

# Sustainability Appraisal (SA) for the Harlow Local Development Plan

Adoption Statement

Harlow Council

November 2020

## Quality information

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# 1. Introduction

## Background

- 1.1 The Harlow Local Development Plan was submitted to Government, for Examination by an appointed Planning Inspector, in October 2018. Following an extensive Examination process, the Inspector published a report into the Plan's legal compliance and soundness in November 2020. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Local Development Plan, incorporating modifications, is being put forward for adoption at a Full Council meeting on 10<sup>th</sup> December 2020.
- 1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM.

## SA explained

- 1.3 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Development Plan's contribution to sustainable development.
- 1.4 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations). SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

## This SA Adoption Statement

- 1.5 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA. It requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/ SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement', and inform the public and consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England and Natural England.
- 1.6 In addition, Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the SA Report alongside the adopted Local Plan.
- 1.7 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the Harlow Local Development Plan must explain:
  - How environmental (and sustainability) considerations have been integrated into the plan;
  - How the SA Report has been taken into account during preparation of the plan;
  - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with;
  - How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account; and
  - The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.8 In association with the above requirements, the SA Adoption Statement is structured as follows:

- **Chapter 2** presents the narrative for plan-making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above.
- **Chapter 3** describes how consultation responses have been taken into account through the Local Development Plan/ SA process.
- **Chapter 4** presents the monitoring programme for the SA.
- **Chapter 5** sets out some overall conclusions on the SA process.

## 2. How the SA process has informed and influenced the development of the Local Development Plan

### Introduction

- 2.1 The SA process has informed and influenced the Harlow Local Development Plan throughout its development. Reflecting this, five main SA documents have been prepared to accompany key points in plan development.
- 2.2 **Table 2.1** below summarise the key documents which have been prepared for the Local Development Plan and accompanying SA process to date.

**Table 2.1: Key documents in plan-making/ SA process**

Year	Plan-making	SA
2007 - 2009	Questionnaires and workshops	
2010		Scoping Report
2010	Issues and Options Consultation	Interim SA Report
2014	Emerging Strategy and Further Options	Interim SA Report
2016	Strategic Spatial Options Study for the HMA	SA of Strategic Spatial Options for the HMA
2017	Development Management Policies Document	
2018	Draft Pre-Submission Local Development Plan	SA Report
2020	Proposed Main Modifications	SA Report Addendum

- 2.3 As demonstrated in the table above, the SA process has been carried out iteratively and informed the development of the Local Development Plan at each key stage. The SA primarily influenced the Plan through the development and appraisal of reasonable alternatives as well as through the appraisal of the emerging Local Development Plan (proposed policies and allocations). This section is structured accordingly.

### Appraisal of reasonable alternatives

- 2.4 As part of the SA process, a series of reasonable alternatives or choices open to the Council with respect to the spatial development strategy were appraised and the findings fed back to the Council. In this way, the SA informed and influenced the development of the Local Development Plan.
- 2.5 The narrative within this section is structured according to the main plan-making/ SA steps, which are as follows:
- Issues and Options (2010);
  - Emerging Strategy and Further Options (2014); and
  - Draft Pre-Submission Local Development Plan (2018).

## Issues and Options (2010)

- 2.6 The Issues and Options document presented a number of alternative options including:
- six spatial options for growth that examined possible broad locations for development outside the existing built up area of Harlow;
  - six approaches to accommodating new employment; and
  - a series of emerging policy options.
- 2.7 A comparative appraisal of each of these options against the SA framework was carried out with the findings presented in an Interim SA Report (2010). The findings of the SA and consultation responses fed into subsequent plan-making.

## Emerging Strategy and Further Options (2014)

- 2.8 At this stage top-down and bottom-up options were explored based on the evidence at the time and used to identify nine spatial strategy alternatives, which are presented in the table below.

**Table 2.2 Alternative spatial strategies in 2014**

**Alternative spatial strategies**

<b>1a</b>	Focused on Priority Regeneration Areas providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>1b</b>	As per 1a plus additional growth to the west and south of the district and to the north of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>2a</b>	Environmental Constraints Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>2b</b>	As per 2a plus additional growth to the south west and north east of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>3a</b>	Passenger Transport Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>3b</b>	As per 3a plus additional growth to the north of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>4a</b>	Regeneration and Landscape Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>4b</b>	As per 4a plus additional growth to the west and north east of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>5</b>	Northern Bypass Led Option providing approximately 20,000 dwellings and 18,121 jobs in and around Harlow

- 2.9 The nine options above were appraised through the SA process with the findings presented in Chapter 12 of the Interim SA Report that accompanied the Emerging and Further Options Document on consultation in 2014. The findings of the SA and representations received fed into subsequent plan-making.

## Draft Pre-Submission Local Development Plan (2018)

- 2.10 Subsequent to the Emerging Strategy and Further Options consultation in 2014, the evidence base and further technical work was progressed. It was recognised that further work was needed to refine understanding of spatial strategy alternatives (i.e. continue the process of refinement discussed above)<sup>1</sup> and ultimately arrive at reasonable alternatives for appraisal/consultation.

<sup>1</sup> National Planning Practice Guidance is clear that understanding of alternatives should be 'refined' over time through the SA process.

## Developing Reasonable Alternatives for the West Essex and East Hertfordshire Housing Market Area

2.11 A three step approach was taken, which ultimately resulted in the establishment of a preferred broad spatial strategy for the West Essex and East Hertfordshire HMA, including a decision on the approach to growth in and around Harlow. Harlow was recognised as the most sustainable location within the HMA to focus residential development given its role as a sub-regional centre for employment, its Enterprise Zone status; its important location on the London Stansted Cambridge corridor and the wider economic growth aspirations for the town.

### **Step 1 - Establish an understanding of housing and economic needs**

2.12 A Joint Strategic Housing Market Assessment (SHMA) for the HMA was published in September 2015.<sup>2</sup> This evidence base document determined the objectively assessed housing need for Epping, East Herts, Harlow and Uttlesford District Councils. It should be noted that further work was carried out in August 2016 and more recently July 2017 based on an assessment undertaken after the publication of the latest 2016 population and household projections. The July 2017 assessment identified the full objectively assessed need for the SHMA as approximately 51,700 new homes. The updated information is considered later in this NTS as part of the story of how District-wide reasonable alternatives were developed in 2017.

### **Step 2 - Develop and appraise spatial alternatives**

2.13 In 2016, Epping Forest, East Herts, Harlow and Uttlesford District Councils commissioned a Strategic Spatial Options Study to identify options for distributing the housing need identified in the SHMA above and to inform the development of a Memorandum of Understanding (MoU) on the distribution of housing. The study identified the following reasonable strategic spatial options:

- Spatial options to deliver ~46,100 new homes across the SHMA area:
  - A. Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)
  - B. Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)
  - C. Less development at Harlow and two new settlements in East Herts (NB ~10,500 at Harlow)
  - D. Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA<sup>3</sup>)
- Spatial option to deliver ~49,638 new homes:
  - E. Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)
- Spatial option to deliver ~57,400 new homes:
  - F. Maximum growth across the HMA (NB ~ 20,985 at Harlow)

<sup>2</sup> Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings [www.edclocalplan.org/technical-information/](http://www.edclocalplan.org/technical-information/)

<sup>3</sup> Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion; Duty to Cooperate developments at East of Stevenage and East of Welwyn unchanged.

### Step 3 - Identify the preferred strategy for the HMA

- 2.14 The implications of the six options (A-F) were investigated through four means:
1. Transport modelling by Essex County Council to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure;<sup>4</sup>
  2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water;<sup>5</sup>
  3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation in particular; and
  4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.<sup>6</sup>
- 2.15 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver around 51,100 new homes across the HMA for the plan period to 2033 set out in **Table 2.3** below.

**Table 2.3: The preferred broad strategy for the HMA**

Local Authority	Net new dwellings 2011-2033
East Hertfordshire District Council	approx 18,000
Epping Forest District Council	approx 11,400
<b>Harlow District Council</b>	<b>approx 9,200</b> (N.B. this target is higher than the identified OAHN at the time)
Uttlesford District Council	approx 12,500
<b>Total across the HMA</b>	<b>approx 51,100</b>
...of which the area in and around Harlow <sup>7</sup> will provide	approx 16,100

- 2.16 A further SHMA update was carried out in 2017 taking into consideration the latest relevant evidence including DCGL's 2014 based household projections (July 2016). These updates led to a revised OAHN for the HMA of 51,710 dwellings from a previous figure of 46,100 while the need for affordable housing remained largely unchanged from the 2015 SHMA.
- 2.17 The latest updates identified a slightly increased OAHN for three of the four local authorities in the HMA. However, as the increase had been largely anticipated and accounted for in the HMA level work and preferred strategy, the updated overall housing need across the entire HMA remained broadly consistent with what had already been agreed (signed Memorandum of Understanding, March 2017). As stated in paragraph 47 of the NPPF, local authorities should "...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."
- 2.18 It was not considered necessary to revisit alternatives for the level and distribution of growth for the HMA as set out in the signed MoU (March 2017). The SA of Strategic Spatial Options published in 2016 considered three alternatives for the overall level of growth in the HMA, which included the delivery of ~ 46,000, ~ 49,638 and ~ 57,400 new homes within the HMA.<sup>8</sup> As such, higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level optioneering work.

<sup>4</sup> Essex County Council. West Essex and East Hertfordshire Local Plan Modelling. Technical Notes 1 to 6.

<sup>5</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

<sup>6</sup> East Herts, Epping Forest, Harlow and Uttlesford District Councils (2016) Harlow Strategic Site Assessment Report.

<sup>7</sup> 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

<sup>8</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

- 2.19 As a result, the HMA authorities were satisfied that the approach set out within the MoU will ensure that the predicted housing need of the HMA will be met over the course of the Local Plan periods.<sup>9</sup> Harlow Council's housing requirement therefore remained 9,200 dwellings as set out within the signed MoU (March 2017).

### **Developing Reasonable Alternatives for the Harlow Local Development Plan**

- 2.20 Returning to the Harlow Local Development Plan, in trying to establish reasonable alternatives for delivering the remaining housing requirement of 1,042 dwellings, it was important to remember that Harlow is not typical of most Districts. It is a former New Town with a planned layout which has been developed from a Master Plan. The consequence of this is that land was identified with some form of specific function.
- 2.21 The Master Plan sought to preserve the form of the original landscape and the natural features that gave the District its distinctive character; consequently the green areas were generally kept free of buildings and as natural as possible. Almost half of the land in Harlow is a form of open space, much of which is multi-functional, with 28% being designated as Green Wedges or Green Fingers, and 10% as Green Belt. These Green Wedges and Green Fingers are fundamental parts of the green infrastructure, as they contain multi-functional open spaces which are linked to other open spaces and the wider countryside.
- 2.22 Harlow's unique character created from key master planning principles has resulted in a strong relationship between the urban form and the Green Wedge network, through which transport corridors pass. The Green Wedges provide a series of connectable open spaces which link major facilities and services, offering a pleasant and attractive footpath, cycleway and bridleway system.
- 2.23 The District boundary reflects the original New Town designated area and, as such, is tightly drawn around the urban area. This means that, unlike many other Councils, Harlow does not have a large hinterland or neighbouring settlements in which to search for potential housing sites.
- 2.24 Through the site selection process the Council identified 21 available and suitable sites that could deliver around 1,147 new dwellings. The majority of these sites are previously developed land (PDL) with only three available and suitable open space sites identified with a capacity to deliver around 63 new dwellings. These open space sites were identified as being of low value and quality through the Harlow Open Space and Green Infrastructure Study (2013).<sup>10</sup>
- 2.25 As set out above, the District boundary is tightly drawn around the urban area, reflecting the original New Town designated area. This means that there are limited opportunities for development on greenfield sites on the edge of the town and within the District's boundary. This leaves the Green Wedges, Green Fingers and other areas of open space which are fundamental to the drainage network, green infrastructure and unique character of Harlow. Taking all these factors into account, no other available, suitable or deliverable sites were identified through plan-making that could provide further capacity and feed into the development of reasonable alternatives for meeting the additional housing requirement of 1,042 dwellings.
- 2.26 In line with the NPPF (2012) and given the importance of the open spaces within Harlow, it was recognised that any alternative should seek to maximise the use of PDL to meet the remaining housing requirement of 1,042 dwellings. It was therefore considered reasonable that alternatives for the additional housing requirement should focus on this issue by exploring increased densities on PDL.
- 2.27 It was determined by the Council that increased densities would be most appropriate for PDL sites that are:
- located within or in close proximity to the town centre where high density schemes may be more suitable utilising existing facilities and public transport in the town centre;

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<sup>9</sup> It should be noted that Uttlesford District Council published a Regulation 18 Local Plan for consultation in July 2017, which includes a housing target of 14,100 dwellings.

<sup>10</sup> Harlow Council (2013) Open Space and Green Infrastructure Study. Prepared by LUC.

- located within close proximity to future public transport nodes likely to come forward as part of the sustainable transport corridor work; and/or
  - located within the District's Hatches<sup>11</sup> where higher density would stimulate regeneration due to their close proximity to public transport.
- 2.28 For those PDL sites meeting the criteria above both a moderate and high density option were explored. The Council calculated the alternative densities so that they would reflect similar applications at town centre/ neighbourhood centre sites within Harlow as well as the sustainability of the sites in terms of access to public transport and facilities/ services.
- 2.29 Based on the above, three reasonable alternatives were identified to meet the additional housing requirement of 1,042 dwellings and these are set out in **Table 2.4** below.

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<sup>11</sup> Hatches sit below the town centre and district centres in the retail hierarchy. They serve specific local needs and provide for a range of community services.

**Table 2.4: The reasonable alternatives**

Ref	Location	Justification for increase in density	Site Size (ha)	Option A Preferred Approach		Option B Moderate density on certain PDL sites		Option C High density on certain PDL sites	
				Density (dph)	Capacity	Density (dph)	Capacity	Density (dph)	Capacity
1	Princess Alexandra Hospital	Close to town centre	14	43	650	120	1400	200	2800
2	Stow Service Bays		0.5	196	70	196	70	196	70
3	Land east of Katherines Way, west of Deer Park		2.37	30	69	30	69	30	69
4	Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery		0.93	45	42	45	42	45	42
5	Land south of Clifton Hatch		1	36	36	36	36	36	36
6	Riddings Lane	Close to sustainable transport corridor node	1.56	22	35	40	62	120	187
7	Kingsmoor Recreation Centre		0.8	44	35	44	35	44	35
8	The Evangelical Lutheran Church, Tawneys Road		0.18	195	35	195	35	195	35
9	Land east of 144-154 Fennells		0.81	28	23	28	23	28	23
10	Pollard Hatch plus garages and adjacent land	Hatch regeneration scheme	0.44	45	20	65	31	100	44
11	Land between Second Ave and St. Andrews Meadow		0.42	38	16	38	16	38	16
12	Coppice Hatch and garages	Hatch regeneration scheme	0.34	47	16	65	22	100	34
13	Sherards House		0.47	32	15	32	15	32	15
14	Elm Hatch and public house	Hatch regeneration scheme	0.2	65	13	65	13	100	20
15	Playground west of 93 - 100 Jocelyns		0.39	30	12	30	12	30	12
16	Fishers hatch	Hatch regeneration scheme	0.19	52	10	65	12	100	19
17	Slacksbury Hatch and associated garages	Hatch regeneration scheme	0.24	41	10	65	16	100	24
18	Garage blocks adjacent to Nicholls Tower		0.34	29	10	29	10	29	10
19	Stewards Farm		0.5	20	10	20	10	20	10
20	Land between Barn Mead and Five Acres		0.32	31	10	31	10	31	10
21	Pypers Hatch	Hatch regeneration scheme	0.19	54	10	65	12	100	19
TOTAL DWELLINGS				Option A 1,147		Option B 1,951		Option C 3,530	

- 2.30 The three reasonable alternatives identified above were subject to appraisal through the SA process. The summary appraisal findings were presented in Chapter 6 and the detailed appraisal matrices presented in Appendix IV of the SA Report that accompanied the Draft Pre-Submission Local Development Plan on consultation in May 2018 and which was submitted alongside the District Plan for independent Examination in October 2018. The findings of the SA informed the Council's outline reasons for selecting the preferred approach (Option A) in light of the alternatives considered, see Chapter 7 of the SA Report (2018).

## Appraisal of the Draft Plan

- 2.31 At various stages of plan making, the SA process has appraised and informed emerging Local Development Plan policies and allocations.

## Issues and Options (2010)

- 2.32 As highlighted earlier in this Section, a number of developing policy options were appraised through the SA process at the Issues and Options Stage in 2010. This included policies for place shaping, housing, prosperity, infrastructure and lifestyles. The findings and recommendations of the SA work can be found in Chapter 14 of the Interim SA Report (2010).

## Draft Pre-Submission Local Development Plan (2018)

- 2.33 The Draft Pre-Submission Local Development Plan represented a first full draft plan, including a range of policies and allocations for guiding development in Harlow. These were developed to reflect the various evidence base studies prepared to support the development of the plan to date and also to reflect the findings of the appraisal of the preferred development strategy and reasonable alternatives through the SA process.
- 2.34 The Draft Pre-Submission Local Development Plan was accompanied by an Interim SA Report for consultation in 2018. This was designed to inform the consultation through presenting an appraisal of the planning policies and allocations presented in the plan. The appraisal of the Draft Plan in Chapter 9 of the SA Report proposed a number of recommendations and proposed mitigation measures with respect to the policies and allocations.

## Proposed Main Modifications (2020)

- 2.35 The Local Development Plan was submitted to Government for Examination in October 2018. It was then the focus of Examination hearings in March and April 2019. As a result of discussion at the hearing sessions and representations received during examination a series of modifications were proposed to the plan.
- 2.36 The proposed modifications were published for consultation alongside a SA Report Addendum in March 2020. The SA Report Addendum presented an appraisal of the proposed Main Modifications to the Local Development Plan. It also gave consideration to reasonable alternatives in light of the proposed Main Modifications.

### 3. Consultation responses and how they have been taken into account

- 3.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report were taken into account.
- 3.2 As discussed in Chapter 2 and Table 2.1, at each stage of the Local Development Plan's development, an SA Report was published alongside the Plan for consultation.
- 3.3 Consultation was carried out with:
  - the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England);
  - other key stakeholders; and
  - the general public.

#### Responses received at Regulation 18 and 19 stages

- 3.4 The responses received prior and subsequent to publication of the Local Development Plan have been presented in the Local Development Plan (Regulation 22) Consultation Statement. This includes a description of the key consultation processes undertaken for the Local Development Plan, a summary of the main issues raised by responses and how they have been addressed.
- 3.5 The Statement of Consultation can be accessed at the following location:  
<https://www.harlow.gov.uk/planning-and-building-control/planning-policy/new-local-plan/local-plan-examination>
- 3.6 Any representations referring directly to the published SA documents were taken into account and informed subsequent stages of the SA process.

#### Responses received at the Main Modifications stage

- 3.7 No representations were received that referred directly to the SA Report Addendum published in March 2020.

## 4. Monitoring

- 4.1 The SEA Regulations require that: “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*”
- 4.2 The Regulations also state that the SA Adoption Statement should set out “*...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*”
- 4.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA are based on data that is already being routinely collected at a local level by Harlow Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Development Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the Local Development Plan’s implementation in relation to the SA framework and outcomes, including areas where the SA identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Development Plan are achieved through the planning process.

**Table 4.1: SA monitoring programme for the Harlow Local Development Plan**

SA topic	Proposed measure
Air quality	<ul style="list-style-type: none"> <li>Monitor the Epping Forest SAC position through the development and implementation of the Air Pollution Mitigation Strategy.</li> <li>Harlow Council’s regular air quality review and assessment work as required by the Environment Act 1995.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Monitor the Epping Forest SAC position through the development and implementation of the Recreation Mitigation Strategy.</li> <li>Condition status of the Hatfield Forest SSSI.</li> <li>Net gain delivered through new development.</li> <li>Change in number of biodiversity and geodiversity designated assets in the district.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Number of developments completed with SuDS measures implemented.</li> <li>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Number of key local facilities in Neighbourhood Centres and Hatches.</li> <li>Delivery of strategic and local infrastructure to support new development.</li> <li>Amount of public open space, allotments, play space and sporting provision and facilities.</li> <li>Change in number and area of Recreational, Sporting, Cultural and Community Facilities.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Net additional employment floorspace up to 2033.</li> <li>Net loss of employment floorspace in Strategic Employment Areas and Neighbourhood Service Areas.</li> <li>Change in number of visitors.</li> <li>Change in employment floorspace outside Strategic Employment Areas and Neighbourhood Service Areas.</li> <li>Number of jobs created by the major developments.</li> <li>Net additional retail floorspace in existing Retail Centre.</li> </ul>

<b>SA topic</b>	<b>Proposed measure</b>
Historic environment	<ul style="list-style-type: none"> <li>• Change in number and area of heritage assets in the district.</li> <li>• Number of heritage assets at risk.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Net additional dwellings built.</li> <li>• Net additional dwellings built in Strategic Housing Site East of Harlow.</li> <li>• Number of new Gypsy and Traveller pitches completed.</li> <li>• Percentage of new dwellings meet the Building Control Part M4(2) Standard for accessible and adaptable homes.</li> <li>• Number of dwellings for wheelchair users under the Building Control Part M4(3) standard in major residential development.</li> <li>• Type and size of housing in major residential developments.</li> <li>• Percentage of Affordable Housing built in new major residential developments</li> <li>• Net additional land allocated for self-build.</li> </ul>
Land and waste	<ul style="list-style-type: none"> <li>• Percentage of recycling household waste.</li> <li>• Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Delivery of strategic and local infrastructure to support new development.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Percentage of new dwellings achieving the Optional Technical Housing Standard for water efficiency (no more than 110 litres per person per day).</li> </ul>

## 5. Conclusions on the SA process

- 5.1 This SA Adoption Statement demonstrates that a robust and iterative SA process has been progressed alongside plan-making, with appraisal findings feeding in to decision-making at each stage, and with five reports having been published for consultation alongside plan documents. Any representations received were taken into account and informed subsequent stages of the SA process.
- 5.2 In summary, the following reports were published as part of the SA process:
  - SA Scoping Report (2010);
  - Interim SA Report (2010);
  - Interim SA Report (2014);
  - Reg 19 SA Report (2018); and
  - SA Report Addendum (2020).
- 5.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Draft Pre-Submission Local Development Plan (Regulation 19 version) in May 2018, presenting the required information. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 5.4 This SA Adoption Statement is the final step in the SA process.

