
Revised SA Report (Dec 2018) Summary of Representations

Introduction

A revised SA Report (Exam Ref:104.20) and Non-Technical Summary (NTS) (Exam Ref:104.21) for the Regulation 19 Pre-Submission Local Plan was published for consultation on 14 January 2019 for six weeks. The Council received eighty-nine representations from a range of stakeholders; including statutory consultees, landowners/ development promoters and the public. A summary of the key issues raised through these representations and the Council's initial response, informed by AECOM's advice, is provided below.

Statutory consultees

Natural England

Natural England raised the following key issues:

- Suggests that SA Objective 1 should widen its scope and extend to European designated sites, in addition to national designations.
- Welcomes reference to the Epping Forest SAC and the acknowledgement of the ongoing discussions on the air quality impacts associated with developments in and around Epping Forest SAC.
- Welcomes the further inclusion of the Hatfield Forest SSSI in the revised SA Report and the acknowledgement that development within the Zone of Influence (Zol) for the SSSI will have the greatest potential for significant negative effects.
- Advise that the Zol for recreational impacts on Hatfield Forest SSSI should now be 14.6km to reflect the findings of summer visitor surveys.
- Disagrees with the conclusion that the GCs will have no significant negative effect on Hatfield Forest SSSI and NNR.
- An assessment should be made of the impacts of proposed development on air quality and the effects this might have on Hatfield Forest SSSI and NNR.
- Suggests that an indicator is included under SA Objective 7 (Reduction in pollution) to monitor the condition status of relevant designated site/habitat and species features, accounting for suitable air quality thresholds.
- An assessment on the Essex Coast Recreational Disturbance and Mitigation Strategy (RAMS) has not yet been undertaken. Understood that further work is to be undertaken on this through the HRA process and we would expect this assessment to also be appropriately reflected within the SA.

UDC's initial response

SA Objective 1 includes the consideration of European and nationally designated sites. This is demonstrated through reference to Epping Forest SAC and SSSIs in the appraisals, as well as direct reference to the findings of the HRA process for the Local Plan.

At the time when the revised SA Report was produced the emerging Zol for recreational impacts on the Hatfield Forest SSSI was 10.4km. It is noted that this has now been extended to 14.6km and this change will need to be taken into consideration as part of any further SA work. The appraisal of alternatives, including GC options, presented in Appendix V of the SA Report takes the Zol for the Hatfield Forest SSSI into account, albeit a Zol of 10.4km based on emerging evidence at that time. The appraisal of the Local Plan presented in Chapter 10 of the SA Report also refers to the emerging Zol for the Hatfield Forest SSSI. The appraisal concludes that, once mitigation is taken into account, the proposed GCs will have a residual

long-term minor negative effect on SA Objective 1 (Biodiversity). In paragraph 10.17, the SA Report states that, *“In line with advice from Natural England, it is recommended that the Local Plan includes a requirement for all development located within the emerging ZoI to provide contributions towards the delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest”*. The Council awaits sight of the updated report referenced in Natural England’s representation, and will consider the recommendation once the report is received.

The SA Report does give consideration to the potential for proposed development to increase traffic along the B1256 and therefore increase atmospheric pollution at Hatfield Forest SSSI and NNR. The appraisal of spatial strategy options in Appendix V states that development to the south of the A120 is most likely to increase the number of vehicles along the B1256, particularly around Takeley as traffic would drive along the B1256 past Hatfield Forest to access the A120 and M11. The appraisal therefore identifies that Options 2b and 3 are less preferred as they propose additional growth at Takeley as well as a greater level of growth south of the A120. The appraisal for growth options at Takeley in Appendix V also indicates that a higher level of growth in this location is likely to increase traffic along the B1256 and therefore have impacts on the air quality at the SSSI and NNR.

The Transport Study (2018) indicates traffic from the Easton park GC will use the A120 rather than the B1256. The Easton Park GC has direct access onto the A120 that is 70mph limit/ free flow design whereas the B1256 has in places a 30mph limit/ traffic lights. Between the M11 J8 and the A120 junction west of Great Dunmow where Easton Park GCs main access is proposed, the stress plans for the B1256 stay green for the whole plan period even with additional traffic generated as a result of the GC. Taking this evidence into account and that only a small proportion of the SSSI/ NNR is within 200m of the B1256, it is considered unlikely that the Local Plan will have a significant effect on air quality at Hatfield Forest SSSI as a result of increased traffic.

Policy EN7 in the draft Local Plan requires development proposals that cause significant harm to a biodiversity interest to provide adequate mitigation measures. The Council would expect any planning application where there is the potential to have air quality impacts on Hatfield Forest to address these policy requirements.

The HRA Report is being updated to reflect the recently completed Essex Coast RAMS. The findings of this work will be reflected in any future reports published as part of the SA process. It should be noted that only two allocations proposed within the Local Plan at this stage fall within the ZoI. Policy FEL 3 already has planning permission and is being built-out so there is no opportunity to charge a tariff payment to the RAMS. FEL 2 falls within the ZoI and will need to contribute a tariff payment to the RAMS for the Essex Coastal European sites.

Environment Agency

The Environment Agency are generally supportive of the SA. The EA notes that there is the potential for significant improvements to the WFD status of rivers in the District as none are achieving good or better ecological or biological status. The SA currently fails to identify a methodology for measuring the enhancement of water quality across the delivery of the Local Plan. There is an assumption that development management will deliver strategic improvements without tangible targets.

UDC’s initial response

Noted, Policy EN12 supports development *“where it is designed to minimise consumption of water, protect and enhance water quality and protect water resources”*. It is difficult for the SA process to identify specific opportunities for water quality enhancement at this stage as the precise layout and design of development is not known and further detailed investigations and assessments will be carried out. An indicator will be included under SA Objective 2 that relates to WFD status, including chemical and ecological or biological status. The detailed WCS published in Jan 2019 and signed off by the EA refers to WFD status/ good status not initially met for the Easton Park GC but can be met going forward via planning policies.

Historic England

Historic England raised the following key issues:

- The fact that revised SA work is considered necessary at this stage in and of itself demonstrates shortcomings in what is meant to be an iterative process undertaken throughout the Plan preparation process.
- Reiterates concerns in relation to the site selection methodology. The Council has relied only on sites coming through the Call for Sites process, broader areas for growth should have also been considered due to historic environment constraints.
- The revised SA Report states that areas were excluded from consideration in 2015 if they included significant constraints, such as Registered Parks and Gardens. This however was clearly not the case as Area of Search 7 clearly includes Easton Lodge RPG.
- The appraisal of the Local Plan in Chapter 10 does not fully explore the potential impacts of the North Uttlesford GC on various archaeological sites and scheduled monuments.
- Broadly agree with the conclusions in paragraph 10.61 that states that development proposed through the Local Plan will 'inevitably significantly change the landscape and townscapes of areas within the district'... 'the policies are likely to reduce the extent of the negative effects identified'.
- While it is agreed that the impact will in part depend on the precise design and layout etc of new development, given its scale and its location in areas that are highly sensitive in terms of the historic environment the impact would clearly be negative. The report optimistically concludes that development will lead to 'at least a residual minor negative effect given the scale of growth proposed within a rural historic setting'. This conclusion underplays the likely extent of the impact, which is likely to be more than a residual minor negative effect.
- Of the GC options, HE rank Option 1 (North Uttlesford) last, below Option 3b, not of equal rank as indicated in Chapter 8 and Appendix V.
- Repeat request for additional monitoring indicators be included.

UDC's initial response

There are numerous examples of where further SA work, which includes the re-consideration of alternatives, has been carried out late in the plan-making process in order to either rectify earlier deficiencies or take account of new evidence. An objective and comparative appraisal of reasonable alternatives has been carried out based on current evidence with the findings presented in the revised SA Report. The Council concluded, based on the findings of the revised SA Report and updated wider evidence, that the preferred approach was still valid in light of the identified reasonable alternatives. As a result, it was not considered necessary by the Council to amend the Local Plan and undertake further consultation alongside the revised SA Report.

The Council pro-actively explored broad areas for growth in 2015 through the identification and assessment of Areas of Search for new settlements as well as for growth areas around towns and villages. The initial call for sites exercise was not completed/ published until February 2016. As a result, the Areas of Search identified and appraised through the SA process and considered in 2015 were not based on sites submitted through the call for sites process. This is made clear in the Preparing a Justified Local Plan Document published in July 2015. Paragraph 3.3 states, "*Maps of submitted sites are currently being prepared and the information submitted typed up. These will then be assessed as part of the standard methodology set out in the Strategic Housing Land Availability Assessment (SHLAA). It should be noted that the Areas of Search exercise has not been led by consideration of whether or not sites are available. Further SHLAA sites may be submitted at any time throughout the process*".

The identified AoS in some cases, in particular for new settlements, covered extensive areas so were clearly not based on sites submitted through the initial call for sites process. The rural area beyond the thirty-three identified AoS was screened out by the Council for being too remote from settlements and the facilities/ services they provide as well as transport corridors. This is explained in paragraph 2.15 of the Preparing a Justified Local Plan Document published in July 2015. Further to the AoS, the Council also explored four high-level strategic scenarios in 2015 that were also not based on site options identified through the call for sites process. These were presented in the Preparing a Justified Local Plan Document (2015) and included Scenarios (B, C and F) that focussed more growth at existing settlements, including Saffron Walden and

Great Dunmow, and proposed no new settlements. This is explained further within Part 1 of the revised SA Report, in particular Chapter 5.

The text in Paragraph 2.18 of the NTS and Paragraph 5.6 and 8.17 of the SA Report need some additional clarification. The Preparing a Justified Local Plan Document published in July 2015, identified five high-level assumptions to be used as a starting point for the identification of AoS. One of these was the exclusion of areas with special protection, for example Registered Parks and Gardens and Sites of Special Scientific Interest. These assumptions were just used as a starting point, the Council consulted key stakeholders to determine if there were any areas that should be excluded from consideration. Historic England suggested that Audley End Registered Park and Garden be excluded, and Natural England suggested that Hatfield Forest SSSI be excluded from consideration. As a result of the representations received from HE and NE, the area to the North East of Great Chesterford was included for further consideration.

Disagree with the assertion that the appraisal of the Local Plan in Chapter 10 does not properly explore the potential impacts of the North Uttlesford GC on various archaeological sites and scheduled monuments. The SA process has explored all reasonable alternatives to development at the North Uttlesford GC. The revised SA Report sets out in Chapter 8 how the evidence is brought together in order to establish reasonable district-wide spatial strategy alternatives including reference to heritage - designated and non-designated assets. Chapter 8 re-considers the potential for existing Towns and certain Type A and B villages to accommodate additional growth. The appraisal of these options, presented in Appendix and summarised in Chapter 8, which includes consideration of designated and non-designated heritage assets, found that all the identified spatial strategy options had the potential for a significant negative effect on the historic environment.

A proportionate appraisal of the Local Plan is presented in Chapter 10 of the revised SA Report. This highlights the designated heritage assets and historic environment sensitivities within and surrounding the North Uttlesford GC site including both designated and non-designated assets. Based on the evidence available - including the Heritage Impact Assessments (May 2018), Archaeological Addendum notes for North Uttlesford, Easton Park, West of Braintree GCs (June 2018) and Archaeological Impact Assessments (July 2018) for the GCs - mitigation provided through Local Plan policies as well as available at the project level a judgement was made that the residual effect of the Local Plan would be minor negative on the historic environment in the longer-term. However, the appraisal recognises that there is a degree of uncertainty until the precise design and layout is known and is also dependent on implementation of mitigation. It should be noted that more detailed Heritage Impact Assessments (HIAs) for the GCs have been carried out and were published in January 2019. The HIAs provide an assessment of the sensitivity of the North Uttlesford GC in terms of built heritage and archaeology as well as sets out detailed mitigation measures to reduce the significance of any impacts. The findings of any future SA work will take account of the HIA published in January 2019. There is no requirement for Local Plans to be accompanied by detailed HIAs that include consideration of below ground non-designated assets.

Note that HE considers that GC Option 1 (North Uttlesford GC 5,000 new homes) is likely to perform worse than Option 3b (Easton Park GC 10,000 homes) against SA Objective 5 (Historic Environment). However, based on the findings of the HIA published in January 2019, it is not considered necessary to revise the rank of the GC options. Furthermore, amending the rank of GC Option 1 from 4 to 5 does not significantly affect the findings of the SA work.

Additional monitoring indicators will be included and identified under SA Objective 5 in the SA Adoption Statement that will be published on adoption of the Local Plan.

South Cambridgeshire District Council

The main issues raised by South Cambridgeshire District Council are set out below along with an initial response:

1. SCDC's Reg 19 representations made reference to the June 2018 Sustainability Appraisal in regard to the transport impacts, landscape impacts, and heritage impacts of the NUGC proposal. The new Sustainability Appraisal continues to identify (in Sustainability Objectives 3 and 5) that the NUGC will have significant adverse impacts on landscape character (pages 398 and 399 of the new SA); and on heritage assets and their settings (from page 401 of the new SA) and yet in both instances it cannot point to any new evidence to demonstrate that these impacts can be effectively and appropriately mitigated. The concerns regarding these matters made in the SCDC's Reg. 19 representations remain unchanged.

UDC's initial response

The appraisal of spatial strategy options presented in Appendix V found that there is the potential for a significant negative effect on the landscape and historic environment as a result of all the identified reasonable spatial strategy alternatives. The appraisal of the Local Plan, including proposed GCs, is presented in Chapter 10 of the revised SA Report and this was informed by numerous detailed evidence-based studies - including the Transport Study, Heritage Impact Assessments and Landscape and Visual Appraisals for each GC. The appraisal concluded that the Local Plan is likely to have a residual minor negative effect in terms of traffic and the historic environment. More detailed HIAs have now been produced and were published in January 2019, these indicate that mitigation is possible and will be taken into account as part of the iterative SA process.

Given the rural nature of the district and the site options that are available/ suitable, meeting the needs of the district will inevitably result in long-term negative effects on the landscape. The Local Plan includes policies to avoid and minimise these impacts and it is likely that residual effects can be reduced further once the precise design and layout of development is known and project level assessments, including Environment Impact Assessment (EIA) for the GCs, have been carried out that will allow for more detailed mitigation measures to be set out.

2. The new Sustainability Appraisal appears to rely on its findings that other spatial options are just as bad or worse in regard to these SA objectives. This may or may not be correct but in any event the impacts of NUGC must be considered in the context of its ability to deliver sustainable development and whether there will be effective mitigations available given the significant adverse impacts in regard to landscape and heritage of which there can be no certainty that appropriate mitigation can be achieved.

UDC's initial response

The SA concluded that all of the identified spatial strategy options have the potential for a significant negative long-term effect on SA objectives relating to the landscape and historic environment. The appraisal of the Local Plan in Chapter 10 identified the potential for both negative as well as positive effects as a result of proposed development. It takes into account the mitigation provided through Local Plan policies and identified within wider evidence base documents, including the HIAs and Landscape and Visual Appraisals for GCs. There is inevitably an element of uncertainty at this stage as the precise layout and design of development is not known. It is likely that residual effects can be reduced further once the precise design and layout of development is known and project level assessments, including EIAs for the GCs, have been carried out that will allow for more detailed mitigation measures to be set out. The SA is proportionate, meets the requirements of the SEA Regulations and is in line with extant guidance and best practice.

3. SA objective 7 concerns pollution, and yet there is still no reference to the impact of light pollution arising from the elevated location of the NUGC development. This failing of the June 2018 SA continues in the new SA. The NPPF 2012 is clear that light is a form of pollution, see paragraph 120 and the definition of pollution in the glossary. Because of this the merits of the different Garden Community locations (and indeed other spatial options) in regard to their differential impacts on amenity arising from light pollution have not been considered in the new SA.

UDC's initial response

Firstly, it should be noted that light pollution is not included as a key question under SA Objective 7 within the SA Framework (please refer to Table 3.1 in the revised SA Report). The SA Scoping Report was published for consultation in 2015 and none of the representations received suggested that the SA framework should be amended to include a reference to light pollution.

The impacts of development on traffic and resultant effects on air quality have been raised as key issues by stakeholders at each stage in plan-making. As a result, a judgement was made that the appraisal of alternatives under SA Objective 7 (presented in Appendix V) should focus on atmospheric pollution as the key issue to help differentiate between the options. Ultimately, the consideration of light pollution within the appraisal of GCs and spatial strategy options is unlikely to result in any changes to the nature and significance of effects or the ranks identified against SA Objective 7.

The appraisal of the Local Plan is presented in Chapter 10 of the revised SA Report. The appraisal under SA Objective 7 (reduce and control pollution) makes a specific reference to Policy EN18, which sets out criteria to manage the effects of light pollution arising from development. This includes ensuring that "it does not have an unacceptable adverse impact on neighbouring uses or the wider landscape", "the alignment of lamps and provision of shielding minimises spillage, glare and glow, including into the night sky", and "the level of lighting and its period of use is the minimum necessary for security and operational purposes". This policy was taken into account and the SA concluded in paragraph 10.84 that there is the potential for a residual minor negative effect as a result of the Local Plan against SA Objective 7.

4. SA objective 9 concerns sustainable travel and SA objective 13 infrastructure provision (pages 406 and 411 of the new SA). In both cases when considering the NUGC proposal no significant impacts are identified. However in both cases no realistic mitigation measures are identified which could help the development secure this assessment. No assessment is made as to the deliverability of new transport infrastructure in the new SA. Our concerns regarding the provision of infrastructure necessary to support the NUGC remain unchanged.

UDC's initial response

The SA is informed by the evidence available at that time, including the Transport Study and IDP. It is not the purpose of the SA to assess the deliverability of new infrastructure, which is an issue for plan-making and other evidence base documents. The appraisal of the Local Plan, including proposed GCs, is presented in Chapter 10 of the revised SA Report. It recognises in Paragraph 10.117 that given the rural nature of the district new residents, including those within the GCs, are likely to look outside of the district to access wider services and employment (e.g. within Cambridge, Bishop's Stortford or Braintree) with the potential for cross-boundary negative effects on traffic, highways infrastructure and parking. Taking account of mitigation proposed through Local Plan policies, in particular Policy TA4, and the improvement measures set out within the Transport Strategy (Transport Study Addendum 2017) the appraisal concludes in Paragraph 10.119 that there is the potential for a residual minor negative effect against SA Objective 9. However, it is recognised in Paragraph 10.118 that additional complementary highway improvements and sustainable transport measures may need to be identified through the planning application process for delivery by developers.

Other stakeholders

The key issues raised through other representations are summarised below along with our initial response. It should be noted that a response to each individual representation has not been provided, in a significant number of cases the comments do not directly refer to the revised SA Report or relate to differences of opinion as to the nature and significance of effects.

The main issues raised by other stakeholders include:

1. The appraisal makes optimistic assumptions about the benefits of GCs and correspondingly negative assumptions about the alternatives;
2. The revised SA is not clear if it considers the whole of the West of Braintree GC;
3. The revised SA Report is not objective and just an attempt to justify the existing preferred strategy;
4. The SA should consider spatial strategy options with the delivery of just one or two GCs;
5. The SA is not compliant as it was still on consultation when the plan was submitted;

6. The revised SA does not consider the impacts of aircraft noise linked from Stansted Airport;
7. Development to the south of Takeley could provide a new primary school;
8. The revised SA fails to take account of the Welcome Genome's development proposal, MoD Carver Barracks;
9. The revised SA only considers strategic employment options and should consider a more dispersed strategy for the delivery of new employment; and
10. The revised SA Report does not address the short comings identified in the review produced by AECOM.

UDC's initial response

1. The appraisal makes optimistic assumptions about the benefits of GCs and correspondingly negative assumptions about the alternatives;

The appraisal of spatial strategy options presented in Appendix V and summarised in Chapter 8 was based on the evidence available at the time and assumptions are set out where necessary. Based on the evidence and taking the baseline into account professional judgement was used to determine if there was likely to be a significant effect and to highlight if there were any significant differences between the options. The appraisal assumed that all development has the potential for deliver new or improved infrastructure, but the GCs offer a critical mass that is likely to deliver significant improvements over and above smaller scale development situated on the edges of existing settlements, in particular the villages where there is limited access to services/ facilities. The appraisal recognises that some of these villages have train stations and this reflected within the judgements made in Appendix V.

2. The revised SA is not clear if it considers the whole of the West of Braintree GC;

The appraisal of GC options and spatial strategy options presented in Appendix V and summarised in Chapter 8 are based on the total delivery at each GC, including any development post plan period and in areas outside of the District. The appraisal of the Local Plan in Chapter 10 also takes account of the development being delivered at the GC both during and beyond the plan period.

3. The revised SA Report is not objective and just an attempt to justify the existing preferred strategy;

The revised SA Report was produced by an independent consultancy with a specialism in SA. The findings of the appraisal of reasonable GC options and spatial strategy options were presented to the Council in a revised SA Report. The Council then determined that their preferred approach was still valid in light of the identified reasonable alternatives and the revised SA findings, including updated wider evidence.

4. The SA should consider spatial strategy options with the delivery of just one or two GCs

This issue is addressed in Paragraph 8.165 of the SA Report, which states:

"It could be argued that additional options should be explored that include the delivery of just one or perhaps two of the three GC options. Particularly given Historic England's objection to the North Uttlesford GC in response to the Regulation 19 Pre-submission Local Plan. However, it is important to note that a comparative and independent appraisal of the three GC options has been carried out and this included variations in the total scale of growth that might be delivered at each of the options where feasible. The summary appraisal findings are presented earlier in Chapter 8 and the detailed appraisal tables provided in Appendix V and this worked informed the development of the spatial strategy options. Furthermore, the four identified alternative spatial strategy options allow the SA to evaluate the likely significant effects and explore the differences between options that focus less or no growth at the GCs compared to increased growth and the district's towns and villages. It is therefore not considered necessary to identify and appraise any additional options."

A spatial strategy option including the delivery of just one or two of the GCs would require additional growth to be directed to the existing settlements. The likely significant effects and trade-offs of directing more growth to the existing settlement was explored through the appraisal of spatial strategy options in Appendix V and summarised in Chapter 8. Identifying additional spatial strategy options would be unlikely to result in the identification of any new or significantly different effects than already identified in Appendix V. As noted in paragraph 8.156 of the SA Report, there could be any number of different permutations of spatial strategy alternatives. However, it is important that the alternatives are suitably distinct in order to allow a meaningful

appraisal to be carried out. Just because this appraisal work could, in theory, be undertaken does not mean that it is necessary for the SA to be legally compliant.

5. The SA is not compliant as it was still on consultation when the plan was submitted

There are numerous examples of where further SA work, which includes the re-consideration of alternatives, has been carried out late in the plan-making process in order to either rectify earlier identified deficiencies or to take account of new evidence. The Inspector for the NEA Local Plans noted in his Post-Hearing Letter (June 2018) stating:

“In making these suggestions I rely on the principle that deficiencies in SA may be rectified, or “cured”, by later SA work, established in the Cogent Land case and restated by the Court of Appeal in No Adastral New Town Ltd¹.

Provided that the alternative spatial strategies are assessed objectively and with due regard to the evidence base, the second stage assessment should provide a sound basis for the selection of a preferred spatial strategy for the Plan (which may or may not include GCs)”.

An objective and comparative appraisal of reasonable alternatives has been carried out based on current evidence with the findings presented in the revised SA Report. The Council concluded, based on the findings of the revised SA Report and updated wider evidence, that the preferred approach was still valid in light of the identified reasonable alternatives. As a result, it was not considered necessary by the Council to amend the Local Plan and undertake further consultation alongside the revised SA Report.

6. The revised SA does not consider the impacts of noise of aircraft from Stansted Airport.

The appraisal of site options presented in Appendix IV (starting on Pg. 299) includes the consideration of the Stansted Airport Public Safety Zone as well as noise contours. It should also be noted that the Council's SLAA included consideration of noise pollution.

7. Development to the south of Takeley could provide a new primary school;

In line with guidance provided by Essex County Council the SA assumed that a development of 750 dwellings would be required to deliver a primary school. Assuming the delivery of a primary school (as per Application UTT/16/3565/OP) under Option 2 (south of Takeley) to meet identified needs, it is likely that the appraisal against SA Objectives 6, 9, 10, 14 would need to be amended. The ranks of both options against these objectives would be the same and the nature and significance of effects against SA Objective 14 would need to be amended to significant positive for Option 2 so that it is consistent with Option 1. The outline reasons for selection and rejection in Para 8.125 of the updated SA would also need to be updated. However, this doesn't change the Council's reasons regarding this location for additional growth.

8. The revised SA fails to take account of the potential for development at Carver Barracks;

The revised SA Report notes in Paragraph 8.58 that the MOD is proposing to vacate the site towards the end of the plan period. This is a substantial site, located to the south of Saffron Walden and could therefore be a potential option for further growth in the next plan period. It is the Council's understanding that this site would not be able to deliver any new homes during the plan period.

9. The revised SA only considers strategic employment options and should consider a more dispersed strategy for the delivery of new employment; and

The Council has explored a number of different spatial strategy options throughout plan-making. This included options for a dispersed delivery of growth across the district. This is explained in detail within Part 1, in particular within Chapters 5, 6 and 7, of the revised SA Report.

The Council and AECOM discussed potential alternatives for meeting employment needs in November 2018. Based on the findings of the Employment Land Review (2017), SLAA and representations received on the Local Plan and SA to date, it was determined that the focus of alternatives appraisal through the SA process should be the delivery of strategic employment land. Given the unique opportunity provided for employment growth at the Chesterford Research Park and Stansted, the delivery of smaller scale employment sites dispersed across the district would not necessarily be a mutually exclusive alternative.

¹ Cogent Land LLP v Rochford DC [2012] EWHC 2542 (Admin) and No Adastral New Town Ltd v Suffolk Coastal DC & SSCLG [2015] EWCA Civ 88

10. The revised SA Report does not address the short comings identified in the review produced by AECOM.

The revised SA Report addresses all the concerns raised within the independent review (Exam ref: 104.22) of the Regulation 19 Local Plan SA Report and by the Inspector for the NEA Local Plans in his Post-Hearing Letter (June 2018). The revised SA Report and NTS identifies, describes and evaluates the likely significant effects of implementing the plan, and reasonable alternatives. Appendix I of the SA Report includes a 'checklist' of how (throughout the SA process) and where (within the report) the regulatory requirements have been (and, in some cases, will be) met (Table IC, page 159-60).