

Sustainability Appraisal (SA) for the London Borough of Barking and Dagenham Council's Local Plan

SA Adoption Statement

London Borough of Barking and Dagenham Council

September 2024

Quality information

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1. Introduction

1.1 Background

- 1.1.1 The London Borough of Barking and Dagenham Council's Local Plan was submitted to Government for Examination by an appointed Planning Inspectors, in December 2021. Following an extensive Examination process the inspectors published a report into the Plan's legal compliance and soundness in August 2024. The Inspectors' Report concludes that subject to the Main Modifications set out in the appendix of the report, the Plan is legally compliant and sound. The Local Plan, incorporating modifications, was adopted at a Council Assembly meeting on 18 September 2024.
- 1.1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants at AECOM.

1.2 SA explained

- 1.2.1 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging plan's contribution to sustainable development.
- 1.2.2 SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plan and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations). SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

1.3 This SA Adoption Statement

- 1.3.1 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA. It requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/ SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement' and inform the public and consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England, and Natural England.
- 1.3.2 In addition, Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the SA Report alongside the adopted Local Plan.

1.3.4 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the London Borough of Barking and Dagenham Council's Local Plan must explain:

- How environmental (and sustainability) considerations have been integrated into the plan.
- How the SA Report has been considered during preparation of the plan.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been considered; and
- The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.3.5 In association with the above requirements, the SA Adoption Statement is structured as follows:

- **Chapter 2** presents the narrative for plan-making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above.
- **Chapter 3** describes how consultation responses have been considered through the Local Development Plan/ SA process.
- **Chapter 4** presents the monitoring programme for the Local Plan.
- **Chapter 5** sets out some overall conclusions on the SA process.

2. How the SA process has informed and influenced the development of the Local Plan

2.1 Introduction

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

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

Date	Plan-making document	SA document
2015	Regulation 18 (1) Issues and Options Report	SA Scoping Report
2019	Regulation 18 (2) Draft Local Plan	Interim SA Report
2020	Regulation 19 (1) Draft Local Plan	SA Report
2021	Regulation 19 (2) Submission Local Plan	SA Report
2024	Main Modifications Consultation Document	SA Report Addendum

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

2.2 Appraisal of reasonable alternatives

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

- 2019 Regulation 18 Draft Local Plan and Interim SA Report
- 2020 Regulation 19 Draft Local Plan and SA Report
- 2021 Regulation 19 Submission Local Plan and Re-Run SA Report
- 2024 Main Modifications Consultation Document and SA Report Addendum

2019 Regulation 18 Draft Local Plan and Interim SA Report

2.2.2 At this stage, five alternative spatial strategy options were explored, which are outlined in **Table 2.2** below. Notably, a large proportion of development proposed under each of the options is comprised of committed development. All five options exceed the identified housing requirement.

Table 2.2 Spatial strategy options assessed through the Interim SA

Option	Description
Option 1: No further release of SIL/ LSIS or Public Open Space and standard densities across brownfield sites	This option does not propose the further release of any SIL/ LSIS or any designated Public Open Space. The housing requirement for the plan period is met through the allocation of the remaining brownfield sites without planning permission using a standard density approach, which is explained in the Barking and Dagenham Local Plan: Strategic Land Availability Assessment Draft Methodology for Consultation (2019).
Option 2: No further release of SIL/ LSIS or Public Open Space and increased densities (15%) at well-connected brownfield sites	This option does not propose the further release of any SIL/ LSIS or any designated Public Open Space. The housing requirement for the plan period is met through the allocation of the remaining brownfield sites without planning permission, with increased densities at the well-connected sites.
Option 3: Release of SIL/ LSIS and Public Open Space and standard densities across brownfield sites	This option proposes the release of SIL/ LSIS and designated Public Open Space (Marks Gate, Site ID CO). It also includes the allocation of all the remaining brownfield sites without planning permission using a standard density approach, which is set out in the Barking and Dagenham Local Plan: Strategic Land Availability Assessment Draft Methodology for Consultation (2019).
Option 4: No further release of SIL/ LSIS or Public Open Space and increased densities at well-connected (33%) and other (20%) brownfield sites	This option does not propose the further release of any SIL/ LSIS or any designated Public Open Space. The housing requirement for the plan period is met through the allocation of the remaining brownfield sites without planning permission, with increased densities across all the brownfield sites but higher densities sought at the well-connected sites.
Option 5: No further release of SIL/ LSIS or Public Open Space and increased densities (36%) at well-connected brownfield sites	This option does not propose the further release of any SIL/ LSIS or any designated Public Open Space. The housing requirement for the plan period is met through the allocation of the remaining brownfield sites without planning permission, with increased densities at the well-connected sites.

2.2.3 The five options were appraised through the SA process and the findings were presented in the 2019 Interim SA Report. The findings of the SA and consultation responses fed into subsequent plan-making.

2020 Regulation 19 Draft Local Plan and SA Report

2.2.4 Following consultation on the Regulation 18 Draft Local Plan in 2019, the representations received were collated and reviewed. Considering the responses as well as updated evidence, three alternative spatial strategy options were developed, which are outlined below. Each of the options could deliver around 42,737 dwellings during the plan period to meet identified needs, based on the sites and capacities identified through LBBD's Housing Land Assessment and housing trajectory.

Option 1: No further release of industrial land and significantly increased densities at well-connected brownfield sites

2.2.5 This option does not propose the release of any additional industrial land outside of committed development (development that has existing planning permission). Under this option there would be no redevelopment of the Gascoigne Industrial Area (ID CM), Thames Road (ID CI), Chadwell Heath (ID CH), Castle Green (ID CF) and Riverside Gateway (ID XK) and there would only be partial redevelopment of the Harts Lane Estate (ID XC). Only an extremely small proportion of Wickes (Hertford Road) site (ID HA) is designated as LSIS, it is assumed the designated area could be avoided and the site is therefore included under this option.

2.2.6 With the removal of four strategic sites and reduced capacity at two strategic sites the Borough would not be able to meet the minimum housing requirement identified through national planning policy and the DNLP. The shortfall could only be met by significantly increasing densities (approx. 80%) at well-connected brownfield sites. This option would deliver around 42,737 dwellings during the plan period (2019 to 2037) and does not include any sites that would deliver growth post plan period.

Option 2: Limited release of industrial land and increased densities at well-connected brownfield sites

2.2.7 This option proposes limited additional release of industrial land in line with the emerging DNLP. Under this option there would be no redevelopment of Chadwell Heath (ID CH) or Castle Green (ID CF) and there would only be partial redevelopment of the Harts Lane Estate (ID XC) during the plan period. Only an extremely small proportion of Wickes (Hertford Road) site (ID HA) is designated as LSIS, it is assumed the designated area could be avoided and it is therefore included under this option. The limited release/intensification of industrial capacity under this option would occur at the following sites:

- The Gascoigne Industrial Area (ID CM) is included as it forms part of a comprehensive estate renewal alongside a number of other committed sites.
- The Thames Road (ID CI) site is included as it forms part of the comprehensive regeneration of the Thames and Riverside Transformational Area. There is an opportunity for the site to link in with the committed Barking Riverside development and deliver a district energy network.

- The Riverside Gateway (ID XK) is included as it is in close proximity to the Thames Road site and would contribute along with the committed sites to transformational change in that area.

2.2.8 With the removal of two strategic sites, in particular Chadwell Heath (ID CH), and reduced capacity at one strategic site the Borough would not be able to meet the minimum housing requirement identified through national planning policy and the NDLP. The shortfall to meet the minimum housing requirement for the plan period would need to be met by increasing densities (approx. 30%) at well-connected brownfield sites. This option would deliver around 42,737 dwellings during the plan period (2019 to 2037) and does not include any sites that would deliver growth post plan period.

Option 3: Significant release of industrial land and standard densities across brownfield sites

2.2.9 This option proposes a significant additional release/ intensification of industrial land in line with the ILS (2020) and the housing trajectory. The release/ intensification of industrial capacity under this option would occur at the following sites:

- Gascoigne Industrial Area (ID CM) is designated as LSIS
- Thames Road (ID CI) is designated as SIL; • Riverside Gateway (ID XK); is designated as SIL
- Harts Lane Estate (ID XC) is partially designated as LSIS
- Chadwell Heath (ID CH) is designated as LSIS
- Castle Green (ID CF) is designated as SIL

2.2.10 This option would deliver around 42,737 dwellings during the plan period (2019 to 2037) using a standard density approach for brownfield sites and includes the delivery of a further 12,001 dwellings post plan period (11,250 dwellings at Castle Green ID CF, 685 dwellings at Chadwell Heath ID CH and 66 dwellings at Harts Lane Estate ID XC).

2.2.11 The three options were appraised through the SA process and the findings were presented in the 2020 SA Report. The findings of the SA and consultation responses fed into subsequent plan-making.

2021 Regulation 19 Submission Local Plan and Re-Run SA Report

2.2.12 Following consultation on the Regulation 19 Draft Local Plan in 2020, the three alternative spatial strategy options were refined, as outlined below.

Option 1: No further release/ intensification/ co-location of designated industrial land and increased densities at well-connected brownfield sites

2.2.13 This option does not propose the release/ intensification/ co-location of any additional designated industrial land outside of committed development (i.e. that has existing planning permission). Under this option there would be no redevelopment of the Gascoigne Industrial Area (ID CM), Thames Road (ID CI), Chadwell Heath (ID CH), Castle Green (ID CF), Riverside Gateway (ID

XK) and Hertford Road Industrial Estate (ID HZ). Only an extremely small proportion of Wickes (Hertford Road) site (ID HA) is designated as LSIS, it is assumed the designated area could be avoided and the site is therefore included under this option.

- 2.2.14 With the removal of four strategic sites and reduced capacity at two strategic sites the Borough would not be able to meet the minimum housing requirement identified through national planning policy and the London Plan. The shortfall could only be met by increasing densities (approx. 35%) at well-connected brownfield sites. This option would deliver 38,865 dwellings during the plan period (2020 to 2037) and does not include any sites that would deliver growth post plan period. This is the minimum housing target to be in conformity with national planning policy and the London Plan.

Option 2: Significant release of designated industrial land and standard densities across brownfield sites

- 2.2.15 This option proposes the full release of industrial land and includes the consideration potential capacity created through co-location as part of the future supply of space. It aligns with Scenario 2 in the ILS (2021). This option would result in the release of around 137.8 ha of designated industrial land from the following sites:

- Castle Green (Site ID CF) - the release of 58.7 ha of SIL
- Chadwell Heath Industrial Estate Site (Site ID CH) - no release but intensification of industrial land and co-location of employment with residential
- Gascoigne Industrial Area (Site ID CM) - the release of 5.8 ha of LSIS.
- Thames Road Site (Site ID CI) - the release of 30.9 ha of SIL and intensification of remaining industrial land and co-location of employment with residential
- Riverside Gateway Zone (Site ID XK) - no release but intensification of industrial land and co-location of employment with residential
- Hertford Road Industrial Estate (Site ID HZ) - the release of 5.4 ha of LSIS

- 2.2.16 This option would deliver around 44,051 dwellings during the plan period (2020 to 2037) using a standard density approach for brownfield sites and includes the delivery of a further 12,235 dwellings post plan period (11,550 dwellings at Castle Green ID CF and 685 dwellings at Chadwell Heath ID CH). This option has the potential to deliver circa 2.1 million sqm of industrial space through intensification, densification and co-location. This would provide sufficient floorspace to be provided to meet future needs of circa 1.9 million sqm of floorspace, with a headroom of circa 200,000 sqm.

Option 3: Limited release of designated industrial land and standard densities at well-connected brownfield sites

- 2.2.17 This option proposes the release of industrial land in line with the recommended approach (Scenario 3) set out in the ILS (2021). This option takes account of LBBD's aspirations but also considers the wider market, delivery and business factors that would influence the successful delivery of a sequenced intensify and release strategy for industrial land. This option

would result in the release of around 49.9 ha of designated industrial land from the following sites:

- Castle Green (Site ID CF) - the release of 31.1 ha of SIL
- Chadwell Heath Industrial Estate Site (Site ID CH) - no release but intensification of industrial land and co-location of employment with residential
- Gascoigne Industrial Area (Site ID CM) - the release of 5.8 ha of LSIS
- Thames Road Site (Site ID CI) - the release of 7.6 ha of SIL and intensification of remaining industrial land and co-location of employment with residential
- Riverside Gateway Zone (Site ID XK) - no release but intensification of industrial land and co-location of employment with residential
- Hertford Road Industrial Estate (Site ID HZ) - the release of 5.4 ha of LSIS

2.2.18 This option would deliver around 44,051 dwellings during the plan period (2020 to 2037) using a standard density approach for brownfield sites and includes the delivery of a further 12,235 dwellings post plan period (11,550 dwellings at Castle Green ID CF and 685 dwellings at Chadwell Heath ID CH). It has the potential to deliver circa 2.6 million sqm of industrial space through intensification, densification and co-location but with a reduced displacement of floorspace (circa 270,000 sqm) compared to Option 2. This would provide sufficient floorspace to meet future needs of circa 1.9 million sqm, with a headroom of circa 700,000 sqm.

2.2.19 It should be noted that Scenario 1 in the ILS has not been taken forward for consideration through the SA as an alternative, as it does not take account of co-location as a replacement for lost industrial space. Scenario 1 couldn't deliver sufficient headroom in the potential supply and therefore reduces flexibility. As a result, it is not considered a reasonable alternative.

2.2.20 The three options were appraised through the SA process and the findings were presented in the 2021 Re-Run SA Report.

2024 Main Modifications Consultation Document and SA Report Addendum

2.2.21 In 2024, in line with the Inspector's Post-Hearing letter [Document EX191] Main Modifications were identified which included changes to the headline numbers relating to new homes in the plan period, clarification around a stepped housing requirement over three parts of the plan period, and less substantial changes to area-specific policies and development management policies. At this stage, no further choices or reasonable alternatives were identified over and above those that have already been appraised to date through the SA process.

2.3 Appraisal of the draft Plan

- 2.3.1 The 2019 Draft Local Plan represented the first full draft plan which included a range of policies and allocations for guiding development in the London Borough of Barking and Dagenham. The Draft Local Plan was accompanied by an Interim SA Report for consultation in 2019 which presented an appraisal of the draft plan in Part 2, including an evaluation of likely significant effects, proposed mitigation measures and plan recommendations. A similar structure was used in the 2020 and 2021 SA Reports, in which Part 2 presents an appraisal of the Draft Local Plan (2021) and the Submission Local Plan (2021). The appraisals evaluated the likely significant effects and informed Regulation 19 consultation.
- 2.3.2 The proposed modifications were also considered through the SA process which presented an appraisal of the Local Plan considering the proposed Main Modifications in the 2024 SA Report Addendum. It was determined that the conclusions for the plan as a whole under most SA themes remained valid each time and no significant effects were identified as a result of the additional modifications.

3. Consultation responses and how they have been considered

3.1 Background

- 3.1.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report were considered.
- 3.1.2 As discussed in Chapter 2, at each stage of the Local Plan's development, an SA Report was published alongside the Plan for consultation.
- 3.1.3 Consultation was carried out with:
- The 3 statutory bodies for SEA (the Environment Agency, Historic England, and Natural England).
 - Other key stakeholders; and
 - The public.

3.2 Responses received at Regulation 18 and 19 stages

- 3.2.1 The responses received before and after publication of the Local Plan have been presented in the Local Plan Consultation Statements and Summaries at each stage and include a description of the key consultation processes undertaken for the Local Plan, a summary of the main issues raised by responses, and how they have been addressed. These documents form part of the submission documents and are identified below.
- Regulation 18 (2) Consultation Statement and Summary Report 2019 [C22]
 - Regulation 19 (1) Consultation Statement and Summary Report 2020 [C16]
 - Regulation 19 (2) Consultation Statement and Summary Report 2021 [C7]
- 3.2.2 These documents can be accessed here:
- [Submission Documents – LBBB Local Plan](#)
- 3.2.3 Any representations referring directly to the published SA documents were considered and informed subsequent stages of the SA process.

3.3 Responses received at Main Modifications stage

3.3.1 Representation received following the publication of the proposed Main Modifications and SA Report Addendum 2024 were submitted to the Inspectors and considered. The Council's consultation summary is available here:

[Main Modifications Consultation Summary Report](#)

3.3.2 The final decision on any changes was made by the Inspectors and set out in their report.

4. Proposed monitoring

4.1 Background

- 4.1.1 The SEA Regulations require that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”*
- 4.1.2 The Regulations also state that the SA Adoption Statement should set out *“... the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.”*
- 4.1.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA are based on data that is already routinely collected at a local level by the London Borough of Barking and Dagenham Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.
- 4.1.4 Table 4.1 therefore outlines a monitoring programme for measuring the Local Plan’s implementation in relation to the SA framework and outcomes, including areas where the SA identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Plan area achieved through the planning process.

4.2 Proposed monitoring

- 4.2.1 The table below outlines the proposed monitoring for the London Borough of Barking and Dagenham Council’s Local Plan.

Table 4.1: SA monitoring programme for the LBBD Local Plan

SA theme	Proposed measure (given appraisal findings)
Biodiversity	<ul style="list-style-type: none"> Action Plan targets that monitor and manage the impacts of growth on Epping Forest SAC Net gains/ losses of buffer land and alternative green space by function that reduce pressures of growth on Epping Forest SAC. Net gain/ loss of habitat arising from development proposals. New linkages between habitats by location.
Climate change	<ul style="list-style-type: none"> New developments containing electric vehicle charging points by land use type.

SA theme	Proposed measure (given appraisal findings)
	<ul style="list-style-type: none"> • Number, location, and type of proposals achieving low carbon design. • Number of decentralised low carbon and renewable energy schemes approved in development. • Approvals of development in Flood Risk Zones 2, 3a, and 3b by use class and flood risk compatibility. • Refusals of development in Flood Risk Zones 2, 3a, and 3b.
Economy and employment	<ul style="list-style-type: none"> • Overall employment and unemployment rate. • Net additional employment floorspace. • Net additional floorspace of commercial development by location. • Net improved quality employment floorspace. • Annual tourism income. • Net additional tourism development by location and type.
Environmental quality (air, soil, and water quality)	<ul style="list-style-type: none"> • Continued air quality monitoring data at air quality monitoring locations. • Area of contaminated land remediated in reporting year. • Number and location of schemes implemented with sustainable drainage serving existing as well as new development. • Number and location of development including watercourse re-naturalisation or flood storage areas.
Health and wellbeing	<ul style="list-style-type: none"> • Indices of multiple deprivation scorings. • Area of new accessible natural spaces provided through development proposals. • Areas of improved access to natural green spaces provided through development proposals. • New active travel connections by location. • Loss/ gain of public open space by type. For example, park, children's playground, allotments.
Historic environment	<ul style="list-style-type: none"> • Number, type, and location of approved development impacting on a heritage asset. • Number of heritage assets improved and raised out of the 'at risk' category.
Land, soil, and water resources	<ul style="list-style-type: none"> • Area and location of brownfield redevelopment in the reporting year. • Loss of agricultural land by grade. • Area of greenfield development in the reporting year. • Number and location of developments contributing to maintenance of water infrastructure.

SA theme	Proposed measure (given appraisal findings)
	<ul style="list-style-type: none"> • Number and location of non-domestic schemes achieving a reduction in water usage over the baseline.
Landscape and townscape	<ul style="list-style-type: none"> • Positive landscape impact assessments on proposals approved. • Negative landscape impact assessments on proposals refused.
Population and communities	<ul style="list-style-type: none"> • Five-year housing land supply. • Number of pitches for travellers and travelling showpeople provided. • Regular updates to the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. • Number of affordable homes completed in the reporting year. • Number of homes completed by type and bedroom size in the reporting year. • Number of homes completed providing specialist accommodation in the reporting year. • Number of self-build/ custom build homes completed in the reporting year.
Transport and movement	<ul style="list-style-type: none"> • Road junction improvements. • Improvements in accessibility scoring by location for walking and cycling. • Improvement in public transport networks. • Transport Plans agreed by location and land use type. • Additional kilometres of Public Rights of Way.

5. Conclusions on the SA process

5.1 Conclusions

- 5.1.1 This SA Adoption Statement demonstrates that a robust and iterative SA process has been progressed alongside plan-making, with appraisal findings feeding into decision-making at each stage, with 5 reports having been published for consultation alongside plan documents. Any representations received were considered and informed subsequent stages of the SA process.
- 5.1.2 In summary, the following reports were published as part of the SA process:
- SA Scoping Report (2015)
 - Interim SA Report (2019)
 - SA Report (1) (2020)
 - SA Report (2) (2021)
 - SA Report Addendum (2024)
- 5.1.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Draft Pre-Submission Local Development Plan (Regulation 19 version) in 2021, presenting the required information. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 5.1.4 This SA Adoption Statement is the final step in the SA process.

