating relevant site policy criteria for those sites without planning consent. For this reason, the alternative of not including the site has been rejected. The cumulative impacts of all of the Neighbourhood Plan’s allocations can be found in Section 6 of this report.

4.5.4 Proposed Mitigation Measures / Recommendations

It is recommended that the site policy criteria reflect the fact that planning consent has already been granted for this site. The policy criteria can be considered redundant in light of the site’s status.

4.6 Policy: DS5: TDA: Land West of Chelmsford Road (Smith's Farm)

The Land West of Chelmsford Road (Smith's Farm) is allocated for 300 residential dwellings, a 70 bed Extra Care home and 2.1 hectares of employment land and a retail store.

The following criteria must be met:

- The development provides for a mixed and balanced community to include 5% older persons 1 and 2 bed bungalows across tenure;*
- It provide for a 70-bed Extra Care home (as part of affordable provision);*
- It provides for public transport contributions;*
- It provides for the provision of cycleways / footpath links from the development to the primary and secondary schools, the Town Centre, and the Flitch Way (in accordance with NP policy GA2);*
- It provides for any necessary junction improvements to the Hoblongs junction in accordance with the submitted Transport Assessment which are completed and operational prior to any part of the sites coming into use;*
- It provides for 1.7 hectares of land for pre – primary school and construction of school facility;*
- It provides for recreation open space within the development, and the provision of children's play spaces (LEAPs and NEAPs);*
- It provides for 1,400m² of retail floorspace;*
- This housing allocation is subject to a linked employment allocation of 2.1 hectares which should come forward as part of the Master Plan. The employment provision will include employment uses comprising industry and / or warehousing (or similar 'sui generis' uses);*
- The site must include a landscaped buffer zone to protect the setting of surrounding residential properties and gardens (in accordance with NP policy NE4: Screening);*
- The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact;*
- The necessary improvement works to the junction will be determined by the highway authority and will include preventing excessive traffic congestion at the junction, particularly in peak hours, as a consequence of the development and use of this site.*

Should any limitations to the site related to Flood Zone 2 be identified, then these limitations must form part of design conditions.

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by this Neighbourhood Plan and Uttlesford District Council. Implementation of the Master Plan will be regulated by legal obligation in association with the grant of planning permissions.

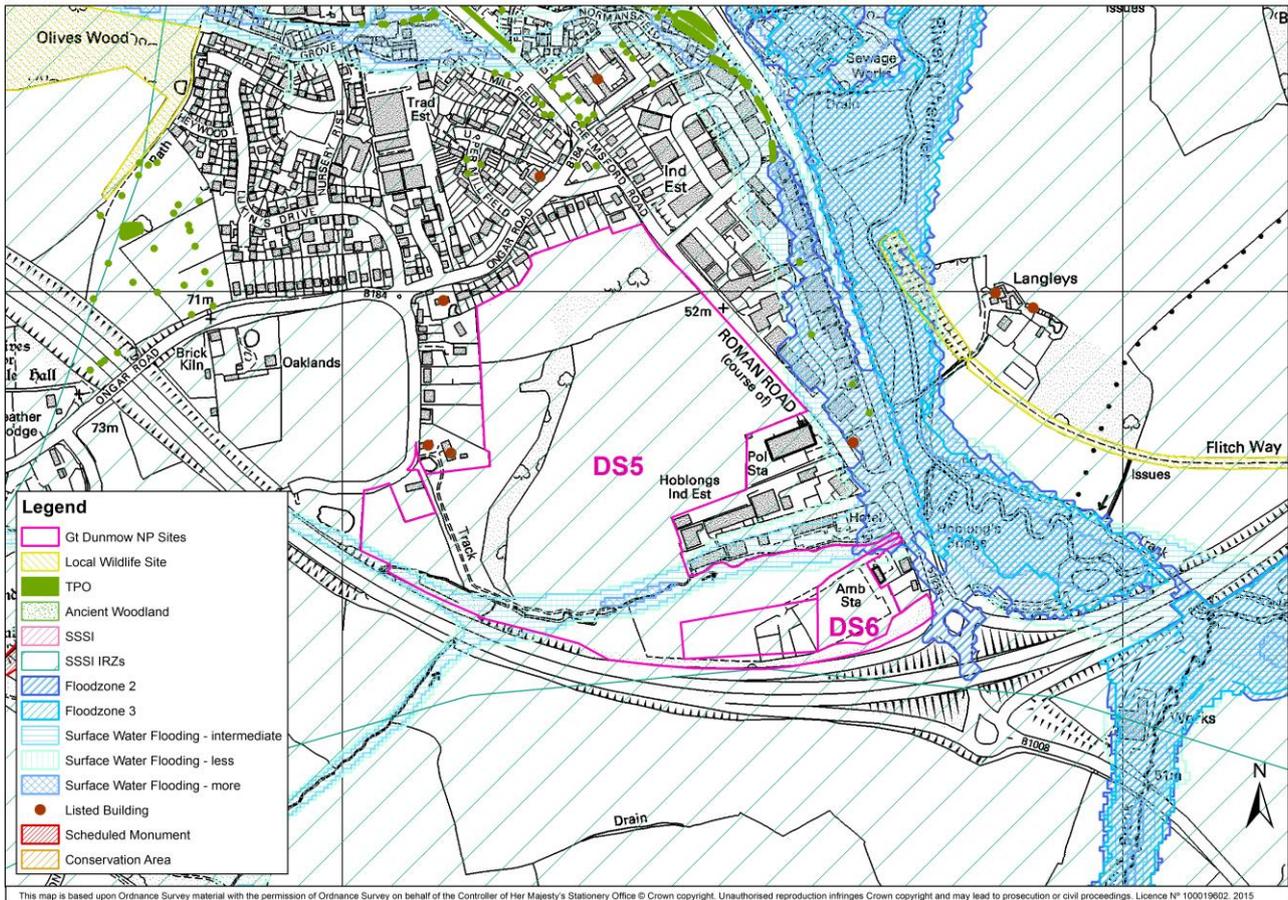


Table 15: Impact on SEA Objectives

SA Objective	Site Criteria	Impact
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?	-	
		Mostly Grade 2 apart from the NE edge which is Grade 3
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)	+	This site has already been excavated

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		(Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	+
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?	/ The entrance from Chelmsford Road is in Flood Zone 2
	- An area at risk from surface water flooding?	/ The entrance from Chelmsford Road and along the course of Hoblongs Brook
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?	+ The N of the site is within 800m
	Is it located in access to existing cycling routes?	+ ECC on street cycleway
	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 appropriate infrastructure and school capacity	Is the site served by 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?	++ Plus 2.1 HA employment
	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	+

4.6.1 Significant Effects

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal’s merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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 as per the policy content and in conjunction with that of 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 such surface water impacts are identified and mitigated in a Surface Water Drainage Strategy. It would also be hoped that any limitations to the site regarding those areas within Flood Zone 2 are factored into the design and layout of the proposal. A policy criterion reflects this SEA recommendation and has been factored in as part of the iterative process.

4.6.2 Temporal Effects

The highlighted effects will not change over time.

4.6.3 Alternatives Considered

Site specific alternatives have been considered and their appraisal is presented elsewhere in this report. The alternative principle of not including the Land West of Chelmsford Road (Smith’s Farm) as an allocation within the Neighbourhood Plan is explored as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS5	0	0	0	0	0	0	0	0	0

There will be no difference of impacts across the range of SEA objectives as a result of the alternative approach of not including the Land West of Chelmsford Road (Smith’s Farm) as an allocation within the Neighbourhood Plan. This is due to the site already having planning consent. The principle of allocating the site 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 will also assist the Steering Group in formulating relevant site policy criteria for those sites without planning consent. For this reason, the alternative of not including the site has been rejected. The cumulative impacts of all of the Neighbourhood Plan's allocations can be found in Section 6 of this report.

4.6.4 Proposed Mitigation Measures / Recommendations

It is recommended that the site policy criteria reflect the fact that planning consent has already been granted for this site. The policy criteria can be considered redundant in light of the site's status.

4.7 Policy: DS6: TDA: Land West of Chelmsford Road (Smith’s Farm) (Waste Transfer Station)

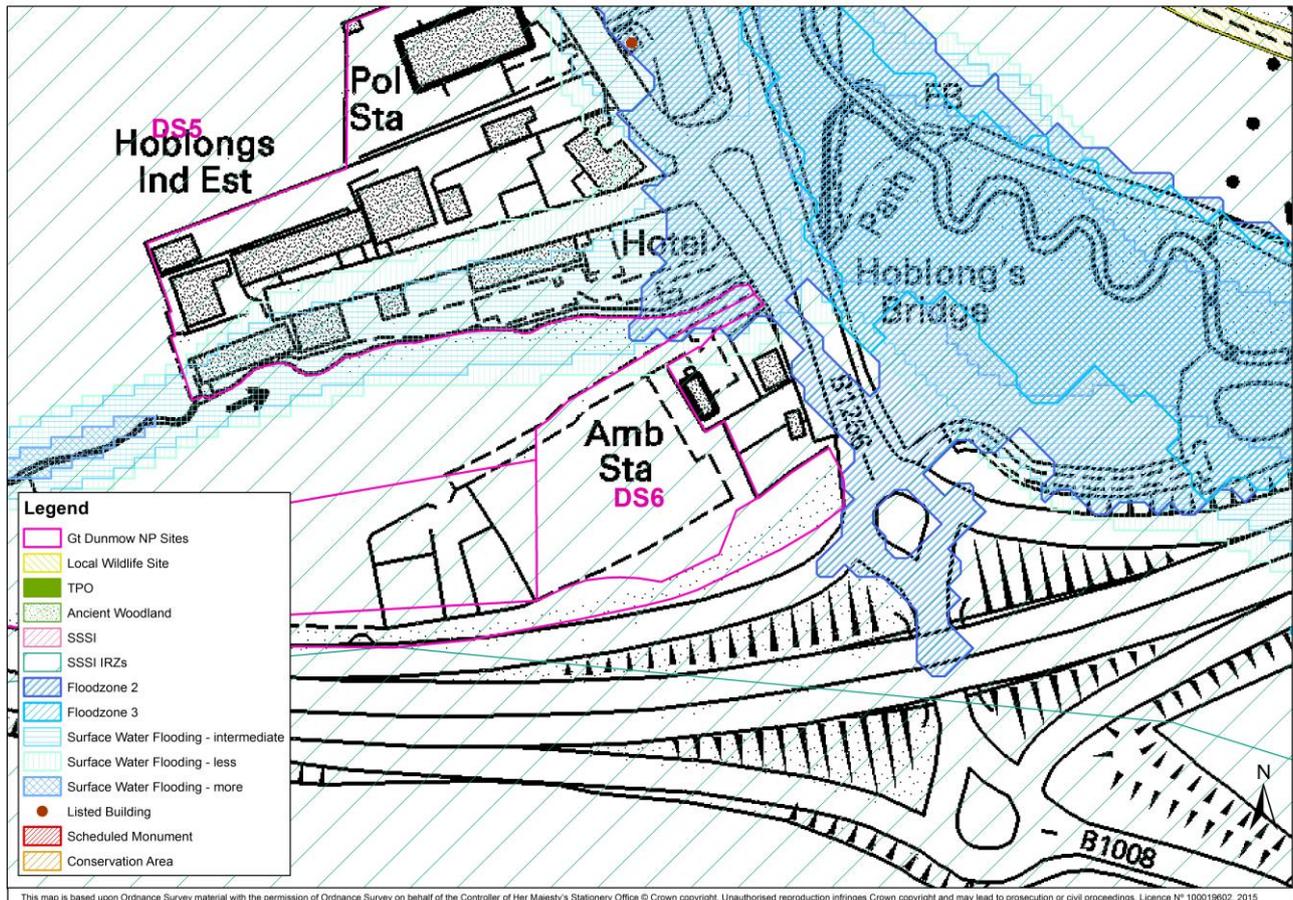
A site adjacent to Land West of Chelmsford Road (Smith’s Farm) is allocated for a waste transfer station.

The following criteria must be met:

- The development provides adequate, appropriate and effective landscaping to protect the amenity of the nearby housing and hotel (see NP Policy NE4: Screening for support);
- The development provides adequate, appropriate and effective landscaping to minimise the view of the site from the A120 (see NP Policy NE4: Screening for support);
- The development provides adequate, appropriate and effective measures to limit any odours, birds and vermin to within acceptable levels of tolerance;
- The development provides adequate, appropriate and effective measures to limit the amount of air-borne waste materials or particles or grit emanating from the site to within acceptable levels of tolerance.

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

A legal obligation will secure the necessary improvements to the junction of the Chelmsford Road (B184) with the A130 resulting from the development of this site.



4.7.1 Significant Effects

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.

4.7.2 Temporal Effects

The highlighted effects will not change over time.

4.7.3 Alternatives Considered

There are no reasonable alternatives for this policy. It should be noted that 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.

4.7.4 Proposed Mitigation Measures / Recommendations

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.

4.8 Policy: DS7: TDA: Woodland's Park

“Land at Woodland's Park (sectors 1-3) is allocated for 842 residential dwellings. This site constitutes an ongoing development.

The following criteria must be met:

- The development provides for a mixed and balanced community;*
- It provides for the provision of cycleways / footpath links from the development to Tesco's, the primary and secondary schools, the Town Centre, and the B184 (in accordance with NP policy GA2);*
- It provides for recreation open space within the development to include informal recreation areas, children's play space (LAPs and LEAPs), and a strategic landscape buffer to the north of the development and along the line of the north-west bypass (in accordance with NP policy NE4: Screening);*
- The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.*

Existing Tree Protection Orders must be a material consideration in the development of the site.

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by this Neighbourhood Plan and Uttlesford District Council. Implementation of the Master Plan will be regulated by legal obligation in association with the grant of planning permissions.”

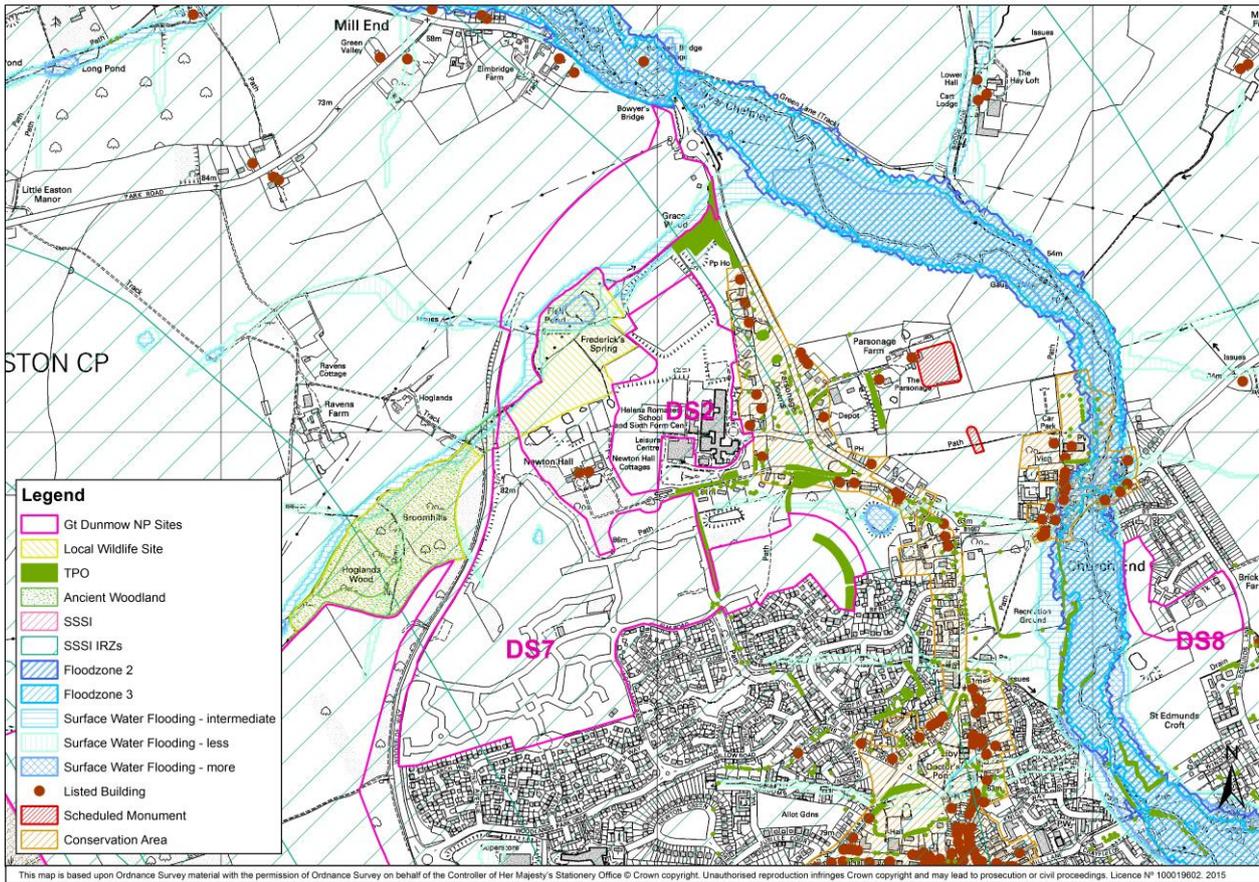


Table 16: Impact on SEA Objectives

SA Objective	Site Criteria	Impact
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	/ Adjacent to Hoglands Wood / Broomhills on E edge of site
	- Ancient Woodland	- Part of the site, to the NW of Newton Hall, has Hoglands Wood Broomhills Ancient Wood going through it.
	Impact on Landscape	/
	Will any Tree Preservation Orders (TPOs) be affected?	- Various groups and individual trees in the eastern areas and adjacent to the site
Is the site greenfield or brownfield?	-	
Will the site result in a loss of high quality agricultural land?	/ The site has a mixture of Grade 2 and Grade 3 agricultural land	
2) To maintain and enhance the district's cultural heritage assets and their settings in the Great Dunmow	Could the site affect a (including its setting):	
	- Scheduled Monument?	+

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Neighbourhood Plan Area	- Listed Building?	/ Two adjacent Grade II between the site and Helena Romanes
	- Conservation Area?	+
	Is the site in an area sensitive to change (Historic Environment)	+ The site has been evaluated and everything dealt with (Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	+
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?	/ Mostly along the boundary with Lt Easton parish
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?	+ The S of the site is within 800m
	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?	+ Only the eastern extremities are within 300m
	- 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 appropriate infrastructure and school capacity	Is the site served by 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	-
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4.8.1 Significant Effects

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal's merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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. Regarding the TPOs, it should be noted that a policy criterion reflects this SEA recommendation and has been factored in as part of the iterative process.

The possible exception to this regards primary school capacity, although it should be acknowledged that those sites in Policy DS4 and DS5 will provide a primary school on site. 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 as stipulated in the accompanying policy. It would be hoped that the TPOs on site are carefully factored into the development.

Of the uncertain or negligible impacts highlighted, these predominantly relate to nearby or adjacent ecological and landscape based constraints. The site is within a SSSI impact risk zone and the land use has been identified as needing consultation with Natural England. 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 is hoped that the proposal suitably factors in mitigation to these impacts consistent with other policies, particularly Policy DS2. 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 also be hoped that any potential negative impacts surrounding surface water flooding along the boundary with Lt Easton parish are identified and mitigated in a required Surface Water Drainage Strategy.

4.8.2 Temporal Effects

The highlighted effects will not change over time.

4.8.3 Alternatives Considered

Site specific alternatives have been considered and their appraisal is presented elsewhere in this report. The alternative principle of not including the Land at Woodlands Park as an allocation within the Neighbourhood Plan is explored as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS7	0	0	0	0	0	0	0	0	0

There will be no difference of impacts across the range of SEA objectives as a result of the alternative approach of not including the Land at Woodlands Park as an allocation within the Neighbourhood Plan. This is due to the site already having planning consent. The principle of allocating the site 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 will also assist the Steering Group in formulating relevant site policy criteria for those sites without planning consent. For this reason, the alternative of not including the site has been rejected. The cumulative impacts of all of the Neighbourhood Plan’s allocations can be found in Section 6 of this report.

4.8.4 Proposed Mitigation Measures / Recommendations

It is recommended that the site policy criteria reflect the fact that planning consent has already been granted for this site. The policy criteria can be considered redundant in light of the site’s status.

4.9 Policy: DS8: TDA: Land at Brick Kiln Farm

Land at Brick Kiln Farm is allocated for 65 residential dwellings and 9.4 hectares of public open space. The part of this site allocated for building has been included in the Town Development Area (NP Policy DS1: TDA: Development Limits), while the part of the site allocated for public open space is identified and protected as part of the Chelmer Valley (see NP Policy LSC3: The Chelmer Valley).

The following criteria must be met by this site in its entirety, development being restricted to the allocated part of the site:

- The development provides for a mixed and balanced community to include at least 5% older persons and 1 and 2 be bungalows across tenure;*
- It provides for the provision of cycleways / footpath links from the development to the Chelmer Valley and the Town Centre (in accordance with NP policy GA2: Integrating Developments (Paths & Ways));*
- It provides for 9.4 hectares of open space to the south and west of the proposed dwellings.*
- The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.*

The application should be accompanied by a Transport Assessment, an approved Waste Water and Surface Water Drainage Strategy, and other required documents, and any recommended improvements / remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by this Neighbourhood Plan and Uttlesford District Council. Implementation of the Master Plan will be regulated by legal obligation in association with the grant of planning permissions.

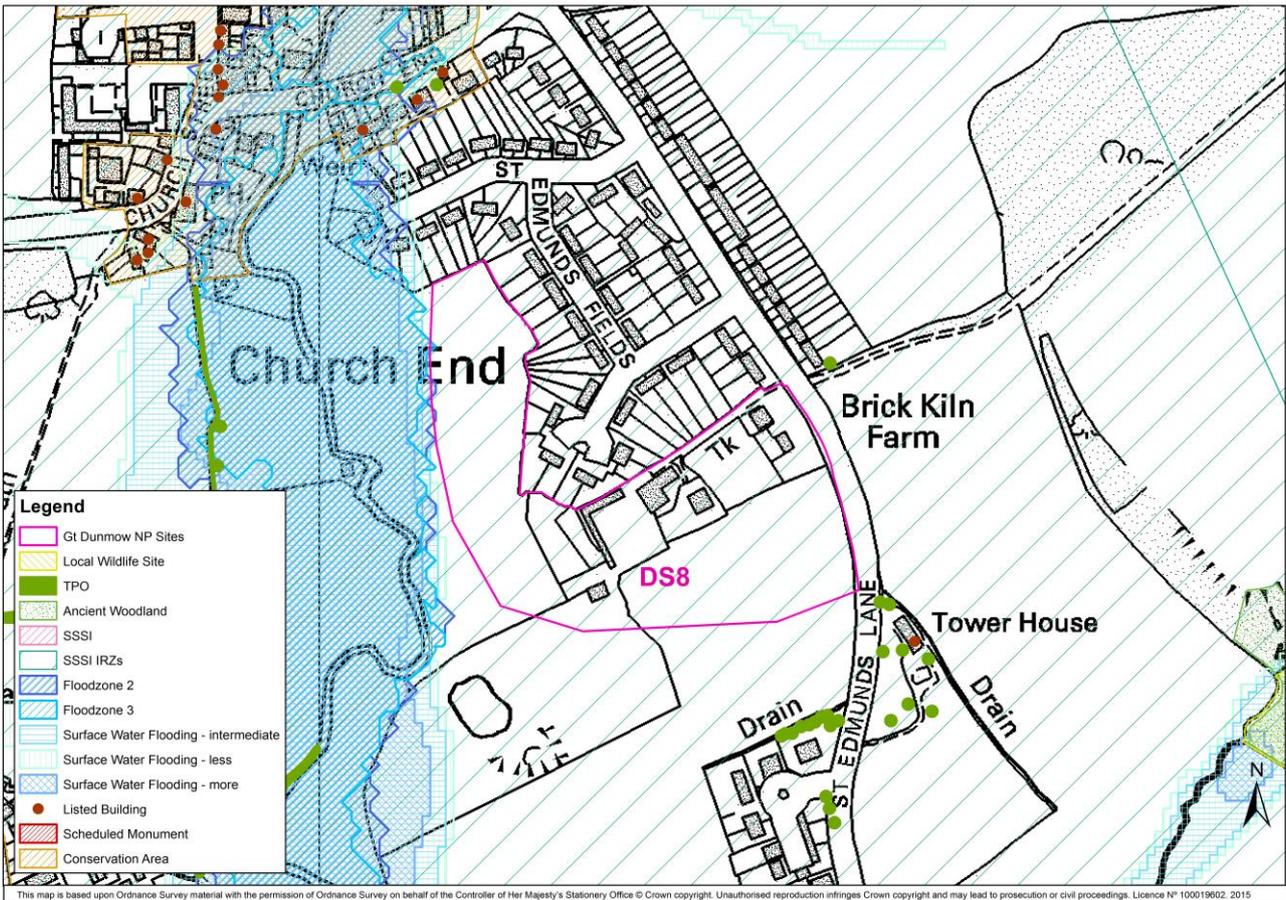


Table 17: Impact on SEA Objectives

SA Objective	Site Criteria	Impact	
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	/ Within 500m of two Ancient Woodlands to the east of the site – Markshill Wood and woodland to the E of Tower House	
	Impact on Landscape	/ Although impacts likely as in Upper Chelmer River Valley	
	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?	+	All Grade 3	
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?	+	But Tower House is opposite the SE

		corner of the site across St Edmunds Lane
	- Conservation Area?	+
	Is the site in an area sensitive to change (Historic Environment)	+ The archaeology has been trenched and dealt with (Place Services assessment)
	Will there be any material harm caused to the form or alignment of protected historic lanes?	+ The only protected Lanes in Great Dunmow are S of the A120
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?	/ In a 2C 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?	+ The area to the W and S of the site is to be protected as 9.4ha of open space
7) To provide appropriate housing to meet existing and future needs	Will the site deliver affordable housing?	+
8) To ensure appropriate infrastructure and school capacity	Is the site served by 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	-
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4.9.1 Significant Effects

The appraisal of this site looks at the sustainability implications of development at this location and scale, and in line with the policy criteria only. This enables the principle of sustainable development to be explored, as specified, on the site / proposal's merits only. The allocations in the Plan, and how they contribute to a strategic approach, are explored cumulatively in relevant sections of this report.

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 should also be overcome. The site could be considered suitable for housing only.

Of the uncertain or negligible impacts highlighted, these relate to Ancient Woodland in proximity to the site 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. Landscape implications are uncertain in line with the SEA criteria / methodology for assessing such impacts, although it should be acknowledged that landscape impacts could be negative in association with the Upper Chelmer River Valley. It would be hoped that the mitigation of landscape impacts be forthcoming.

It would also be hoped that any potential negative impacts surrounding ground water quality / pollution are identified and mitigated in a Waste Water and Surface Water Drainage Strategy.

4.9.2 Temporal Effects

The highlighted effects will not change over time.

4.9.3 Alternatives Considered

Site specific alternatives have been considered and their appraisal is presented elsewhere in this report. The alternative principle of not including the Land at Brick Kiln Farm as an allocation within the Neighbourhood Plan is explored as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS8	0	0	0	0	0	0	0	0	0

There will be no difference of impacts across the range of SEA objectives as a result of the

alternative approach of not including the Land at Brick Kiln Farm as an allocation within the Neighbourhood Plan. This is due to the site already having planning consent. The principle of allocating the site 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 will also assist the Steering Group in formulating relevant site policy criteria for those sites without planning consent. For this reason, the alternative of not including the site has been rejected. The cumulative impacts of all of the Neighbourhood Plan’s allocations can be found in Section 6 of this report.

4.9.4 Proposed Mitigation Measures / Recommendations

It is recommended that the site policy criteria reflect the fact that planning consent has already been granted for this site. The policy criteria can be considered redundant in light of the site’s status.

4.10 Policy: DS9: Building for Life

“Residential development proposals which are accompanied by a Building for Life 12 assessment and which meet the following scores will be supported.

- A GREEN score against criteria 1 (Connections), 4 (Meeting Local Housing Requirements), 5 (Character) and 6 (Working with the site and its Context);
- On all the remaining criteria an AMBER score will only be acceptable where it is accompanied by a clear justification in terms of local circumstances or viability explaining why a green score cannot be achieved.

A self-assessment by developers will be submitted as part of a planning application at either the Details Following Outline stage or Full planning permission stage of securing planning permission. Review of this self-assessment document will inform decisions surrounding the granting or refusal of planning permission.

It will be insufficient only to consider this document in the latter stages of planning and proposal. BfL12 must be integral to the planning process from the beginning.”

Table 18: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	✓	0	✓	✓	0	✓	✓	0
Medium Term	✓	✓	0	✓	✓	0	✓	✓	0
Long Term	✓	✓	0	✓	✓	0	✓	✓	0

4.10.1 Significant Effects

The impact of requiring Building for Life 12 green scores with regard to connections, local housing requirements, character and context are likely to have positive impacts on biodiversity (SO1), cultural heritage (SO2), flooding (SO4), accessibility (SO5), housing needs (SO7) and infrastructure (SO8) by virtue of the requirements.

4.10.2 Temporal Effects

These impacts are not likely to vary over time.

4.10.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on Building for Life requirements to accompany development proposals at the planning application stage within the Plan. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS9	/	/	0	/	/	0	/	/	0

The positive impacts associated with the Policy may or may not be forthcoming under the alternative approach, where it is uncertain whether developers would abide by such principles in the absence of self-assessment at the planning application stage. The Building for Life 12 is based on the National Planning Policy Framework and responds to the Government’s commitment to build more homes, better homes and involve local communities in planning. It should be noted however that Building for Life 12 is not a requirement of any of the Local Planning Authority’s adopted Plan policies and as such this alternative approach has been rejected.

4.10.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.11 Policy: DS10: The Case for Space

“Development proposals will be required to meet, and will be encouraged to exceed, the minimum space standards set out in good practice guidance prepared by the Royal Institute of British Architects (RIBA) in its 2011 publication *The Case for Space: The Size of England’s New Homes* and outlined in the justification to this policy.

Where standards exist as determined by other bodies such as Essex County Council, and which exceed the Case for Space standards, these higher standards must be implemented.”

Table 19: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	✓	0	0
Medium Term	0	0	0	0	0	0	✓	0	0
Long Term	0	0	0	0	0	0	✓	0	0

4.11.1 Significant Effects

The policy should result in positive outcomes for Objective 7 – the provision of appropriate housing to meet existing and future needs.

4.11.2 Temporal Effects

There is no anticipated temporal change.

4.11.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on ‘The Case for Space’ minimum space standards in development proposals. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS10	0	0	0	0	0	0	/	0	0

The positive impact associated with the Policy may or may not be forthcoming under the alternative approach, where it is uncertain whether developers would abide by such principles in the absence of the requirement. Such a policy direction is not a requirement of any of the Local Planning Authority’s adopted Plan policies and as such this alternative approach has been rejected.

4.11.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.12 Policy: DS11: Hedgerows

“Developers should ensure that hedgerows form an integral network of native and local species across the entire development for proposals of over 10 units.”

Table 20: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	/	0	0	0	0	0	0	0
Medium Term	✓	/	0	0	0	0	0	0	0
Long Term	✓	/	0	0	0	0	0	0	0

4.12.1 Significant Effects

Policy DS11 is likely to have positive impacts on Objective 1 (Biodiversity) in line with national guidance. However 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.

4.12.2 Temporal Effects

There are no anticipated changes over time.

4.12.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on hedgerow requirements in development proposals. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS11	/	0	0	0	0	0	0	0	0

There would be no significant impact on any of the SEA objectives as a result of the alternative approach. There will be uncertainty however surrounding the nature and form of any green infrastructure provision in the absence of the policy, although it could be expected that some level of green infrastructure will be provided. Such a focused and specific policy direction is not a requirement of any of the Local Planning Authority’s adopted Plan policies and as such this alternative approach has been rejected in order to deliver locally significant features of an ecological benefit in new developments.

4.12.4 Proposed Mitigation Measures / Recommendations

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.

4.13 Policy: DS12: Eaves Height

"Developments should preserve, enhance and promote the existing good character found in the immediate vicinity of its location, in terms of eaves height and in other respects (see the supporting text). In particular, an eaves height of two storeys, where appropriate, should be favoured on the borders of Great Dunmow."

Table 21: Impact on SEA objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	✓	0	0	0	0	0	0	0
Medium Term	0	✓	0	0	0	0	0	0	0
Long Term	0	✓	0	0	0	0	0	0	0

4.13.1 Significant Effects

There will be positive impacts on cultural heritage (SO2) as a result of ensuring developments should preserve, enhance and promote the existing good character found in the immediate vicinity of its location, in terms of eaves height and in other respects as evidenced by the Town Design Statement.

4.13.2 Temporal Effects

There are no anticipated changes over time.

4.13.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on eaves height in development proposals. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS12	0	/	0	0	0	0	0	0	0

There would be uncertain impacts on cultural heritage (SO2) as a result of the alternative approach; the absence of policy is unlikely to deliver developments with specific design requirements in the Plan Area. Such a specific policy direction is not a requirement of any of the

Local Planning Authority’s adopted Plan policies however and as such this alternative approach has been rejected in order to deliver housing design specifically in line with the Town Design Statement.

4.13.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.14 Policy: DS13: Rendering, Pargetting and Roofing

“New developments should where possible be constructed with tiled or slate roofing, and proposals in which each unit is either wholly rendered or wholly brick, with a mixture of rendered and brick on development sites over fifty units, will be permitted. This policy supports proposals for pargetting on new developments, using traditional Essex and Great Dunmow themes.”

Table 22: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	✓	0	0	0	0	0	0	0
Medium Term	0	✓	0	0	0	0	0	0	0
Long Term	0	✓	0	0	0	0	0	0	0

4.14.1 Significant Effects

Policy DS13 is likely to have positive impacts on Cultural Heritage (SO2) where new developments are in keeping with the character of the existing historical interest within the NP area.

4.14.2 Temporal Effects

No change is anticipated over time.

4.14.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on rendering, pargetting and roofing in development proposals. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS13	0	/	0	0	0	0	0	0	0

There would be uncertain impacts on cultural heritage (SO2) as a result of the alternative approach; the absence of policy is unlikely to deliver developments with specific design requirements in the Plan Area. Such a specific policy direction is not a requirement of any of the Local Planning Authority’s adopted Plan policies however and as such this alternative approach

has been rejected in order to deliver housing design specifically in line with local characteristics.

4.14.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.15 Policy: DS14: Integration of Affordable Housing

“Affordable housing requirements must always be properly integrated with easy, accessible, safe and comprehensive footpaths and cycleways in accordance with this Plan’s Getting Around policies (including safer routes to schools). Affordable housing must be designed as integral to the development and must be catered for to the same level of access as the private units.”

Table 23: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	✓	0	✓	0	0
Medium Term	0	0	0	0	✓	0	✓	0	0
Long Term	0	0	0	0	✓	0	✓	0	0

4.15.1 Significant Effects

Policy DS14 is likely to have positive impacts on accessibility and housing need through implementation.

4.15.2 Temporal Effects

No anticipated change over time.

4.15.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on the integration of affordable housing in development proposals. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS14	0	0	0	0	/	0	/	0	0

There would be uncertain impacts on sustainable access (SO5) and housing (SO7) as a result of the alternative approach; the absence of policy may see less focus on access requirements in the delivery of affordable housing in the Plan Area. Such a specific policy direction is not a requirement of any of the Local Planning Authority’s adopted Plan policies however and as such this alternative approach has been rejected in order to locate and support affordable housing specifically in line with the Plan’s Getting Around policies.

4.15.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.16 Policy: DS15: Local Housing Needs

“All major residential schemes (10 units and above) are to provide a choice of housing where at least 70% are 3 bedrooms or fewer and at least 30% are 2 bedrooms or fewer, unless housing needs have been demonstrated to be different through an up to date housing needs assessment. 5% on all schemes above 20 units are to be bungalows.”

Table 24: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	✓✓	0	0
Medium Term	0	0	0	0	0	0	✓✓	0	0
Long Term	0	0	0	0	0	0	✓✓	0	0

4.16.1 Significant Effects

Policy DS15 is likely to have significant positive impacts on housing need (SO7). The policy is supported by a number of sources of evidence and local survey work and as such the requirements of the policy are representative of local need.

4.16.2 Temporal Effects

No changes anticipated over time.

4.16.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on the choice of housing in major residential schemes. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative DS15	0	0	0	0	0	0	✓	0	0

There would be positive impacts on housing (SO7) as a result of the alternative approach as broad local housing needs will still be delivered in Great Dunmow as a market town with district-wide importance. Despite this the absence of the policy is likely to see a less significant mix of housing types delivered in the Plan Area and less specific to the requirements of the Plan Area itself. Such a specific policy direction is not a requirement of any of the Local Planning Authority's adopted Plan policies however and as such this alternative approach has been rejected in order to develop housing choices specifically in line with the Plan Area.

4.16.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.17 Policy: LSC1: Landscape, Setting and Character

“Development proposals which are visually attractive and can demonstrate how they will contribute positively to the quality of the area throughout the lifetime of the development will be supported.

This means:

- *The design, setting and materials should be informed by the defining characteristics of its local character areas as described in The State of the Parish Today;*
- *The design, setting and materials should respect the key positive features of the approaches to Great Dunmow as described in The State of the Parish Today;*
- *Scoring a Green against criteria 5 and 6 in the Building for Life (BfL12) Assessment.*

Where a landscape character assessment is required, the assessment will consider the landscape, setting and character of the existing development in the vicinity and also of the town of Great Dunmow as a whole. It will carefully explain the impact of the proposed development on these factors.”

Table 25: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓✓	✓	0	0	0	0	0	0	0
Medium Term	✓✓	✓	0	0	0	0	0	0	0
Long Term	✓✓	✓	0	0	0	0	0	0	0

4.17.1 Significant Effects

There will be significant positive impacts on landscape (SO1) where the policy seeks to actively enhance the street scene and/or landscape in regards to new development and the requirements for proposals put forward. There will also be positive impacts on cultural heritage (SO2) where the policy seeks to actively maintain and enhance the district’s cultural heritage, assets and surroundings.

4.17.2 Temporal Effects

No changes anticipated over time.

4.17.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on landscape, setting and character. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative LSC1	✓	✓	0	0	0	0	0	0	0

The alternative approach would have similar impacts as the preferred policy LSC1, where requirements to preserve the existing landscape already exist as part of wider planning policy as set by the LPA. Impacts will however not be as specific to the Plan Area regarding landscapes (SO1) under the alternative approach and as such the alternative has been rejected in favour of a more locally focussed policy.

4.17.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.18 Policy: LSC2: Important Views

“The following views in Great Dunmow are designated for protection and planning permission will be refused for the development proposals that adversely affected them:”

View 1: View of the Chelmer Valley North – a view of a rural landscape and the Chelmer Valley.

View 2: View from Church End – a view of a rural landscape and the Chelmer Valley.

View 3: View of Church End – an impressive all-round view of the dominating church tower.

View 4: View of Brick Kiln Farm from St. Edmund’s Lane – a view of a rural landscape.

View 5: View of the agricultural landscape edge to the East.

View 6: View down Braintree Road – a sweeping view down the hill towards a rural landscape.

View 7: View South of Ongar Road – a view of a rural landscape.

View 8: View of Olive’s Wood – a view of woods, bluebells, and a rural buffer before the A120.

Development proposals falling within these views will be expected to be accompanied by a Visual Impact Assessment.”

Table 26: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓✓	✓	0	0	0	0	/	0	0
Medium Term	✓✓	✓	0	0	0	0	/	0	0
Long Term	✓✓	✓	0	0	0	0	/	0	0

4.18.1 Significant Effects

There will be significant positive impacts on landscape (SO1) and positive impacts on cultural heritage (SO2) as a result of the policy and its stance on protecting important views; many of which

are reflective of the historic environment. There will be uncertain impacts on housing delivery where the policy could be seen to limit the potential of housing development in the Plan Area. This is not a criticism of the Plan however; as such a policy is unlikely to ever stimulate development by nature.

4.18.2 Temporal Effects

No changes anticipated over time.

4.18.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on important views. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative LSC2	/	/	0	0	0	0	✓	0	0

There would be a positive impact on housing (SO7) as a result of the alternative approach as local housing needs would not be limited to those areas where view have been identified as strategically important. There will be uncertain impacts on landscapes (SO1) and cultural heritage (SO2) through the absence of a policy retaining such features. Such a specific policy direction is not a requirement of any of the Local Planning Authority’s adopted Plan policies however and as such this alternative approach has been rejected in order to focus policy to be specifically relevant to the Plan Area.

4.18.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.19 Policy: LSC3: The Chelmer Valley

“Development will always, where appropriate, seek to enhance and protect the floodplain and the setting of the Chelmer Valley, including the GHQ Line pill boxes. General open spaces in the area of the Chelmer Valley are shown on the following map.

Planning permission will be refused for proposals that adversely affect the character, the floodplain function and the associated open spaces in the Chelmer Valley as shown on the Proposals Map.

Exceptions may be made for the undertaking of essential utility works subject to a clear demonstration of benefits outweighing the harm.”

All planning applications coming forward in or adjacent to the Chelmer Valley must be accompanied by a Landscape Visual Impact Assessment.

Table 27: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓✓	✓	0	✓	0	✓	0	✓	0
Medium Term	✓✓	✓	0	✓	0	✓	0	✓	0
Long Term	✓✓	✓	0	✓	0	✓	0	✓	0

4.19.1 Significant Effects

There will be positive impacts associated with the water environment / biodiversity (SO1), cultural heritage (SO2), minimising flood risk (SO4), open space (SO6) and infrastructure (SO8) as a result of the implementation of this policy. There will also be positive impacts associated with landscape as a result of the requirement of a Landscape Visual Impact Assessment to accompany planning applications in the Chelmer Valley. This will see significant impacts on SO1.

4.19.2 Temporal Effects

No changes anticipated over time.

4.19.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on the Chelmer Valley. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative LSC3	/	/	0	✓	0	/	0	/	0

There would be uncertain impacts on the majority of relevant objectives as a result of the alternative option of not having a specific policy on the Chelmer Valley. It can be assumed however

that minimising the risk of flooding would not have any less an impact in the absence of the policy as such a criterion would still be ensured regardless of the Plan’s scope and content. The Chelmer Valley falls outside the Town Development Area and so any proposed development would not be subject to general development principles / criteria. For this reason an alternative of not including such a policy has been rejected in order to protect and enhance the setting of the valley within the Plan Area.

4.19.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.20 Policy: LSC4: Local Green Space

“This Plan identifies the following areas of important open communal space within Great Dunmow. These are to be retained as essential community and character assets, and are designated as Local Green Space in accordance with NPPF Paragraph 76. Development will only be allowed in very special circumstances where the benefit of the development clearly outweighs any harm and contributes to the function of that site.

- (1) Parsonage Downs (GDTC; Local Wildlife Site);*
- (2) St. Mary’s Church Riverside Walk (Church of England);*
- (3) Recreation Ground (GDTC);*
- (4) Doctor’s Pond and Talberd’s Ley (GDTC);*
- (5) Newton Green (UDC);*
- (6) Area off Stortford Road (UDC);*
- (7) Allotments (GDTC);*
- (8) Scout Grounds (Scouts);*
- (9) Lime Tree Hill (GDTC);*
- (10) Lower Mill Field Open Space (GDTC);*
- (11) Threader’s Green (GDTC).”*

Table 28: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	0	0	0	0	✓✓	0	0	0
Medium Term	✓	0	0	0	0	✓✓	0	0	0
Long Term	✓	0	0	0	0	✓✓	0	0	0

4.20.1 Significant Effects

Implementation of Policy LSC4 is likely to have significant positive impacts on the provision of open

space and recreational facilities (SO6). There will also be positive impacts on landscape and biodiversity (SO1) in more specific circumstances through the identified areas.

4.20.2 Temporal Effects

No changes anticipated over time.

4.20.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on local green space. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative LSC4	/	0	0	0	0	/	0	0	0

There would be uncertain impacts on the relevant objectives regarding health / open space (SO7) and biodiversity / landscape (SO1) in the absence of the policy. The policy is explicit about the protection of specific areas using local knowledge however clearly sets out that analysis of proposals must clearly set out why proposals would outweigh the current benefits on these sites. The alternative of not having a policy on local green space has been rejected to reflect the protection of specific sites in the Plan Area.

4.20.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.21 Policy LSC5: Assets of Community Value

“Assets of Community Value have been listed by Great Dunmow Town Council and approved by Uttlesford District Council. Development proposals that would enhance the community value of an Asset of Community Value (for example, through improved accessibility, e.g. improved pedestrian and cycle access) will be supported. Development proposals that would result in either the loss of or significant harm to an Asset of Community Value will be resisted, unless it can be clearly demonstrated that the operation of the Asset, or the ongoing delivery of the community value of the Asset, is no longer financially viable.”

Table 29: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	✓	0	0	0	✓	0	0	/
Medium Term	0	✓	0	0	0	✓	0	0	/
Long Term	0	✓	0	0	0	✓	0	0	/

4.21.1 Significant Effects

There will be positive impacts on cultural heritage (SO2) and health / open space (SO6) as a result of this policy seeking to protect and enhance assets of community value. There will however be uncertain impacts on economic growth regarding this approach's potential to limit employment development; however the approach is considered suitably flexible regarding its stance on viability.

4.21.2 Temporal Effects

No changes anticipated over time.

4.21.3 Alternatives Considered

No alternative approaches to this policy could be considered reasonable. The approach of LSC5 is clear on its stance regarding assets of community value, both in enhancing, protecting such assets as well as those instances where any loss would be acceptable.

4.21.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.22 Policy: NE1: Identified Woodland Sites

The following ancient woodlands, SSSIs, and sites of high biodiversity value within the Neighbourhood Plan Designated Area have been identified. These sites and their settings are to be protected, and any development which impacts upon them must contribute to rather than detract from their biodiversity and setting value.

- (1) Bigod's Wood (ancient woodland; private; Local Wildlife Site);*
- (2) Ridley Wood (ancient woodland; private; Local Wildlife Site);*
- (3) The Grove (ancient woodland; private);*
- (4) Frederick's Spring (ancient woodland; private);*
- (5) Hogland's Wood (ancient woodland; private; Local Wildlife Site);*
- (6) High Wood (ancient woodland; private; SSSI);*
- (7) Ash Grove / Oak Spring (ancient woodland; private; Local Wildlife Site);*
- (8) Olive's Wood (ancient woodland; private; Local Wildlife Site);*
- (9) Merks Hill and Homelye Wood (ancient woodland; private; Local Wildlife Site).*

Table 30: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓✓	✓	0	0	0	0	0	0	0
Medium Term	✓✓	✓	0	0	0	0	0	0	0
Long Term	✓✓	✓	0	0	0	0	0	0	0

4.22.1 Significant Effects

There will be significant positive impacts on the protection of biodiversity designations (SO1) and cultural heritage (SO2) through the identified woodland sites and their protection.

4.22.2 Temporal Effects

No changes anticipated over time.

4.22.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on identified woodland sites. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative NE1	✓✓	✓	0	0	0	0	0	0	0

There would be identical effects in an absence of policy as the highlighted designations are protected through other means at a higher level. The stance of including policy NE1 is supported however for completeness within the Neighbourhood Plan and commensurate with the detail of other policies. For this reason the alternative of not including has been rejected.

4.22.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.23 Policy: NE2: Wildlife Corridors

This Plan promotes the enhancement of the woodland and wildlife corridors in the Great Dunmow Neighbourhood Plan Designated Area. Wildlife corridors are identified on the map overleaf (a reproduction of Figure 9).

The following improvements to the corridors may be sought from development proposals which impact on these locations:

- *Additional tree corridors to help link the woodland and open space network;*
- *Additional water body (such as a balancing pond) to help link the woodland and open space network.*

The improvements will be sought, as appropriate, on site as part of the development proposal or via S106 contributions.

Table 31: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓✓	0	0	✓	0	✓	0	/	0
Medium Term	✓✓	0	0	✓	0	✓	0	/	0
Long Term	✓✓	0	0	✓	0	✓	0	/	0

4.23.1 Significant Effects

There will be significant positive impacts on biodiversity and landscape (SO1), flooding (SO4) and health / open space (SO6) as a result of the implementation of this policy. There will however be uncertain impacts on infrastructure delivery as a result of the extent of the highlighted areas, and through enhancements being delivered through s106 contributions. The current position on s106 is that contributions should be directly related to the development; and fairly and reasonably related in scale and kind to the development.

4.23.2 Temporal Effects

No changes anticipated over time.

4.23.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on wildlife corridors. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative NE2	/	0	0	/	0	/	0	0	0

There would be uncertain impacts on relevant objectives as a result of the alternative approach. The significance of improving wildlife corridors through new development has been identified as a key improvement opportunity for the Plan Area and as such the alternative has been rejected; a lack of policy would see s106 contributions directed to other uses or potential pooling within the remit of the LPA.

4.23.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.24 Policy: NE3: Street Trees on Development Sites

Where development proposals involve the creation of new streets proposals will be supported where the accompanying landscaping scheme demonstrates opportunities have been maximised for successful tree planting. The landscaping scheme should demonstrate that the right tree for the location is selected in order to secure successful establishment.

When selecting tree species regard should be given to:

- Maximising benefits for biodiversity;
- Prioritising native species, particularly in locations adjacent to wildlife corridors identified in Figure 9 of this Plan;
- Integrating tree planting into a network of habitats alongside the hedgerows planted on site in accordance with NP Policy DS12;
- Managing surface water run off;
- Combating soil erosion;
- Contributing positively to the urban environment.

Developers should decide which type of tree is most appropriate for their development in discussion with local wildlife groups, and may expect the Town Council to put them in touch with these groups on request.

Table 32: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	0	0	✓	0	0	0	0	0
Medium Term	✓	0	0	✓	0	0	0	0	0
Long Term	✓	0	0	✓	0	0	0	0	0

4.24.1 Significant Effects

There will be positive impacts on landscape / biodiversity (SO1) and flooding (SO4) as a result of the policy's implementation.

4.24.2 Temporal Effects

No changes anticipated over time.

4.24.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on street trees on development sites. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative NE3	/	0	0	0	0	0	0	0	0

There would be uncertain impacts on landscape / biodiversity (SO1) as a result of the alternative approach. Such a specific policy direction is not a requirement of any of the Local Planning Authority's adopted Plan policies and as such this alternative approach has been rejected in order to ensure that tree planting and landscaping is specifically in line with the characteristics of the Plan Area.

4.24.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.25 Policy: NE4: Screening

Wherever appropriate, the planting of additional trees should be included in new development schemes.

Development proposals should be accompanied by a landscaping scheme that demonstrates that tree planting has been designed in at the earliest opportunity in the development process. The landscaping scheme should show:

- *Plotted areas for future planting which will be protected from damage by construction activities such as soil compaction;*
- *Species selection with regard to maximising benefits for biodiversity;*
- *Prioritising of native species, particularly in locations adjacent to wildlife corridors identified in Figure 9 of this Plan;*
- *Integration of tree planting into a network of habitats alongside the hedgerows planted on site in accordance with NP Policy DS12;*
- *Managing surface water run off;*
- *Combating soil erosion;*
- *Contributing positively to the urban environment.*

Developers should decide which type of tree is most appropriate for their development in discussion with local wildlife groups, and may expect the Town Council to put them in touch with these groups on request.

Table 33: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	0	0	✓	0	0	0	0	0
Medium Term	✓	0	0	✓	0	0	0	0	0
Long Term	✓	0	0	✓	0	0	0	0	0

4.25.1 Significant Effects

There will be positive impacts on biodiversity / landscape (SO1) and flooding (SO4) as a result of the policy's implementation.

4.25.2 Temporal Effects

No changes anticipated over time.

4.25.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on screening. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative NE4	/	0	0	0	0	0	0	0	0

There would be uncertain impacts on landscape / biodiversity (SO1) as a result of the alternative approach. Such a specific policy direction is not a requirement of any of the Local Planning Authority's adopted Plan policies and as such this alternative approach has been rejected in order to ensure that screening is specifically in line with the characteristics of the Plan Area.

4.25.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.26 Policy: SOS1: Identified Sports Facilities

Planning permission will be refused for proposals that will result in the loss of the following community sporting assets.

- (1) Leisure Centre;*
- (2) Astro turf;*
- (3) Skate Park;*
- (4) Football Pitches, Recreation Ground;*
- (5) Bowls Club;*
- (6) Cricket Club Pitch;*
- (7) Tennis Courts.*

Exceptional circumstances will only be allowed where alternative provision is of the same quality and in the same general location should be secured. Where it is not practical to provide immediate provision, temporary provision will be sought.

Sports' facilities which consist of fields should be designed and maintained to support benefits to biodiversity and wildlife corridors, as per NP Policy NE2.

Table 34: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	0	0	0	0	✓✓	0	0	0
Medium Term	✓	0	0	0	0	✓✓	0	0	0
Long Term	✓	0	0	0	0	✓✓	0	0	0

4.26.1 Significant Effects

There will be significant positive impacts on health / open space and recreational facilities (SO6) as a result of the policy. There may also be minor positive impacts on landscapes (SO1) in specific circumstances. The approach is considered flexible regarding the suitability of land for other uses should alternative provision be of the same quality however further detail may be required to assist developers to determine what would be considered 'in the same general location' regarding exceptional circumstances.

4.26.2 Temporal Effects

No changes anticipated over time.

4.26.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on identified sports

facilities. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative SOS1	/	0	0	0	0	/	0	0	0

There would be uncertain impacts on relevant objectives as a result of the alternative. Although it is likely that such facilities would be protected in the LPAs wider Local Plan, the policy has been included for completeness and commensurate to the level of detail of other policies in the NP. For this reason the alternative has been rejected.

4.26.4 Proposed Mitigation Measures / Recommendations

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.

4.27 Policy: SOS2: Sporting Infrastructure Requirements

Proposals for residential development over 30 units will be required to be accompanied by an assessment of the need for additional sports provision. Where need is identified this should be met through provision of financial contributions and/or as part of the development schemes.

In assessing need the following should be taken into account:

- *Standards of district provision established in the Uttlesford Open Space, Sport Facility and Playing Pitch Strategy 2012;*
- *Existing provision or shortage of provision within the Great Dunmow Neighbourhood Plan area;*
- *Projected population profile of the proposed development.*

The possibility of encouraging an additional sports' centre with substantial swimming pool facility is covered by NP Policy DS3 and Position SOS-A.

Table 35: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	0	0	0	0	✓	0	0	0
Medium Term	✓	0	0	0	0	✓	0	0	0
Long Term	✓	0	0	0	0	✓	0	0	0

4.27.1 Significant Effects

There will be positive impacts on health / open space and recreational facilities (SO6) as a result of the policy. There may also be minor positive impacts on landscapes (SO1) in specific circumstances. The supporting evidence specifies the need for such a policy; however it could benefit from some description in the supporting text as to why the threshold of 30 units is

specifically suitable in the local context.

4.27.2 Temporal Effects

No changes anticipated over time.

4.27.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on identified sports facilities. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative SOS2	/	0	0	0	0	/	0	0	0

There would be uncertain impacts on relevant objectives as a result of the alternative. Although it is likely that such facilities would be delivered as part of the requirements of the LPA’s wider Local Plan, the policy has been included for completeness and commensurate to the level of detail of other policies in the NP. For this reason the alternative has been rejected.

4.27.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.28 Policy: SOS3: Children’s Play Space

Development proposals will be rejected which damage the usability of the children’s play areas identified in this policy via the associated map.

Table 36: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	/	0	0	0
Medium Term	0	0	0	0	0	/	0	0	0
Long Term	0	0	0	0	0	/	0	0	0

4.28.1 Significant Effects

There will be uncertain impacts on the relevant sustainability objective (health – SO6) as it is uncertain how damage would be predicted for the purposes of rejecting any development proposals.

4.28.2 Temporal Effects

No changes anticipated over time.

4.28.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on children's' play space. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative SOS3	0	0	0	0	0	/	0	0	0

There would be uncertain impacts on health (SO6) in the absence of a policy on children's' play space. The alternative of not having a policy direction on the issue has been rejected in line with evidence that historic provision has not been satisfactory.

4.28.4 Proposed Mitigation Measures / Recommendations

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.

4.29 Policy: SOS4: Cemetery Space

The Town Council land shown on the map below is allocated, in accordance with Town Council intentions, for additional space for burials and cremations.

Table 37: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	0	✓	0
Medium Term	0	0	0	0	0	0	0	✓	0
Long Term	0	0	0	0	0	0	0	✓	0

4.29.1 Significant Effects

There will be positive impacts on necessary infrastructure (SO8) by expanding cemetery capacity in the Plan Area. Pending the decisions surrounding any planning application for the land for cemetery use and the suitability of the land in question, the general location can be considered a sensible extension of the existing cemetery space.

4.29.2 Temporal Effects

No changes anticipated over time.

4.29.3 Alternatives Considered

No reasonable alternative sites have been highlighted. The site can be seen as a sensible and proportionate extension of the current cemetery and is currently in ownership of the Town Council. As such the site is viable and as such alternative sites need not be explored within the Plan Area.

4.29.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.30 Policy: GA1: Core Footpath and Bridleway Network

Where development proposals come forward on land that includes a bridleway or footpath, as shown on Figure 11, they will be expected to retain the footpath and bridleway provision, and link this provision to the green spaces of the wildlife corridor network.

Where development proposals come forward on land that includes a bridleway or footpath of the core network, as shown on Figure 41, they will be expected to create or retain, and where practically possible enhance, the footpath and bridleway provision. Upgrades and extensions to routes (the routes preferred by the Flich Way Connection Group and this Plan are illustrated on the map below) must adhere to the following criteria:

- (1) Footpaths (see map) must have permissible cycling provision and signposting;*
- (2) Footpaths (see map) must be constructed with a smooth, hard, all-weather surface in accordance with current best practice;*
- (3) Bridleways (see map) must be constructed with the same standard of surface as for footpaths, with a grass track running alongside it suitable for riding.*

Table 38: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	✓	0	0	✓	0
Medium Term	0	0	0	0	✓	0	0	✓	0
Long Term	0	0	0	0	✓	0	0	✓	0

4.30.1 Significant Effects

There will be positive impacts on sustainable travel / access (SO5) and infrastructure (SO8) through the policy's stance on public rights of way.

4.30.2 Temporal Effects

No changes anticipated over time.

4.30.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on the core footpath and bridleway network. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative GA1	0	0	0	0	✓	0	0	✓	0

There would be positive impacts on relevant objectives through the alternative approach of not having a policy on the core footpath and bridleway network. This is due to a similar policy direction being espoused by Essex County Council in their Development Management Policies document (Policy DM11 – Public Rights of Way). The alternative approach has been rejected however as the NP's policy extends to core footpaths beyond those that are defined public rights of way, and as such has a more locally specific context.

4.30.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.31 Policy: GA2: Integrating Developments (Paths and Ways)

Development proposals which are linked with and well-integrated into the surrounding footpath and bridleway network will be permitted. The footpaths that are provided, with permissible cycling provision and signposting, must provide safer routes to schools, and be in accordance with the relevant criteria in the previous policy (GA1: Core Footpath and Bridleway Network), points (1) and (2). They should also be linked to the green spaces of the wildlife corridor network.

All footpaths provided must be well signposted, including signposting towards the town centre, and must not only service the entire development but must be integral to planning how the new population will travel within the development and to the town centre and other essential services provided in the town, such as schools and health facilities.

Developers should seek advice from the various organisations in Great Dunmow with an interest and expertise in footpath, cycleway and bridleway provision when deciding how and where to locate rights of way in their plans. Developers may expect the Town Council to put them in touch with these groups on request.

Table 39: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	✓	0	0	0	✓	0	0	✓	0
Medium Term	✓	0	0	0	✓	0	0	✓	0
Long Term	✓	0	0	0	✓	0	0	✓	0

4.31.1 Significant Effects

There will be positive impacts on sustainable travel / access (SO5) and infrastructure (SO8) through the policy's stance on integrating developments. There will also be positive impacts associated with biodiversity (SO1) through the policy seeking paths and ways being linked to green spaces of the wildlife network.

4.31.2 Temporal Effects

No changes anticipated over time.

4.31.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on integrating developments. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative GA2	0	0	0	0	✓	0	0	✓	0

There would be positive impacts on access and infrastructure objectives through the alternative approach of not having a policy on integrating developments. This is due to a similar policy direction being espoused by Essex County Council in their Development Management Policies document. This alternative approach has been rejected however as the NP's policy extends to core footpaths beyond those that are defined public rights of way, and as such has a more locally specific context.

4.31.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.32 Policy: HSTC1: Uses and Variety

Where planning permission is required:

- *Development proposals leading to change of use from A1 (retail) to other town centre uses (Classes, A2, A3, A4) will be permitted subject to 35% of the frontage remaining in A1 use;*
- *Development proposals involving the creation of new A5 (hot food takeaway) will be permitted subject to no more than 5% of the primary shopping frontage being in A5 use and no more than 10% of the secondary frontage being in A5 use;*
- *The conversion of ground floor units to residential use in the High Street will not be permitted.*

Table 40: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	/	0	/
Medium Term	0	0	0	0	0	0	/	0	/
Long Term	0	0	0	0	0	0	/	0	/

4.32.1 Significant Effects

There will be uncertain impacts on economic growth (SO9) in regards to retail and housing (SO7) where the policy deviates from what is permitted development as stipulated in The Town and Country Planning (General Permitted Development) (England) Order 2015. 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).

4.32.2 Temporal Effects

No changes anticipated over time.

4.32.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on the variety of uses. This appraisal has not been undertaken where it represents permitted development as per The Town and Country Planning (General Permitted Development) (England) Order 2015.

4.32.4 Proposed Mitigation Measures / Recommendations

It is recommended that the procedures for Article 4 directions, as per Schedule 3 of The Town and Country Planning (General Permitted Development) (England) Order 2015 are followed regarding the removal of those permitted development rights as highlighted in the policy.

4.33 Policy: HSTC2: Coach Park

Development proposals which incorporate a coach park site will be supported subject to:

- *Provision of easy and safe pedestrian access to the Town Centre and*
- *Not being detrimental to the visual and/or environmental character and amenity of the area (i.e. noise, fumes and smell, litter, traffic, general disturbance).*

Proposals to incorporate a Park and Ride car park within the same site would also be supported if the above criteria were met.

Table 41: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	✓	0	0	0	✓
Medium Term	0	0	0	0	✓	0	0	0	✓
Long Term	0	0	0	0	✓	0	0	0	✓

4.33.1 Significant Effects

There will be positive impacts on accessibility (SO5) and economic growth (SO9) as a result of the policy. Impacts are limited where those sites that would be expected to be supported may be equally suitable for other and potentially more financially viable land uses. 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.

4.33.2 Temporal Effects

No changes anticipated over time.

4.33.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on coach park sites. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative HSTC2	0	0	0	0	0	0	0	0	0

There would be no additional impacts from the current baseline position with the absence of a policy on coach park provision. This alternative was rejected however in line with the long standing recommendation of the Great Dunmow Chamber of Trade that the town would benefit from a coach park, as stated in the supporting text of this Neighbourhood Plan policy.

4.33.4 Proposed Mitigation Measures / Recommendations

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.

4.34 Policy: E1: Employment Land

Employment opportunities will be supported and encouraged subject to:

- *Employment land being easily accessible and well connected to the Town Development Area*
- *Not being detrimental to the visual and/or environmental character and amenity of the area (i.e. noise, fumes and smell, litter, traffic, general disturbance).*

Table 42: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	✓	0	0	0	✓
Medium Term	0	0	0	0	✓	0	0	0	✓
Long Term	0	0	0	0	✓	0	0	0	✓

4.34.1 Significant Effects

There will be positive impacts on accessibility to employment uses (SO5) and economic growth (SO9) as a result of the policy and the general locational criteria of employment land. Impacts are limited where those sites that would be expected to be supported in easily accessible and well connected locations are likely to have some level of impact regarding noise and traffic. 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.

4.34.2 Temporal Effects

No changes anticipated over time.

4.34.3 Alternatives Considered

In light of the Plan Area's importance as a market town in the wider district, it can be considered unreasonable to not include a policy on employment land. This position is strengthened through the housing allocations contained within the Plan and the need for supporting employment opportunities. Alternatives to the approach of the policy in allocating land specifically for employment use have not been deemed necessary due to the general mixed-use nature of the allocated sites within the Plan.

4.34.4 Proposed Mitigation Measures / Recommendations

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.

4.35 Policy: E2: Loss of Employment Land

Proposals for the redevelopment or change of use of land or buildings in employment use to non-employment use will not be permitted unless:

- *the existing use can be shown to be no longer financially viable and that*
- *replacement land is available within the Neighbourhood Plan area for any businesses displaced by the loss of the employment site.*

For all other development proposals affecting employment sites, opportunities will be sought to improve employment sites (e.g. through improved public realm, pedestrian access and soft landscaping).

Table 43: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	0	0	✓
Medium Term	0	0	0	0	0	0	0	0	✓
Long Term	0	0	0	0	0	0	0	0	✓

4.35.1 Significant Effects

Policy E2 is likely to result in positive impacts against employment (SO9). The policy could benefit however from having a statement on permitted development rights affecting employment land in different use class orders. This relates to the statement that proposals would not be permitted unless replacement land is available within the Neighbourhood Plan area for any businesses displaced by the loss of the employment site.

4.35.2 Temporal Effects

No changes anticipated over time.

4.35.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on the loss of employment land. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative E2	0	0	0	0	0	0	0	0	/

There would be uncertain impacts on economic growth (SO9) through not having a policy stance on the loss of employment land. The alternative could give rise to the loss of employment land without the supplying of information on the financial viability of the existing use in proposals, which could affect the make-up of employment opportunities in the Plan Area. This approach was rejected in order to maintain Great Dunmow as a thriving economic centre and, moreover, to improve and increase this status within the scope of the Plan.

4.35.4 Proposed Mitigation Measures / Recommendations

The policy could benefit from being supported by a statement on permitted development rights affecting employment land in different use class orders.

4.36 Policy: HE1: Medical Facilities

As UDC continues to allocate sites within developments to allow the implementation of the CCG strategy as it emerges, these allocations will be made – and any facilities brought forward will be built – according to the following strict particulars. Medical facility development will be permitted if the proposals meet the following criteria:

- (1) All medical facilities should be easily accessible by road;*
- (2) All medical facilities should be easily and safely accessible by foot and bicycle;*
- (3) All medical facilities should provide at least two car parking spaces for the exclusive use of patients per doctor or nurse's office or room (used for seeing patients) which will be or can reasonably be expected to be provided within the building;*
- (4) All medical facilities should provide access points for public and private (e.g. voluntary) non-emergency ambulances;*
- (5) All medical facilities must, where practical, be provided with a bus stop within 5 minutes' walk, serviced by the local bus network; and*
- (6) The space allocated for doctor or nurse's offices and for the waiting room and reception will be determined in close cooperation with the CCG and taking full guidance from NHS England Property Services and the doctors' surgeries in Great Dunmow.*

Table 44: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	✓	0	✓	0	0	0	0
Medium Term	0	0	✓	0	✓	0	0	0	0
Long Term	0	0	✓	0	✓	0	0	0	0

4.36.1 Significant Effects

The impact of this policy would be largely positive with regard to pollution (SO3) and accessibility (SO5). No negative sustainability impacts have been identified. It should be noted, regarding parking requirements that those used in the policy respond to those stated in Appendix 1 of the UDC Adopted Local Plan 2005. ECC Parking Standards Design and Good Practice September 2009 revise this to reflect a maximum standard for medical centres at 1 space per full time equivalent staff + 3 per consulting room and this has been adopted by the LPA as an amendment to the Adopted Local Plan 2005. A secondary impact is likely to result in positive impacts on health (SO6) through the provision of medical facilities.

4.36.2 Temporal Effects

None of impacts are identified as changing over time.

4.36.3 Alternatives Considered

Within the scope of the Plan, and evidenced by the supporting text of this policy, it can be considered unreasonable to not include a policy addressing healthcare provision in the Plan Area. As such, the alternative of not including such a policy can be considered unreasonable, particularly in response to the Plan's housing allocations and through consultation with the residents of the Plan Area.

4.36.4 Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations have been proposed.

4.37 Policy: HE12: Secondary School Provision

Applications for new sites and / or extensions will be permitted where the design and construction of said sites and / or extensions meet these criteria:

- (1) Any new site should be easily and safely accessible by foot and bicycle to minimise travelling by car;*
- (2) Any new site should be easily accessible by road;*
- (3) Any new site should provide adequate car parking for the servicing of the school;*
- (4) Any new site should be designed in sympathy with the rural and market town nature of Great Dunmow;*
- (5) Any new site should be serviced by the local bus network;*
- (6) Any new site must have adjacent green space designated and maintained as playing fields; and*
- (7) Any extension must integrate well into the existing footprint and community of the school, and must not deprive the existing site of playing fields. If playing fields are lost by necessity, they must be replaced in kind as an immediate priority, and in a way which will make possible the maximum community use of the facilities.*

Any infrastructure development required as a consequence of any of the above will be sought as an immediate priority planning gain.

Table 45: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	✓	✓	0	✓	✓	0	✓	0
Medium Term	0	✓	✓	0	✓	✓	0	✓	0
Long Term	0	✓	✓	0	✓	✓	0	✓	0

4.37.1 Significant Effects

The criteria of this policy would be largely positive across a range of SEA Objectives, including cultural heritage (SO2), pollution (SO3), accessibility (SO5), open space (SO6) and school capacity (SO8). No negative sustainability impacts have been identified. Nevertheless, the policy or supporting text should acknowledge that the County Council determine planning applications for schools.

4.37.2 Temporal Effects

No changes anticipated over time.

4.37.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on secondary school provision. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative HEI2	0	✓	✓	0	✓	✓	0	✓	0

There would be positive impacts on related objectives as per the preferred policy approach of HEI2 in line with the County Council being the relevant body to determine planning applications for schools in line with relevant UDC policy / strategy. This alternative has been rejected however in order to support UDC's strategy for expanding schools through policy HEI2.

4.37.4 Proposed Mitigation Measures / Recommendations

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.

4.38 Policy: HEI3: Primary School Provision

As UDC continues to support the various stakeholders in developing a strategy for expanding primary school provision, sites will be allocated – and any schools brought forward will be built – according to the following strict particulars. School development will be permitted if the proposals meet the following criteria:

- (1) Any new site should be easily and safely accessible by foot and cycle to minimise travelling by car;*
- (2) Any new site should be easily accessible by road;*
- (3) Any new site should provide adequate car parking for the servicing of the school;*
- (4) Any new site should be designed in sympathy with the rural and market town nature of Great Dunmow;*
- (5) Any new site should be serviced by the local bus network; and*
- (6) Any new site must have adjacent green space designated and maintained as playing fields, with sufficient outdoor space to accommodate a full range of child centred activities and to encourage physical activity.*

Table 46: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	✓	✓	0	✓	✓	0	✓	0
Medium Term	0	✓	✓	0	✓	✓	0	✓	0
Long Term	0	✓	✓	0	✓	✓	0	✓	0

4.38.1 Significant Effects

The criteria of this policy would be largely positive across a range of SEA Objectives, including cultural heritage (SO2), pollution (SO3), accessibility (SO5), open space (SO6) and school capacity (SO8). No negative sustainability impacts have been identified. Nevertheless, the policy or supporting text should acknowledge that the County Council determine planning applications for schools.

4.38.2 Temporal Effects

No changes anticipated over time.

4.38.3 Alternatives Considered

An alternative approach considered reasonable would be to not have a policy on primary school provision. The appraisal of this alternative is as follows:

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Alternative HEI2	0	✓	✓	0	✓	✓	0	✓	0

There would be positive impacts on related objectives as per the preferred policy approach of HEI2 in line with the County Council being the relevant body to determine planning applications for schools in line with relevant UDC policy / strategy. This alternative has been rejected however in order to support UDC's strategy for expanding schools through policy HEI2.

4.38.4 Proposed Mitigation Measures / Recommendations

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.

4.39 Policy: HEI4: Conversion to Educational Use

"This Plan supports proposals to convert existing buildings to an educational use (such as a free school or an extension or satellite to an existing school), provided the site meets these criteria:

- (1) Any converted site should be easily and safely accessible by foot and bicycle to minimise travelling by car;*
- (2) Any converted site should be easily accessible by road;*
- (3) Any converted site should provide adequate car parking for the servicing of the school;*
- (4) Any converted site must retain the positive aspects of its character, and remain in sympathy with the rural and market town nature of Great Dunmow, even as its design is optimised for its new use;*
- (5) Any converted site should be serviced by the local bus network;*
- (6) Any converted site must have easy access to green space designated and maintained as playing fields;*
- (7) Where the identified building is a listed building, it should be capable of conversion without loss of its architectural or historic interest."*

Table 47: Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	✓	✓	0	✓	✓	0	✓	0
Medium Term	0	✓	✓	0	✓	✓	0	✓	0
Long Term	0	✓	✓	0	✓	✓	0	✓	0

4.39.1 Significant Effects

The impact of this policy would be largely positive across a range of SEA Objectives, including cultural heritage (SO2), pollution (SO3), accessibility (SO5), open space (SO6) and school capacity (SO8). No negative sustainability impacts have been identified.

4.39.2 Temporal Effects

No changes anticipated over time.

4.39.3 Alternatives Considered

Where the policy indicates support for proposals in line with the criteria being met, and with the criteria pertaining to general principles of sustainable development, no alternatives have been considered reasonable or distinct enough to be considered.

4.39.4 Proposed Mitigation Measures / Recommendations

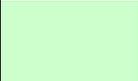
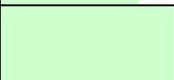
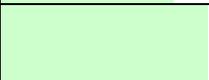
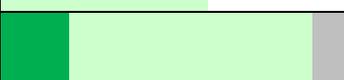
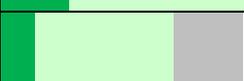
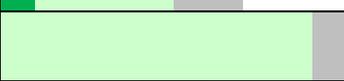
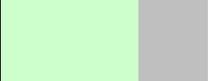
No mitigation measures or recommendations have been proposed.

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

5.1 Cumulative and synergistic effects

This 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.

Table 48: 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	
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 policies supporting and strengthening each other, particularly 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.

6 The cumulative and synergistic effects of the site allocation policies

The following section looks at the cumulative and synergistic effects of the site allocations as set out in the following policies. For the purposes of this section, the quantum 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 [to be displayed as LABL for the purposes of this section] 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, 1,400m² 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

It should be noted that some sites (specifically those responding to Policies DS4, DS5, DS7 and DS8) 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 the Steering Group 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.

6.1 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.

6.2 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.

6.3 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.

6.4 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.

6.5 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.

6.6 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.

6.7 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.

6.8 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.

6.9 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.

6.10 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.

7 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 options 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 represent alternatives sites and are assessed in the following table.

Table 49: 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?	+	+	+	+	+	+	+	+	+	+
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	+	/	/	-	+	/	/	+	+	+

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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	-	-	-	+	-	-	-	-	-	-

7.1 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.

8 Conclusions and Recommendations

8.1 The Plan's non-site allocation policies

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

Table 50: General performance of the Plan's non-site allocation policies

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

Policy	SEA Objectives								
	1	2	3	4	5	6	7	8	9
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

8.1.1 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.

8.2 The Plan's site allocation Policies

8.2.1 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	
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.

8.2.2 Policy: DS3: TDA: Land South of Stortford Road

Land South of Stortford Road

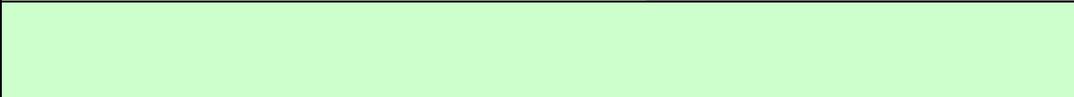
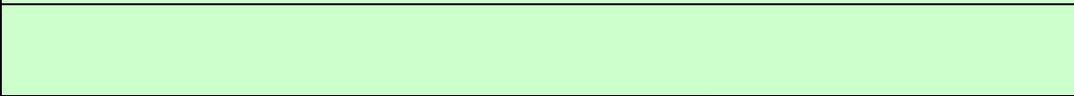
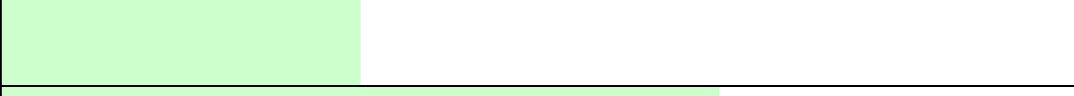
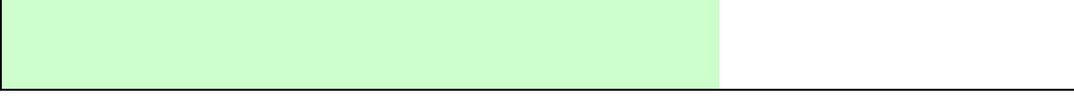
Sustainability Objective	Extent of impacts		
1 Biodiversity / Landscape			
2 Cultural Heritage			
3 Pollution			
4 Flooding and water			
5 Sustainable Travel			
6 Health and Open Space			
7 Appropriate Housing			
8 Infrastructure			
9 Economy / Town Centre			

- 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	
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 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.

8.2.3 Policy: DS4: TDA: Land West of Woodside Way

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, Grey
5 Sustainable Travel	Light Green, Red
6 Health and Open Space	Light Green, Red
7 Appropriate Housing	Light Green
8 Infrastructure	Light Green, Red
9 Economy / Town Centre	Light Green

- 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.

8.2.4 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	
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

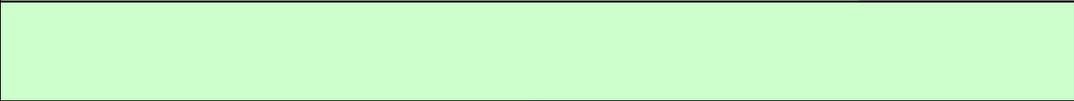
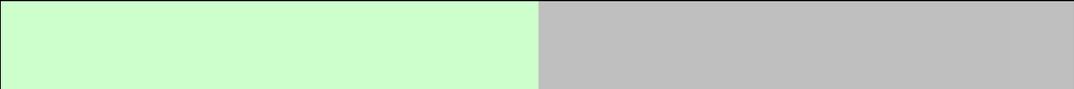
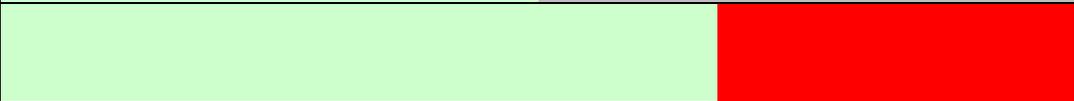
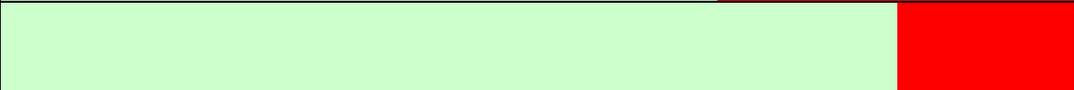
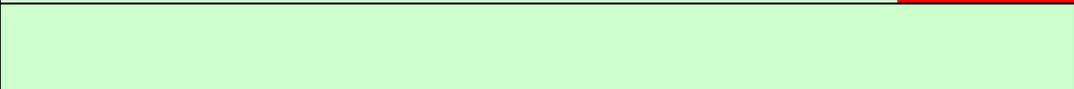
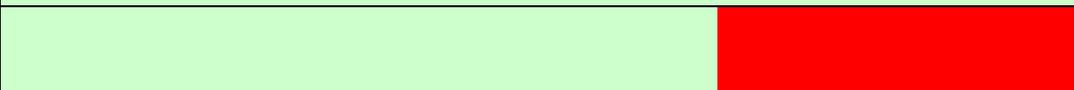
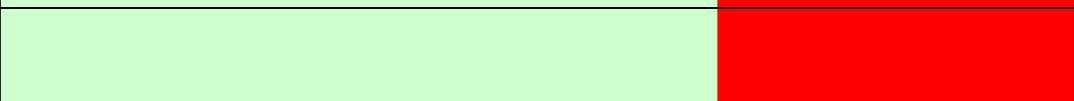
nearest primary school. Of these negative impacts, it should be noted that none are significant.

- 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.

8.2.5 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.

8.2.6 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.

8.2.7 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			
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.

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

Planning Policy Team

Council Offices

London Road

Saffron Walden

Essex

CB11 4ER

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Place Services Team at Essex County Council
You can contact us in the following ways:

Visit our website:
placeservices.co.uk

By telephone:
03330 136 840

By email:
enquiries@placeservices.co.uk

By post:
Place Services, Essex County Council
PO Box 11, County Hall, Chelmsford, Essex, CM1 1QH

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