

ED148/EB214

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

SA Report Addendum

Epping Forest District Council

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Non-Technical Summary

Introduction

AECOM is commissioned to undertake the Sustainability Appraisal (SA) (incorporating Equalities Impact Assessment (EqIA)) in support of the Epping Forest District Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.

Epping Forest District Council's new Local Plan will set out the proposed strategy for meeting the District's development needs up to 2033, and will replace all of the saved policies of the Local Plan 1998 and the 2006 Local Plan Alterations. The plan is being prepared under the Planning and Compulsory Purchase Act 2004, (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 and, once adopted, will have the status of a Local Plan.

The emerging Local Plan is at an advanced stage of preparation, having been formally published in December 2017 ahead of being submitted to the Planning Inspectorate for examination in September 2018; and then having been the subject of examination hearings in February, March, May and June 2019. Following this the Inspector appointed at the time provided the Council with post hearings advice on 2 August 2019 (ED98) confirming that changes to the plan (referred to as 'Main Modifications') would be necessary to address soundness issues and that, in some cases additional work would be required to enable the Council to ascertain the precise form of the proposed modifications. Subsequently the Inspector agreed a proposed programme of additional work, which continued over a period of some 18 months. The additional work informed the preparation of the Council's draft Schedule of Proposed Main Modifications which were consulted on between July and September 2021 and which were considered through the SA process (EB210). A new Inspector was appointed in May 2022 and he provided the Council with further advice in a note dated 16 June 2022 (ED141). Having had regard to the Inspector's advice the Council is proposing a number of further Main Modifications to the Local Plan.

The proposed further Main Modifications need to be considered through the SA process applicable to Local Plans. This is a Non-Technical Summary (NTS) of the SA Report Addendum which considers the Main and further Main Modifications and is an Addendum to the SA Report (Exam ref: EB204) submitted to the Inspector in September 2018. The aim of this SA Report Addendum is essentially to present information on the proposed Main and further Main Modifications, and alternatives where appropriate, with a view to informing the consultation on the further Main Modifications and subsequent plan finalisation. For ease the Addendum includes the consideration of the 2021 Main Modifications and the further Main Modifications.

Clarifications on the SA process

The SA (incorporating EqIA) for the Epping Forest District Local Plan was discussed during the examination hearing session on 12 February 2019. Chapter 3 in this SA Report Addendum clarifies several aspects of the SA process discussed at the examination hearings.

Appraisal of proposed Main Modifications

The Council is proposing a number of further changes ('Main Modifications') to the submitted Local Plan (EB114) as a result of the examination hearing sessions, updates to the evidence base to take account of the advice from the then Inspector in her letter of 2 August 2019 (ED98) and the advice provided by the newly appointed Inspector in his note to the Council of 16 June 2022 (ED141). These changes need to be considered through the SA process to determine if they significantly affect the findings set out in the SA Report (EB204) submitted alongside the Local Plan Submission Version (2017) and the SA Addendum June 2021 published in support of the proposed Main Modifications that were consulted on between July and September 2021. The reference to 'Main Modifications' in the remainder of this report relates to both the Main Modifications and the further Main Modifications.

The consideration of these changes through the SA was carried out in three stages and these are set out below along with summary findings:

- **Screening** - At the first stage each proposed individual Main Modification was screened (in Appendix I of this SA Report Addendum) and found that individually they do not significantly affect the findings of the SA Report (EB204) or the June 2021 Addendum (EB210).
- **Alternatives in light of the proposed Main Modifications** - The next stage was to consider if there is a need to give further consideration to alternatives in light of the Main Modifications. It was concluded that it was not necessary to explore alternatives further in terms of District-wide spatial strategy options or more localised amendments.
- **Appraisal of the Local Plan Submission Version plus proposed Main Modifications** - The final stage considered if the conclusions set out in the SA Report (EB204) for the Local Plan Submission Version (2017) as a whole, need to be amended in light of the proposed Main Modifications. It was determined that the conclusions for the plan as a whole under the majority of SA topics are still valid and therefore do not require amendment. The exception to this is the biodiversity and green infrastructure topic, where the conclusion for the plan as a whole has been amended from an uncertain minor negative effect to an uncertain minor positive/ neutral effect. This change was made in light of the proposed Main Modifications which help to strengthen the plan in relation to biodiversity and green infrastructure as well as the further detail provided in terms of implementation through the Green Infrastructure Strategy adopted by the Council.

Next steps

Following the consultation on the further Main Modifications, the Inspector will consider all the representations received (both in relation to the 2021 Main Modifications consultation and the further Main Modifications consultation undertaken in 2022), before deciding whether to report on the Plan's soundness (with modifications as necessary), or resume examination hearings. Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption a 'SA Statement' will be published that explains the process of plan-making/ SA in full and also presents 'measures decided concerning monitoring' in line with legal requirements.

The SA Report (EB204) presents a range of 'proposed monitoring measures' in Part 3, Chapter 10. The work carried out in relation to the proposed modifications does not necessitate any significant amendments to the proposed measures at this stage. A final list of monitoring measures will be presented within the SA Statement produced once the Local Plan is adopted.

1. Introduction

Background

- 1.1 Epping Forest District Council is preparing a new Local Plan that will set out the proposed strategy for meeting the District's development needs up to 2033, and will replace all of the saved policies of the Local Plan 1998 and the 2006 Local Plan Alterations. The plan is being prepared under the Planning and Compulsory Purchase Act 2004, (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 and, once adopted, will have the status of a Local Plan.
- 1.2 The emerging Local Plan is at an advanced stage of preparation, having been formally published in December 2017 ahead of being submitted to the Planning Inspectorate for examination in September 2018; and then having been the subject of examination hearings in February, March, May and June 2019. Following this the then Inspector provided the Council with post hearings advice on 2 August 2019 (ED98) confirming that Main Modifications to the emerging Plan would be necessary to address soundness issues and that, in some cases additional work would be required to enable the Council to ascertain the precise form of the proposed modifications. Subsequently the Inspector agreed a proposed programme of additional work, which continued over a period of some 18 months. The additional work informed the preparation of the Council's draft Schedule of Proposed Main Modifications which were consulted on between July and September 2021. A new Inspector was appointed in May 2022 and he provided further advice to the Council in a note dated 16 June 2022 (ED141). The Council, having had regard to the Inspector's advice, is proposing further Main Modifications to the emerging Local Plan. The reference to 'Main Modifications' in the remainder of this report relates to both the Main Modifications and the further Main Modifications.
- 1.3 The Main Modifications need to be considered through the Sustainability Appraisal process applicable to Local Plans.

Sustainability Appraisal (SA)

- 1.4 AECOM is commissioned to undertake the Sustainability Appraisal (SA) (incorporating Equalities Impact Assessment (EqIA)) in support of the Epping Forest District Local Plan. SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

Purpose and structure of the SA Report Addendum

- 1.5 The aim of the SA Report Addendum is essentially to present information on the proposed Main Modifications (ED145), and alternatives if appropriate, with a view to informing the further Main Modifications consultation and subsequent plan finalisation.
- 1.6 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report [Exam ref: EB204] submitted to the Inspector in September 2018. This SA Report Addendum is structured as follows:
 - **Chapter 2** - presents the scope of the SA;
 - **Chapter 3** - provides clarification on aspects of the SA process discussed during the Examination hearing sessions;
 - **Chapter 4** - presents the appraisal of the Local Plan Submission Version in light of the proposed Main Modifications; and
 - **Chapter 5** - sets out the next steps in the plan-making and SA processes as well as any changes to previously proposed plan monitoring measures.

2. SA Scope

2.1 The scope of the SA work, with respect to the Epping Forest District Local Plan, is introduced within the SA Report (December 2017) [Exam ref: EB204]. Essentially, the scope is reflected in a list of sustainability topics and objectives, which collectively provide a methodological 'framework' for appraisal.¹ The SA topics and objectives are listed in **Table 2.1** below. It has not been considered necessary to update or revise the SA framework for the purposes of this appraisal.

Table 2.1: SA topics and objectives

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'
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 SFRA², 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

¹ It is important to note that the objectives and topics are all closely linked and there are direct and indirect interrelationships between them.

² Strategic Flood Risk Assessment

SA Topics	SA Objectives
Transport	<ul style="list-style-type: none"><li data-bbox="515 232 1353 262">• Maintain and enhance characteristic landscapes and landscape features<li data-bbox="515 277 1353 329">• Bring about a modal shift in terms of commuting patterns, away from car dependency<li data-bbox="515 338 1353 421">• 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"><li data-bbox="515 439 1342 490">• Minimise water use to mitigate the worsening problem of 'serious water stress'<li data-bbox="515 499 1342 551">• Maintain and improve water quality / water courses in line with legislative requirements<li data-bbox="515 560 1342 584">• Direct development to areas with sewerage infrastructure capacity

3. Clarifications on the SA process

Background

- 3.1 The Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan was discussed during the examination hearing session on 12 February 2019. This section clarifies several aspects of the SA process discussed at the examination hearings.

Sustainability Appraisal and Housing Market Area (HMA)-level considerations

- 3.2 Extensive joint working was undertaken by the four local 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). The nature of the HMA-level work and its conclusions are summarised in chapters 6 and 7 of the SA Report (EB204).
- 3.3 As part of the joint work undertaken, the four authorities identified options for spatially distributing different levels of housing need and provided an evidence-based Sustainability Appraisal setting out the anticipated significant positive and negative impacts of each option (EB203³). The options varied in particular in terms of the scale of housing to be potentially accommodated around Harlow; however, different scales of development were also explored for other settlements within the HMA in some cases (see Table 1.1 in EB203). On page 3 of EB203, it is explained why a Sustainability Appraisal underpinned by the requirements of the EU SEA Directive (2001/42/EC) was not undertaken (indeed, could not be undertaken in the absence of a formal plan or programme to assess). The Sustainability Appraisal work undertaken at the HMA-level was necessarily reasonably high level and the report (EB203) emphasised that the four constituent local plans including that of Epping Forest District would be subject to an assessment in line with the SEA Directive's requirements.

Sustainability Appraisal and District-level considerations

- 3.4 In order to assess the sites submitted through the call for sites and identified through other evidence base studies across the District, the Council applied a bespoke Site Selection Methodology (SSM), which sought to identify the most suitable sites for allocation in the Local Plan to meet the District's housing, traveller and employment needs. The methodological approach to the site assessment is summarised in the SA Report (EB204⁴). The site assessment process was undertaken in parallel to the SA and essentially forms part of the SA process. An analysis was undertaken to demonstrate that the topics in the SA Framework were covered within the site assessment process - see Appendix IV of the SA Report (EB204).
- 3.5 In order to reflect the responses to the Community Choices consultation in 2012 and inform the selection of sites, the Council explored strategic options to accommodate growth at settlements within the District through the site assessment process. The strategic options were essentially directions for growth at each settlement (typically North, South, East and West) and were developed based on the sites identified through the site assessment process and considered through Stage 2 of that process. It should be noted that a strategic option for intensification of the existing urban area was also explored for settlements. The findings of this work and the

³ Available at: www.efdclocalplan.org/wp-content/uploads/2018/02/EB203-Sustainability-Appraisal-of-Strategic-OAHN-Spatial-Options-AECOM-2016.pdf

⁴ Available at: www.efdclocalplan.org/wp-content/uploads/2018/03/EB204-Sustainability-and-Equalities-Impact-Appraisal-AECOM-December-2017-1.pdf

Council's justification for more or less suitable strategic options are presented in Appendix V of the SA Report (EB204).

- 3.6 Informed by the assessment of both site and strategic options through the site assessment process, three reasonable District-wide spatial strategy options were identified and appraised through the SA process. The options were presented in Table 7.1 and Figures 7 to 9 with the summary findings set out in Table 7.2 and paragraphs 7.35 to 7.37 in the SA Report (EB204). These options explored the potential for more or less growth at particular settlements within the District based on the evidence. The outline reasons for the selection and rejection of the District-wide spatial strategy options were presented in paragraphs 7.40 to 7.50 in the SA Report (EB204).
- 3.7 The reasons for any changes made to the site allocations for individual settlements from the Draft Local Plan to the Local Plan Submission Version were set out in the Site Selection Report (EB805) in paragraph 2.137, which accompanied the SA Report (EB204) on consultation in 2018.
- 3.8 It should be noted that the SA Report published at the Regulation 19 stage of Local Plan preparation constitutes the 'environmental report' required under the SEA Directive and implementing regulations and is therefore the report that must present the legally required information. Earlier SA Reports, i.e. those published at Regulation 18 are prepared on a voluntary basis by local authorities and they therefore have discretion over their content.

4. Appraisal of the proposed Main Modifications

Introduction

- 4.1 The Council proposed a number of Main Modifications to the submitted Local Plan (ED130) as a result of the examination hearing sessions, and updates to the evidence base to take account of the advice from the Inspector in her letter of 2 August 2019 (ED98). These changes were considered through the SA process to determine if they significantly affected the findings set out in the SA Report (EB204) submitted alongside the Local Plan Submission Version 2017. The Additional Modifications mainly related to minor edits to the text and were therefore screened out as not being significant in terms of the SA, i.e. they would be inherently unlikely to give rise to significant effects.
- 4.2 As set out in the SA Addendum 2021 (EB210) the SA process as it applies to the Main Modifications was undertaken in three stages and was structured as follows:
- **Screening** - each of the Main Modifications was screened to determine if it is likely to significantly affect the findings of the of the SA Report (EB204).
 - **Alternatives in light of the proposed modifications** - sets out if there is a need for further consideration of reasonable alternatives through the SA process in light of the proposed Main Modifications.
 - **Appraisal of the Local Plan Submission Version plus proposed modifications** - considers the Local Plan Submission Version and proposed Main Modifications to determine if the findings of the previous SA work should be amended.

Screening findings

- 4.4 As an initial step, it is necessary to screen each of the proposed Main Modifications (ED145) to determine if they are likely to significantly affect the findings of the SA Report (EB204) and if further appraisal work is therefore required.
- 4.5 All of the Main Modifications were screened and the findings of this exercise including the rationale for why each Main Modification was screened in or out are provided in **Appendix I**.
- 4.6 The screening found that none of the Main Modifications significantly affect the findings of the previous SA work presented in the SA Report (EB204). They seek to reflect updated evidence or provide further clarity and do not fundamentally alter the overall aim and focus of the policies/ plan.

Alternatives in light of Main Modifications

- 4.7 A range of alternatives have been explored and appraised through the SA process and informed the development of the Local Plan. The findings of this work, along with the outline reasons for selection or rejection of alternatives, are set out in Part 1 (What has plan-making/ SA involved up to this point?) of the SA Report (EB204) submitted alongside the Local Plan.
- 4.8 The Inspector's post-advice note (ED98) set out a number of key points that were relevant to the consideration of alternatives in light of the proposed Main Modifications. In terms of the housing requirement during the plan period the Inspector stated in paragraph 20:

"Policy SP2 sets the Plan's housing requirement for the period 2011-2033 at a minimum of 11,400 new dwellings, which is below the Objectively Assessed Need for Housing (OAN) of 12,573 dwellings for Epping Forest found by the most recent Strategic Housing Market Assessment (HMA) of July 2017 (EB407). The submitted Plan in fact claims a total housing supply of 13,152 new dwellings and so, on the face of it, setting the requirement below the OAN seems rather unambitious. However, Epping Forest is part of a wider HMA comprising

four local authority areas and the delivery of a minimum of 11,400 dwellings would help enable the full OAN for market and affordable housing to be met within the Housing Market Area (HMA) as a whole, as required by paragraph 47 of the 2012 Framework. Given the significant constraints upon development in the District, including the SAC and Green Belt; and in light of my concerns about some of the Plan’s allocated housing sites (see below), the requirement for Epping Forest should not be increased further”.

- 4.9 With regard to housing distribution, the Inspector stated in paragraphs 21 to 23 that, in light of the post-hearing advice and the need to potentially reduce the capacity of, or delete, some allocations, it was possible that alternative sites might need to be found in order to address any shortfall in meeting the housing requirement during the plan period. The Inspector noted that it might be possible to find alternative sites within the Council’s preferred spatial strategy; however, if they cannot be found, *“then the Council would need to explore specific, preferably localised amendments to the spatial strategy through the SA process before I could consider any reduction in the total housing requirement”.*
- 4.10 In line with the Inspector’s June 2022 advice note, the Council has updated the housing land supply figures used to reflect the current position and this is set out below in **Table 4.1**.

Table 4.1: Current housing land supply (taking the proposed Main Modifications into account)

Housing land supply: 2011-2033	
The components of housing land supply over the period 2011-2033 are as follows:	
Minimum number of homes required to be built 2011-2033: 518 x 22 years	~11,400
Homes Built (Completions) 2011- <u>2022</u> up to 31 March <u>2022</u>	<u>3,023</u>
What is available in the future (supply)	
Sites with planning permission up to 31 March <u>2022</u> + 10% non-delivery rate	<u>1,665</u>
Windfalls 35 x <u>6</u> years	<u>210</u>
Requirement met through Garden Communities around Harlow within <u>the District</u>	<u>3,400*</u>
<u>Requirement met through allocations outside the Garden Communities within the District</u>	<u>3,901</u>
<u>Total supply</u>	<u>12,199</u>
* Note: The Plan allocates ~3,900 homes in the Garden Communities around Harlow within the District. For the purposes of determining housing land supply it is considered that 3,400 homes will be delivered within the Plan period to 2033.	

- 4.11 The table above demonstrates that, in light of the Main Modifications, which include a reduction in capacity at some allocations and the deletion of others, and based on the most up-to-date information the housing requirement (~ 11,400 dwellings) for the plan period can still be delivered within the Council’s preferred spatial strategy.
- 4.12 Taking the above into account it is not considered necessary to explore further District-wide spatial strategy alternatives or localised amendments to the spatial strategy through the SA process at this stage.

Appraisal of the Local Plan Submission Version plus Main Modifications

- 4.13 This section presents the conclusions of the SA Report (EB204) for the Local Plan Submission Version 2017 and considers if these need to be amended in light of the Main Modifications. It is structured under the 11 SA topics identified through scoping (and used to structure the appraisal findings within the SA Report).

Air quality

- 4.14 The SA Report (EB204) concluded the following under this topic:

“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).

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.⁵

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.

*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.”*

- 4.15 No new allocations are being proposed through the Main Modifications. Consequently, the Main Modifications do not result in a significant change to the overall level of growth or the spatial strategy for delivering this growth during the plan period.
- 4.16 Further traffic and air quality modelling was undertaken following the then Inspector’s post-hearing advice in August 2019 and this informed the development of the Council’s adopted interim Air Pollution Mitigation Strategy. The Strategy sets out the actual measures that the Council will implement during the lifetime of the Plan. These measures range from those which will help to limit the increase in the level of traffic using roads through the Epping Forest SAC and significantly increase the uptake of electric vehicles through to the implementation of a ‘Clean Air Zone’ should the future monitoring demonstrate this is necessary. The Air Pollution Mitigation Strategy also includes targets that will need to be achieved by 2033 together with a Monitoring Framework.

⁵ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

- 4.17 Taking the above into account, it is considered that the Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus the Main Modifications are still predicted to have a neutral effect on air quality.

Biodiversity and green infrastructure

- 4.18 The SA Report (EB204) concluded the following for this topic:

“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 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.

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

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.

*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.”*

- 4.19 As set out above under air quality, there are no new allocations and no significant changes to the overall level of growth to be delivered during the plan period. The Council has an agreed Interim Air Pollution Mitigation Strategy setting out the actual measures that the Council will implement during the lifetime of the Plan. Further HRA work was carried out and accompanied the Main Modifications consulted on in 2021 and the 2021 SA Report Addendum. The HRA has been updated to reflect the proposed further Main Modifications and will accompany the proposed further Main Modifications and this SA Report Addendum on consultation.
- 4.20 The Main Modifications to Policy DM2 will continue to ensure that there will be no adverse effect on the integrity of either the Epping Forest Special Area of Conservation (SAC) or the Lee Valley Special Protection Area/Ramsar site as a result of development facilitated by the Local Plan.
- 4.21 As well as the Interim Air Pollution Mitigation Strategy referred to in paragraph 4.18 the Council has formally adopted a Green Infrastructure Strategy to support the implementation of policies within the emerging Local Plan. The strategy sets out the GI vision and objectives for the District and how these will be implemented through the delivery of high quality and integrated assets of a strategic scale, including through the strategic development sites, and the protection of the Epping Forest SAC through the provision of Suitable Alternative Green Space and specific projects for the enhancement of existing Green Infrastructure assets. The Council has also adopted a Strategic Access Management and Monitoring (SAMM) Strategy for the Epping Forest SAC to mitigate any adverse effects on the integrity of the Epping Forest SAC as a result of additional visitors arising from new residential development within a 6.2km Zone of Influence.
- 4.22 Taking the above into account, it is considered that the Main Modifications supported by the adopted interim Air Pollution Mitigation Strategy, Green Infrastructure Strategy and SAMM Strategy reduce the likelihood for residual minor negative effects and enhance the potential for

positive effects as a result of the development proposed through the Local Plan as a whole. It is now predicted that the Local Plan is likely to have an uncertain **minor positive/ neutral** effect on biodiversity and green infrastructure.

Climate change

4.23 The SA Report (EB204) concluded the following for this topic:

“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 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) given the presence of the River Roding to the east of the Central Line; however, the 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.⁶”*

4.24 As set out previously, there are no new allocations and no significant changes to the overall level of growth to be delivered during the plan period. The Main Modifications propose additional text in the Place Policies requiring any proposals for development to include measures to promote and encourage the use of sustainable modes of transport and provide viable alternatives to single occupancy private car use including car clubs/car sharing or pooling arrangements and limiting the provision of on-site residents' car parking (to that required to service the needs of the development).

4.25 Taking the above into account, it is considered that the Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications are predicted to have a residual neutral effect on climate change.

Community and wellbeing

4.26 The SA Report (EB204) concluded the following for this topic:

“The Submission Plan will help to meet the housing and employment requirements 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.

The focus of growth in the Garden communities around Harlow and at the larger settlements 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 and schedule. This will contribute towards the development of sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all.

While there are concerns in relation to the loss of some amenity 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

⁶ 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.

*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.”*

- 4.27 No new allocations are being proposed through the Main Modifications, with the reality being that they propose a reduction in capacity as well as the deletion of some allocations in the South of the District where, as stated in the SA Report (EB204), there are existing congestion and air quality issues. The removal of some allocations, in particular LOU.R5 (Jessel Green) will help to reduce the loss of open space within Loughton and Chigwell. The proposed Main Modifications do not result in a significant change to the overall level of growth to be delivered during the plan period given the updated housing land supply situation, in particular the number of homes built up to March 2022. In summary, the spatial strategy has not significantly changed with the focus of growth in the Garden Communities around Harlow and at the larger settlements within the District.
- 4.28 Taking the above into account, it is considered that the proposed Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications and further Main Modifications are predicted to have a significant positive long term effect on community and wellbeing.

Economy and employment

- 4.29 The SA Report (EB204) concluded the following for this topic:

*“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 2) maintaining the role of existing centres, and supporting the 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.”*

- 4.30 There have been no significant changes to the overall level or location of new employment land to be delivered during the plan period. As a result, it is considered that the Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications are predicted to have a residual significant positive long term effect on the economy and employment.

Equalities, diversity and inclusion

- 4.31 The SA Report (EB204) concluded the following for this topic:

“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.

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.”*

- 4.32 There are no significant changes to the overall level, location or type of development during the plan period. The plan still seeks to support specialist groups through policy requirements and promote cohesive communities through area specific policy. No new or additional significant effects are identified in relation to groups with protected characteristics.
- 4.33 As a result, it is considered that the proposed Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications are predicted to have a significant positive long term effect on the equalities, diversity and inclusion.

Historic environment

- 4.34 The SA Report (EB204) concluded the following for this theme:

“Housing, traveller and employment 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 North Weald Bassett Masterplan 2014.

*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.”*

- 4.35 As stated previously, there are no new allocations and no significant changes to the preferred spatial strategy or the overall level of growth to be delivered during the plan period. While the Main Modifications to Policy DM7 (Heritage Assets) consulted on in 2021 substantially revise the wording of the policy, it still seeks to preserve or enhance the historic environment, including designated and non-designated heritage assets. No significant changes have been made to Policy DM8 (Heritage at Risk). Appendix 6 now Part 2 of the Plan sets out site specific policy requirements for allocations.
- 4.36 While the plan has been strengthened in some areas in relation to the historic environment, it is still considered appropriate to conclude that the Local Plan Submission Version plus Main Modifications are likely to have an uncertain minor negative effect on the historic environment.

Housing

- 4.37 The SA Report (EB204) concluded the following for this theme:

*“The strategy is to allocate sites to support housing growth to meet the housing requirement of 11,400 homes over the plan period. This has been established in coordination with neighbouring authorities within the HMA and is set out the Memorandum of understanding agreed in March 2017. The strategy seeks to recognise the strategic economic role of Harlow and seeks to distribute the remaining housing requirement across all the main 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.”*

- 4.38 The Local Plan Submission Version plus Main Modifications and further Main Modifications will still meet the housing requirement of 11,400 homes over the plan period as well as meet Traveller accommodation needs in full. As a result, it is considered that the proposed Main

Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications are predicted to have a residual significant positive long term effect on housing.

Land and waste

4.39 The SA Report (EB204) concluded the following for this theme:

*“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.”*

4.40 There are no significant changes proposed in terms of the location or overall level of growth during the plan period. The Local Plan Submission Version plus Main Modifications will still result in the loss of greenfield and agricultural land during the plan period; however, as stated in the previous conclusion it is not clear what more could be done through the spatial strategy to minimise this loss. It is therefore considered that the previous conclusion is still valid and that the Local Plan Submission Version plus Main Modifications will have a negative effect on land and waste.

Landscape

4.41 The SA Report (EB204) concluded the following for this theme:

*“The spatial strategy has been developed, and individual sites have been assessed, to take into account landscape character assessment work and settlement edge landscape sensitivity studies. Consideration has also been given to local knowledge, regarding how settlement edge sensitivity varies at each settlement (in particular through consultation with local Councillors and town and parish councils). 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.”*

4.42 There are no significant changes proposed in terms of the location or overall level of growth during the plan period. The reduction in the capacity of EPP.R1 and EPP.R2 (the South of Epping Masterplan Area) and inclusion of an identified ‘build line’ both at this site and at SP4.1 (Latton Priory Garden Community) will help to reduce the impact of development on the landscape and character of these areas. When considering the effect of the plan as a whole for the District, the proposed changes do not significantly affect the conclusion of the previous SA work. The Local Plan Submission Version plus Main Modifications are predicted to have an uncertain minor negative effect on the landscape.

Transport

4.43 The SA Report (EB204) concluded the following for this theme:

“The 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.

The transport modelling work to date indicates that the proposed level of development in the Submission Plan would increase traffic levels across the network. The Highways Assessment Report (2017) 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.⁷

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).

*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).⁸ 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 sustainable transport modes in mind.”*

- 4.44 The Transport Assessment Report 2019 (TAR) (EB503) demonstrates, “*that the combination of more ambitious sustainable modal shift, changes in travel behaviour and a package of physical highway improvements could potentially mitigate the most significant impacts of the Local Plan. In many instances, junction approaches would deliver a similar level of performance over the existing situation, or at the least, improve on the 2033 Do-Minimum scenario, where no Local Plan growth or transport improvements are delivered*”.
- 4.45 The TAR identifies “*some localised residual impacts on part of the network, largely due to the challenges associated with delivering junction improvements in constrained urban or rural areas*”.
- 4.46 There are no significant changes proposed in terms of the location or overall level of growth during the plan period. No material changes are proposed to the 2021 Main Modifications which included additional text to the Place Policies in relation to infrastructure requirements and the need for development to deliver and/ or contribute towards provisions of walking and cycling facilities. This includes linkages within the site and to key destinations as well as enhancements to public transport provision.
- 4.47 The further Main Modifications do not include the inclusion of a new Policy (D8: Local Plan Review) that had been proposed through the 2021 Main Modifications. Instead Policy D7 is proposed to be modified to include a Local Plan Review element. The further Main Modification to Policy D7 sets out that when reviewing the Local Plan the Council will have particular regard to a number of matters including transport modal shift away from the use of private vehicles towards sustainable transport modes when determining whether or not relevant policies require updating.
- 4.48 Taking the above into account, it is considered that the Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications are predicted to have uncertain positive effects with respect to transport.

Water

- 4.49 The SA Report (EB204) concluded the following for this theme:

“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

⁷ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

⁸ Ibid.

*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.”*

- 4.50 There are no significant changes proposed in terms of the location or overall level of growth during the plan period. Changes to the Place Policies through the Main Modifications include additional text in relation to infrastructure requirements. The additional text seeks to ensure that development in those areas deliver and/ or contribute proportionately towards utility infrastructure, which includes wastewater.
- 4.51 Taking the above into account, it is considered that the Main Modifications do not significantly affect the conclusions of the previous SA work set out above. The Local Plan Submission Version plus Main Modifications are predicted to have a neutral effect on the water topic.

5. Next Steps

Plan finalisation

- 5.1 Following the proposed further Main Modifications consultation, the Inspector will consider all representations received as part of this consultation and the consultation on proposed Main Modifications undertaken in 2021 before reporting on the Plan's soundness (with agreed Modifications as necessary), or whether further Examination hearings are required.
- 5.2 Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be reported to Council for adoption. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/ SA in full and presents 'measures decided concerning monitoring'.

Monitoring

- 5.3 The SA Report (EB204) presents a range of 'proposed monitoring measures' in Part 3, Chapter 10. The work carried out in relation to the proposed Modifications does not necessitate any significant amendments to the proposed measures at this stage. A final list of monitoring measures will be presented within the SA Statement produced once the Local Plan is adopted.

Appendix I: Screening of proposed Main Modifications and further Main Modifications

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
General			
MM1 - 2	Various policies	The removal of text relating to key evidence sections, additional text to ensure consistency, to reflect the changes to the Use Classes and amendments to make it clear that Appendix 6 constitutes a policy and as such now forms Part 2 of the Plan.	No
Chapter 1 - Introduction and Setting the Scene			
MM3 - 6	Various paras and Figure 1.5	Amendments to provide further clarification and correct errors.	No
Chapter 2 - Strategic Context and Policies			
MM7	Lee Valley Regional Park	Changes to reflect Lee Valley Regional Park Authority's most up to date strategic aims	No
MM8 - 9	Changes to the Plan's Vision and Objectives	Changes to reflect concerns raised by Historic England, include a reference to air quality and nature conservation as well as better recognise opportunities for health and wellbeing and green and blue infrastructure.	No - while the changes help to strengthen the Plan's Vision and Objectives in relation to a number of SA themes, they do not significantly affect the findings of the previous SA work.
MM10	Policy SP1 (Presumption in favour of sustainable development)	Deletion of Policy SP1 to avoid duplication with National Policy.	No, the deletion of this policy doesn't significantly affect the findings of the previous SA work.
MM11 - 13	Table 2.3 to 2.5	Changes to reflect the Inspectors Interim Findings (ED98) and advice note (ED141), including updated evidence on housing land and traveller pitch supply, to reflect changes to the Use Classes Order and provide further clarification.	No - amendments to reflect updated evidence on housing land supply.

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM14 - 15	Policy SP2 (Spatial Development Strategy 2011-2033) and supporting text	Changes to provide further clarification and in the interest of the Plan's effectiveness, reflect updated evidence (re housing land supply), more clearly present the stepped trajectory and reflect proposed changes to the Place Policies. The minimum number of pitches to be delivered during the plan period has been amended to ensure that the full objectively assessed need is set out in policy. There has been no change in terms of the overall number of pitches to be delivered.	No - the amendments to the policy reflect updated evidence as well as proposed changes to the Place Policies. No new allocations are being proposed, the level of growth at settlements has been amended to reflect changes in the Place Policies including reduced capacity at some sites as well as the deletion of some allocations. The proposed changes do not result in a significant change to the overall level of growth to be delivered during the plan period. In summary, the spatial strategy has not significantly changed with the focus of growth in the garden communities around Harlow and at the larger settlements within EFDC. Overall, these changes do not significantly affect the findings of the previous work.
MM16 - 17	Policy SP3 (Place Shaping) and supporting text	Changes to provide clarification and better reflect National Policy by recognising health and wellbeing principles in place shaping, and to clarify the status and timing of Strategic Masterplans and Concept Framework Plans,	No - while the changes help to strengthen the Policy in terms of the Health and Wellbeing theme, they do not significantly affect the findings of the previous SA work.
MM18 - 19	Policy SP4 (Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town) and supporting text	Changes include to provide clarification and consistency, recognise health and wellbeing principles in place shaping, address concerns raised by Historic England and clarification regarding the timing and phasing of the provision of sustainable transport infrastructure.	No - while the proposed changes help to strengthen the policy in relation to the Historic Environment and Transport themes through the inclusion of additional criteria in Part C (xvii and xx) of Policy SP4, they do not significantly affect the findings and overall conclusions of the previous SA work.

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM20 - 21	Policy SP5 (Garden Town Communities) and supporting text	Changes to provide clarification, consistency and more flexibility as well as address concerns raised by Essex County Council, Environment Agency, Natural England and Thames Water and reflect changes to the Use Classes Order.	No - the location and level of growth proposed through the policy has not significantly changed.
MM22 - 23	Policy SP6 (Green Belt and District Open Land) and supporting text	Changes to provide clarification and address errors, to reflect the advice in ED141 in relation to site RUR.R1 as well as replace all references to District Open Land with Local Green Space throughout the Plan to ensure consistency with National Policy.	No
MM24 - 25	Policy SP7 (The Natural Environment, Landscape Character and Green and Blue Infrastructure) and supporting text	Changes to provide clarification and ensure consistency with other policies.	No
Chapter 3 - Housing, Economic and Transport Policies			
MM26 - 27	Policy H 1 (Housing Mix and Accommodation Types) and supporting text	Changes to provide clarification, consistency and flexibility.	No
MMX28 - 29	Policy H 2 (Affordable Housing) and supporting text	Changes to provide clarification and reflect the Inspector's Interim Findings (ED98).	No - the percentage of affordable homes to be provided on-site has not changed.
MM30 - 31	Policy H 3 (Rural Exceptions) and supporting text	Changes to provide clarification and ensure consistency with other policies.	No
MM32	Policy H 4 (Traveller Site Development)	Change removes the site size limit for traveller sites.	No - the policy still seeks to deliver sufficient pitches to meet identified needs.
MM33 - 34	Policy E 1 (Employment Sites) and supporting text	Changes to provide clarification and provide flexibility through recognising the potential role of sui generis uses of an employment character, in addition to uses which are complementary and supporting to employment uses and to reflect changes to the Use Classes Order.	No

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM35 - 36	Policy E 2 (Centre Hierarchy/ Retail Policy) and supporting text	Changes to provide greater clarity as to how the criteria should be applied depending on whether the proposed development is within or outside of a primary or secondary frontage and to reflect changes to the Use Classes Order.	No
MM37 - 38	Policy E 3 (Food Production and Glasshouses) and supporting text	Changes to provide clarification that proposals for new accommodation and the conversion of existing buildings are expected to be subject to this Policy as well as remove reference to a target.	No - however it is noted that the policy has been strengthened in relation to the biodiversity theme through the addition of a criteria relating to the Epping Forest SAC.
MM39	Policy E 4 (The Visitor Economy) and supporting text	Changes to provide clarification and strengthen the policy to ensure that international sites are protected.	No - while the proposed changes help to strengthen the policy in relation to the Biodiversity topic they do not significantly affect the findings and overall conclusions of the previous SA work.
MM40 - 41	Policy T 1 (Sustainable Transport Choices) and supporting text	Changes to provide clarification, avoid duplication and reflect changes to the Building Regulations in relation to the provision of infrastructure for electric vehicles.	No
MM42 - 43	Policy T 2 (Safeguarding of Routes and Facilities) and supporting text	Changes to provide clarification, to make specific reference to the requirement to safeguard land to deliver the transport improvements and to ensure that land required to facilitate the delivery of other schemes and projects will be protected where locations are known.	No
Chapter 4 - Development Management Policies			
MM44 - 45	Policy DM 1 (Habitat Protection and Improving Biodiversity) and supporting text	Changes to provide clarification, ensure consistency with National Policy and reflect the Inspector's Interim Findings (ED98).	No - while the policy has been strengthened and provides more clarity the changes do not significantly affect the findings and overall conclusions of the previous SA work.
MM46 - 47	Policy DM 2 (Epping Forest SAC and the Lee Valley SPA) and supporting text	Changes to provide clarification on the different components of mitigation and to reflect the Inspector's advice as set out in his note of 16 June 2022 (ED141).	No - while the policy has been substantially updated to reflect the revised HRA and representations it still seeks to conserve and enhance the

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
			Epping Forest SAC and the Lee valley SPA.
MM48	Policy DM 3 (Landscape Character, Ancient Landscapes and Geodiversity)	To improve the clarity and effectiveness of the Policy by specifically referring to settlement edges and the need to assess developments with reference to relevant available evidence.	No
MM49	Policy DM 4 (Green Belt)	Changes for consistency with national planning policy and other Local Plan Policies.	No
MM50 - 51	Policy DM 5 (Green and Blue Infrastructure) and supporting text	Changes to reflect concerns raised by the EA and include a reference to the Epping Forest SAC.	No
MM52 - 53	Policy DM 6 (Designated and Undesignated Open Spaces) and supporting text	Changes to correct an error and clarify the mechanism in which Local Green Space can be designated.	No
MM54 - 55	Policy DM 7 (Heritage Assets) and supporting text	Changes to reflect the Inspector's Interim Findings (ED98) and include Protected Lanes as a relevant asset.	No - while the policy has been substantially updated it still seeks to preserve and enhance the historic environment, including designated and non-designated heritage assets.
MM56	Policy DM 9 (High Quality Design)	Changes for consistency and to address concerns raised by Historic England, Essex County Council and Sport England. Part E of Policy DM 10 moved to this Policy.	No
MM57	Policy DM 10 (Housing Design and Quality) and supporting text	Changes to provide clarification, correct an error and ensure that private amenity space is of a size, shape and nature that enables reasonable use. Part E of this Policy moved to Policy DM 9.	No
MM58 - 59	Policy DM 12 (Subterranean, basement Development and Lightwells) and supporting text	Changes to provide clarification, respond to concerns raised by Historic England and reflect the Inspector's Interim Findings (ED98).	No

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM60	Policy DM 13 (Advertisements) and supporting text	Changes to provide further clarity.	No
MM61	Policy DM 14 (Shopfronts and On Street Dining)	Changes to address concerns raised by Historic England.	No
MM62 - 63	Policy DM 15 (Managing and Reducing Flood Risk) and supporting text	Changes to provide clarification and to ensure consistency between other Local Plan Policies and National Policy.	No
MM64 - 65	Policy DM 16 (Sustainable Drainage Systems) and supporting text	Changes to provide clarification and address concerns raised by the Environment Agency.	No
MM66	Policy DM 17 (Protecting and Enhancing Watercourses and Flood Defences)	Changes to provide clarifications on the 8m buffer zone and the role of the Environment Agency.	No
MM67 - 68	Policy DM 18 (On Site Management and Reuse of Waste Water and Water Supply) and supporting text	Changes to provide clarification including on the phasing of infrastructure provision and remove outdated requirements.	No
MM69 - 70	Policy DM 19 (Sustainable Water Use) and supporting text	Changes to provide greater clarity and consistency.	No
MM71 - 72	Policy DM 20 (Low Carbon and Renewable Energy)	Changes to support the provision of low carbon or renewable technologies, remove reference to CHP, CCHP in order to clarify and to futureproof the policy.	No
MM73	Policy DM 21 (Local Environmental Impacts, Pollution and Land Contamination) and supporting text	Changes to address concerns raised by HE.	No

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM74 - 75	Policy DM 22 (Air Quality) and supporting text	Changes to provide clarification and simplification including that the Policy only relates to human health and to provide consistency with other policies.	No - while the policy has been substantially updated to provide clarity and include references to updated evidence it does not significantly affect the findings and overall conclusions of the previous SA work.
Chapter 5 - Places			
MM76	Policies P 1 - P 15 and supporting text	Changes to provide clarification and consistency, address the Inspector's Interim Findings (ED98) and to reflect the changes to the Use Classes Order.	No
MM77 - 78	Policy P 1 (Epping) and supporting text	Reduction of 500 dwellings to be delivered at EPP.R1 and EPP.R2 and deletion of allocations EPP.R3 (89 dwellings) and EPP.R10 (6 dwellings). Further changes include additional policy text relating to access to sustainable transport modes, upgrading infrastructure, the delivery of a new leisure centre to replace the facility currently located at site EPP.R5, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions. In relation to the South Epping Masterplan Area - clarification of the timing of, and weight to be attributed to, the Masterplan, the identification of a build-line and provision of Suitable Alternative Natural Greenspace.	No - The SA Report (EB204) does not identify any significant effects arising as a result of this policy or the proposed allocations alone. The Submission Plan plus proposed Main Modifications and further Main Modifications are considered collectively in Chapter 4 of this SA Report Addendum. The other amendments to this policy help to strengthen it in relation to the air quality, biodiversity (with regard to recreational pressure), climate change and transport themes through the inclusion of text relating to sustainable transport modes and reference to the Council's Air Pollution Mitigation Strategy.
MM79 - 80	Policy P 2 (Loughton) and supporting text	Deletion of five sites (LOU.R1, R2, R5, R8 and R17) allocated for the delivery of 552 dwellings. Designation of an additional existing site for employment uses. Further changes include additional policy text relating to access to sustainable transport modes, upgrading infrastructure, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions. Deletion of text relating to the Jessel Green Masterplan as a result of the deletion of LOU.R5. Additional policy text added to cover any sites within the Impact Risk Zone for the Roding Valley Meadows SSSI.	No - see commentary above for Policy P 1 (Epping).

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM81 - 82	Policy P 3 (Waltham Abbey) and supporting text	Deletion of two sites (WAL.R4 and WAL.R7) allocated for the delivery of 138 dwellings. The removal of WAL.E7 (Providence Nursery) as an existing site designated for employment uses. Further changes include additional policy text relating to access to sustainable transport modes, upgrading infrastructure reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions. In relation to the North Waltham Abbey Masterplan Area - clarification of the timing of, and weight to be attributed to, the Masterplan and the need for enhancements within the Lee Valley Regional Park.	No - see commentary above for Policy P 1 (Epping).
MM83 - 84	Policy P 4 (Ongar) and supporting text	No significant changes to the residential allocations. Changes include additional policy text relating to access to sustainable transport modes, upgrading infrastructure and a reference to the Council's adopted Air Pollution Mitigation Strategy. Clarification of the timing of, and weight to be attributed to Ongar Concept Framework.	No - there have been no significant changes to site allocations. The amendments to this policy help to strengthen it in relation to the air quality, climate change, qualities and transport themes through the inclusion of text relating to sustainable transport modes and reference to the Council's Air Pollution Mitigation Strategy.
MM85	Policy P 5 (Buckhurst Hill) and supporting text	No significant changes to the residential allocations. Changes include additional policy text relating to access to sustainable transport modes, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions.	No - there have been no significant changes to site allocations. The Submission Plan plus proposed Main Modifications and proposed further Main Modifications are considered collectively in Chapter 4 of this SA Report Addendum. The other amendments to this policy help to strengthen it in relation to the air quality, biodiversity (with regard to recreational pressure), climate change and transport themes through the inclusion of text relating to sustainable transport modes and reference to the Council's Air Pollution Mitigation Strategy.
MM86 - 87	Policy P 6 (North Weald Bassett) and supporting text	No significant changes to the residential allocations. Additional policy text relating to sustainable transport choices, upgrading infrastructure, reference to the Council's	No - see commentary above for Policy P 5 (Buckhurst Hill).

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
		adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions. In relation to the North Weald Residential Masterplan Area - clarification of the timing of, and weight to be attributed to, the Masterplan and provision of Suitable Alternative Natural Greenspace.	
MM88 - 89	Policy P 7 (Chigwell) and supporting text	Deletion of five sites (CHIG.R1, R2, R3, R6, R8 and R7) allocated for the delivery of 174 dwellings. Additional policy text relating to sustainable transport choices, upgrading infrastructure, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions.	No - see commentary above for Policy P 1 (Epping).
MM90	Policy P 8 (Theydon Bois) and supporting text	No significant changes to the residential allocations. Additional policy text relating to sustainable transport choices, upgrading infrastructure, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions.	No - see commentary above for Policy P 5 (Buckhurst Hill).
MM91 - 92	Policy P 9 (Roydon) and supporting text	Deletion of one site (ROYD.R3) allocated for the delivery of 14 dwellings. Additional policy text relating to sustainable transport choices, upgrading infrastructure and a reference to the Council's adopted Air Pollution Mitigation Strategy.	No - see commentary above for Policy P 1 (Epping).
MM93 - 94	Policy P 10 (Nazeing) and supporting text	No significant changes to the residential allocations. Additional policy text relating to sustainable transport choices, upgrading infrastructure and a reference to the Council's adopted Air Pollution Mitigation Strategy. Clarification in relation to the timing of, and weight to be attributed to, the Concept Framework Plan.	No - see commentary above for Policy P 5 (Buckhurst Hill).
MM95 - 96	Policy P 11 (Thornwood) and supporting text	No significant changes to the residential allocations. Additional policy text relating to sustainable transport choices, upgrading wider infrastructure, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure, including, where necessary, the provision of financial contributions.	No - see commentary above for Policy P 5 (Buckhurst Hill).
MM97 - 98	Policy P 12 (Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbots) and supporting text	Deletion of two sites (STAP.R2 and R3) allocated for the delivery of 14 dwellings. Additional policy text relating to sustainable transport choices, upgrading wider infrastructure, reference to the Council's adopted Air Pollution Mitigation Strategy and strengthened reference to recreational pressure for developments within Coopersale, including, where necessary, the provision of financial contributions.	No - see commentary above for Policy P 1 (Epping).

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM99 - 100	Policy P 13 (Rural Sites in the East of the District) and supporting text	Deletion of two sites (RUR.R1 and RUR.R2) allocated for the delivery of 41 homes. Additional policy text relating to sustainable transport choices, upgrading wider infrastructure and a reference to the Council's adopted Air Pollution Mitigation Strategy.	No - see commentary above for Policy P 1 (Epping).
MM101 - 102	Policy P 14 (Rural Sites in the West of the District) and supporting text	No changes to the allocations. Additional policy text relating to sustainable transport choices, upgrading wider infrastructure and a reference to the Council's adopted Air Pollution Mitigation Strategy.	No - see commentary above for Policy P 5 (Buckhurst Hill).
MM103 - 104	Policy P 15 (Rural Sites in the South of the District) and supporting text	No changes to the allocations and additional policy text added in relation to air pollution and impacts on Epping Forest.	No - see commentary above for Policy P 5 (Buckhurst Hill).
Chapter 6 - Infrastructure & Delivery			
MM105 - 106	Policy D1 (Delivery of Infrastructure) and supporting text	Amendments to provide further clarification in relation to the Council's approach to the consideration of viability matters and health considerations at the development management stage. Additional policy text relating to the contribution of development towards the delivery of infrastructure as well as the potential cumulative impacts of development.	No
MM107 - 108	Policy D2 (Essential Facilities and Services) and supporting text	Amendments to address concerns raised by Essex County Council. Changes include additional policy text in relation to the replacement of services/ facilities in appropriate locations and the inclusion of text requiring developments of a certain scale to provide a Health Impact Assessment (HIA).	No
MM109	Policy D3 (Utilities) and supporting text	Minor changes to provide clarification.	No
MM110	Policy D4 (Community, Leisure and Cultural Facilities) and supporting text	Amendments to remove duplication, provide flexibility and further clarity.	No
MM111 & 112	Policy D7 (Monitoring and Enforcement) and supporting text	Changes to include the approach to Local Plan Review, provide clarification and remove duplication.	No
Appendices			

Mod. No.	Submission Local Plan Reference	Summary of proposed Main Modification/further Main Modification where relevant	Does the proposed Main Modification/further Main Modification significantly affect the findings of the previous SA work (EB204)?
MM113 - 138	Appendices	Various changes to reflect updated evidence and provide further clarification and consistency.	No - while Appendix 6 is now Part 2 of the plan setting out site specific policy requirements these were taken into account as part of appraisal of the plan as a whole through the SA process. No significant effects.

