

# Sustainability Appraisal (SA) of the East Herts District Plan

SA Adoption Statement

East Hertfordshire District Council

August 2018

## Quality information

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## Revision History

<b>Revision</b>	<b>Revision date</b>	<b>Details</b>	<b>Name</b>	<b>Position</b>
v1	20 July 2018	Draft for internal review	Alastair Peattie	Associate Director
v2	27 July 2018	Draft for client review	Alastair Peattie	Associate Director
v3	01 August 2018	Final following client review	Alastair Peattie	Associate Director

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# 1. Introduction

## Background

- 1.1 The East Herts District Local Plan (hereafter referred to as the 'District Plan') was submitted to Government, for Examination by an appointed Planning Inspector, in March 2017. Following a year-long Examination process, the Inspector published a report into the Plan's legal compliance and soundness in July 2018. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The District Plan, incorporating modifications, is being put forward for adoption at a Full Council meeting on 11th September 2018.
- 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 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) which transpose into national law European Union Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. 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, and 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 East Herts District Plan must explain:
  - How environmental (and sustainability) considerations have been integrated into the Local 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:

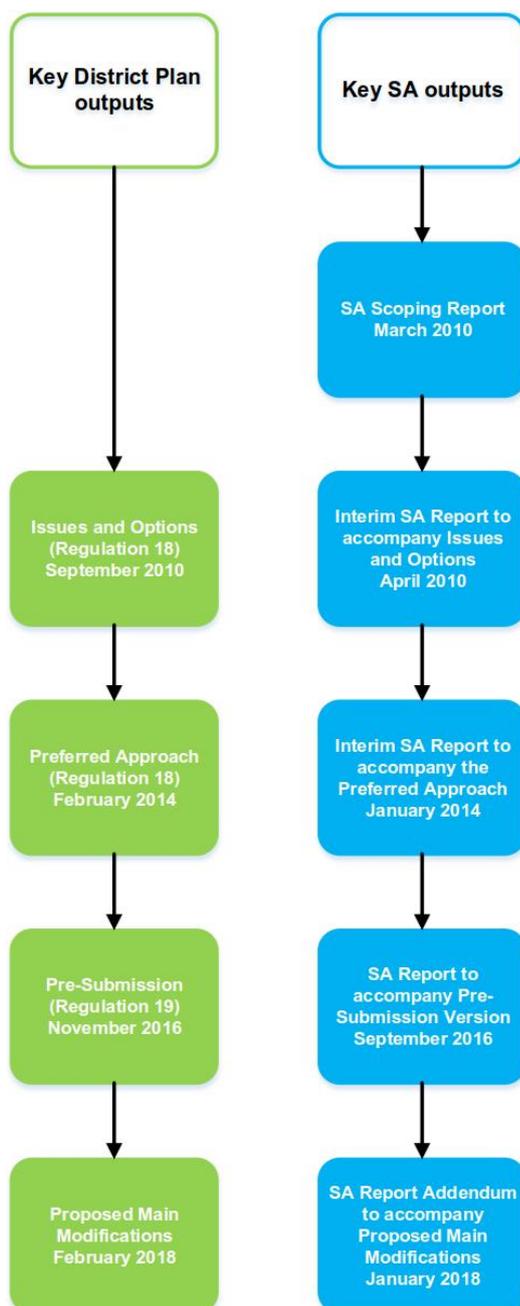
- **Chapter 2** presents the narrative for plan-making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above.
- **Chapter 3** describes how consultation responses have been taken into account through the Local Plan/SA 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 District Plan

### Introduction

- 2.1 The SA process has informed and influenced the East Herts District Plan throughout its development. Reflecting this, five main SA documents have been prepared to accompany key points in plan development.
- 2.2 **Figure 1** below summarise the key documents which have been prepared for the District Plan and accompanying SA process to date.

**Figure 1: Key outputs of the East Herts District Plan and accompanying SA process (February 2010 to February 2018)**



2.3 As demonstrated in **Figure 1**, the SA process has been carried out iteratively and informed the development of the District 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 Draft 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 District 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)
- Preferred Approach (2014)
- Pre-Submission (2016)

## Issues and Options (2010)

2.6 Two rounds of public engagement in 2008 sought to raise awareness and elicit residents' likes and dislikes. SA first actively informed the emerging plan in 2010, when an Interim SA Report was published for consultation alongside the Council's 'Issues and Options' consultation document.<sup>1</sup>

2.7 The Interim SA Report<sup>2</sup> set out an appraisal of six distinct development strategy options and six housing distribution options. Alternative growth options were also appraised for the following key areas: Bishop's Stortford; Buntingford; Hertford; Sawbridgeworth; Ware; Villages; and North of Harlow.

2.8 Appraisal findings from 2010 fed into subsequent plan-making. In particular, appraisal findings in relation to the different spatial options fed into the identification of 69 'areas of search' (see Step 3 below).

## Preferred Options (2014)

2.9 In 2012 the Council embarked on a 'stepped' approach to spatial strategy-making. Each step corresponded with a chapter of the Supporting Document to the District Plan, which was presented at a series of committee meetings between March 2012 and December 2013. For more information see [www.eastherts.gov.uk/SSS](http://www.eastherts.gov.uk/SSS) (SSS/001).

- **Step 1** involved exploring the nature of the task.
  - Consideration was given to progress on the District Plan to date and the scope of forthcoming work taking into account factors such as the national planning policy context (e.g. relating to localism and the duty to cooperate) and the critical role of infrastructure planning / delivery.
- **Step 2** involved exploring the strategic planning issues.
  - Issues were explored under the following thematic headings: Housing; Economy; Education; Transport; Water; Telecoms, Gas and electricity; Natural and historic environment; Green Belt; Community and leisure; Natural resources; and Environmental quality.
- **Step 3** involved developing a series of assessment criteria under 'topic' headings.
  - The topic headings were: Land availability, Employment potential, Primary schools, Secondary schools, Highways infrastructure, Vehicular access, Access

<sup>1</sup> See [www.eastherts.gov.uk/pdp](http://www.eastherts.gov.uk/pdp) (SSS/001)

<sup>2</sup> See [www.eastherts.gov.uk/submission](http://www.eastherts.gov.uk/submission) (SUB/007)

- to bus services, Access to rail, Waste water, Flood risk, Wildlife sites, Historic assets, Landscape character, Green Belt, Strategic gaps, Boundary limits, Community facilities, Agricultural land, Environmental stewardship, and Noise.
- These topic headings were identified taking into account the established SA Framework (see discussion above).
- **Step 4** involved drawing on the criteria established at Step 3 to assess 69 'areas of search'.
  - Assessment involved a 'sieving' process, where: Sieve 1 looked at each area in isolation; and Sieve 2 looked at combinations around each of the main towns.
  - 18 areas of search dropped-out from further consideration at that stage. Also, a number of options were 'refined' in that: 1) sub-areas were removed from further consideration; and/or the 'scale (i.e. the level of growth) assumption' was modified.
- **Step 5** involved further sieving of the shortlisted areas of search taking into account potential impacts on urban form and economic development.
- **Step 6** took into account further information gathered through a Green Belt Review, submissions made by Hertfordshire County Council (in relation to schools and transport), and submissions made by landowners/developers.
  - None of the 51 shortlisted areas of search dropped-out at Steps 5 or 6, but the assessment did lead to a number of further modifications to scale assumptions.

2.10 Step 3 - 6 are important from an SA perspective as they essentially involved identifying and then appraising site options. The Supporting Document outlines how the SA, in particular SA topics were integrated into the plan-making process in Chapter 1, Table 1.4, which is provided below as Table 2.1. It is available to view and download on the Council's website.<sup>3</sup>

**Table 2.1: Integration of the SA framework with the plan-making process**

SA framework topic	Plan-making process
Air Quality	Step 2: Environmental Quality Strategic Overview Step 4: Areas of Search Assessments Step 5: Scenario Testing  Development impacts are considered in terms of additional traffic resulting from cumulative impact of development, based on traffic modelling results.
Biodiversity and Green Infrastructure	Step 2: Natural & Historic Environment Strategic Overview Step 3: Designated Wildlife Sites Topic Assessment Step 4: Areas of Search Assessment Step 5: Scenario Testing: Habitats Regulations Assessment Step 6: Preferred Strategy  This includes consideration of sites designated at European, national, and County level. Green Infrastructure opportunities are considered through the formulation of the development scenarios. This includes consideration of the role and function of the Key Biodiversity Areas. A Green Infrastructure strategy will support the draft development strategy.
Climate Change (mitigation and adaptation) (includes flood risk)	Step 2: Natural & Historic Environment Strategic Overview Step 2: Natural Resources Strategic Overview Step 3: Flood Risk Topic Step 4: Areas of Search Assessment Step 6: Preferred Strategy  Overall climate change impacts as a result of increased emissions are addressed through the approach to sustainable transport. Climate Change adaptation is addressed through the approach to Green Infrastructure and drainage. The strategic overview of Natural Resources considers opportunities for low and zero carbon energy.
Community and	Step 2: Community Infrastructure Strategic Overview

<sup>3</sup> [www.eastherts.gov.uk/SSS](http://www.eastherts.gov.uk/SSS) (SSS/001)

## SA framework topic      Plan-making process

Wellbeing	<p>Step 2: Housing Strategic Overview  Step 2: Environmental Quality Strategic Overview  Step 3: Maintaining Tranquillity Topic  Step 3: Noise Topic  Step 6: Preferred Strategy</p> <p>The SA Scoping Report identified a number of elements to this, including health, crime, economic wellbeing, and social inclusion. The plan-making process promotes sustainable communities, in which there is easy access from housing to a range of services and facilities. It also considers the implications of housing and demographic change on various sections of the population, including the young and the elderly. Green Infrastructure and Sustainable Communities are considered through the plan-making process and provide opportunities for public health through walking and cycling. A strategic design framework which may address site-level considerations including designing out crime and encouraging healthy lifestyles. The development strategy will provide a policy context for Neighbourhood Planning to further many of the local aspects of community and wellbeing.</p>
Economy and Employment	<p>Step 2: Economy Strategic Overview  Step 3: Employment Potential Topic  Step 5: Scenario Testing  Step 6: Preferred Strategy</p> <p>The cumulative impact assessment will assess the employment offer against the levels of housing and form a basis for the housing and employment components of the development strategy.</p>
Historic Environment	<p>Step 2: Natural &amp; Historic Environment Strategic Overview  Step 3: Historic Assets Topic  Step 3: Landscape Character Topic  Step 4: Areas of Search  Step 5: Scenario Testing  Step 6: Preferred Strategy</p> <p>Scenario testing will involve an integrated appraisal of the whole settlement character and setting.</p>
Housing (including gypsies and travellers)	<p>Step 2: Housing Strategic Overview  Step 5: Scenario Testing  Step 6: Preferred Strategy</p> <p>Housing mix and tenure, and special housing needs are considered in the strategic overview on housing and demographic change. Housing market areas inform the development of scenarios for testing the cumulative impact of development.</p>
Land (includes waste)	<p>Step 2: Natural Resources Strategic Overview  Step 2: Green Belt Strategic Overview  Step 3: Minerals and Waste Designations Topic  Step 3: Green Belt Topic  Step 3: Boundary Limits Topic  Step 3: Strategic Gaps Topic  Step 3: Agricultural Land Classifications Topic  Step 3: Environmental Stewardship Topic  Step 6: Preferred Strategy</p>
Landscape	<p>Step 2: Natural &amp; Historic Environment Strategic Overview  Step 3: Landscape Character Assessment Topic  Step 5: Scenario Testing  Step 6: Preferred Strategy</p> <p>Scenario testing will involve an integrated appraisal of the whole settlement character and setting.</p>
Transport	<p>Step 2: Transport Strategic Overview  Step 3: Highways Infrastructure  Step 3: Vehicular access  Step 3: Access to Bus services</p>

## SA framework topic      Plan-making process

	<p>Step 3: Access to Railway Stations Step 5: Scenario Testing Step 6: Preferred Strategy</p> <p>Traffic modelling of alternative development scenarios will be undertaken to enable a more realistic look at the network effects of traffic.</p>
Water	<p>Step 2: Water Strategic Overview Step 2: Waste Water Impacts Step 5: Scenario Testing Step 6: Preferred Strategies</p> <p>Water cycle issues will be considered throughout the process, including the effect on groundwater and the aquifer, and environmental effects including the European Water Framework Directive.</p>
European Sites	<p>Step 2: Natural &amp; Historic Environment Step 3: Designated Wildlife Sites Step 5: Scenario Testing Step 6: Preferred Strategies</p> <p>A full Habitats Regulations Assessment (HRA) will be conducted as part of scenario testing. HRA is a requirement of the Habitats Directive. European sites are those designated as follows:</p> <ul style="list-style-type: none"> <li>• Special Areas of Conservation (SACs)</li> <li>• Special Protection Areas (SPAs)</li> <li>• Ramsar Sites</li> </ul> <p>For the Issues and Options stage, an HRA Screening report was prepared to identify any potential impact pathways between development in East Herts and the following European Sites:</p> <ul style="list-style-type: none"> <li>• Wormley-Hoddesdonpark Woods SAC</li> <li>• Epping Forest SAC</li> <li>• Lee Valley SPA</li> <li>• Lee Valley Ramsar</li> <li>• Eversden and Wimpole Woods</li> </ul> <p>The Screening Report concluded that options for significant development could not be screened out as having no likely significant effects on the European Sites. It therefore recommended that a more detailed Appropriate Assessment will be required, based on firmer growth options, in order to determine in-combination effects, and the amount of mitigation (if any) required. This work will be undertaken at Step 5.</p>

2.11 On the basis of the stepped process of development options appraisal the Council was able to establish a number of alternative spatial strategies in 2014. These are set out below:

- **Option 1** proposed the delivery of 15,932 new homes (3,000 in the Gilston Area, 1,800 North and East of Ware and 450 East of Welwyn Garden City).
- **Option 2** proposed the delivery of 15,382 new homes through 'maximising' growth at two of the Broad Locations - East of Welwyn Garden City (1,700 new homes) and North and East of Ware (3,000 new homes) - at the expense of growth in the Gilston Area.
- **Option 3** proposed the delivery of 15,382 new homes through 'maximising' growth at two of the Broad Locations - East of Welwyn Garden City (1,700 new homes) and West of Sawbridgeworth (with a bypass) (3,000 new homes) - at the expense of growth in the Gilston Area.

- **Option 4** proposed the delivery of 15,682 new homes, in part through an urban extension East of Stevenage (5,000 new homes).
- **Option 5** proposed the delivery of 15,682 new homes - including development in the Gilston Area (5,000 new homes) at the expense of development at the other Broad Locations.
- **Option 6** proposed the delivery of 15,682 new homes - included the concept of a new settlement in a transport corridor (5,000 new homes). The indicative, 'non-location-specific' nature of the option was appropriate at that stage, given the paucity of available evidence in relation to specific locations for a new settlement.
- **Option 7** proposed the delivery of 15,102 new homes primarily through development of 10,000 homes in the Gilston Area. This option did not propose any urban extensions to the market towns.
- **Option 8** proposed the delivery of 25,382 new homes through development of 1,700 homes East of Welwyn Garden City, 3,000 homes North and East of Ware and 10,000 homes in the Gilston Area. This enabled the testing of higher levels of growth which might result if the Council had to accept the unmet need of other districts.

2.12 The eight alternative spatial strategies were subject to appraisal through the SA process. Summary findings of this work were presented within Chapter 11 of the SA Report and detailed appraisal findings within Appendix B of that report which was published in 2014 alongside the Preferred Options consultation document.<sup>4</sup> The Council's reasons for selecting the preferred approach (Option 1) in light of the appraisal findings were presented within Chapter 11, Table 11.3 of the Interim SA Report (2014).

## Pre-Submission (2016)

2.13 Subsequent to the Preferred 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>5</sup> and ultimately arrive at reasonable alternatives for appraisal/consultation.

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

2.14 It is important at this point to recognise work undertaken at the broader spatial scale of the West Essex and East Hertfordshire Housing Market Area (HMA). The HMA comprises the four districts of East Herts, Epping Forest, Harlow and Uttlesford. A three step approach was taken, which ultimately resulted in the establishment of a preferred broad spatial strategy for the HMA.

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

2.15 A joint Strategic Housing Market Assessment (SHMA) was undertaken for the four HMA authorities in order to establish Objectively Assessed Housing Need (OAHN) for the HMA.

2.16 The SHMA, published in September 2015, identified OAHN for the HMA to be 46,100 dwellings over the period 2011 - 2033, equivalent to an average of 2,095 dwellings per year. This included an Objectively Assessed Need for Affordable Housing of 13,600 dwellings.<sup>6</sup>

2.17 In August 2016, Opinion Research Services (ORS) updated the OAHN (but without undertaking a full review of the SHMA) to take into account more recent information including the Department for Communities and Local Government's (now the Ministry of Housing, Communities and Local Government) 2014-based household projections and suggested a revised OAHN for the HMA of 54,608 new homes disaggregated as follows:

- **19,427 dwellings in East Hertfordshire (883 per year);**

<sup>4</sup> [www.eastherts.gov.uk/PDP\(PDP/001\)](http://www.eastherts.gov.uk/PDP(PDP/001))

<sup>5</sup> National Planning Practice Guidance is clear that understanding of alternatives should be 'refined' over time through the SA process.

<sup>6</sup> Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings [www.eastherts.gov.uk/HOP\(HOP/001\)](http://www.eastherts.gov.uk/HOP(HOP/001))

- 13,278 dwellings in Epping Forest (604 per year);
- 7,824 dwellings in Harlow (356 per year); and
- 14,080 dwellings in Uttlesford (640 per year).

## Step 2 - Develop and appraise strategic spatial alternatives

- 2.18 In response to a need to fulfil Duty to Co-operate requirements, the West Essex and East Hertfordshire authorities explored options for meeting OAHN in the sub-region. This included the consideration of a range of locational options for delivering housing.
- 2.19 To support this process the four authorities commissioned a study which:
- identified options for spatially distributing the housing need identified in the SHMA (2015), the DCLG 2012-based household projections and the August 2016 advice from ORS, across the HMA, based on an analysis of the policy context and evidence base;
  - provided an evidence-based Sustainability Appraisal setting out the anticipated significant positive and negative impacts of each option (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and
  - facilitated the development of a Memorandum of Understanding (MoU) between the four authorities which set out a high level agreement as to how new housing should be distributed across the HMA.
- 2.20 These activities are collectively referred to as the Strategic Spatial Options Study. It was anticipated that the study would provide a critical piece of evidence for demonstrating to the Planning Inspectorate at the independent Examinations into the four local plans that the key strategic issue of housing growth has been robustly addressed and that the Duty to Co-operate had been clearly complied with.
- 2.21 As part of the Strategic Spatial Options Study, a range of spatial options for distributing housing across the HMA were considered. Three levels of growth were considered:
- ~46,100 new homes in line with the 2015 SHMA
  - ~49,638 new homes in line with the DCLG 2012-based household projections
  - ~57,400 new homes in line with early advice from ORS in light of more recent information including the DCLG 2014-based household projections (NB this figure was later revised down to 54,608 – see above)
- 2.22 In particular, the spatial options explored different levels of growth in and around Harlow, a key urban centre within the HMA:
- ~10,500 (lower growth)
  - ~14,150 (medium growth)
  - ~17,650 (higher growth)
  - ~20,985 (maximum growth)
- 2.23 The study identified the following reasonable strategic spatial options:
- **Spatial options to deliver ~46,100 new homes across the HMA:**
    - 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>7</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)

### Step 3 - Identify the preferred strategy

2.24 To assist in discharging the Duty to Co-operate, the Co-operation for Sustainable Development Member Board (the Co-op Member Board) for the HMA considered the six options (A-F) above for accommodating new housing development across the HMA area up to 2033. The implications of the six HMA spatial strategy 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;
2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water. The findings of the SA were published in 2016;<sup>8</sup>
3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation; and
4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.

2.25 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver c. 51,000 new homes across the HMA to 2033 broken down in **Table 2.2** below.

**Table 2.2: The preferred broad strategy for the HMA**

Local authority	Net new dwellings 2011-2033
East Herts District Council	c. 18,000
Epping Forest District Council	c. 11,400
Harlow District Council	c. 9,200
Uttlesford District Council	c. 12,500
<b>Total across the HMA</b>	<b>c. 51,100</b>

...of which the area in and around Harlow<sup>9</sup> will provide c. 16,100

2.26 The preferred strategy was established drawing on evidence available at the time on the basis that:

- At c. 51,000 new homes, the planned level of housing growth was higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the DCLG 2012-based household projections (49,638). It was lower than ORS' estimated OAHN figure taking into account then recent information including the CLG 2014-based

<sup>7</sup> Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion.

<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. [www.eastherts.gov.uk/HOP/HOP/002](http://www.eastherts.gov.uk/HOP/HOP/002)

<sup>9</sup> 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

household projections (54,608) but nonetheless represented good progress towards this higher figure. Overall, the figure of c. 51,000 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF), and, furthermore, significantly boosting the supply of housing (NPPF, para. 47).

- Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town. The findings and recommendation of the London Stansted Cambridge Corridor (LSCC) Growth Commission report, published in July 2016, stated that “*Broxbourne, Harlow and Stevenage have significant strategies and ambitions for growth and development. They can play an important role in supporting the Corridor’s tech and life sciences clusters. Current development and future plans will greatly improve the industrial, commercial and residential offer. These areas must be supported to provide the right types of development that enhance the quality of place for the Corridor’s knowledge-based industries and residents*” (our emphasis).<sup>10</sup>
- The transport modelling undertaken at that time demonstrated that growth of between 14,000 and 17,000 new homes in and around Harlow could be accommodated provided that the mitigation measures set out in the then Draft [now signed] Highways and Transportation Infrastructure MoU for the West Essex and East Hertfordshire HMA were delivered during the plan period. Evidence suggested that growth beyond 2033 is likely to be possible subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures.
- The Strategic Site Assessment (AECOM, September 2016) indicated that sufficient suitable strategic sites were available in and around Harlow to deliver the figure of c. 16,100 (together with sites either already completed or granted planning permission as well as urban brownfield sites). The Strategic Site Assessment is available on the East Herts District Plan evidence-base webpage.<sup>11</sup>

2.27 The latest SHMA update (2016) identified a slightly increased OAHN for three of the four local authorities in the HMA. However, as the increase was 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).

2.28 It was not considered necessary to revisit alternatives for the level and distribution of growth for the HMA 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>12</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.

2.29 As a result, the HMA authorities are 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>10</sup> London Stansted Cambridge Corridor Growth Consortium (2016). Findings and recommendation of the London Stansted Cambridge Growth Commission [www.lscggrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf](http://www.lscggrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf).

<sup>11</sup> Harlow, Epping Forest, East Herts and Uttlesford District Councils (2016) Harlow Strategic Site Assessment. Prepared by AECOM. [www.eastherts.gov.uk/HOP \(HOP/003\)](http://www.eastherts.gov.uk/HOP (HOP/003))

<sup>12</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. [www.eastherts.gov.uk/HOP \(HOP/002\)](http://www.eastherts.gov.uk/HOP (HOP/002))

## Developing Reasonable Alternatives for East Herts District

- 2.30 Returning to East Herts's District Plan, as explained earlier in this Section, the Council embarked on a 'stepped' approach to spatial strategy-making in 2012. Each of the steps corresponded with a Chapter of the Supporting Document, which included the identification and appraisal of site options (Steps 3 to 6). This work informed the selection of site allocations as well as the development of the preferred spatial strategy as set out in the Preferred Options Document in 2014.
- 2.31 Following the end of the Preferred Options consultation in May 2014, a range of new information and evidence emerged, including but not limited to a Green Belt Review (2015), updated Strategic Land Availability Assessment (SLAA 2016), further transport modelling and the progression of various Neighbourhood Plans. This new evidence along with the representations received at the Preferred Options stage were considered by the Council and informed further work in relation to the development and refinement of spatial strategy options at the HMA as well as District level.
- 2.32 This further work took the form of a number of settlement appraisals that sought to continue the 'stepped' approach and narrative of the Supporting Document, in particular Chapters 4 to 6, by detailing information and evidence for each settlement which had emerged since the Preferred Options consultation ended in May 2014. This included all of the sites submitted to the Council through the 'Call for Sites' process and considered through the updated SLAA Report (2016).
- 2.33 As part of the further work undertaken by the Council presented in the settlement appraisals, consideration was given to potential alternative options for development and further SA work was carried out. This took into consideration all the updated technical work (Green Belt Review, updated SLAA), consultation responses and current development situation (planning applications). The detail of this work is presented in the settlement appraisals which are available separately on the Council's website.<sup>13</sup>
- 2.34 The further technical work carried out by the Council informed the development and refinement of reasonable spatial strategy options for the East Herts District Plan in 2016. It is important to remember that this work was carried out in the context of, and informed, the Strategic Spatial Options Study for the HMA referred to earlier in this Section. The work undertaken by the Co-op. Member Board to develop and test options for distributing different levels of growth across the HMA formed a critical component of the evidence base informing the District Plan. This information, including the SA of the strategic spatial options for the HMA<sup>14</sup>, is available to view and download on the Council's website.<sup>15</sup>
- 2.35 The findings of the emerging Strategic Spatial Options Study were discussed at a meeting between Council officers and AECOM in August 2016. This, along with the further evidence at the District level, including updated technical evidence, emerging settlement appraisals and consultation responses, informed the identification of more localised spatial strategy options ('reasonable alternatives') to be explored through the SA process for the East Herts District Plan. The options identified were as follows:

**Option 1** - accommodate ~18,000 new homes over the plan period (OAHN = 16,400<sup>16</sup> but we know from the CLG 2014 household projections that the need is trending upwards):

- a. Preferred distribution as set out in the Strategic Spatial Options Study.
- b. Preferred distribution (1a) but with ~3,000 fewer homes within the Green Belt at key settlements including Bishop's Stortford (reduction of 750 dwellings), Hertford (reduction of 750 dwellings), Sawbridgeworth (reduction of 500 dwellings) and Ware (reduction of 1,000 dwellings). The ~3,000 would instead be dispersed across the rural area.
- c. Preferred distribution (1a) but with ~3,000 fewer homes within the Green Belt at key settlements including Bishop's Stortford (reduction of 750 dwellings), Hertford (reduction of 750 dwellings), Sawbridgeworth (reduction of 500 dwelling) and Ware (reduction of

<sup>13</sup> [www.eastherts.gov.uk/evidencebase](http://www.eastherts.gov.uk/evidencebase)

<sup>14</sup> Sustainability Appraisal of the Spatial Strategy Options for the West Essex and East Hertfordshire Housing Market Area (2016) Available [online]: [www.eastherts.gov.uk/HOP/HOP/002](http://www.eastherts.gov.uk/HOP/HOP/002)

<sup>15</sup> Harlow Strategic Site Assessment (2016) Available [online]: [www.eastherts.gov.uk/HOP/HOP/003](http://www.eastherts.gov.uk/HOP/HOP/003)

<sup>16</sup> Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings [www.eastherts.gov.uk/HOP/HOP/001](http://www.eastherts.gov.uk/HOP/HOP/001)

1,000 dwellings). The ~3,000 would instead be focused at two new settlements (near Little Hadham and Watton-at-Stone).

**Option 2** - accommodate ~19,500 new homes over the plan period (updated OAHN = 19,500<sup>17</sup>):

- a. Preferred distribution (1a) plus other sites around settlements identified through the evidence base, including additional sites in Buntingford and north of Harlow.

2.36 The four reasonable alternatives identified above were subject to appraisal through the SA process. The summary appraisal findings were presented in Chapter 7 and the detailed appraisal matrices presented in Appendix IV of the SA Report that accompanied the Pre-Submission District Plan on consultation in September 2016 and which was submitted alongside the District Plan for independent Examination in March 2017. The findings of the SA informed the Council's outline reasons for selecting the preferred approach (Option 1a) in light of the alternatives considered, see Chapter 8 of the SA Report (2016).

## Appraisal of the Draft Plan

2.37 At various stages of plan making, the SA process has appraised and informed emerging District Plan policies and allocations.

## Preferred Options (2014)

2.38 As highlighted in the introduction to this Section, the Preferred Options Draft District Plan was released for consultation in February 2014. The document presented a full Draft District Plan, including a range of policies and allocations for guiding development in East Herts. 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.

2.39 The Preferred Options consultation was accompanied by an Interim SA Report (2014). This was designed to inform the consultation through presenting an appraisal of the planning policies and allocations presented in the Preferred Options document. The appraisal of the Draft Plan in Chapter 13 of the SA Report proposed a number of recommendations with respect to the policies and allocations. It also indicated how previous SA work had influenced the policies presented in the Preferred Options document.

## Pre-Submission (2016)

2.40 The planning policies for the District Plan were then updated for the Regulation 19 Pre-Submission consultation, and again appraised through the SA process and recommendations made. The findings of the appraisal and the subsequent recommendations were presented in Part 2 (Chapters 9 to 21) of the SA Report (Sept 2016) accompanying the Pre-Submission document on consultation in November 2016.

## Proposed Main Modifications (2018)

2.41 The District Plan was submitted to Government for Examination in March 2017. It was then the focus of Examination hearings in October/November 2017 as well as a joint hearing session with Welwyn Hatfield Borough Council in January 2018. During the hearings, the Inspector gave her preliminary views on the matters discussed and indicated that modifications would be necessary to make the District Plan 'sound'. She invited the Council to develop a list of proposed modifications, for her agreement and subsequent publication.

2.42 The proposed modifications were published for consultation alongside a SA Report Addendum<sup>18</sup> in February 2018. The SA Report Addendum presented an appraisal of the

<sup>17</sup> Opinion Research Services (August 2016). Updating the Overall Housing Need Based on 2014 projections for West Essex & East Herts [www.eastherts.gov.uk/HOP](http://www.eastherts.gov.uk/HOP) (HOP/011)

<sup>18</sup> <https://www.eastherts.gov.uk/examinationdocuments> (ED182)

proposed Main Modifications to the District 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 as visualised in **Figure 1**), at each stage of the District 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 District Plan have been presented in the District Plan (Regulation 22) Consultation Statement. This includes a description of the key consultation processes undertaken for the District 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:  
[www.eastherts.gov.uk/submission](http://www.eastherts.gov.uk/submission) (SUB/009)
- 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 A number of representations were received that referred directly to the SA Report Addendum published in February 2018. These were reviewed and taken into account and it was determined that no further SA work was necessary.

## 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 East Herts District 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 District Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the District 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 District Plan are achieved through the planning process.

**Table 4.1: SA monitoring programme for the East Herts District Plan**

Sustainability topic	Indicator	Responsibility	Frequency
Air quality	East Herts Council’s regular air quality review and assessment work as required by the Environment Act 1995.	East Herts District Council	Annual
Biodiversity and green infrastructure	Change in number and area of statutorily protected sites. This will monitor the legally protected site network of SSSIs and LNRs which are also a statutory designation.	East Herts District Council	Annual
	Change in number and area of non-statutory sites. These will be anything else that is considered to have some form of informal biodiversity or geodiversity recognition namely, Wildlife sites, important geological/ geomorphological sites, Wildlife Trust or other reserves.	East Herts District Council	Annual
	Change in number and area of ancient woodlands.	East Herts District Council	Annual
Climate change	Number of new developments producing at least 10% of total predicted energy requirements in accordance with Policy CC3.	East Herts District Council	Annual
	Amount of new sources of renewable energy generation permitted.	East Herts District Council	Annual
Community and wellbeing	Number of planning permissions granted on land designated for open space, sport and recreation under policy CFLR1 contrary to policy.	East Herts District Council	Annual
	Amount of new open space, sport and recreation facilities completed by typology and settlement.	East Herts District Council	Annual
	Number of planning permissions for residential development granted that result in meeting Accessible Natural Greenspace Standards.	East Herts District Council	Annual

Sustainability topic	Indicator	Responsibility	Frequency
	Number of planning permissions granted on land designated as Local Green Space under policy CFLR2 which are contrary to policy.	East Herts District Council	Annual
	Number of planning permissions granted that result in the loss of uses, buildings or land for public or community contrary to Policy CFLR8.	East Herts District Council	Annual
	Amount of new uses, buildings or land for public or community use completed by settlement.	East Herts District Council	Annual
	Delivery of strategic and local infrastructure to support new development.	East Herts District Council	Annual
Economy and employment	Number of additional jobs provided in the District between 2011-2033.	East Herts District Council	Annual
	Amount of additional employment land allocated for Use Classes B1/B2/B8 between 2011-2033.	East Herts District Council	Annual
	% of new employment floorspace completed by type on Previously Developed Land (PDL).	East Herts District Council	Annual
	Net additional retail floorspace completed between 2011-2033, by settlement and primary shopping area.	East Herts District Council	Annual
Historic environment	Change in number of designated historical assets.	East Herts District Council	Annual
	Number of Conservation Area appraisals completed.	East Herts District Council	Annual
	Number of listed buildings on the national 'Buildings at Risk Register'.	East Herts District Council	Annual
	Number of approvals which include a consideration of a designated heritage asset.	East Herts District Council	Annual
	Number of refusals which include consideration of a designated heritage asset.	East Herts District Council	Annual
	Number of approvals which were objected to by Historic England.	East Herts District Council	Annual
Housing	Net additional dwellings completed between 2011-2033, by settlement and broad location for growth.	East Herts District Council	Annual
	Net additional dwellings in future years and phasing (trajectory).	East Herts District Council	Annual
	Net additional dwellings completed on Allocated sites.	East Herts District Council	Annual
	Net additional dwellings completed in the monitoring year, by size, type and tenure and by settlement and broad location for growth.	East Herts District Council	Annual
	% of affordable housing permissions completed in accordance with Policy HOU3 in terms of site capacity/size thresholds.	East Herts District Council	Annual
	Amount of new specialist accommodation to meet the specific needs of older and vulnerable people, falling within Use Classes C2, C3, or sui-generis.	East Herts District Council	Annual
	Number of new Gypsy and Traveller pitches and Travelling Showpeople plots completed.	East Herts District Council	Annual
Land	% of new and converted dwellings on Previously Developed Land (PDL).	East Herts District Council	Annual

<b>Sustainability topic</b>	<b>Indicator</b>	<b>Responsibility</b>	<b>Frequency</b>
Landscape	Number of planning permissions granted on land in the Green Belt contrary to Policy GBR1.	East Herts District Council	Annual
	Number of dwellings permitted in the Green Belt contrary to Policy GBR1.	East Herts District Council	Annual
Transport	Amount of new residential development completed within 30 minutes public transport time of six key services.	East Herts District Council	Annual
	Amount of completed development complying with car parking standards.	East Herts District Council	Annual
	Delivery of strategic and local infrastructure to support new development.	East Herts District Council	Annual
Water	Number of permissions granted contrary to the advice of the Environment Agency and/or Hertfordshire County Council, as Lead Local Flood Authority, on either flood defence or water quality grounds.	East Herts District Council	Annual
	% of new residential development achieving mains water consumption of 110 litres or less per head per day.	East Herts District Council	Annual
	Delivery of strategic and local infrastructure to support new development.	East Herts District Council	Annual

## 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 numerous junctures, and with numerous 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)
  - Two Interim SA Reports (2010 and 2014)
  - The SA Report (2016)
  - One SA Report Addendum (2018)
- 5.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Pre-Submission (Regulation 19) version of the District Plan in 2016, 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.

