

Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan

SA Adoption Statement

Epping Forest District Council

March 2023

Quality information

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1. Introduction

Background

- 1.1 The Epping Forest District Plan was submitted to Government, for Examination by an appointed Planning Inspector, in September 2018. Following an extensive Examination process the inspector published a report into the Plan's legal compliance and soundness in February 2023. The Inspector's Report concludes that subject to the Main Modifications set out in the appendix of the report, the Plan is legally compliant and sound. The Local Plan, incorporating modifications, was adopted at an Extraordinary Meeting of the Council on 6th March 2023.
- 1.2 A parallel process of Sustainability Appraisal (SA) (incorporating Equalities Impact Assessment) was undertaken alongside plan-making, led by consultants at 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 Regulation 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.
- 1.5 The SA for the Epping Forest District Local Plan (EFDLP) has also incorporated Equalities Impact Assessment (EqIA). As a public sector organisation, Epping Forest District Council (EFDC) has a duty under the Equality Act 2010¹ and associated Public Sector Equality Duty (PSED) to ensure that the objectives and proposals within the EFDLP eliminate unlawful discrimination (direct and indirect), and advance equality of opportunity. An EqIA is often used by public sector organisations to demonstrate how this duty has been met. In 2017, EFDC decided to fully integrate EqIA into the SA, and consequently the SA considers the topic of 'equality, diversity, and inclusion'.

¹ [Equality Act 2010](#)

This SA Adoption Statement

- 1.6 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.
- 1.7 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.
- 1.8 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the EFDLP must explain:
- How environmental (and sustainability) considerations have been integrated into the plan.
 - How the SA Report has been considered 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 considered; and
 - The measures that are to be taken to monitor the significant effects identified for the Local Plan.
- 1.9 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 considered 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 Plan

Introduction

2.1 The SA process has informed and influenced the EFDLP throughout its development. Reflecting this, six main SA documents have been prepared to accompany key points in plan development. Table 2.1 summarises the key documents which have been prepared for the EFDLP and accompanying SA process to date.

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

Date	Plan-making document	SA document
2010/ 2011	Community Visioning Consultation Document	SA Scoping Report (separate consultation 2010)
2012	Community Choices Consultation Document (Issues and Options Consultation)	Interim SA Report
October 2016	Regulation 18 Draft Local Plan	Interim SA Report
December 2017	Regulation 19 Submission Version Local Plan	SA Report
June 2021	Main Modifications Consultation Document	SA Report Addendum
October 2022	Further Main Modifications Consultation Document	SA Report Addendum

2.2 As demonstrated in Table 2.1, the SA process has been carried out iteratively and informed the development of the EFDLP at each key stage. The SA primarily influenced the EFDLP through the development and appraisal of reasonable alternatives as well as through the appraisal of the emerging Plan (proposed policies and site allocations). This section is structured accordingly by these two primary influences.

Appraisal of reasonable alternatives

2.3 As part of the SA process, a series of reasonable alternatives or choices open to the Council with respect to the development of the EFDLP were identified and appraised and the findings were fed back to EFDC. In this way, the SA informed and influenced the development of the EFDLP. The narrative of this section is structured according to the main plan-making/ SA steps which are as follows:

- 2012 Community Choices (Issues and Options) Consultation and Interim SA Report
- 2016 Draft Local Plan and Interim SA Report
- 2017 Submission Version Local Plan and SA Report
- 2021 Main Modifications and SA Report Addendum

- 2022 Further Main Modifications and SA Report Addendum

2012 Community Choices (Issues and Options) Consultation and the Interim SA Report

2.4 The 2012 Community Choices consultation presented a range of alternative options for:

- Six spatial issues relating to housing targets, employment land, growth around Harlow, distributing growth around the remainder of the district, directions for growth beyond existing settlement boundaries, and North Weald Airfield.
- Five thematic issues relating to the Lea Valley Glasshouse Industry, managing existing employment sites, creating a balance of retail shops and other services, dwelling size and design, and Green Belt and density.

2.5 A comparative appraisal of each set of options against the SA framework was carried out with the findings presented in the Interim SA Report (2012). The findings of the SA and consultation responses fed into subsequent plan-making.

2016 Draft Local Plan and Interim SA Report

2.6 At this stage, top-down and bottom-up options were explored considering the evidence at the time and used to identify the five spatial strategy alternatives presented in Table 2.2. All five options would meet the identified residual housing requirement at that time for 11,400 homes over the plan period.

Table 2.2: The district-wide reasonable alternatives in 2016

Option	Distribution
1 The preferred option (emerging from consultation to date)	Distributed development that maximises development within existing settlements and on brownfield land, and minimises the release of Green Belt land.
2 Lower growth at North Weald Basset	Lower growth at North Weald Bassett and consequentially higher growth elsewhere (dispersed).
3 Higher growth at North Weald Basset	Higher growth at North Weald Bassett and consequentially lower growth elsewhere (dispersed).
4 Lower growth at urban greenspaces	Lower growth at urban greenspace sites and consequentially higher growth elsewhere (dispersed).
5 Higher growth along the Central Line	Higher growth at settlements served by the Central Line and consequentially lower growth elsewhere (dispersed).

2.7 The five options were appraised through the SA process and the findings were presented in the 2016 Interim SA Report. The findings of the SA and consultation responses fed into subsequent plan-making.

2017 Submission Version Local Plan and SA Report

- 2.8 Following consultation on the Draft Local Plan and Interim SA Report in 2016, the representations received were collated and reviewed. Considering the responses as well as updated evidence, it was deemed appropriate to develop the district-wide reasonable alternatives further, building on Housing Market Area (HMA) level considerations and site options evidence. Consideration is given below to these updates.

HMA level considerations

- 2.9 In relation to HMA level considerations, a further Strategic Housing Market Assessment (SHMA) Update was carried out in 2017 which, based on updated housing projections, identified a revised and higher overall housing growth target of 51,710 dwellings over the plan period (compared to the target of 46,100 in the previous 2015 SHMA that informed consultation in 2016). However, this increase had largely been anticipated and the overall housing need across the entire HMA remained broadly consistent with what had already been agreed in the signed Memorandum of Understanding (MoU) in March 2017.
- 2.10 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.² As such, higher numbers including figures approximating to and exceeding 51,710 new dwellings had already been tested and there was no need to revisit the HMA-level optioneering work.
- 2.11 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.³ Epping Forest District Council's housing requirement therefore remains 11,400 dwellings as set out within the signed MoU (March 2017).

Site options evidence

- 2.12 In relation to site options evidence, following consultation in 2016, further work was carried out on the Site Selection Methodology (SSM) which considered consultation responses and sources used to identify sites. Sites were re-assessed, and some amendments were made to strategic options at Chigwell, Epping, Harlow, Lower Nazeing, North Weald Bassett, Roydon, Theydon Bois, and Waltham Abbey. Appendix V of the 2017 SA Report provides an assessment of the strategic options for settlements.

Establishing reasonable alternatives in 2017

- 2.13 Building on the updated evidence, the district-wide reasonable alternatives at this stage focused on exploring variations in terms of distributing the housing and employment needs based on the preferred spatial strategy.

² Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/C/HttpHandler.ashx?id=6626&p=0>

³ 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.

2.14 The alternatives in 2017 were defined to test the parameters of the potential changes under consideration by the Council, following consideration of the latest evidence and responses to the Draft Local Plan consultation. The alternatives were developed to enable further consideration of the following in relation to the Draft Local Plan:

- Whether transport impacts on Epping could be minimised.
- Whether air quality impacts on Epping Forest could be minimised.
- Whether transport impacts and congestion generally across the district could be minimised.
- The potential impacts from decisions on key infrastructure, particularly Princess Alexandra Hospital and the location of two new secondary schools.
- Contribution to five-year land supply; and
- Potential alignment with emerging neighbourhood plans.

2.15 This would help to inform the Council's decision-making on proposed site allocations in the Submission Local Plan. Based on the above, three reasonable District-wide alternatives were identified, as set out in Table 2.3.

Table 2.3: The district-wide reasonable alternatives in 2017

	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the district
Description	This distribution took the sites from the Draft Local Plan together with the new and amended sites as part of the site selection process and assessed whether they would be suitable based on the notion of minimising the level of change to the Draft Local Plan.	This distribution set out to assess the impacts of changing the distribution of sites on the travel patterns across the district, using both the allocated and new and amended sites of this round of the site selection process.	This distribution set out to assess the impacts of the location of schools in the district, using both allocated and new/amended of the site selection process.
Residential	<ul style="list-style-type: none"> • More growth at Epping and Theydon Bois. • More growth on suitable brownfield sites in Loughton and less on the managed open space sites. 	<ul style="list-style-type: none"> • Less growth at Epping and Theydon Bois. • More growth at Ongar and north of Waltham Abbey. 	<ul style="list-style-type: none"> • More growth at Epping (same level as Alternative A). • Less growth at Theydon Bois (same level as Alternative B). • More growth at Ongar (same level as Alternative B). • More growth on brownfield sites in Loughton and less on the managed open space sites.
Employment	<ul style="list-style-type: none"> • Lower growth at North Weald Basset. • Higher growth at Waltham Abbey, primarily to the south. • Lower growth at Harlow Strategic Sites. 	<ul style="list-style-type: none"> • Higher growth at North Weald Basset. • No growth at Waltham Abbey. • Higher growth at Harlow Strategic Sites. 	<ul style="list-style-type: none"> • Higher growth at North Weald Basset. • Growth at Waltham Abbey. • Higher growth at Harlow Strategic Sites.
Infrastructure	<ul style="list-style-type: none"> • Two new secondary schools at Harlow Strategic Sites - Latton Priory and East of Harlow • Expansion of Waltham Abbey and Loughton secondary schools. 	<ul style="list-style-type: none"> • New secondary school at East of Harlow. • New secondary school at Waltham Abbey to the north. • Expansion of Loughton secondary schools. 	<ul style="list-style-type: none"> • New secondary school at East of Harlow. • New secondary school at Epping. • Expansion of Loughton/Waltham Abbey secondary schools.

2.16 These three reasonable alternatives were subject to appraisal through the SA process, with summary appraisal findings reported in Chapter 7, and detailed appraisal findings presented in Appendix VI of 2017 SA Report. The findings of the SA informed the Council's outline reasons for selecting the preferred approach (a hybrid of the three alternatives) – see Chapter 7 of the SA Report (2017).

2021 Main Modifications and SA Report Addendum

- 2.17 Following submission of the EFDLP for examination in 2018, alternatives were again considered in light of the proposed Main Modifications and Inspector’s concerns. The Inspector did not deem it necessary to increase the housing requirement for the District but noted concern over certain site allocations.
- 2.18 Considering an identified need to potentially reduce the capacity of, or delete, some allocations, it was possible that alternative sites may have been needed to address any shortfall in meeting the housing requirement during the plan period. The Inspector noted that it might be possible to find alternative sites within the Council’s preferred spatial strategy; however, if they cannot be found, *“then the Council would need to explore specific, preferably localised amendments to the spatial strategy through the SA process before I could consider any reduction in the total housing requirement”*.⁴
- 2.19 In line with the Inspector’s post-hearing advice, the Council updated the housing land supply figures considering the proposed modifications, as set out in Table 2.4.

Table 2.4: Housing land supply (taking the proposed Main Modifications into account)

Component	Dwellings
Homes built (completions) 2011-2020 up to 31 March 2020	2,497
Sites with planning permission up to 31 March 2020 + 10% non-delivery rate	1,118
Windfalls 35 dwellings per annum x 8 years	280
Requirement met through Garden Communities around Harlow within EFDC	3,900
Requirement met through allocations outside the Garden Communities within EFDC	4,463
Total	12,258

- 2.20 Table 2.4 demonstrates that, considering the proposed Main Modifications, which include a reduction in capacity at some allocations and the deletion of others, the housing requirement (~ 11,400 dwellings) for the plan period can still be delivered within the Council’s preferred spatial strategy. On this basis, it was not considered necessary to explore further district-wide spatial strategy alternatives or localised amendments to the spatial strategy through the SA process.

⁴ Inspector’s post-advice note (ED98)

2022 Further Main Modifications and SA Report Addendum

2.21 In 2022, in line with the Inspector’s note of June 2022, Further Main Modifications to the EFDLP were identified which included an update to the housing land supply figures. Table 2.5 highlights these changes. The Inspector’s note of June 2022 did not identify a need to revisit the total housing requirement for the district.

Table 2.5: Housing land supply (taking the proposed Further Main Modifications into account)

Component	Dwellings
Homes built (completions) 2011-2022 up to 31 March 2022	3,023
Sites with planning permission up to 31 March 2022 + 10% non-delivery rate	1,665
Windfalls 35 dwellings per annum x 6 years	210
Requirement met through Garden Communities around Harlow within the district	3,400*
Requirement met through allocations outside the Garden Communities within the district	3,901
Total	12,199

**Note: The Plan allocates ~3,900 homes in the Garden Communities around Harlow within the district. For the purposes of determining housing land supply it is considered that 3,400 homes will be delivered within the Plan period to 2033.*

2.22 However, Table 2.4 still demonstrates that, considering the proposed Further Main Modifications, the housing requirement (~11,400 dwellings) for the plan period can still be delivered within the Council’s preferred spatial strategy. On this basis, it was not considered necessary to explore further district-wide spatial strategy alternatives or localised amendments to the spatial strategy through the SA process.

Appraisal of the draft Plan

- 2.23 The 2016 Draft Local Plan represented the first full draft plan which included a range of policies and allocations for guiding development in Epping Forest District. The Draft Local Plan was accompanied by an Interim SA Report for consultation in 2016 which presented an appraisal of the draft plan in Part 2, including an evaluation of likely significant effects, proposed mitigation measures and plan recommendations. A similar structure was used in the 2017 SA Report, in which Chapters 8 and 9 present an appraisal of the submission version of the EFDLP. The appraisal evaluated the likely significant effects of the EFDLP and informed Regulation 19 consultation.
- 2.24 The proposed modifications were also considered through the SA process which presented an appraisal of the Local Plan Submission Version plus proposed Main Modifications in the 2021 SA Report Addendum and considering the proposed Further Main Modifications in the 2022 SA Report Addendum. It was determined that the conclusions for the plan as whole under most SA topics remained valid each time. The exception to this is the biodiversity and green infrastructure topic, where the conclusion for the plan was amended from an uncertain minor negative effect to an uncertain minor positive/ neutral effect. This change was made considering the proposed Main Modifications which helped to strengthen the plan in relation to biodiversity and green infrastructure as well as the further detail provided in terms of implementation through the Green Infrastructure Strategy produced by the Council.

3. Consultation responses and how they have been considered

- 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 considered.
- 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 public.

Responses received at Regulation 18 and 19 stages

- 3.4 The responses received before and after publication of the Local Plan have been presented in the Local Plan (Regulation 22) Consultation Statement (EB115). This includes a description of the key consultation processes undertaken for the EFDLP, a summary of the main issues raised by responses and how they have been addressed.
- 3.5 The Consultation Statement can be accessed here:
[Submission Documents – EFDLC Local Plan](#)
- 3.6 Any representations referring directly to the published SA documents were considered and informed subsequent stages of the SA process.

Responses received at the Main Modification stages

3.7 Representations received following the publication of the proposed Main Modifications and SA Report Addendum 2021 were considered in the subsequent Further Main Modifications consultation and SA Report Addendum 2022. The representations received, including those commenting on the SA, were collated, and summarised with comments by EFDC and can be accessed here:

[Main Modifications Responses – EFDC Local Plan](#)

3.8 Representations received following the publication of the Further Main Modifications and SA Report Addendum 2022 are publicised by EFDC on their website and include a response specific to the SA. This response outlines that limited consultation on the new Habitat Regulations Assessment and updated SA are reasons to find the Plan and proposed modifications unsound and not legally compliant. It is noted that both the Main Modifications and SA Report Addendum 2021 and the Further Main Modifications and SA Report Addendum 2022 were consulted on over a reasonable period and the SA is considered robust and compliant.

3.9 Further Main Modifications representations can be accessed here:

[Further Main Modifications Responses – EFDC Local Plan](#)

4. Proposed 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 Epping Forest 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 Local Plan.
- 4.4 Table 4.1 therefore outlines a monitoring programme for measuring the Local 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 Plan are achieved through the planning process.

Table 4.1: SA monitoring programme for the EFDLP

SA topic	Proposed measure (given appraisal findings)
Air quality	<ul style="list-style-type: none"> Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose monitoring measures.
Biodiversity and green infrastructure	<ul style="list-style-type: none"> Net gain/loss of habitat arising from development proposals. New linkages between habitats by location. Epping Forest SAC & Lee Valley SPA: <ul style="list-style-type: none"> Net gains/ losses of buffer land and alternative green space by function. Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose monitoring measures.
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> New developments containing electric charging points by land use type. Number, location, and type of proposals achieving low carbon design. Number of decentralised low carbon and renewable energy schemes approved in development. Approvals of development in flood risk zones 2, 3a and 3b by use class and flood risk compatibility. Number of approvals and refusals in Local Flood Risk Zones.
Community and wellbeing	<ul style="list-style-type: none"> Indices of multiple deprivation scorings. Number of new connections made in the green infrastructure network. Area of new accessible natural spaces provided through development proposals. Areas of improved access to natural green spaces provided through development proposals. Number and amount by area and type of new accessible space created by development e.g., woodland, hedgerow, ponds, parks, allotments etc. Linkages between new and existing development and the countryside/ other spaces. Loss/ gain of public open space by type e.g., park, children's playground, allotment.
Economy and employment	<ul style="list-style-type: none"> Overall employment and unemployment rate. Net additional employment floorspace. Net additional floorspace of commercial development by location. Area and number of new glasshouses constructed by location. Annual tourism income.
Equality, diversity, and inclusion	<ul style="list-style-type: none"> Indices of multiple deprivation scorings Area of new accessible natural spaces provided through development proposals. Areas of improved access to natural green spaces provided through development proposals. Loss/ gain of public open space by type e.g., park, children's playground, allotment.
Historic environment	<ul style="list-style-type: none"> Number type and location of approved developments impacting on a heritage asset. Number of heritage assets improved and raised out of the 'at risk' category.
Housing	<ul style="list-style-type: none"> Five-year housing land supply. Number of pitches for travellers and travelling show people provided. Regular updates to the Gypsy and Traveller Accommodation Assessment. Number of affordable homes completed in the reporting year.

SA topic	Proposed measure (given appraisal findings)
	<ul style="list-style-type: none"> • The number of homes completed by type and bedroom size in the reporting year. • The number of homes completed through the provision of specialist housing in the reporting year. • The number of self-build/custom build homes completed in the reporting year.
Land and waste	<ul style="list-style-type: none"> • Applications refused on the grounds of harm to the Green Belt or District Open Land.
Landscape	<ul style="list-style-type: none"> • Positive landscape impact assessments on proposals approved. • Negative landscape impact assessments by EFDC on proposals refused.
Transport	<ul style="list-style-type: none"> • Road junction improvements. • Improvements in accessibility scoring by location for walking and cycling. • Improvements in public transport networks. • Numbers of Transport Plans agreed by location and land use type. • Additional kilometres of public rights of way.
Water	<ul style="list-style-type: none"> • Number and location of schemes implemented with sustainable drainage serving existing as well as new development. • Number and location of developments contributing to maintenance of watercourse infrastructure. • Number and location of developments including watercourse re-naturalisation or flood storage areas. • Number and location of non-domestic schemes achieving a 30% reduction in water usage over base line. • Number of dwellings signed off as meeting (or not meeting) Part L optional standard for water efficiency.

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 into decision-making at each stage, and with six reports having been published for consultation alongside plan documents. Any representations received were considered 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 (2012)
 - Interim SA Report (2016)
 - SA Report (2017).
 - SA Report Addendum (2021); and
 - SA Report Addendum (2022).
- 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 December 2017, 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.

