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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Epping Forest District Local Plan. Once adopted, the plan will establish a spatial strategy for growth and change up to 2033, allocate sites and establish the policies against which planning applications will be determined.

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, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, a draft version of the Local Plan is published for consultation, and an 'Interim SA Report' is published alongside. The Interim SA Report aims to inform consultation responses, and subsequent plan-making work (see the discussion of 'next steps', below).

This is a Non-technical Summary (NTS) of the Interim SA Report.

## Structure of the Interim SA Report / this NTS

SA 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 Draft Plan.
3. What are the next steps?

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?

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 2010). Taken together, these objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal.

*Table 1: Sustainability objectives (the SA framework as agreed in 2010)*

Topics	Objectives
Air quality	<ul style="list-style-type: none"> <li>• Avoid worsening of existing issues through minimising <b>traffic congestion</b></li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>• Avoid <b>direct impacts</b> to important biodiversity sites and linear features</li> <li>• Avoid more <b>indirect impacts</b> (e.g. through pollution or development preventing adaptation of biodiversity to climate change)</li> <li>• Carefully plan and implement multifunctional <b>green infrastructure</b></li> <li>• Support initiatives that seek to achieve <b>biodiversity benefits</b>, including through targeted habitat creation and enhancement</li> <li>• Plan for biodiversity at a '<b>landscape scale</b>'</li> </ul>
Climate change (mitigation & adaptation)	<ul style="list-style-type: none"> <li>• Lower <b>greenhouse gas</b> emissions</li> <li>• Increase the amount of <b>renewable and decentralised energy</b> generation</li> <li>• Drawing on the SFRA, take a pro-active approach to reducing <b>flood risk</b> and mitigate risk associated with new development where it occurs</li> </ul>

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

## PLAN-MAKING / SA UP TO THIS POINT

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.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise alternative approaches to housing 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.

**Developing reasonable alternatives**

Alternative spatial strategies were developed and appraised in 2012, at the time of the Issues and Options consultation; however, in 2016 it was recognised that there was a need to revisit and refine understanding of ‘the reasonable alternatives’ in light of:

- 1) Work undertaken amongst the four authorities that comprise the West Essex East Herts Housing Market Area (HMA) to establish Objectively Assessed Housing Need (OAHN) and how this need should be apportioned between the four authorities (and how growth of Harlow should be accommodated); and
- 2) Work undertaken by Epping Forest District Council, working with consultants Arup, to assess the large number of development site options within the District, and identify those that are a candidate for allocation.

Ultimately, five ‘reasonable’ alternative spatial strategies were arrived at - see **Table 2**. All involve delivering the housing target figure arrived at on the basis of (1), and broadly involve delivering the spatial strategy to emerge from (2), i.e. the alternatives vary only in limited respects. Specifically -

- Option 1 is the preferred strategy to emerge from (1) and (2) itself, which involves:
  - 3,900 homes on the edge of Harlow;
  - maximising opportunities for development on previously developed land within the existing settlements of the District, and also utilising previously developed land within the Green Belt;
  - utilising open space within settlements where this would not adversely affect open space provision within the settlement and make the best use of existing land without compromising local character;
  - allowing for a limited release of Green Belt land to provide for housing on the edge of settlements to achieve specific objectives; 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.
- Options 2 - 5 are as set out below and described in Table 3.

*Table 2: The reasonable alternatives*

Option		Quantum	Distribution
1	The preferred option	Meet the housing target of ~11,400 homes	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		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)

**Summary alternatives appraisal findings**

Summary appraisal findings are presented within Table 3. Within each row (i.e. for each of the objectives that comprise the SA framework) the columns to the right hand side seek to rank the alternatives in order of performance. Also, ‘ = ’ is used to denote instances where the alternatives perform broadly on a par.

*Table 3: Spatial strategy alternatives appraisal findings*

Summary findings and conclusions					
Topic	Categorisation and rank				
	Option 1 The preferred option	Option 2 Lower growth at North Weald Bassett	Option 3 Higher growth at North Weald Bassett	Option 4 Lower growth at urban greenspaces	Option 5 High growth along the Central Line
Air quality	=	=	=	=	=
Biodiversity and green infrastructure	★1	★1	★1	★1	5
Climate change (mitigation and adaptation)	★1	★1	★1	★1	5
Community and wellbeing	=	=	=	=	=
Economy and employment	=	=	=	=	=
Historic environment	=	=	=	=	=
Housing	=	=	=	=	=
Land and waste	★1	3	3	5	★1
Landscape	=	=	=	=	=
Transport	=	=	=	=	=
Water	=	=	=	=	=

Table 3: Spatial strategy alternatives appraisal findings (Cont'd)

Summary findings and conclusions				
Option 1	Option 2	Option 3	Option 4	Option 5
The preferred option	Lower growth at North Weald Bassett	Higher growth at North Weald Bassett	Lower growth at urban greenspaces	High growth along the Central Line
<p>All of the options are found to have the potential for a significant long-term positive effect in relation to communities and wellbeing as well as housing. The appraisal also finds all to have the potential for a significant negative effect in terms loss of agricultural and greenfield land.</p> <p><b>Option 1</b> involves a distribution as per the preferred strategy to emerge from the site selection work. This is a tailored approach that performs broadly well in terms of a range of sustainability objectives. It seeks to ensure that growth is well distributed between settlements, and also make efficient use of land / minimise the loss of Green Belt land. However, it is also associated with certain draw-backs. The 'pros and cons' of the preferred approach are highlighted through the discussion of the alternatives presented below.</p> <p><b>Option 2</b> proposes a <i>lower</i> level of growth at North Weald Bassett. It would result in a higher level of growth in other areas of the District; however, the precise level of this displaced growth and its location is not known at this stage. This option -</p> <ul style="list-style-type: none"> <li>• is likely to have a reduced positive effect for the communities in and around North Weald Bassett compared to the other options given the lower level of housing proposed and associated improvements in terms of access to public transport, employment and services/facilities;</li> <li>• offers opportunities to direct displaced growth towards areas that could potentially have better access to public transport, employment and services/facilities but this would not help to address existing sustainability issues or maximise opportunities for improvement within North Weald Bassett.</li> </ul> <p><b>Option 3</b> proposes a <i>higher</i> level of growth at North Weald Bassett. It would result in a lower level of growth in other areas of the District; however, the level of growth and the precise areas it would be diverted from are not known at this stage. This option -</p> <ul style="list-style-type: none"> <li>• is likely to have an enhanced positive effect compared to other options for communities in North Weald Bassett as a greater level of housing development is proposed; and</li> <li>• is more likely to take advantage of and maximise identified opportunities as well as better address existing issues for the town in relation to poor access to public transport and services/ facilities.</li> </ul> <p><b>Option 4</b> proposes less development on greenspaces within the urban areas. This option -</p> <ul style="list-style-type: none"> <li>• could result in a need to divert growth to locations on the edge of Loughton (in order to avoid unreasonably low growth at the town) that are sensitive in terms of flood risk and/or biodiversity (e.g. given the River Roding) and/or landscape (e.g. given the important Loughton / Theydon Bois gap);</li> <li>• performs poorly compared to the other options in terms of the efficient use of land as there will be lower growth within the urban areas, which would result in a higher level of growth and therefore loss of greenfield sites and agricultural land on the edge of settlements;</li> <li>• could help to ensure good access to open/green space; however, this is uncertain given evidence to suggest that the open spaces in question are under used, and that sufficient capacity would remain.</li> </ul> <p><b>Option 5</b> proposes a higher level of growth in and around the settlements in the south of the District that are served by the Central Line. This option -</p> <ul style="list-style-type: none"> <li>• is less likely to take advantage of and maximise opportunities for development in areas and settlements away from the Central Line, e.g. at Chipping Ongar and Waltham Abbey, where there are particular growth related opportunities;</li> <li>• directs growth to areas with good access to public transport, employment and services/facilities;</li> <li>• performs poorly compared to other options against biodiversity as it proposes a higher level of growth in close proximity to sensitive and designated nature conservation sites, leading to the prediction of a 'significant negative effect';</li> <li>• directs growth away from the best and most versatile Grade 2 agricultural land situated in the northern areas of the District; and</li> <li>• is more likely to result in the loss of Green Belt land in the south of the District, which provides gaps that are important in terms of maintaining separation between settlements.</li> </ul>				

## The Council's response / justification for the preferred approach

The following text is the Council's response to the alternatives appraisal / reasons for supporting the preferred approach (Option 1)

"The preferred option - Option 1 - involves making provision for 11,400 homes over the plan period through a distribution strategy that emerged subsequent to work with neighbouring authorities (see discussion in Section 6.2) and a detailed site selection process (see discussion in Section 6.3), and reflects the following broad principles -

- Allocating sites around Harlow in accordance with the vision of the London Stansted Cambridge Corridor Consortium Core Area;
- 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 made 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.

The appraisal summarised within Table 7.1 above considers the merits of the strategy relative to four alternative strategies that would involve a markedly different distribution, and in doing so raises a number of important points. Notably -

- In relation to North Weald Bassett the appraisal highlights that a higher growth option has some merit in terms of certain objectives (e.g. comprehensive development could support a sustainable community) and that the lower growth option would not facilitate the provision of the required infrastructure and maximise opportunities for improvement. The Council considers therefore on balance that the preferred option (something of a middle-ground approach) represents sustainable development.
- In relation to urban open space development, the appraisal highlights that there are arguments for retention of the provision, but that in the absence of this strategy there would be consequential need to allocate more sites in the Green Belt which gives rise to a range of sustainability concerns. In light of this discussion, the Council feels that the preferred option (support development of selected urban open spaces, ensuring no adverse effect to the overall provision in the settlements concerned) represents sustainable development.
- In relation to transport accessibility, the appraisal highlights that there are quite strong arguments for maximising growth along the main transport corridor, but equally highlights that were this strategy to be followed then there would be a risk of developing sites that are sensitive from an environmental perspective, and there would be a risk of growth related opportunities being missed at the rural towns and villages. In light of this discussion, the Council feels that the preferred option (limit the focus along the transport corridor / ensure a degree of dispersal) on balance represents sustainable development."

# APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the Interim SA Report answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Draft Plan. Appraisal findings are presented under twelve ‘sustainability objective’ headings (see Table 1, above), and summary findings are presented below.

## Air quality

There are existing congestion and air quality issues in the south of the District and focusing development there could exacerbate this; 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 concerns, given the District's only designated Air Quality Management Area (AQMA) 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). 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; however, there is some uncertainty. More work will need to be completed to examine the number and direction of car movements that will result (given potential for enhancement to public transport and walking/cycling infrastructure), and the potential for traffic congestion (given the potential for road/junction improvements).

## Biodiversity and green infrastructure

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 and wider scales, the preferred spatial strategy serves to allay concerns, in particular given avoidance of sensitive settlement edge locations in the south of the district. However, there remains some potential for sites to impact in combination, and there will be a need for further work to examine potential impacts (and opportunities) subsequent to the current consultation. There will be the potential to develop site specific policies that reflect the nature conservation and green infrastructure priorities locally, and it may be that the district-wide development management policies can be strengthened (although it is the case that they are already demonstrably evidence-based and robust). 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.

## Climate change (mitigation and adaptation)

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 is 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).

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), 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).

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.<sup>1</sup>

<sup>1</sup> 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.

## Community and wellbeing

On balance the preferred spatial strategy should have the effect of addressing the challenges and capitalising on the opportunities that can result from housing growth. In particular, there are strategic opportunities at North Weald Bassett, and also Chipping Ongar, that are set to be realised. A concern relates to the loss of some open space within Loughton and Chigwell, but it is not clear that the local community will be significantly disadvantaged as there is good provision within the settlements and access to the wider green infrastructure network. It is assumed that housing growth will be supported by upgrades to community infrastructure capacity, to the benefit of new and existing residents; however, there is considerable uncertainty at this stage - i.e. it is the case that there is more work necessary to refine the Infrastructure Delivery Plan. 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.

## Economy and employment

The plan is set to deliver on district-wide housing and employment land targets and support the regeneration of Harlow, which should help to ensure that sub-regional economic growth objectives are realised. There is also likely to be an appropriate focus of growth within the key transport corridor(s), although in respect of employment land provision there is a need for further work to finalise the strategy. There are also more specific issues in relation to maintaining the role of existing centres, and supporting the Lee Valley Glasshouse industry, which are set to be addressed primarily through development management policies. On balance, it is appropriate to conclude **uncertain positive effects** at this stage.

## Historic environment

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 landscape setting of heritage assets, and the potential for traffic through town and village centres to impact on heritage appreciation. Perhaps the most notable aspect of the preferred spatial strategy is the concentration at North Weald Bassett, which on balance is supported from a heritage perspective, given that the proposal is to deliver growth in-line with a recently prepared masterplan; however, there is a need for further work and investigation, leading to the setting of robust site specific policy. 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.

## Housing

The preferred strategy is to allocate sites to support housing growth in-line with the identified need - 11,400 homes over the plan period - established in coordination with neighbouring authorities within the sub-regional Housing Market Area (HMA), and also distribute housing amongst all settlements in the District, hence it is possible to conclude **significant positive effects**. The plan is also to provide for Gypsy and Traveller accommodation needs in full, and distribute new sites to appropriate locations.

## Land and waste<sup>2</sup>

The preferred strategy 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 **significant 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 options would result in a similar conclusion. It is not clear that more could be done through the spatial strategy to minimise greenfield land take.

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<sup>2</sup> The key issue here relates to 'land', with the spatial strategy having few if any implications in respect of waste management.

## Landscape

The preferred spatial strategy has been developed in light of landscape character assessment work, and also on the basis of local knowledge regarding how settlement edge sensitivity varies at each settlement (in particular through consultation with local Councillors). Key sensitivities have been avoided; and the Council has sought to avoid potential impacts to sensitive landscapes, including areas identified as sensitive through landscape character assessment. On balance, it is appropriate to conclude **uncertain negative effects** at this stage, recognising that there will be the potential to avoid/mitigate effects through site specific policy and masterplanning of proposed allocations and that the same conclusion could be drawn for all options.

## Transport

The preferred spatial strategy involves a focus on locations in the south of the District, where there is good access to public transport and services/facilities and therefore good potential to support modal shift away from car dependency; however, there are existing problems of traffic that could be worsened. 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. On balance, it is appropriate to conclude **uncertain positive effects** at this stage, recognising that there is uncertainty at this stage, given limited understanding in relation to the number and direction of car movements that will result (given potential for enhancement to public transport and walking/cycling infrastructure), and the potential for traffic congestion (given the potential for road/junction improvements). 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

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, although there have been concerns in the past, given the link between WWTW capacity and water quality / nature conservation objectives. 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.

## Next steps

Part 3 of the Interim SA Report answers– *What happens next?*

### Plan finalisation

Subsequent to the current consultation, the Council's intention is to prepare the Proposed Submission version of the Plan for publication. This will be the version of the plan that the Council believes to be 'sound' and intends to submit to the Government for Examination in Public. The SA Report will be published alongside the Proposed Submission Plan, with a view to informing representations.

Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted 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).

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

At the current time, there is a need only to present 'measures envisaged concerning monitoring'. In light of the appraisal presented above, issues that might be a focus of monitoring efforts include -

- Traffic and air quality at key hotspots, e.g. Epping
- Recreational pressure on Epping Forest SAC
- Delivery of green infrastructure enhancements to mitigate for urban open space loss
- Delivery of CHP / low carbon infrastructure where there is a concentration of growth
- Heritage at risk
- The spatial distribution of new employment land, according to type
- Delivery of Gypsy and Traveller sites / pitches, and views amongst the travelling and settled communities.