

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

Non-Technical Summary (NTS)

December 2017

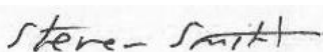
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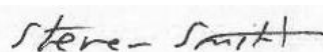
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1. Introduction

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Submission Version of the Epping Forest District Local Plan 2017. Once adopted, the plan will establish a spatial strategy to meet the economic and housing needs in the District up to 2033. The Plan identifies sites for housing (including traveller accommodation) and employment. It also sets out the development management policies and infrastructure requirements against which planning applications will be determined.
- 1.2 The SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement and must be undertaken in-line with the European Union (EU) Strategic Environmental Assessment (SEA) Directive.
- 1.3 At the current time, a Submission Version of the Local Plan is published for representations in-line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and an 'SA Report' is published alongside. The SA Report aims to inform consultation responses, and subsequent plan-making work (see the discussion of 'next steps', below).
- 1.4 This is a Non-Technical Summary (NTS) of the SA Report.

Structure of the SA Report/this NTS

- 1.5 Sustainability Appraisal reporting essentially involves answering the following questions in turn:
- 1) What has plan-making/SA involved up to this point?
 - Including consideration of 'reasonable alternatives'.
 - 2) What are the appraisal findings at this current stage?
 - i.e. in relation to the Submission Plan.
 - 3) What are the next steps?
- 1.6 Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering an initial question: *What's the scope of the SA?*

What's the scope of the SA?

- 1.7 The scope of the SA is essentially reflected in a list of sustainability objectives, developed subsequent to a 'scoping' process (which included consultation on a Scoping Report in 2010¹). Taken together, these objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal.

Table 1: SA topics and objectives (i.e. the SA framework as broadly agreed in 2010)

SA Topics	SA Objectives
Air quality	<ul style="list-style-type: none"> • Avoid worsening of existing issues through minimising traffic congestion
Biodiversity and green infrastructure	<ul style="list-style-type: none"> • Avoid direct impacts to important biodiversity sites and linear features • Avoid more indirect impacts (e.g. through pollution or development preventing adaptation of biodiversity to climate change) • Carefully plan and implement multifunctional green infrastructure • Support initiatives that seek to achieve biodiversity benefits, including through targeted habitat creation and enhancement • Plan for biodiversity at a 'landscape scale'

¹ Epping Forest District Council (2010) SA and HRA Scoping Report. Prepared by Scott Wilson (now AECOM). www.efdclocalplan.org/technical-information/

SA Topics	SA Objectives
Climate change (mitigation & adaptation)	<ul style="list-style-type: none"> Lower greenhouse gas emissions Increase the amount of renewable and decentralised energy generation Drawing on the SFRA, take a pro-active approach to reducing flood risk and mitigate risk associated with new development where it occurs
Community and wellbeing	<ul style="list-style-type: none"> Address pockets of deprivation Meet the health and social needs of a growing and ageing population, including through ensuring good access to community infrastructure Address all aspects of equality, where relevant to spatial planning Address issues specific to rural communities Provide facilities and infrastructure to support active living
Economy and employment	<ul style="list-style-type: none"> Maintain a diverse economy including through supporting existing sectors (inc. rural) Taking a long term view, support initiatives that capitalise on local strengths, including tourism potential (e.g. resulting from attractive towns and countryside) Ensure local job creation in line with local housing growth Maintain the key functions of local centres (also a 'community and wellbeing' issue) Address deprivation issues through targeted economic growth
Historic environment	<ul style="list-style-type: none"> Protect the District's heritage assets and their settings from inappropriate development Ensure that development respects wider historic character
Housing	<ul style="list-style-type: none"> Meet identified needs through providing new housing of the appropriate type (e.g. to reflect the ageing population and trend towards more single person households) Increase the provision of affordable housing Meet the needs of Travellers
Land and waste	<ul style="list-style-type: none"> Protect Green Belt that meets the nationally established objectives Make efficient use of land, accounting for land quality, and previously developed land Support good waste management
Landscape	<ul style="list-style-type: none"> Direct development away from the most sensitive landscapes and landscape features Maintain and enhance characteristic landscapes and landscape features
Transport	<ul style="list-style-type: none"> Bring about a modal shift in terms of commuting patterns, away from car dependency Promote and support investment in sustainable transport infrastructure, including in rural areas where access to services and employment is an issue
Water	<ul style="list-style-type: none"> Minimise water use to mitigate the worsening problem of 'serious water stress' Maintain and improve water quality / water courses in line with legislative requirements Direct development to areas with sewerage infrastructure capacity

'Equalities' considerations

- 1.8 As a public sector organisation, Epping Forest District Council has a duty under the Equality Act 2010² and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the Epping Forest District Local Plan eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with a protected characteristics³ and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.
- 1.9 Equalities issues were already being considered through the SA process under the Community and Wellbeing Topic. However, in 2017 the Council decided to more fully integrate EqIA into the SA process. As a result, it was decided that there should be a separate SA topic ('Equality, Diversity and Inclusion') to more clearly address equalities. This will help to ensure that equality issues/ impacts are considered and discussed as part of the appraisal of the Submission Plan and reasonable alternatives. It should be noted that the baseline information was updated to include consideration of protected characteristics.

² Equality Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents>

³ Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

2. Plan-making/SA up to this point

- 2.1 An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.
- 2.2 As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise alternative approaches to housing and employment growth (‘alternative spatial strategies’). Specifically, Part 1 of the report:
- 1) Explains the process of establishing reasonable alternatives;
 - 2) Presents the appraisal of the reasonable alternatives; and
 - 3) Gives the Council’s response to the alternatives appraisal findings.
- 2.3 Whilst Local Plan-making has been underway since 2010 - with AECOM commissioned as SA consultants from the outset - for the benefit of stakeholders it is helpful to focus on the key steps undertaken in 2016 and 2017 that led to the development of District-wide reasonable alternatives.
- 2.4 To minimise complexity, the intention here is not to report on steps taken prior to 2016, despite it being the case that all work undertaken over the course of the plan-making/SA process has fed-in and helped to set the context for alternatives development.⁴

Reasonable Alternatives in 2016

Developing reasonable alternatives in 2016

- 2.5 Alternative spatial strategies were developed and appraised in 2012, at the time of the Issues and Options consultation. In 2016 it was recognised that there was a need to revisit and refine our understanding of ‘the reasonable alternatives’ in light of:
- 1) HMA level considerations - including work undertaken amongst the four authorities that comprise the West Essex and East Hertfordshire Housing Market Area (HMA) to establish Objectively Assessed Housing Need (OAHN) for the HMA and how this need should be apportioned between the four authorities (and, in particular, how the growth of Harlow should be best accommodated); and
 - 2) District level considerations - work undertaken by Epping Forest District Council to assess the sites put forward through the Strategic Land Availability Assessment (SLAA) 2016 and rolling call for sites in the District, and identify those that were candidates for allocation. This included the identification and assessment of strategic options (i.e. directions of growth) for settlements to inform the selection of candidate preferred sites and the detailed site assessment of each site which was undertaken in line with SA objectives.
- 2.6 We briefly explain (1) and (2) in turn, and then conclude by explaining how the evidence-base was drawn on to establish District-wide reasonable alternatives for appraisal in 2016.

Housing Market Area (HMA) level considerations

- 2.7 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

⁴ A key step was taken in 2012, when the Council consulted on ‘Issues and Options’ alongside an Interim SA Report. In relation to the spatial strategy, the consultation document presented - four alternative housing growth quantum figures; seven alternative broad spatial strategy alternatives; and spatial growth options (not necessarily alternatives) for each of each the main settlements. The Interim SA Report presented an appraisal of these options/alternatives (as well as alternatives for several other issues). Numerous issues/impacts were raised at this time, and taken into account. However, lessons learned from this stage in the process are now somewhat dated and, for that reason, not presented here. See www.eppingforestdc.gov.uk/index.php/home/file-store/category/221-issues-and-options-consultation

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

- 2.8 A Joint Strategic Housing Market Assessment (SHMA) for the HMA was published in September 2015.⁵ 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

- 2.9 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 HMA⁶)
- 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 for the HMA

- 2.10 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;
 2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water;⁷
 3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation in particular; and

⁵ Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings www.efdclocalplan.org/technical-information/

⁶ 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.

⁷ 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/CHttpHandler.ashx?id=6626&p=0>

4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.
- 2.11 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** below.

Table 2: 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
Harlow District Council	approx 9,200
Uttlesford District Council	approx 12,500
Total across the HMA	approx 51,100

...of which the area in and around Harlow⁸ will provide approx 16,100

District level considerations

- 2.12 The HMA work discussed above resulted in an understanding of the preferred strategic sites within Epping Forest District around Harlow, and resulted in an understanding of the housing requirement which would need to be delivered through other sites within Epping Forest District. There remained a need to develop a District-wide understanding of the site options available within the wider District to deliver the remaining housing requirement.

Housing, traveller and employment sites

- 2.13 Sites were identified through the Strategic Land Availability Assessment (SLAA) published in 2016 and the Council's rolling call for sites. In order to assess the sites across the District, the Council applied a bespoke site selection methodology, which sought to identify the most suitable sites for allocation in the Local Plan to meet the Districts' housing requirement. The site assessment process undertaken to inform the Draft Local Plan involved a number of key stages and these are set out below:
- **Stage 1** - Major policy constraints - Residential sites were considered against six major policy constraints and employment sites five. A site was not progressed to the next stage if it was affected by one or more of the major policy constraints.
 - **Stage 2** - Quantitative and qualitative assessment - A more detailed assessment was carried out against a range of criteria to identify the relative suitability of sites for development. The site assessment criteria were developed with the explicit purpose of reflecting the SA framework. No sites were rejected at this stage. The site selection process for employment sites was put on hold at this point until the Employment Land Supply Assessment could be updated.
 - **Stage 3** - Identify candidate preferred sites - The purpose of this stage was to identify the candidate preferred sites, which were then subject to further capacity and deliverability assessment. The focus at this stage was to identify the 'best' fit sites for a particular settlement rather than those sites which might be 'best' at the District scale (please refer to strategic options for settlements below).
 - **Stage 4** - Deliverability - This stage considered the deliverability of the sites to inform the housing trajectory for the Draft Local Plan.

- 2.14 The site assessment process in 2016 is summarised in **Figure 1**.

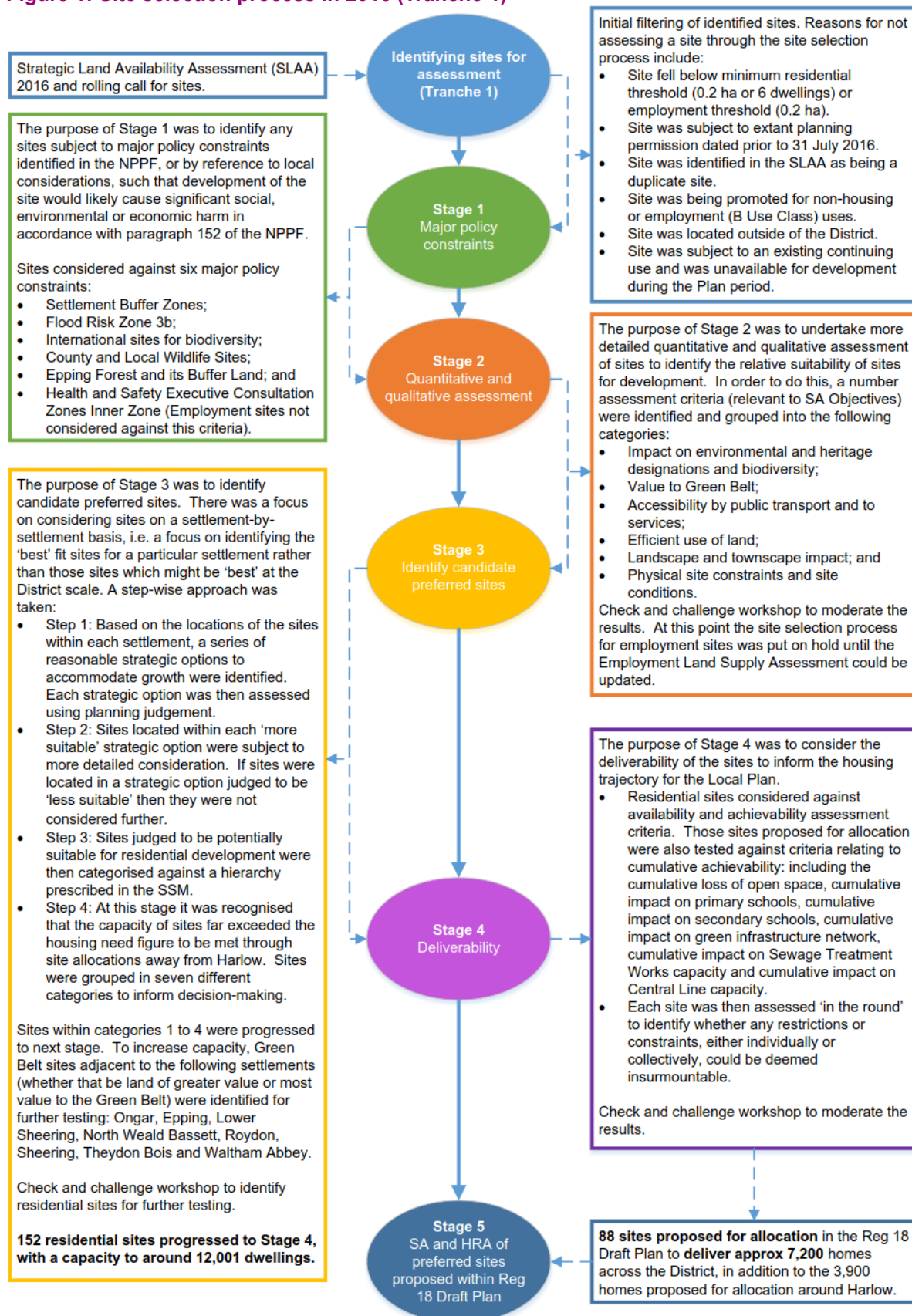
⁸ 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

Strategic options for settlements

- 2.15 Responses received from the Issues and Options consultation in 2012 led to the view that growth should be distributed across the District and prioritised within or adjacent to settlements to support sustainability.
- 2.16 In order to reflect the consultation responses and inform the selection of sites, the Council explored strategic options to accommodate growth at settlements within the District.⁹ The strategic options were essentially directions for growth at each settlement (e.g. North, South West) and were developed based on the sites identified through the site assessment process and considered through Stage 2. It should be noted that for all settlements a strategic option for intensification of the existing urban area was also explored. For each strategic option a planning judgement was made using evidence available including the Landscape Character Assessment Study, Green Belt Study, was made about whether the option represented a more or less suitable location for growth.
- 2.17 This work informed the site selection process at Stage 3. Sites located within a 'more suitable' spatial option were progressed through the site assessment process and were subjected to more detailed consideration. If sites were located in a strategic option judged to be 'less suitable' then they were not considered further as part of the site assessment process.

⁹ In some settlements only a single broad option was identified, while in other settlements the location of some sites was not considered to justify identification of a broad option.

Figure 1: Site selection process in 2016 (Tranche 1)



Establishing the District-wide Reasonable Alternatives in 2016

2.18 The outcome of the Issues and Options consultation had led to the Council's approach to distribute development across the District, maximise development within existing settlements on brownfield land and minimise the release of Green Belt land in the District. Informed by the assessment of sites set out above, including strategic options for settlements, a series of District-wide spatial strategy alternatives were developed based on outcome of the Issues and Options consultation in 2012. The alternatives varied in terms of distribution only (recognising that the housing requirement for the District has been determined at the sub regional, HMA scale). All involved delivering the housing requirement of around 11,400 new homes arrived at on the basis of HMA level work, and broadly involved delivering the spatial strategy set out below, i.e. the alternatives varied only in limited respects. These are set out below:

- Option 1 was the preferred strategy (which was consulted on in the Draft Local Plan) to emerge from the HMA level work and site assessment process, which involved:
 - 1) A sequential flood risk assessment - proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
 - 2) Sites located on previously developed land within settlements;
 - 3) Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;
 - 4) Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015);
 - 5) Greenfield/Green Belt land on the edge of settlements:
 - a. Of least value to the Green Belt if the land meets other suitable criteria for development.
 - b. Of greater value to the Green Belt if the land meets other suitable criteria for development.
 - c. Of most value to the Green Belt if the land meets other suitable criteria for development.
 - 6) Agricultural land:
 - a. Of Grade 4-5 if the land meets other suitable criteria for development.
 - b. Of Grade 1-3 if the land meets other suitable criteria for development.
 - 7) Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.
- Options 2 - 5 are as set out below and described in Table 3.

Table 3: The District-wide Reasonable Alternatives in 2016

Option	Quantum	Distribution
1 The preferred option		The preferred strategy
2 Lower growth at North Weald Bassett		Lower growth at North Weald Bassett, and consequentially higher growth elsewhere (dispersed)
3 Higher growth at North Weald Bassett	Meet the housing requirement of ~11,400 homes	Higher growth at North Weald Bassett, and consequentially lower growth elsewhere (dispersed)
4 Lower growth on urban greenspaces		Lower growth on 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)

2.19 The above District-wide spatial strategy options were considered to be the ‘reasonable’ alternatives at that stage in plan-making, in that their appraisal would enable and facilitate discussion of important issues/opportunities for the District. Whilst it was recognised that there are other options that could potentially have featured, there is a need to limit the number of alternatives, with a view to facilitating engagement.

SA of the District-wide Reasonable Alternatives in 2016

2.20 The options in **Table 3** were appraised through the SA process with the findings presented in the Interim SA Report and NTS that accompanied the Draft Local Plan on public consultation in October 2016.¹⁰

The Council’s response/justification for the preferred approach in 2016

2.21 The Council’s justification for the preferred approach in 2016 was set out at paragraph 3.54 of the Draft Local Plan (2016), as reflected in Draft Local Plan Policy SP 2. That justification can be summarised as follows:

- 2.22 The preferred approach - Option 1 - made provision for 11,400 homes over the plan period through a distribution strategy that emerged subsequent to work with neighbouring authorities and a detailed site selection process and reflected the following broad principles:
- Allocating sites around Harlow in accordance with the vision of the London Stansted Cambridge Corridor Core Area and to recognise its role from an economic perspective;
 - Maximising opportunities for development on previously developed land within the existing settlements of the District;
 - Utilising open space within settlements where such selection would not adversely affect open space provision within the settlement and making the best use of existing land without compromising local character;
 - Utilising previously developed land within the Green Belt;
 - Allowing for a limited release of Green Belt land to provide for housing on the edge of settlements to distribute housing across the District, in keeping with Green Belt policy that exceptional circumstances must be demonstrated for Green Belt release; and
 - Enabling small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.

¹⁰ Epping Forest District Council (2016) Interim SA Report. Prepared by AECOM. www.efdclocalplan.org/technical-information/

Reasonable Alternatives in 2017

Developing reasonable alternatives in 2017

- 2.23 Subsequent to the consultation on the Draft Local Plan and Interim SA Report in 2016, the representations received were collated and reviewed. On the basis of the responses received as well as updated evidence, it was considered appropriate to give further consideration to reasonable alternatives.
- 2.24 Building on the work carried out in 2016 and explained above, the discussion below is again structured according to the following:
- 1) HMA level considerations relating to the broad strategy for the sub-regional HMA (including sites on the around Harlow); and
 - 2) District level considerations relating to site options within the rest of Epping Forest District.
- 2.25 As for the previous work again we consider (1) and (2) in turn, and then conclude by explaining how the updated evidence-base was drawn on to establish and refine District-wide reasonable alternatives for appraisal in 2017.

Housing Market Area (HMA) level considerations

- 2.26 Since the Draft Local Plan consultation in 2016, a further SHMA update was carried out in 2017 taking into consideration the latest relevant evidence including the Department for Communities and Local Government's 2014 based household projections (July 2016). These updates led to a revised objectively assessed housing need (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.
- 2.27 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 National Planning Policy Framework (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..."
- 2.28 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.¹¹ 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.¹² Epping Forest District Council's housing requirement therefore remains 11,400 dwellings as set out within the signed MoU (March 2017).

¹¹ 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/CHttpHandler.ashx?id=6626&p=0>

¹² 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.

District level considerations

Housing, traveller and employment sites

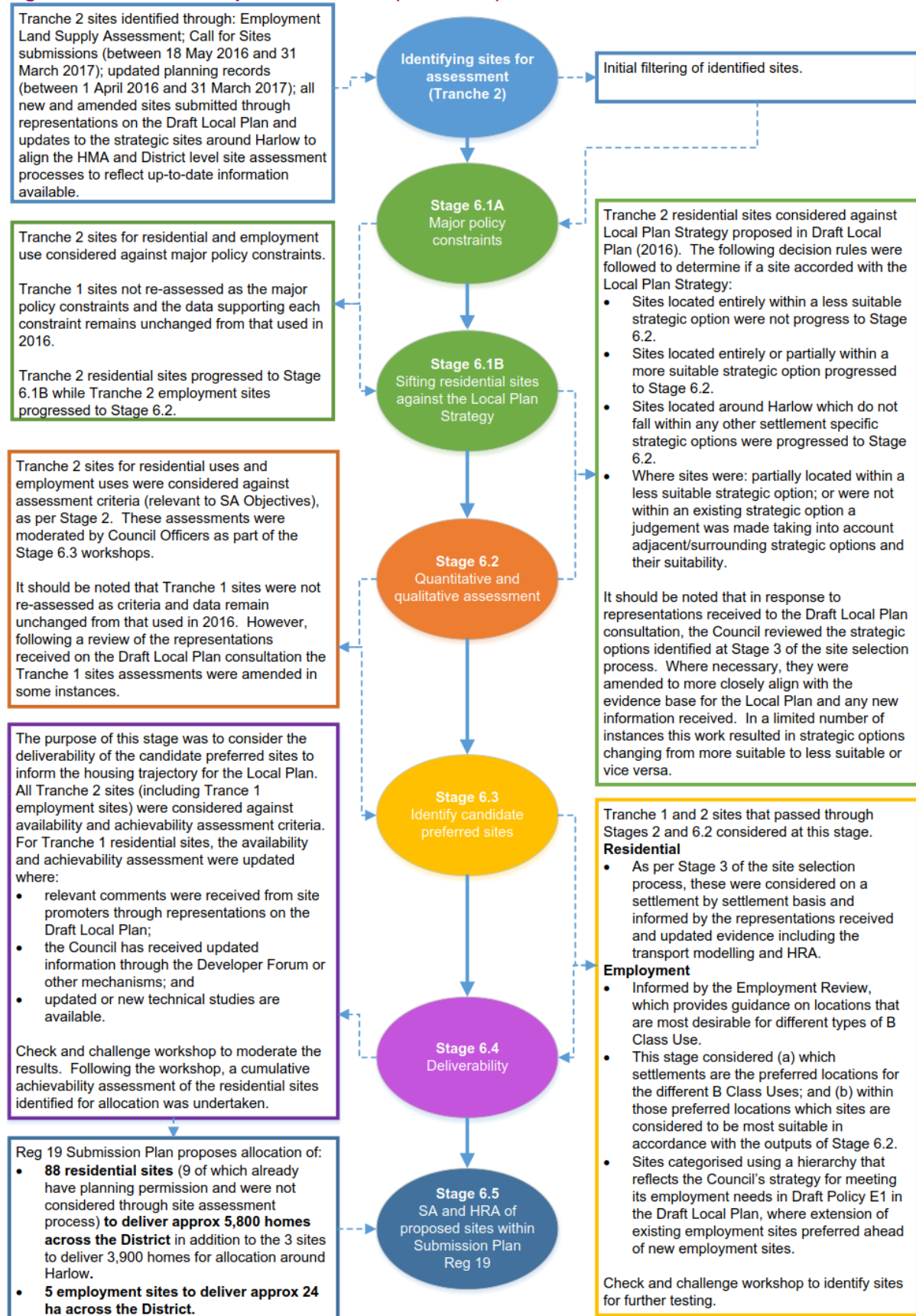
- 2.30 Following the Draft Local Plan consultation in 2016, further site assessment work has been undertaken based on an updated Site Selection Methodology Document, which is available on the Council's website¹³, and summarised in **Figure 2** below.
- 2.31 The sources of information for identifying additional sites to be subject to the SSM post-Draft Local Plan consultation (referred to as Tranche 2 sites) are different to that used for the Tranche 1 sites in 2016. In order to identify Tranche 2 sites the following sources were used:
- Employment Review¹⁴ and Employment Land Supply Assessment¹⁵ studies;
 - Call for Sites submissions received between 18 May 2016 and 31 March 2017;
 - Refused and withdrawn planning applications, live planning applications and pre-application enquiries received between 1 April 2016 and 31 March 2017;
 - Representations from site promoters received in response to the Draft Local Plan consultation which identify new sites and/or amended proposals for Tranche 1 sites which are materially different from that previously assessed; and
 - Updates to the strategic sites around Harlow to align the HMA and District level site assessment processes to reflect up-to-date information available.
- 2.32 It should be noted that Tranche 1 site assessments were amended in some instances to reflect responses received from the Draft Local Plan consultation in 2016.

¹³ <http://www.efdclocalplan.org/wp-content/uploads/2017/07/Updated-EFDC-Site-Selection-Methodology-Post-Reg-18.pdf>

¹⁴ Epping Forest District Council (2017) Employment Review. Prepared by Hardisty Jones Associates.
www.efdclocalplan.org/technical-information/

¹⁵ Epping Forest District Council (2017) Employment Land Supply Assessment. Prepared by Arup.
www.efdclocalplan.org/technical-information/

Figure 2: Site selection process in 2017 (Tranche 2)



Strategic options for settlements

2.33 In response to representations received through the Draft Local Plan consultation, the Council reviewed the strategic options (directions for growth) for each settlement identified previously at Stage 3 of the site selection process in 2016. Where necessary, the strategic options were amended to more closely align with the evidence base for the Local Plan and any new information received. Further justification has also been developed to set out why a strategic option is considered to be more or less suitable. In a limited number of instances this work has resulted in strategic options changing from more suitable to less suitable or vice versa. The updated strategic options informed the selection of sites at Stage 6.3 of the site assessment process in 2017.

Establishing the District-wide Reasonable Alternatives in 2017

2.34 Building on the work carried out in 2016 and informed by updated evidence, which includes the assessment of new/amended sites submitted since the 2016 site selection work through the rolling call for sites/Tranche 2 sites (for housing, traveller and employment uses); the Employment Review¹⁶ and Employment Land Supply Assessment¹⁷ studies - the consideration of 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.

2.35 It was not considered necessary to re-visit broader District-wide spatial strategy alternatives at this stage. The SA process appraised alternatives to the preferred spatial strategy for the delivery of ~ 11,400 homes in 2016, with the findings published in the Interim SA Report (2016).¹⁸ The representations received in relation to the Draft Local Plan and Interim SA Report along with the updated evidence do not suggest that there are any new District-wide spatial strategy alternatives that need to be explored or that the appraisal needs to be re-visited.

2.36 The alternatives in 2017 were defined in order 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 school(s);
- Contribution to five year land supply within the Local Plan; and
- Potential alignment with emerging Neighbourhood Plans.

2.37 This would help to inform the Council's decision-making on proposed site allocations in the Submission Plan. Based on the above, three reasonable District-wide alternatives were identified and these are set out in the Table below.

¹⁶ Epping Forest District Council (2017) Employment Review. Prepared by Hardisty Jones Associates. www.efdclocalplan.org/technical-information/

¹⁷ Epping Forest District Council (2017) Employment Land Supply Assessment. Prepared by Arup. www.efdclocalplan.org/technical-information/

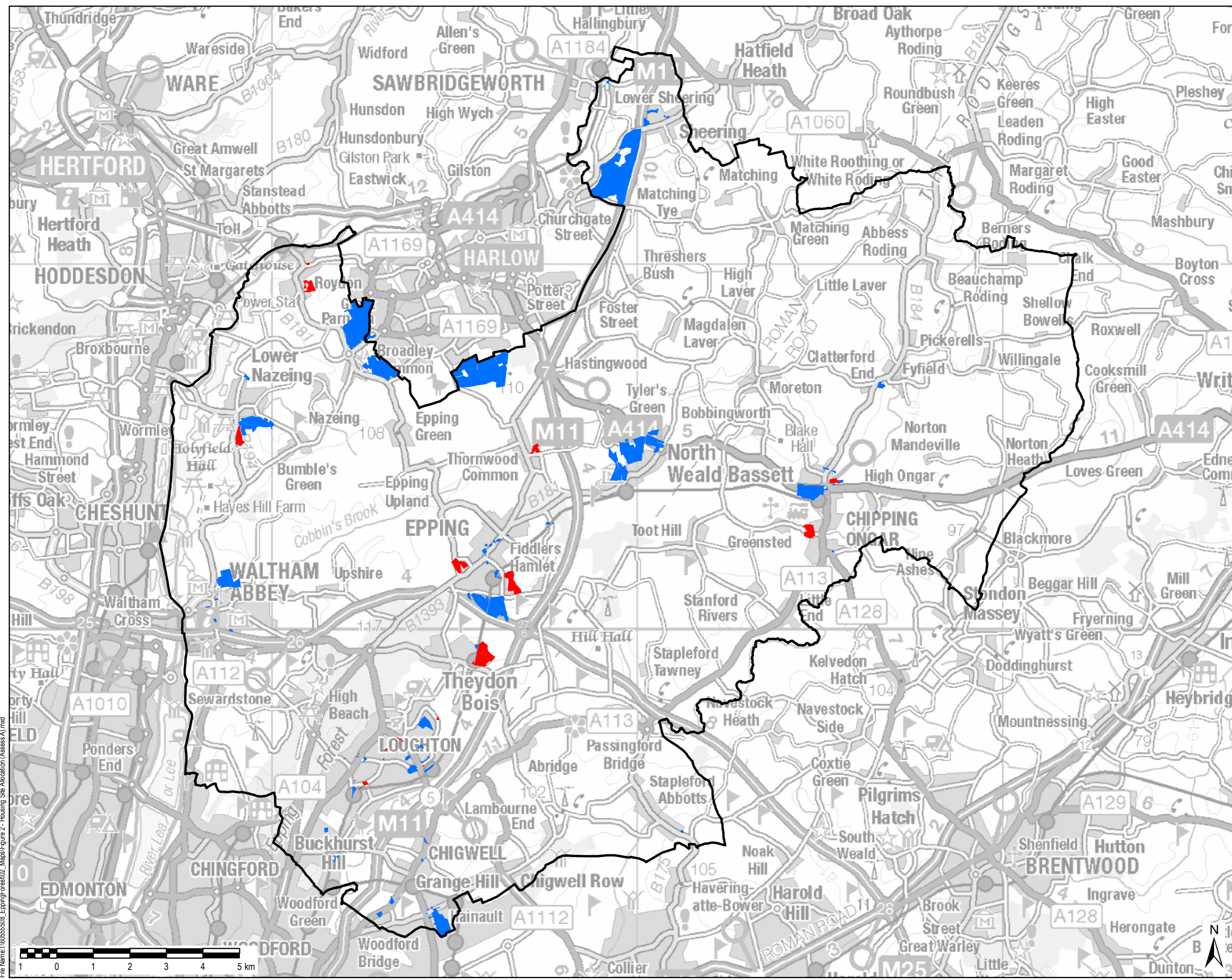
¹⁸ Epping Forest District Council (2016) Interim SA Report. Prepared by AECOM. www.efdclocalplan.org/technical-information/

Table 4: The District-wide Reasonable Alternatives in 2017

	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patters	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 from Tranche 2 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 from tranche 2 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 sites from Tranche 2 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 (emerging through Tranche 2) 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 (emerging through Tranche 2) 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.

2.38 It was understood that the sites ultimately identified for allocation in the Submission Version of the Local Plan would represent a hybrid of the three alternatives above, taking into account the findings of the technical assessment work (transport modelling, education requirements and the SA process).

2.39 The varying distribution of housing under the three alternatives is illustrated in **Figures 3 to 5**. Broad locations for employment and new secondary schools were explored as part of the alternatives rather than specific sites. These broad locations are identified in **Table 2** above. As a result, the broad locations are not included as part of the figures to avoid confusion with the specific residential sites.



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LEGEND

- Epping Forest District Boundary
- Residential sites for testing**
 - Constant
 - Variable

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Purpose of Issue

Client
EPPING FOREST DISTRICT COUNCIL

Project Title
SA FOR EPPING FOREST DISTRICT LOCAL PLAN

Drawing Title
Alternative A

Drawn SM	Checked CN	Approved AP	Date 01/12/2017
AECOM Internal Project No. 60555508		Scale @ A3 1:95,000	

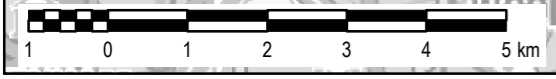
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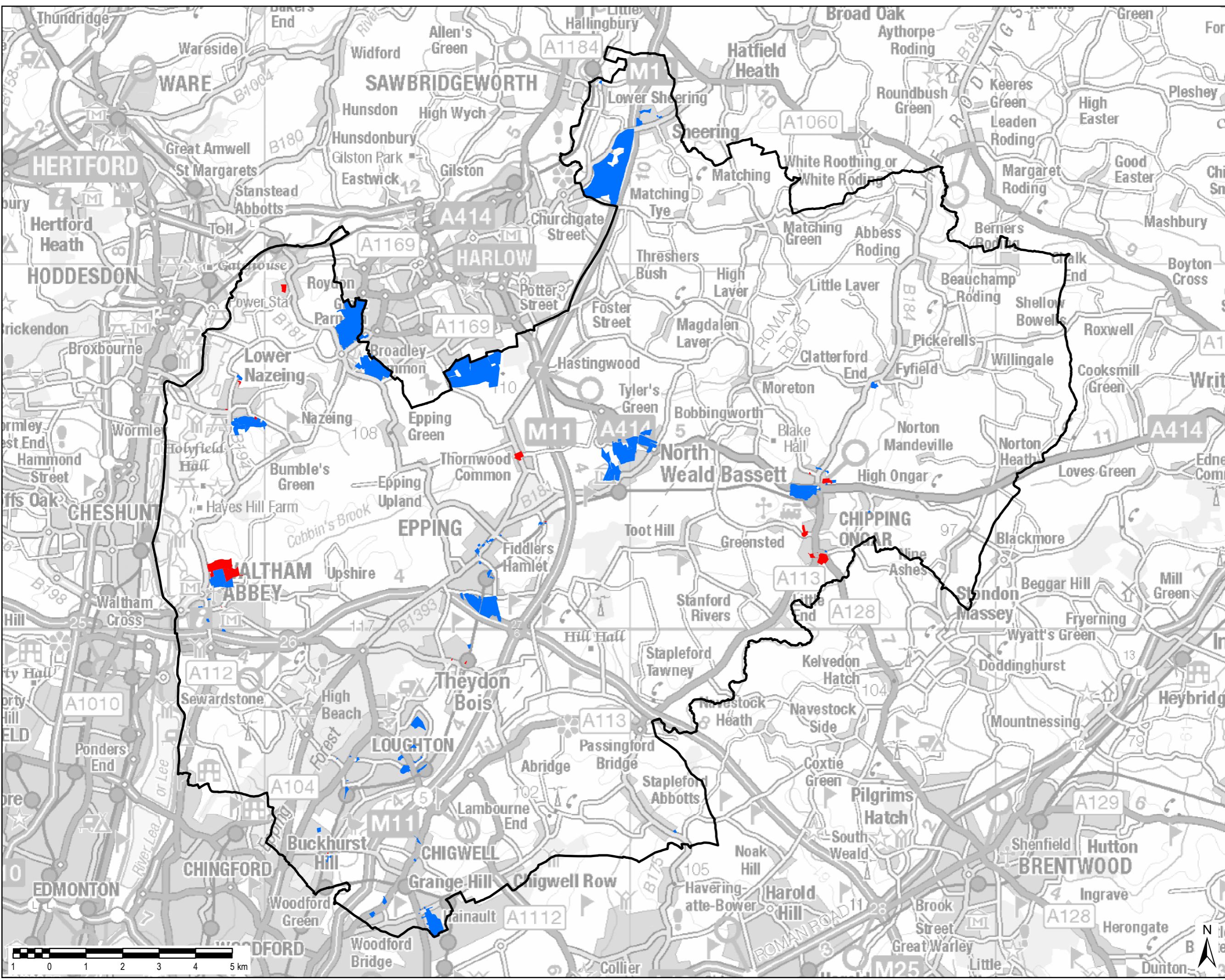
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FIGURE 3

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Purpose of Issue

Client
EPPING FOREST DISTRICT COUNCIL

Project Title
SA FOR EPPING FOREST DISTRICT LOCAL PLAN

Drawing Title
Alternative B

Drawn SM	Checked CN	Approved AP	Date 14/11/2017
AECOM Internal Project No. 60555508		Scale @ A3 1:95,000	

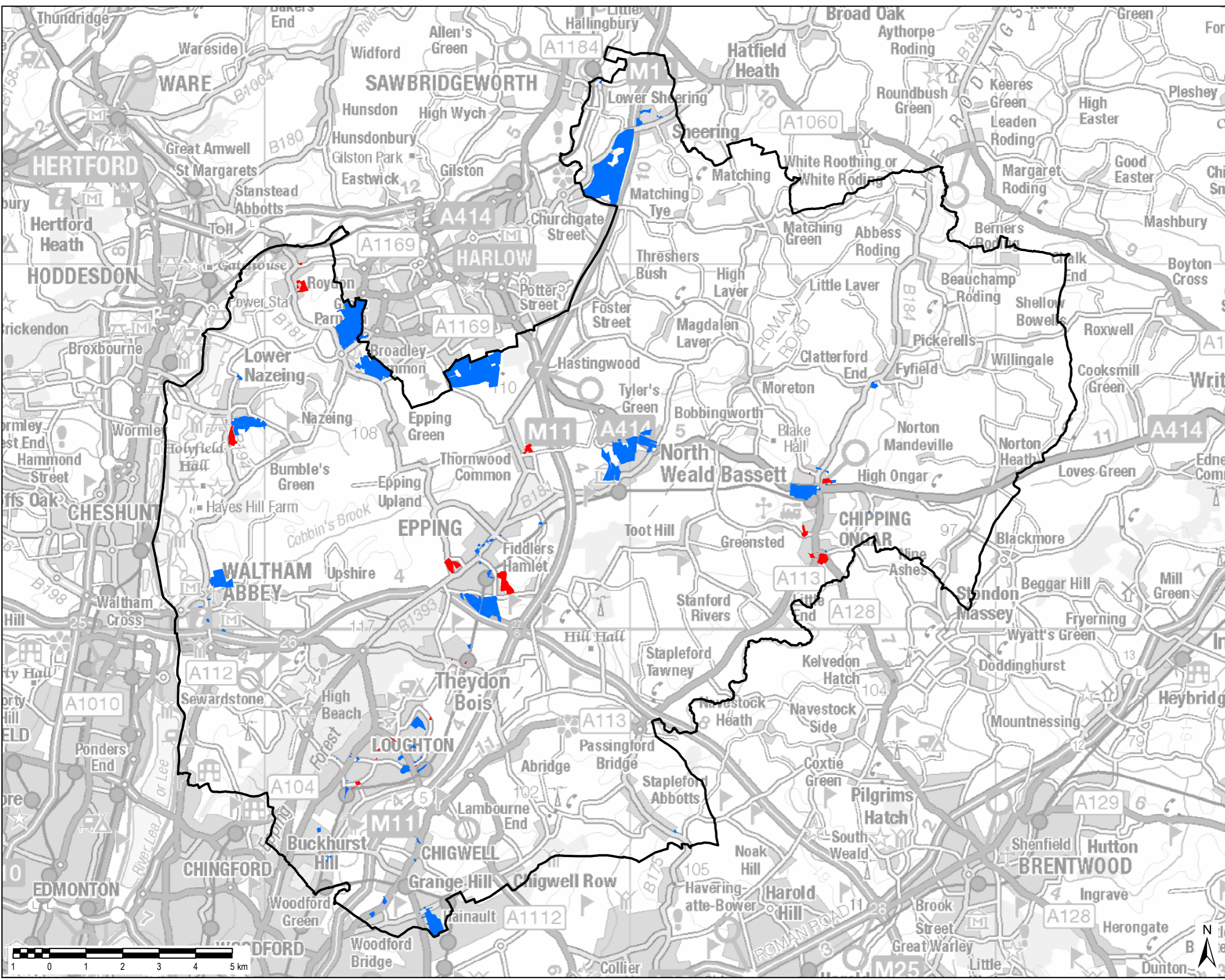
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Purpose of Issue

Client
EPPING FOREST DISTRICT COUNCIL

Project Title
SA FOR EPPING FOREST DISTRICT LOCAL PLAN

Drawing Title
Alternative C

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Summary alternatives appraisal findings in 2017

2.40 Summary appraisal findings are presented within **Table 5**. Within each row (i.e. for each of the topics that comprise the SA framework, including equalities) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using **red / green**) and also rank the alternatives in relative order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it is not possible to differentiate between them). A star is used to highlight the option or options that are preferred from an SA perspective.

Table 5: Summary spatial strategy alternatives appraisal findings

Summary findings and conclusions			
Topic	Categorisation and rank		
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Air quality	=	=	=
Biodiversity and green infrastructure	2	2	★1
Climate change (mitigation and adaptation)	★1	2	2
Community and wellbeing	=	=	=
Economy and employment	=	=	=
Equality, diversity and inclusion	=	=	=
Historic environment	=	=	=
Housing	2	★1	2
Land and waste	★1	3	★1
Landscape	=	=	=
Transport	★1	3	2
Water	=	=	=

2.41 The appraisal found that for a number of SA topics the differences in terms of distribution do not result in any significant differences between the alternatives or are likely to generate any significant effects at a District scale. There are differences between the alternatives at a local level, in terms of positive and negative effects, against the majority of SA topics. This in particular relates to biodiversity, landscape, historic environment and transport. It is not appropriate to go into detail about these localised effects within the NTS - as where they occur reflects the distribution of growth. They were also found by the appraisal to not be significant once mitigation is taken into account.

2.42 In terms of significant effects the appraisal found the following:

- There is the potential for all the alternatives to have a **significant long term positive effect** on SA topics relating to community and wellbeing, economy and employment and housing. The delivery of delivery of housing and employment as well as associated improvements to infrastructure, including community facilities/services and public transport, will help to meet the needs of communities and have a positive effect for the District. Alternative B performed slightly better against the housing topic compared to the others as it would deliver a slightly higher level of overall housing growth.
- There is the potential for all the alternatives to have a **significant negative effect** on the land and waste SA topic through the loss of greenfield and agricultural land. While the Local Plan Strategy and therefore all of the alternatives seek to minimise the loss of both where possible, there will still be a loss that is of significance in order to ensure that housing needs are being met. Alternative B performs worse against this topic as it proposes less brownfield development in Loughton compared to the others.

2.43 While the appraisal did not identify any further significant effects, it did highlight some differences between the alternatives for the following topics:

- **Biodiversity** - Alternative C performs slightly better than the others as it directs more growth away from the sensitive receptors, such as Epping Forest and the Lee Valley, situated in the South West and West of the District.
- **Transport** - There are existing congestion issues in the south of the District and focusing development there could exacerbate this. However, the settlements in the south of the District have good access to the Underground network and services/facilities. Housing within and around these settlements accompanied with associated improvements to public transport infrastructure could potentially help to reduce use of the private vehicle and therefore traffic by encouraging the use of other, more sustainable modes of transport. Alternative A proposes the greatest level of growth along the Central Line, so it performs better against the transport topic compared to the other alternatives. It is followed by Alternative C with Alternative B performing less well as it proposes directs growth away from the Central Line.
- **Climate Change** - Linked to the findings of the appraisal for transport, the appraisal found that Alternative A performs slightly better against the climate change topic as it is more likely to reduce the need to travel/ use of the private vehicle so is therefore more likely to minimise transport related CO₂ emissions.

The Council's response / justification for the preferred approach in 2017

- 2.44 The three alternatives outlined earlier in **Table 5** were tested through transport modelling, sustainability appraisal, education requirements (principally assessing the impacts of different secondary school locations) and contribution to the five year land supply. The findings were used to inform the allocation of sites to be included in the Submission Version of the Local Plan.
- 2.45 The transport modelling found key traffic impacts are likely to arise in Epping and Waltham Abbey and that the Wake Arms Roundabout is a key constraint. The modelling found the following in terms of differences between the alternatives:
- **Wake Arms roundabout** - Alternative C performs slightly worse in the AM and there are no significant differences between Alternatives A and B in the AM. There are no significant differences between the alternatives in the PM. The modelling found that all the alternatives are likely to have reduced traffic impacts compared to the Draft Local Plan (2016).
 - **Epping** - Alternative B performs best in the AM and PM as it proposes the lowest level of growth. Alternative C performs worse in the AM as a result of the delivery of a new secondary school. Alternative A falls between B and C in the AM and performs similarly to Alternative C in the PM. The modelling found that all the alternatives are likely to have increased traffic impacts compared to the Draft Local Plan (2016), apart from Alternative B in the PM.
 - **Loughton** - All the alternatives perform similarly in the AM and PM. The modelling found that all the alternatives are likely to significantly reduce traffic impacts, particularly in the AM, compared to the Draft Local Plan (2016).
 - **Waltham Abbey** - Alternative B performs significantly worse in the AM and PM. There are no significant differences between Alternatives A and C. The modelling found that all the alternatives are likely to have and increased traffic impact compared to the Draft Local Plan (2016).
 - **Harlow** - Alternative B performs worse in the AM and PM followed by Alternative C. Alternative A performs better in both the AM and PM. This is likely due to the higher level of employment growth proposed at the Harlow Strategic Sites under Alternatives B and C. The modelling found that all the alternatives are likely to have increased traffic impacts compared to the Draft Local Plan (2016), apart from Alternative A in the PM.
- 2.46 In terms of education requirements, all of the alternatives scored similarly with regard to primary schools. The location of new secondary schools is a key issue in terms of education provision during the life of the Local Plan. A new secondary school on the East of Harlow Site is included under all the alternatives and can be accommodated. There are significant doubts that a new secondary school could be provided at Waltham Abbey due to transport issues and whether the level of growth would be sufficient to deliver it. Essex County Council's preferred location for the second secondary school is Latton Priory as they consider it will have a comparatively reduced impact on traffic. It is assumed that secondary schools in the south of the District will expand to cater for growth in needs. There is potential for the relocation of King Harold School onto the new masterplan area to the North of Waltham Abbey.
- 2.47 The SA found that for the majority of SA topics the differences in terms of distribution do not result in any significant differences between the alternatives or are likely to generate any significant effects at a District scale. There will be differences between the alternatives at a local level, in terms of positive and negative effects, against SA topics relating to the landscape, historic environment, biodiversity, economy, communities and transport. Some of the differences identified through the SA are highlighted below:
- **Biodiversity** - Alternative C performs slightly better against biodiversity as it proposes less growth in the south west of the District where there are sensitive receptors.

- **Climate change** - Alternative A performs slightly better in terms of transport related CO2 emissions given the focus of growth around the Central Line and therefore access to public transport.
- **Housing** - Alternative B performs slightly better against the housing topic as it proposes a slightly higher overall level of growth compared to the other alternatives.
- **Land and waste** - Alternatives A and C perform slightly better against this topic as they take advantage of the brownfield sites emerging in Loughton through the site assessment process (Tranche 2), whereas Alternative B does not.
- **Transport** - The settlements in the south of the District have good access to the Underground network and services/facilities. Housing within and around these settlements accompanied with associated improvements to public transport infrastructure could potentially help to reduce use of the private vehicle and therefore traffic by encouraging the use of other, more sustainable modes of transport. Alternative A proposes the greatest level of growth along the Central Line so it performs better against this topic.

2.48 The results from the technical assessments of alternatives set out above, together with analysis of the Draft Local Plan consultation feedback and the updated evidence base, fed into the Council's preferred approach and led to the following:

- Less growth overall in Epping but higher growth in the South of the settlement, to reduce impacts on traffic congestion and air quality at Epping Forest. Focus on non-urban brownfield sites to the south of the settlement to ensure greater alignment with the emerging Epping Neighbourhood Plan that reflects local aspirations for a greater level of growth in the South of the settlement.
- Less growth at Theydon Bois due to potential impact on Epping Forest due to increased recreational pressure.
- Less growth at North Weald Bassett to reduce impacts on traffic as well as concerns raised through the Draft Local Plan consultation.
- A new secondary school and additional growth to support this at Waltham Abbey (as per Alternative B) not supported by the County due to traffic impacts and insufficient growth to sustain it. However, there is the potential to support the relocation/extension of existing secondary school. Epping not preferred location for second secondary school due to impact on traffic
- Employment growth to be focussed in Waltham Abbey to the South of the M25 and at North Weald Airfield.
- Reduction in growth to be delivered on managed open space sites in Loughton, to reflect consultation responses on the Draft Local Plan.

2.49 The preferred approach at this stage represents a hybrid of the three alternatives. It supports strategic priorities - including the London Stansted Cambridge Corridor Core Area Strategic Vision and MoUs established through the Cooperation for Sustainable Development Member Board - and meets the identified needs of communities while reflecting significant constraints, including the Metropolitan Green Belt and environmental assets within the District, such as Epping Forest and the Lee Valley.

2.50 The allocation of land for new homes and the opportunities for delivering the associated supporting infrastructure around Harlow meets part of the District's housing requirement - the overall capacity around Harlow was assessed as being about 17,000. The spatial strategy underpinning the remaining requirement to be met through the Local Plan therefore focuses on opportunities for accommodating new homes within existing urban areas and on brownfield sites before any Green Belt release. This provides only limited opportunities in terms of overall numbers and so the Council has identified a range of sites on the edge of settlements which reflect the opportunities to create sustainable communities of different size and which can support sustainable transport choices to reduce the need to travel by car, thus reducing impacts on the Epping Forest in particular. The Plan has also sought to recognise and reflect the emerging work of a Neighbourhood Plans in Chigwell and Epping. In doing so the Local Plan provides a balance between supporting the Council's strategic priorities, reducing any likely

significant effect on environmental assets, minimising the need as much as possible to develop on Green Belt land whilst supporting local priorities and opportunities.

- 2.51 The Local Plan allocates the remaining housing requirement identified for Epping Forest District by taking a sequential approach to where new homes will be provided. In determining the appropriate sites the Council has taken account of the previous consultation responses which considered that new housing should be distributed across the District, together with the evidence on sites put forward and the policy and environmental constraints in the District. The approach to the allocation of sites has been to take each settlement and consider the most appropriate sites in accordance with the order of priority identified previously in Paragraph 2.18 of this NTS.
- 2.52 The spatial distribution of the employment sites has sought to reflect the needs identified across the District, particularly taking into account the need for additional space to serve employment markets in the south of the District, including at Loughton and Waltham Abbey. Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Enterprise Zone, and further small-scale employment uses will also be provided within the Garden Town Communities to promote the sustainable growth of Harlow and reduce out-commuting.
- 2.53 It is important that Epping Forest District makes provision for employment in other areas where new homes are to be provided, where there is market appetite to develop and to manage the level of traffic growth generated in order to minimise pressure on the roads through Epping Forest. Taking this approach makes a positive contribution toward the delivery of the London-Stansted-Cambridge Corridor Vision, the employment needs across the Functional Economic Market Area, and the needs of the District.
- 2.54 The Council also recognises that a significant proportion of new floorspace is capable of coming forward through the regeneration of existing employment sites. Therefore in order to both protect existing stock wherever possible and provide certainty for future investors the Plan allocates existing employment sites where it has been appropriate to do so.

3. Appraisal findings at this stage

- 3.1 Part 2 of the SA Report answers the question - *What are appraisal findings at this stage?* - by presenting an appraisal of the Submission Plan. Appraisal findings are presented under thirteen 'sustainability objective' headings (see Table 1, above), and summary findings are presented below. Where necessary, the appraisal narrative below identifies the nature (positive, negative or neutral) and significance (significant or minor) of effects.

Air quality

- 3.2 There are existing congestion and air quality issues in the south of the District and, as such, the focus of development in this location could exacerbate these concerns. However, on the other hand, settlements in the south of the District have good access to public transport (in particular the Central Line), employment and services/facilities. Growth at North Weald Bassett and Epping also gives rise to some potential issues, given the District's only designated Air Quality Management Area (AQMA) is located on the southern edge of Epping; however, the findings of work to examine strategic growth options at the HMA scale serves to allay concerns (albeit this work was focused on impacts to the condition of Epping Forest SAC, as opposed to the matter of worsening air quality within the AQMA).
- 3.3 It should be noted that the transport modelling work to date concludes that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered.¹⁹
- 3.4 Localised air quality issues throughout the District are addressed through Chapter 5 of the Plan, within area specific policies. In the context of Epping Forest SAC, the HRA (2017) considers that the Plan's firm commitment to the development of mitigation strategies to address air quality around Epping Forest, the commencement of work on those solutions, the agreement to a deadline for devising those strategies, and the authorities' (West Essex and East Hertfordshire HMA Local Authorities, Essex and Hertfordshire County Councils, City of London Corporation and Natural England) commitment to monitor the efficacy of those strategies provides a sufficient framework to ensure no adverse effect will arise from air quality on the integrity of the SAC.
- 3.5 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline. It is recognised that the updating of traffic and air quality modelling and the testing and securing of specific mitigation measures will clearly be an iterative process.

Biodiversity and green infrastructure

- 3.6 Whilst housing growth gives rise to a concern that there will be impacts to important natural environment assets locally and, more generally, an impact to biodiversity at the District scale, the preferred spatial strategy serves to allay concerns, in particular given its avoidance of sensitive settlement edge locations in the south of the District. In line with the recommendations of the HRA (2017), the Plan seeks to deliver accessible natural greenspace to mitigate against potential or identified adverse effects of additional development in the District. In this context, focus is placed on the Garden Town Communities around Harlow and the opportunity for recreational self-sufficiency at a strategic scale.
- 3.7 Chapter 5 of the plan includes area specific policies which have been developed to prioritise nature conservation, and consider recreational pressure on the Epping Forest SAC. Mitigation proposed includes contributing to the access management and monitoring of visitors to the Forest in accordance with Policy DM 2 (Epping Forest SAC and the Lee Valley SPA). The HRA

¹⁹ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

(2017) concludes that the plan will not lead to likely significant effects, alone or in-combination, on European designated sites.

- 3.8 Area-specific policies also reflect the nature conservation and green infrastructure priorities locally. While there is the potential for cumulative negative effects on wider designated and non-designated biodiversity, it is considered that the mitigation provided through the plan policies and available at the project level (e.g. through planning conditions) will reduce the significance of any residual negative effects.
- 3.9 On balance, it is appropriate to conclude **uncertain minor negative effects** at this stage, recognising that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Climate change (mitigation and adaptation)

- 3.10 Whilst housing growth in itself does not give rise to concerns regarding climate change mitigation, there is a need to minimise per capita emissions. This means distributing development to locations where car dependency and the need to travel long distances by car are minimised (with 'modal shift' supported), and supporting larger, strategic-scale development schemes that give rise to the greatest opportunity to design-in low carbon infrastructure. In both respects the preferred spatial strategy performs well, and robust development management policies are set to be put in place to ensure that opportunities are realised; however, there is always the potential to 'go further', and climate change mitigation should be a focus of ongoing work (e.g. to ensure that adjacent development sites coordinate efforts).
- 3.11 Housing growth within the densely populated southern part of the District does give rise to concerns in relation to flood risk (the key climate change adaptation issue) given the presence of the River Roding to the east of the Central Line; however, the preferred spatial strategy directs growth away from areas of greatest risk, and again there is robust policy framework proposed that should help to ensure that residual risk (in particular in relation to surface water flood risk) is mitigated through the implementation of Sustainable Drainage Systems (SuDS).
- 3.12 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.²⁰

Community and wellbeing

- 3.13 The Submission Plan will help to meet the housing and employment needs of existing and new communities within the District and the HMA. Throughout the District, housing and employment growth will be supported by upgrades to community infrastructure, ensuring capacity and accessibility, to the benefit of new and existing residents.
- 3.14 The focus of growth around the fringes of Harlow and at North Weald Bassett provides an opportunity to deliver high quality development, which is phased and underpinned by a comprehensive package of infrastructure as set out within the Infrastructure Delivery Plan. This will contribute towards the development of sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all.
- 3.15 While there are concerns in relation to the loss of some open space within Loughton and Chigwell, policy requirements include provision of open space throughout the settlements, to offset any potential loss. Additionally, existing green space provision within the settlements is good, and there is sufficient access to the wider green infrastructure network. On balance, it is appropriate to conclude that the Submission Plan would have **significant positive long term effects** on communities and wellbeing.

²⁰ In relation to climate change mitigation, there is very little potential to conclude that a Local Plan will result in significant effects, recognising the climate change mitigation is a global issue.

Economy and employment

- 3.16 The Submission Plan is set to deliver on District-wide housing and employment land requirements and support the regeneration of Harlow, which should help to ensure that sub-regional economic growth objectives are realised. There is also an appropriate focus of growth within the key transport corridor(s), integrating new communities to Harlow, the Enterprise Zones and other employment areas. There is also a commitment to the delivery of sustainable transport corridors as part of the Garden Town Communities around Harlow. Policy E 1 provides a flexible supply of future sites to cater for needs, while also seeking to retain and enhance existing employment sites and premises. This will positively contribute towards (Policy E 3) maintaining the role of existing centres, and supporting the Lee Valley Glasshouse Industry, which is addressed primarily through development management policies. On balance, it is appropriate to conclude that the Submission Plan would have **significant positive effects** on economy and employment.

Equalities, diversity and inclusion

Age (all groups but particularly children, younger people, and older people)

- 3.17 The Submission Plan will help to support people of all ages within the District through providing a high quality environment to work and reside. It seeks to ensure that the right size and type of new homes is provided across the District to meet the needs of specialist groups, particularly older people. This reflects the evidence as set out in the SHMA and the 2017 update that there is an existing need for accessible housing in the District that will continue taking into account the ageing profile of the District's population over the period of the Local Plan.
- 3.18 The mix of housing supported through the plan includes affordable housing, specialist accommodation, and self-build/custom build housing. The provision of specialist housing will support those vulnerable and requiring assistance, responding to the variation in needs shaped by health, income/equity, level of activity, and lifestyle. A minimum of 40% affordable housing is to be delivered on development sites of 11 or more homes, which will encourage young people and families on to the housing ladder.
- 3.19 The spatial strategy sets out in policy how the District's population of young people and families' needs will be met, including through the regeneration of towns to provide employment opportunities in sustainable locations. The continued expansion of North Weald Bassett as an employment location, and the targeted employment expansion at Waltham Abbey are expected to be particularly beneficial for young people in these locations, through job creation. It is also noted that strategic employment growth is proposed along the M11 corridor, which will provide high tier job opportunities for young people to aspire to.
- 3.20 Additional secondary schools on the sites to the East of Harlow and Latton Priory and the expansion of primary schools (for example at Ongar, North Weald Bassett, and Waltham Abbey) will provide additional capacity and facilities, and therefore will positively impact children. In this context, further education provision will also provide opportunities for, but not exclusively, younger people. Improving access to education and training will result in new skills development, reducing rates of unemployment in the area and improving living environments. This could be particularly beneficial for young people, families and older lower skilled people.
- 3.21 The Garden Town Communities are proposed to deliver sociable, vibrant, healthy and walkable neighbourhoods. This includes improvements to the sustainable transport network, which will positively affect the elderly population and also younger residents that do not have access to a car/are unable to drive. The provision of new and/or improved sustainable transport infrastructure (including greater frequency of bus/train services and road widening improvements) would have improving mobility for these groups, providing greater access to day-to-day services and facilities, and neighbouring settlements.
- 3.22 The Garden Town Communities also seek to deliver access to multi-functional open space, the Green Wedge Network and sports and leisure facilities. This will have a positive impact on older people, younger people, and families with young children, facilitating the uptake of exercise and community engagement. This will contribute positively to the physical and mental

health of all groups. Overall health will also be improved through increased access to, and provision of, health facilities. New and/or improved GP surgeries where there is local need will have a positive impact on children, younger and older people.

- 3.23 Air quality improvements are promoted through the plan through sustainable transport and the requirement for all new developments to provide electrical vehicle charging points. Children are likely to be more vulnerable to exposure to poor air quality compared to adults, and as such objectives and policies within the plan which seek to reduce pollution will positively impact this group.

Disability (all forms of disability recognised under the Equalities Act)

- 3.24 The plan recognises the importance for a proportion of new homes to provide for the needs of those with, or who may develop, accessibility needs. This includes support for housing specifically designed to meet the identified needs of disabled people. The Council's approach is that all new homes should be built to Category 2: Accessible and Adaptable Homes standards, in order to maximise choice in the type, size and location of new homes available. This should ensure that there is sufficient provision to meet the specific needs of disabled people.
- 3.25 Infrastructure delivery in the plan area seeks to meet the aspirations set out within the spatial strategy. Promotion of additional community facilities including recreation and health facilities is likely to encourage the integration of disabled people into the community, contributing positively towards overall quality of life and community cohesion. The provision of GP surgeries in local areas will further help to reduce local health inequalities, contributing towards the improvement of levels of disability in the District. Epping town centre in particular includes the provision of a 'health hub', which will comprise of an integrated GP surgery, pharmacy and any other necessary health services identified within the Infrastructure Delivery Plan.
- 3.26 As discussed under 'Age', improvements to the sustainable transport network through the regeneration of existing centres and the development of the Garden Town Communities would improve accessibility for residents. This is of particular importance to disabled people where their disability can inhibit mobility. Improvements to/the provision of new bus services, train services, and footpath improvements (i.e. widening) would improve disabled peoples access both day-to-day local services and facilities, and to neighbouring settlements.
- 3.27 The plan includes objectives to facilitate working from home, which would widen employment opportunities for disabled residents, reducing inequality in the workplace.

Gender (including males, females, and gender reassignment)

- 3.28 No significant effects have been identified for this protected characteristic.

Marriage and civil partnership

- 3.29 No significant effects have been identified for this protected characteristic.

Pregnancy and maternity

- 3.30 The plan includes objectives to facilitate working from home, which would likely provide additional employment flexibility during pregnancy and maternity. This will be supported by improvements to high speed broadband and telecommunications infrastructure.
- 3.31 The provision of new and/or improvements to health facilities in the District is likely to have a positive impact on women during pregnancy and maternity by ensuring facilities are easily accessible and have capacity, considering the likely increased use of the facilities for this group. This will be facilitated through the delivery of the Garden Town Communities, and also in locations such as Epping, Loughton and Waltham Abbey (if required), where sustainable, inclusive communities are promoted.
- 3.32 In addition to health facilities, the plan seeks to develop communities with good access to public transport; and with safe and pleasant routes for cyclists and pedestrians. This will have a positive impact on pregnant women or women with small children, improving access to outdoor recreation and the uptake of healthier modes of travel. This is also expected to positively affect quality of life and neighbourhood satisfaction for this group.

Race (all ethnic groups)

- 3.33 The plan encourages the development of flexible local employment space to meet the employment and economic needs of the District. This may include local ethnic owned businesses, having a positive effect on the economic prosperity of these groups.

Religion or belief (all religions and groups)

- 3.34 Infrastructure delivery in the plan area seeks to meet the aspirations set out within the spatial strategy. The provision of, and improvements to, community facilities may positively affect religious groups depending on the type of facility and intended use. Positive effects are expected where community facilities include places for worship and religious activities. This may include cultural facilities and community meeting spaces proposed through the Garden Town Communities around Harlow. However it is noted that the change of use of community facilities could result in negative impacts; and as such it is recommended that specific EqIAs should be undertaken for planning applications where necessary.
- 3.35 The protection and enhancement of designated and non-designated heritage assets may have a positive impact for religious groups who have connections to these assets, for example places of worship. The plan policies seek to sustain and enhance the significance of heritage assets for long-term enjoyment and conservation.

Sexual orientation

- 3.36 No significant effects have been identified for this protected characteristic.

Socio-economic status (lower economic status and deprived areas)

- 3.37 The plan will help to support deprived areas, improving levels of equality through provision of high quality new residential development in sustainable locations. Residential development to be delivered will include a mix of affordable housing units in terms of affordable rent and intermediate housing, to accord with the latest available evidence set out in the SHMA. This will support local housing need, positively addressing levels of deprivation across the District.
- 3.38 The plan supports interconnected communities, identifying socio-economic objectives at the local and strategic level through Chapter 5 and the spatial strategy. This will maximise infrastructure delivery and employment opportunities in areas of lower economic status. A considerable opportunity for this will be delivered through the Garden Town Communities around Harlow, which seek to diversify existing local communities. Towns such as Epping and Waltham Abbey are also focus areas for growth, meeting the needs of the towns and promoting the general well-being of all levels of the community.
- 3.39 The provision of retail facilities within local villages and smaller settlements will provide positive impacts for those from lower socio-economic groups that may not have a car, facilitating access to day-to-day services and amenities.

Conclusion

- 3.40 The plan seeks to promote accessibility and connectivity to housing, employment, education and leisure facilities throughout the District. Specialist groups are supported through policy requirements, ensuring that an appropriate mix of housing and accommodation types is provided to meet the needs of all residents. This includes support for proposals for housing specifically designed to meet the identified needs of older people, specialist accommodation and self-build/custom build housing.
- 3.41 The plan demonstrates the Council's ongoing commitment to equality, promoting cohesive communities in the District through area specific policy. Chapter 5 of the plan and the spatial strategy highlight the support for diverse interconnected communities, identifying socio-economic objectives at the strategic and local level. This will maximise infrastructure delivery and employment opportunities in areas of lower economic status, contributing towards addressing deprivation. Taking this into consideration, it is appropriate to conclude that the Submission Plan would have **significant positive long term effects** on this topic at this stage.

Historic environment

- 3.42 Housing growth does not necessarily lead to conflicts with the historic environment, given the potential to address heritage at risk and improve the appreciation of heritage assets; however, there is some potential for conflict locally, e.g. given the potential for impacts to the setting of heritage assets, and the potential for traffic through town and village centres to impact on heritage appreciation. It is noted that these issues are taken into account through site guidance requirements and capacity assessments for the sites. Perhaps the most notable aspect of the spatial strategy is the concentration of development at North Weald Bassett, which on balance is supported from a heritage perspective, given that the proposal is to deliver growth broadly in accordance with the recently prepared North Weald Bassett Masterplan Area.
- 3.43 On balance, it is appropriate to conclude **uncertain minor negative effects** at this stage, particularly given the findings of the appraisal for landscape. It is recognised that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Housing

- 3.44 The preferred strategy is to allocate sites to support housing growth to meet the agreed housing requirement of 11,400 homes over the plan period. This has been established in coordination with neighbouring authorities within the HMA. The strategy distributes housing amongst all settlements in the District; therefore, helping to meet the needs of all communities. It is possible to conclude that the Submission Plan would have a **significant positive long term effect** on this topic. The plan is also to provide for Traveller accommodation needs in full, and distributes new sites to appropriate locations.

Land and waste

- 3.45 The Submission Plan clearly involves the loss of greenfield and agricultural land; however, opportunities to redevelop brownfield sites - both within settlements and within the Green Belt - are set to be maximised and it is also the case that development of under-used urban open spaces can potentially be considered an efficient use of land. On balance, it is appropriate to conclude **negative effects**; however, this conclusion is uncertain, given that there would be greenfield loss under a 'no plan' (or 'future baseline') scenario and that all the alternatives would result in a similar conclusion. It is not clear that more could be done through the spatial strategy to minimise greenfield land take.

Landscape

- 3.46 The preferred spatial strategy has been developed, and individual sites have been assessed, to take into account landscape character assessment work. Consideration has also been given to local knowledge, regarding how settlement edge sensitivity varies at each settlement (in particular through consultation with local Councillors). Where possible sensitive areas have been avoided and suitable mitigation proposed to reduce the significance of impacts. On balance, it is appropriate to conclude **uncertain minor negative effects** at this stage, recognising that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Transport

- 3.47 The preferred spatial strategy involves a dispersed approach to development across the District with a focus on development around Harlow. Development directed towards the south of the District will have good access to public transport and services/facilities and therefore good potential to support modal shift away from car dependency; however, there are existing traffic problems that could be worsened.

- 3.48 There is also a focus of growth at North Weald Bassett, which gives rise to some concerns from a traffic perspective, given existing highways and public transport connectivity, albeit there is potential for enhancement, and there are good links to Harlow. The delivery of growth around Harlow provides a good opportunity to deliver new essential infrastructure across a range of sustainable modes, and policies in the Local Plan will enable a cohesive approach to the delivery of housing, employment, community uses and infrastructure provision. There is a commitment to the delivery of sustainable transport corridors as part of the Garden Town Communities.
- 3.49 A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).
- 3.50 The transport modelling work to date indicates that the proposed level of development in the Submission Plan would increase traffic levels significantly across the network. The Highways Assessment Report found that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered. It identifies a number of potential improvements to bus services, cycling infrastructure and proposed sustainable corridors within the District. It concludes that further work is needed and the scale of mitigation required will be refined as part of ongoing assessments of the Submission Plan.²¹
- 3.51 On balance, it is appropriate to conclude **uncertain positive effects** at this stage, recognising that there is some uncertainty at this stage and the need for further assessment and refinement as identified within the Highways Assessment Report (2017).²² Furthermore, a robust development management policy framework is proposed, which serves to allay concerns to some extent, e.g. helping to ensure that developments are designed with walking/cycling in mind.

Water

- 3.52 There is a need to ensure that water demand/resources and waste water infrastructure capacity can be managed throughout the plan period; however, there is little to indicate that this is a key issue for the spatial strategy. At most sites it should prove possible to ensure adequate water supply and sewerage infrastructure is provided alongside development, although costs may vary, and in respect of Waste Water Treatment Works (WWTWs) there is thought to be capacity locally. It is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.

²¹ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

²² Ibid.

4. Next steps

4.1 Part 3 of the SA Report answers - *What happens next?*

Plan finalisation

- 4.2 Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then submit the plan (and the summary of representations received) for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).
- 4.3 If found to be ‘sound’ the plan will be formally adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that sets out (amongst other things) ‘the measures decided concerning monitoring’.

Monitoring

- 4.4 At the current time, there is a need only to present ‘measures envisaged concerning monitoring’. The Submission Plan includes a range of proposed monitoring measures. The table below lists a selection of the Council’s proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

Table 6: A selection of the Council’s potential monitoring measures

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 a number of 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 a number of 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.

SA topic	Proposed measure (given appraisal findings)
	<ul style="list-style-type: none"> • Annual tourism income.
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. • 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.

