



TPA/002

East Herts District Plan: Topic Papers

March 2017

Sustainability Appraisal





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1 Introduction

1.1 The purpose of this Topic Paper is to detail the District Plan's approach to the Sustainability Appraisal and Strategic Environmental Assessment.

1.2 Sustainability Appraisal (SA) is a mechanism for considering and communicating the likely effects of a draft Plan and any alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising positives. In simple terms, the process of SA is one of assessing and recording how possible implications of development have been considered through the Plan-making process. The Strategic Environmental Assessment (SEA) is integrated into the Sustainability Appraisal process; therefore the Environmental Report covers both these elements.

1.3 In line with the procedures prescribed in the Environmental Assessments of Plan and Programmes Regulations 2004, which was prepared to transcribe into UK national Law the EU Strategic Environmental Assessment (SEA Directive, 2001), the SA process has been carried out in an integrated way throughout the Plan-making process; therefore, there is no one single report that comprises 'the Environmental Report' for the District Plan.

1.4 This Topic Paper has been prepared to respond to some of the comments made during the Pre-Submission consultation that the narrative of the SA process is not easy to follow.

1.5 Table 1 below sets out the different Plan-making stages and briefly summarises the SA work undertaken at that time. This demonstrates that the process has been iterative and informed by an extensive range of technical work including consultation with key stakeholders.

1.6 Section 2 below goes on to explain in more detail the work undertaken since 2010 to establish the reasonable alternatives. The Council has taken a 'stepped approach' to the development of a preferred spatial strategy since 2012.

1.7 The documents to which this Paper refers are as follows:

Sustainability Appraisal Documents:

- Sustainability Appraisal Scoping Report, 2010 (**SUB/007**)
- Sustainability Appraisal Report of the Issues and Options District Plan, 2010 (**SUB/006**)
- Interim Sustainability Appraisal Report, 2014 (**SUB/005**)
- Sustainability Appraisal of the East Herts District Plan, 2016 (**SUB/004**)
- Sustainability Appraisal of Strategic Options for the West Essex and East Hertfordshire Housing Market Area, 2016 (**HOP/002**)

Settlement and Site Specific Studies:

- Supporting Document, 2014 (**SSS/001**)



- Interim Development Strategy Report, 2014 (**SSS/017**)
- Bishop's Stortford Settlement Appraisal, 2016 (**SSS/002**)
- Buntingford Settlement Appraisal, 2016 (**SSS/003**)
- Hertford Settlement Appraisal, 2016 (**SSS/004**)
- Sawbridgeworth Settlement Appraisal, 2016 (**SSS/005**)
- Ware Settlement Appraisal, 2016 (**SSS/006**)
- Villages Settlement Appraisal, 2016 (**SSS/007**)
- The Gilston Area Settlement Appraisal, 2016 (**SSS/008**)
- East of Welwyn Garden City Settlement Appraisal, 2016 (**SSS/009**)
- East of Stevenage Settlement Appraisal, 2016 (**SSS/010**)



Table 1.1 The Integrated Sustainability Appraisal Approach

Plan-making Stage	Key Tasks Integrating the SA Approach	SA / SEA
<p>Issues and Options, 2010</p>	<p>An initial exploration of alternative approaches to the distribution of development across the district was undertaken. Seven approaches to development were considered and indicative locations for potential development were identified.</p>	<p>Sustainability Appraisal Scoping Report, 2010 (SUB/007)</p> <p>Sets out the evidence baseline against which impacts are considered, and looks at other relevant plans and programmes.</p> <p>Sustainability Appraisal Report, 2010 (SUB/006)</p> <p>The SA individually appraised each of the options included in the Issues and Options consultation document. The SA provides a summary of key mitigation recommendations to ensure that any negative effects are reduced and that any beneficial effects are enhanced.</p>
<p>Preferred Options, 2014</p>	<p>Preparation of a Supporting Document (SUB/001), which presented the various plan-making stages involved in the development of the Preferred Options Consultation. A seven step approach (see paragraph 2.5 below) was undertaken which was based upon the objectives and topics set out in the Sustainability Appraisal Framework. A significant number of alternative approaches to development were considered at a variety of scales and a full assessment</p>	<p>Interim Sustainability Appraisal Report, January 2014 (SUB/005)</p> <p>Sets out an updated baseline and scope and describes the processes that have been undertaken between 2008 and 2011 in the preparation of the Issues and Options District Plan; the evolution of the Preferred Options District Plan; and how these stages have involved Sustainability Appraisal processes.</p>



Plan-making Stage	Key Tasks Integrating the SA Approach	SA / SEA
	<p>of potential impacts, including what could happen without the Plan, was undertaken before reaching the preferred development strategy.</p> <p>An Interim Development Strategy Report (SSS/017) set out how an initial SA of the preferred option was taken into account in the further refinement of the preferred development strategy.</p>	<p>The SA appraised eight alternative distribution options against the SA Framework Topics, which included the Preferred Option.</p>
<p>Pre-Submission, 2016</p>	<p>Preparation of Settlement Appraisals (SSS/002-010) which set out how the preferred development strategy for each settlement or strategic site has evolved. The Settlement Appraisals were designed to incorporate the SA approach, including an assessment of alternative approaches to development, consideration of the cumulative effects of development and an appraisal against the SA Framework Objectives. Changes proposed to the Development Management policies were undertaken within the context of improving their effectiveness against the SA Objectives.</p>	<p>Sustainability Appraisal of the East Herts District Plan, September 2016 (SUB/004)</p> <p>The Pre-Submission SA explains the work undertaken since the Preferred Options consultation.</p> <p>Taking account of the Settlement Appraisals (SSS/002-010) and additional technical work, in particular the West Essex and East Hertfordshire Strategic Housing Market Assessment (HOP/001) and the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (HOP/002), four reasonable alternatives were identified and appraised against the SA Framework Topics.</p>



2 Developing the Reasonable Alternatives

2.1 This section sets out how the reasonable alternatives have been developed throughout the various plan-making stages.

Issues and Options (2010) (PDP/002)

2.2 Two rounds of public engagement in 2008 sought to raise awareness and identify residents' likes and dislikes. Sustainability Appraisal (SA) fed in for the first time in 2010, when the Interim SA Report, 2010 (**SUB/006**) was published for consultation alongside the Council's Issues and Options consultation document (**PDP/011**).

2.3 The Interim SA Report included two parts. First, the document identified the issues facing East Herts. Second, a number of alternative options to respond to these issues were identified. These included:

- Six distinct spatial options for distributing growth
 - Option A: Towns Only, with possible directions for growth for each town
 - Option B: Towns and Larger Service Villages
 - Option C: Towns, Larger Service Villages and Smaller Service Villages
 - Option D: Towns, Larger Service Villages and Smaller Service Villages and Other Villages/Hamlets
 - Option E: Towns, Stevenage and Welwyn Garden City
 - Option F: Settlements within Transport Corridors
- Six approaches to housing distribution
 - Approach I: Proportional distribution
 - Approach II: Adjusted proportional distribution
 - Approach III: Reversed proportional distribution
 - Approach IV: Equal distribution
 - Approach V: Distribution by land availability
 - Approach VI: Distribution by settlement type



- A series of growth options across Bishop's Stortford, Buntingford, Hertford, Ware and the Villages
- A series of options for growth north of Harlow

2.4 Appraisal findings from 2010 fed into subsequent plan-making. In particular, the appraisal findings in relation to the different spatial options fed into the identification of 69 'areas of search' (see Step 4, below).

Preferred Options (2014) (PDP/001)

2.5 In 2012 the Council embarked on a 'stepped approach' to the identification of reasonable alternatives. Each step in the process corresponded with a chapter in the Supporting Document (**SSS/01**) to the District Plan.

Step 1 – involved exploring the nature of the task

- Consideration was given to progress on the District Plan to date and the scope of forthcoming work, describing how the approach would integrate the topics set out within the SA Framework.

Step 2 – involved exploring the strategic planning issues

- Issues were explored under the following thematic headings: Housing; Economy; Education; Transport; Water; Telecoms; Gas and Electricity; Natural and Historic Environment; Green Belt; Community and Leisure; Natural Resources; and Environmental Quality.

Step 3 – involved developing a series of assessment criteria under topic headings

- The topic headings were: Land Availability; Employment Potential; Primary Schools; Secondary Schools; Highways Infrastructure; Vehicular Access; Access to Bus Services; Access to Rail; Waste Water; Flood Risk; Wildlife Sites; Historic Assets; Landscape Character; Green Belt; Strategic Gaps; Boundary Limits; Community Facilities; Agricultural Land; Environmental Stewardship; and Noise.

Step 4 – involved drawing on the criteria in Step 3 to assess 69 'areas of search'

- Assessment involved a 'sieving' process where Sieve 1 looked at each area of search in isolation; and Sieve 2 looked at combinations of areas around each of the main towns.

- At this stage, 18 areas of search dropped out from further consideration. A number of other areas were refined; particular sub-areas were removed from further consideration; and/or the level of growth assumption was modified.

Step 5 – involved further sieving

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- Further sieving of the shortlisted areas of search was undertaken taking account of potential impacts, for example, on urban form and economic development.

Step 6 – took account of further information

- In particular, this stage took account of the Green Belt Review, submissions made by Hertfordshire County Council in relation to schools and highways, and submissions made by landowners/developers.

- None of the 51 shortlisted areas dropped out at Steps 5 or 6, but the assessment did lead to some further modifications to scale assumptions.

2.6 The next stage (**Step 7**) involved the Council identifying its preferred spatial strategy.

- A number of alternatives to the preferred spatial strategy were identified and appraised by the Interim SA (**SUB/005**):

- Option 1: 3,000 homes in the Gilston Area, 1,800 homes North and East of Ware and 450 homes East of Welwyn Garden City
- Option 2: 1,700 homes east of Welwyn Garden City and 3,000 homes North and East of Ware
- Option 3: 1,700 homes east of Welwyn Garden City and 3,000 homes West of Sawbridgeworth
- Option 4: 5,000 homes East of Stevenage
- Option 5: 5,000 homes in the Gilston Area
- Option 6: 5,000 homes at a new settlement in a transport corridor
- Option 7: 10,000 homes in the Gilston Area
- Option 8: 1,700 homes east of Welwyn Garden City, 3,000 homes North and East of Ware and 10,000 homes in the Gilston Area

2.7 The Interim Development Strategy Report, January 2014 (**SSS/017**) summarises the 'stepped approach' undertaken by the Council, discusses how the preferred development strategy was subject to an interim SA which was then taken into account in the refinement of the strategy, and demonstrates how the strategy meets the tests of soundness set out in paragraph 182 of the National Planning Policy Framework.

Pre-Submission (2016)

2.8 Following the Preferred Options consultation in 2014, additional technical work has been undertaken. It was therefore recognised by the Council that further work was needed to refine the understanding of 'reasonable alternatives' for subsequent appraisal.

2.9 At this stage the Council led on work to explore site options. In particular, work on a series of Settlement Appraisals (**SSS/002-010**) was undertaken. Incorporating the Sustainability Appraisal approach, each Settlement Appraisal considered all



reasonable site options for the locality, set out the proposed development strategy for the settlement and appraised this approach against the SA Objectives. Finally, each Settlement Appraisal clearly explained why the proposed development strategy approach was chosen.

2.10 Work was also undertaken with the Council’s HMA partners (Epping Forest, Harlow and Uttlesford Councils) to explore options for meeting housing in the wider sub-region. The study – a Sustainability Appraisal of Strategic Options for the West Essex and East Hertfordshire Housing Market Area (**HOP/002**) – considered three levels of growth:

- ~ 46,100 new homes in line with the 2015 SHMA
- ~ 49,638 new homes in line with the DCLG 2012-based household projections
- ~ 57,400 new homes in line with early advice from ORS based on more recent information including the DCLG 2014-based household projections (NB this figure was later revised down to 54,608 and has subsequently been revised down further to between 48,700 and 50,700 – see **TPA/004**)

2.11 Harlow was identified as a key urban centre within the HMA. As such the spatial options explored different levels of growth in and around Harlow. The study identified the following reasonable strategic spatial options:

- **Spatial option to deliver ~46,100 new homes across the SHMA area:**
 - A. Each authority meets its OAHN within its own boundaries (~14,150 at Harlow)
 - B. Less development at Harlow and accelerated development on the A120 in Uttlesford (~10,500 at Harlow)
 - C. Less development at Harlow and two new settlements in East Herts (~10,500 at Harlow)
 - D. Maximum growth at Harlow (~17,650 at Harlow; reduced allocations in constrained areas of the HMA)
- **Spatial option to deliver ~ 49,638 new homes:**
 - E. Higher growth across the HMA (~17,650 at Harlow; allocations in constrained areas)
- **Spatial option to deliver ~57,400 new homes:**
 - F. Maximum growth across the HMA (~20,985 at Harlow)

2.12 Options A-F were considered in light of

1. Transport modelling – to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure.



2. Sustainability Appraisal – to assess their implications in relation to a series of topics including biodiversity, community and wellbeing, historic environment, landscape and water.
3. Habitats Regulations Assessment – to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation.
4. Strategic Site Assessment – to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.

2.13 In light of this work, a Preferred Spatial Option was identified which would deliver c. 51,000 new homes across the HMA as follows:

Table 2.1 Preferred Spatial Option

Local Authority	Net New Homes 2011-2033
East Herts	c. 18,000
Epping Forest	c. 11,400
Harlow	c. 9,200
Uttlesford	c. 12,500
Total across the HMA	c. 51,100
Of which the area around Harlow will provide	c. 16,100

2.14 The Preferred Spatial Option was chosen as the most sustainable choice for the HMA on the basis that:

- c.51,000 new homes is higher than the OAHN identified in the 2015 SHMA (46,100) (**HOP/001**) and higher than the 2012-based household projections (49,638).
- Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment; its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections; its location in the London-Stansted-Cambridge corridor; together the wider economic growth aspirations for the town.
- The transport modelling undertaken to date demonstrates that that growth between 14,000 and 17,000 new homes in and around Harlow can be accommodated (subject to mitigation measures).
- The Harlow Strategic Site Assessment (**HOP/003**) indicates that sufficient suitable strategic sites are available in and around Harlow to deliver c. 16,100 new homes.



2.15 Taking account of the Settlement Appraisals and additional technical work, in particular the West Essex and East Hertfordshire Strategic Housing Market Assessment (**HOP/001**) and the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (**HOP/002**), four reasonable alternatives for East Herts were then identified and appraised:

- **Alternatives 1-3** – to accommodate ~**18,000** new homes over the plan period:
 - a. Preferred distribution as set out in the Sustainability of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (**HOP/002**).
 - b. Preferred distribution (1a) but with ~3,000 fewer homes within the Green Belt at key settlements including Bishop’s Stortford (reduction of 750 dwellings), Hertford (reduction of 750 dwellings), Sawbridgeworth (reduction of 500 dwellings) and Ware (reduction of 1,000 dwellings). The ~3,000 will instead be dispersed across the rural area.
 - c. Preferred distribution (1a) but with ~3,000 fewer homes within the Green Belt at key settlements including Bishop’s Stortford (reduction of 750 dwellings), Hertford (reduction of 750 dwellings), Sawbridgeworth (reduction of 500 dwelling) and Ware (reduction of 1,000 dwellings). The ~3,000 will instead be focused at two new settlements (near Little Hadham and Watton-at-Stone).
- **Alternative 4** – to accommodate ~**19,500** new homes over the plan period:
 - a. Preferred distribution (1a) plus additional sites in Buntingford and north of Harlow.

2.16 The table below provides a summary of the appraisal findings in relation to the four alternatives identified above. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using **red / green**) and also to rank the alternatives in relative order of performance. ‘=’ is used to denote instances where the alternatives perform on a par (i.e. it is not possible to differentiate between them).

Table 2.2 Options Appraisal

SA Topics	Option 1a	Option 1b	Option 1c	Option 2a
Air Quality	1	4	3	2
Biodiversity and GI	=			
Climate Change	1	4	3	1
Community & Wellbeing	1	4	3	1
Economy & Employment	1	4	3	1

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SA Topics	Option 1a	Option 1b	Option 1c	Option 2a
Historic Environment	1	4	1	3
Housing	2	3	3	1
Land	1	1	1	4
Landscape	=			
Transport	1	4	3	1
Water	=			

2.17 For completeness, reasonable site options identified through the SLAA, 2016 (**HOP/004**) were also appraised against the SA framework.

2.18 As can be seen from the table above, the preferred strategy (Option 1a) performed well against the majority of SA Topics when compared to the other options.

2.19 Alternatives to the release of Green Belt land around the main towns for development were considered, including the redirection of growth to the rural area and the potential for two new settlements in the district. However, the dispersal of housing across the rural area would not represent a sustainable form of development; and a new settlement option is not considered deliverable due to the lack of available land, together with concerns over the delivery of infrastructure. The SA also found that given the level of development proposed in each new settlement (1,500 new homes in each), this would not result in self-containment and residents would still need to travel to the main towns in order to access employment and other facilities. As such these alternatives were not supported by the Council.

2.20 A higher growth option was also considered. This looked at the potential to deliver additional development in Buntingford and in the Gilston Area. However, further development in Buntingford, beyond that already granted planning permission, is considered by the Council to be unsustainable, in particular due to the lack of local employment and sustainable transport opportunities (see **SSS/003**). Equally, the additional sites proposed to the north of Harlow are considered unsuitable due to their environmental constraints (flood plain and impact on the Stort Valley), impact on the character of Gilston village and impact on the strategic Green Belt gap (see **SSS/008**).

3 Conclusion

3.1 Sustainability Appraisal (incorporating Strategic Environmental Assessment) (SA/SEA) has been an integral part of the process to develop the East Herts District Plan up to its submission for Examination. During that process a range of sustainability reports and other work have been published to communicate the findings of the combined SA/SEA process and enable consultation.



3.2 This Topic Paper has outlined the ‘stepped approach’ that the Council has taken since 2012 to the development of a preferred spatial strategy. This process has been iterative and informed by an extensive range of technical work including consultation with key stakeholders. The details of this work are presented in the Supporting Document (**SSS/001**) and Settlement Appraisals (**SSS/002-010**). The SA approach has been integrated into this work, and in parallel, the SA has been informed by and has assessed this work at each stage in the process.

3.3 The Council’s preferred spatial strategy provides a balanced distribution of housing to meet the identified needs of both rural and urban communities, when compared to reasonable alternatives.

3.4 Any Main Modifications proposed to make the Plan sound will of course be subject to SA at that stage.