

# chapter 3

## strategic policies of the local plan

### The Strategic Context

3.1 This section sets out the strategic context, including the Vision and Objectives against which the draft policies of the Draft Local Plan have been developed. It includes the key draft policies which set the strategic direction of the Plan including a positive approach to sustainable development, the amount of development needed in the District and the associated infrastructure requirements, the proposed spatial distribution of this development, the approach to the Green Belt and the strategic Green Network (including Epping Forest and The Lee Valley Regional Park).

### Strategic Planning and Meeting the Duty to Co operate

3.2 The National Planning Policy Framework (NPPF) states that: “Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities...” and that “The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities” (para 178). It also expects local authorities “... to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of Plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development” (para 181).

3.3 This Draft Local Plan has been developed taking into account: the duty set out in the Localism Act 2011; national policy in the NPPF on the Duty to Cooperate; and current practice guidance in the Planning Practice Guidance (PPG). The Act places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in relation to strategic cross boundary matters.<sup>1</sup>

<sup>1</sup> NPPG 9-001-20140306

3.4 There are ten adjoining local authority neighbours, four in Essex (Brentwood, Chelmsford, Harlow and Uttlesford), two in Hertfordshire (Broxbourne and East Hertfordshire), and four London Boroughs (Enfield, Havering, Redbridge and Waltham Forest) together with Essex and Hertfordshire County Councils and the Greater London Authority. There are in addition, a wide range of organisations that have an interest in strategic planning in the District. These organisations include important partners such as Historic England, the Environment Agency, Highways England, Natural England, the Lee Valley Regional Park Authority, the City of London Corporation (as owners of Epping Forest) and others. The District Council is a member of many partnership groups containing different mixes of these partners, and others, depending upon the relevant matters. These groups are working to address the strategic matters that this plan addresses. In brief the matters are:

- the amount, type and distribution of housing across the Strategic Housing Market Area;
- the economic role of Epping Forest District in the Functional Economic Market Area including retail, and the amount and type of development required to meet needs;
- the role of Epping Forest District as a location within the London Stansted Cambridge Corridor;
- future planning policy for glasshouse food production which extends beyond the District;
- strategic social infrastructure such as secondary and higher education and hospitals;
- the extent of the Green Belt and any alterations through Local Plan processes by Epping Forest District Council and neighbouring authorities;
- the recreational and conservation role of Epping Forest and other green infrastructure in a wider context; and
- strategic transport infrastructure – road, rail, London Underground, bus, and other networks

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>

3.5 A number of critical pieces of evidence for the Plan have been commissioned on a joint basis across administrative boundaries (see paragraphs 3.13-3.16 below). Key partners such as Essex County Council, Highways England, the City of London Corporation (as owners of Epping Forest), the Lee Valley Regional Park Authority, Historic England, the Environment Agency and Natural England have been engaged in developing the draft policy in the Plan on an ongoing basis. The District surrounds Harlow on three sides and this presents an opportunity to provide development to support the broader regeneration and growth for Harlow Town, and together with East Herts District Council, to create a new Garden Town. This requires a shared commitment with neighbouring authorities, infrastructure providers and National Government to provide a strategic approach.

### London Stansted Cambridge Corridor (LSCC) Core Area Strategic Vision

- 3.6 The London Stansted Cambridge Corridor (LSCC) covers the area of London north from the Royal Docks, Tech City, the City Fringe, Kings Cross, and the Olympic Park, north, through the Lea Valley, the M11, A1 and A10 road, the East Coast and West Anglia Mainline rail corridors to Stevenage, Harlow and London Stansted Airport, and through to Cambridge and Peterborough.
- 3.7 The District Councils of Broxbourne, East Hertfordshire, Epping Forest, Harlow and Uttlesford form the LSCC Core Area which lies at the heart of the LSCC. This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses.
- 3.8 Over the past five years the Corridor's dynamic, knowledge-based economy has grown at a rate almost double that of the UK average and as a result rates of population growth have increased. Transport links are excellent; with two major rail routes - the East Coast and West Anglia main lines - serving the Corridor. The A1(M), A10 and M11 motorways link its towns and cities with the capital, while London Stansted Airport offers international connections.
- 3.9 With a significant number of jobs in knowledge-based industries, the Corridor is a leading knowledge economy and a showcase for tech industries and firms. There is a high rate of innovation.
- 3.10 The Corridor accounts for 24,700 jobs in the life sciences sector contributing 11% of all national employment. This success is built on research institutes and notable firms and organisations, including Amgen and AstraZeneca in Cambridge, GlaxoSmithKline in Stevenage, and Public Health England in Harlow.

3.11 The continued success of the Corridor as a great place to live, work, do business and visit provides the opportunity for the Core Area to deliver greater and lasting prosperity for its residents and businesses. As such the Council is working with its partner authorities in the Core Area to deliver the following LSCC strategic vision for the area up to 2050:

### Vision for the London Stansted Cambridge Corridor Core Area

The Core Area will build on its key strengths including its skilled workforce in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace, its high quality environment and educational opportunities. Together with London Stansted Airport, the local authorities will deliver sustainable growth which supports the economic ambitions of the LSCC and the UK through:

- complementing and supporting the economic performance of the Corridor whilst maintaining and enhancing the special character of the area, including the locally distinctive historic character of its market towns and rural settlements;
- the delivery of housing, supported by good access to social, leisure, community and health facilities, education and jobs, that meets the needs of local people and supports sustainable economic growth, whilst ensuring it remains an attractive place for people to live and locate to;
- capitalising on existing economic sectors and promoting growth of expanding industries including in the food production, life sciences, pharmaceuticals and technology sectors; tourism including hotels, London Stansted Airport's expansion, recreation/green assets including the Lea Valley, Stort Valley, Epping Forest and Hatfield Forest National Nature Reserve;
- working with partners to protect and enhance the high quality environment, its unique landscapes and places of special wildlife value. This would be achieved by place-shaping initiatives which would include measures to conserve areas of high biodiversity; the provision of new, alternative green spaces for people and wildlife; and the increase of green infrastructure connections between these areas, to provide greater opportunities for more sustainable access to nature for everyone living in the corridor;
- working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia Mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7A and improvements to junctions 7 and 8, and to the A414, A120, A10 and M25; and delivery of superfast broadband;

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- supporting the delivery of new jobs in the Harlow Enterprise Zone, and the north side of London Stansted Airport, Broxbourne Park Plaza, Brookfield and Bishop's Stortford – all identified as Strategic Opportunity Sites within the corridor; and
- the regeneration of existing urban areas including at Harlow, Waltham Abbey, Loughton and Waltham Cross

The Core Area supports the development and sustainable growth of Greater Harlow and key growth locations at Broxbourne, Brookfield and Bishop's Stortford together with London Stansted Airport growing to its full permitted capacity and as a business growth hub. These centres, with proportionate growth throughout the wider area, and the right investment, would create an economic powerhouse.

Putting in place these critical building blocks will provide the foundations for looking further ahead to 2050. Certainty through further investment and delivery of key infrastructure, including in the West Anglia Mainline, Crossrail 2, the M11 junctions, M25 junctions, A414, A120 and A10 is a vital component of this.



Mainline trains to London

- 3.12 In developing the Draft Local Plan the Council has recognised, and taken into account, the wider context within which it is located, and therefore the need to reflect the aspirations and opportunities identified in the LSCC Vision.

## The West Essex and East Hertfordshire Strategic Housing Market and Functional Economic Market Area

- 3.13 Epping Forest, East Hertfordshire, Harlow and Uttlesford District Councils together with the two county councils have a substantial history of co-ordinated working on strategic planning issues, not least on assessing housing need and planning for future growth. The Councils established the Cooperation for Sustainable Development Member Board in October 2014 (the Co-Op Board) in order to take a strategic approach to the delivery of housing and economic needs across the area.



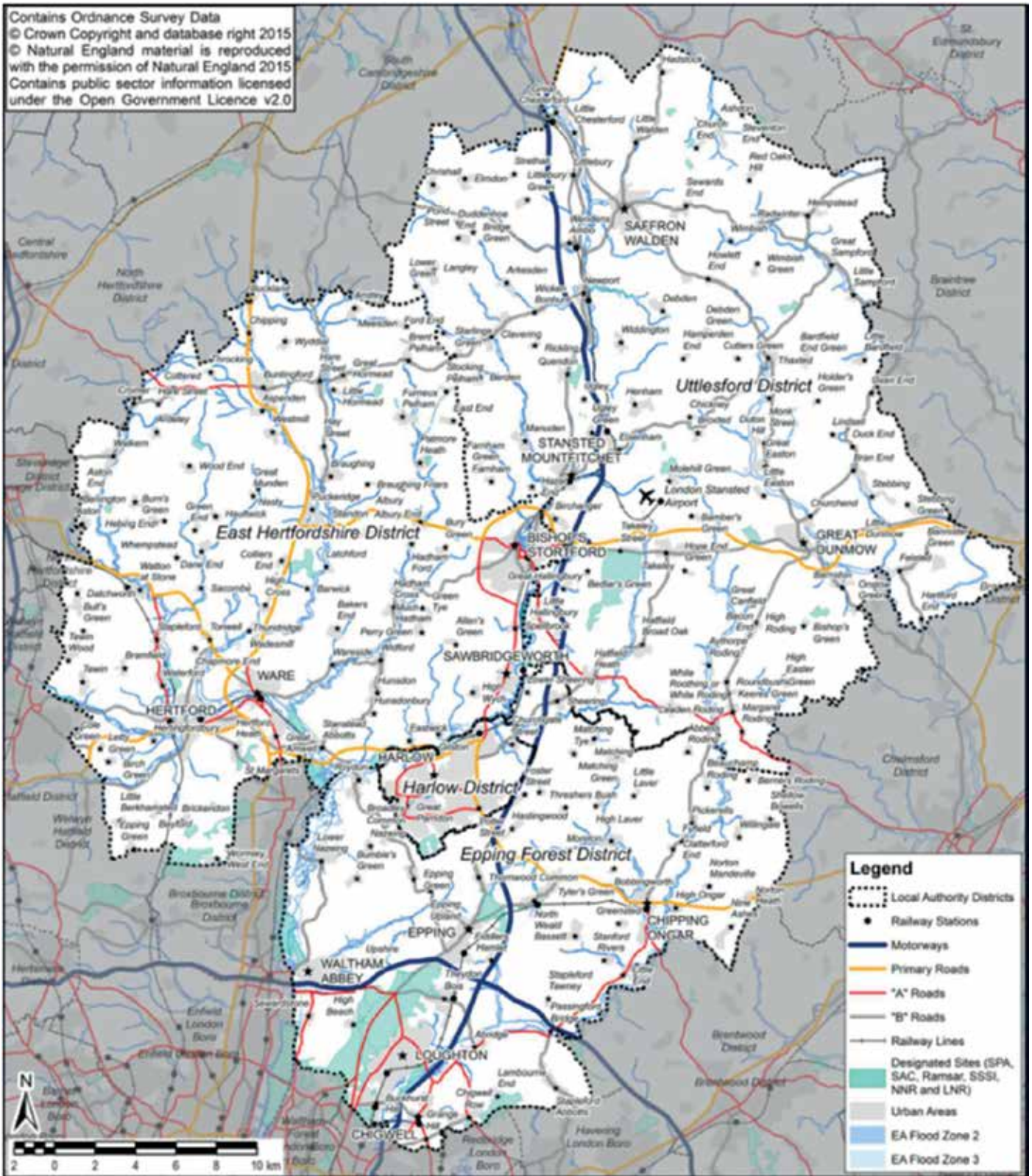
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- 3.14 Three Strategic Housing Market Assessments (SHMAs), published in 2010, 2012 and 2015 have been undertaken for the combined area of East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts. The 2015 Strategic Housing Market Assessment (SHMA) gives an up to date and policy-compliant assessment of housing need over the Housing Market Area (HMA) for the period 2011-2033.
- 3.15 The four authorities also commissioned in parallel a Joint Economic Report, to consider the Objectively Assessed Economic Need (OAEN) of the Functional Economic Market Area (FEMA, which for the area has been found to be the same as the Strategic Housing Market Area). This was published in 2015 and gives an up to date and policy-compliant assessment of employment need over the FEMA for the period 2011-2033.
- 3.16 A Draft Memorandum of Understanding (MoU) has been developed by the four District Councils, and supported by Essex County Council, Hertfordshire County Council and Highways England in respect of the 'Distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Area. This forms part of the mechanism for delivering the LSCC Vision. Further Draft MoUs have been developed by the four authorities, Essex County Council, Hertfordshire County Council and Highways England in relation to the provision of Strategic Highways and Transport Infrastructure to support the delivery of the strategic housing and economic needs of the wider area, and with Natural England and the Conservators of Epping Forest to ensure that the Epping Forest Special Area of Conservation is monitored to ensure that the growth does not adversely affect air quality in the Forest. These three draft documents are available as part of the evidence base for the Draft Local Plan.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



Figure 3.1 - Map of the Housing Market Area/Functional Economic Area



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## Lee Valley Regional Park

3.17 The Lee Valley Regional Park (LVRP) was created by a unique Act of Parliament in 1966 as a “green lung” for London, Essex and Hertfordshire. It follows the course of the River Lea for almost 23 miles (37 km) from the southern edge of Ware in Hertfordshire to the River Thames at East India Dock Basin and comprises some 4,000 hectares. of open space interspersed with various leisure facilities with some pockets of residential, industrial or horticultural developments.

3.18 The main body of the Regional Park extends from Ware to Leyton, with a substantial area lying within Epping Forest District (3929.52 acres or 39.64%, of which 97.97% is in the Green Belt) including the River Lee Country Park, recreational open space resources at Nazeing, Glen Faba and Roydon, a range of family orientated visitor facilities located at Fishers Green and Hayes Hill Farm, well established sailing facilities at Nazeing lagoons, and angling, walking and cycling facilities throughout. Important ecological resources including parts of the Lee Valley Special Protection Area (SPA) and Ramsar site provide opportunities to enjoy and learn about nature with good access for all abilities. Further visitor and educational opportunities are provided by the key heritage assets at Waltham Abbey Gardens, Royal Gunpowder Mills and Royal Gunpowder Park. The Olympic Lee Valley White Water Centre lies just across the District border in Broxbourne.

3.19 The Lee Valley Regional Park Act 1966 (the Park Act) defined the boundary of the Park and established the Lee Valley Regional Park Authority. It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the 4,000 hectares of the Park. It has an appointed board of 28 Members. The Members are elected and nominated to the Authority by their own constituent Authorities. Epping Forest District Council has two members appointed to the Board.

3.20 Section 14 (1) of the Park Act requires the Authority to prepare a Plan setting out proposals for the future management and development of the Regional Park. Planning authorities in the Park Area are under a mandatory obligation to include those parts of the Plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)). The Authority is in the process of preparing a suite of documents, the Park Development Framework (PDF), which will establish its aspirations and specific proposals for the future use and development of the Regional Park. In July 2010, the Authority adopted the Vision, Strategic Aims and Principles followed by adoption of a series of Thematic Proposals in January 2011 which set out development and management proposals on a broad Park-wide thematic basis.

3.21 The Authority is not a local planning authority for the purposes of either Local Plan preparation or a decision-maker for planning application purposes. Consequently, the Local Plan will be an important document in terms of the protection, enhancement, development and management of the Regional Park and the public enjoyment of its leisure, ecological, heritage, and sporting resources. It will need to recognise and support the Park as a key asset for the District, and component of the region's green infrastructure.

### Lee Valley Regional Park Vision

The Lee Valley Regional Park Vision outlines a common purpose for the Regional Park and expresses the desirable characteristics of the Regional Park. The vision is:

- to be a cohesive, sustainable and valued regional green lung;
- to be an area of enhanced and protected natural biodiversity for the enjoyment of all;
- to achieve full utilisation of the unique land and water assets of the Regional Park for specialist leisure and recreational facilities developed in accordance with principles of sustainability and design excellence; and
- to be an accessible and permeable, integrated visitor attraction to serve the region which will include local communities.

3.22 The delivery of the Vision for the Lee Valley Regional Park is supported by the Draft Local Plan through a number of draft policies including:

- Draft Policy SP 4 Green Belt;
- Draft Policy SP 6 The Natural Environment, Landscape Character and Green Infrastructure;
- Draft Policy E 4 Visitor Economy;
- Draft Policy DM 1 Habitat protection and improving biodiversity;
- Draft Policy DM 3 Epping Forest SAC and the Lee Valley SPA;
- Draft Policy DM 4 Suitable Accessible Natural Green Spaces and Corridors; and
- Draft Policy DM 9 High Quality Design.

3.23 The Lee Valley Regional Park Authority is also preparing particular proposals for the future use and development of individual sites and areas that collectively form the totality of the Regional Park, which are being produced to cover eight areas across the Park. Epping Forest District is partially covered by Area 5 proposals which were adopted by the Lee Valley Regional Park Authority in April 2013 – this aims to enhance current visitor facilities at the Royal Gunpowder Park to create a visitor hub and improve pedestrian and cycle links. Other parts of the District will be covered within Areas 6 and 7 for which no proposals have yet been published.

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## Conservators of Epping Forest

3.24 The Conservators of Epping Forest are charged with the duties and responsibilities for conserving and protecting Epping Forest under the Epping Forest Act 1878. Epping Forest Land covers 5% of the District, and together with the Buffer Lands, over 7% of the District. It is a major public recreation and tourism destination. It makes a major contribution to the provision of public open space within the District. The Forest is protected by Site of Special Scientific Interest status and is designated as a Special Area of Conservation. The Council has duties as the Competent Authority for Epping Forest in relation to the Habitats and Species Regulations 2010. There are identified issues in relation to poor air quality in and around the Forest, which the Council is committed to working with partners to address. Ongoing management of the Forest's landscape, wildlife and visitors is guided by a Management Plan which outlines the vision and direction. A new Management Plan is being developed by the Conservators for the 10 year period 2017-2027.

3.25 The future of Epping Forest and the enhancement of its biodiversity is supported by the Draft Local Plan and will also be supported by the agreement of a Memorandum of Understanding to manage the impacts of growth with the West Essex/East Hertfordshire Area on Epping Forest Special Area of Conservation, and a number of draft policies including:

- Draft Policy SP 6 The Natural Environment, Landscape Character and Green Infrastructure;
- Draft Policy E 4 Visitor Economy;
- Draft Policy DM 1 Habitat protection and improving biodiversity;
- Draft Policy DM 3 Epping Forest SAC and the Lee Valley SPA;
- Draft Policy DM 4 Suitable Accessible Natural Green Spaces and Corridors; and
- Draft Policy DM 9 High Quality Design.

## Draft Vision and Objectives for Epping Forest District to 2033

3.26 The following section presents the Council's aspirations for the area and forms the vision and objectives for the Local Plan. Individual visions for places within the District are contained in the relevant sections in Chapter 5.

## The Draft Vision for the District

By 2033 Epping Forest District will be a place where:

- residents continue to enjoy a **good quality of life**;
- **new homes of an appropriate mix of sizes, types and tenures** to meet local needs have been provided and well integrated communities created;
- development **respects the attributes** of the different towns and villages;
- development needs will be met in the most **sustainable locations**;
- **Epping Forest** will be conserved and enhanced;
- the recreational aims of **Lee Valley Regional Park** are supported;
- a more **sustainable local economy** including tourism, aviation, research and development, food production will be developed;
- a **distinctive and attractive network** of town and village centres will have been maintained;
- **access** to places by public transport, walking and cycling will be promoted; and
- **significant residential development** will be located near Harlow to support the economic regeneration of the town.



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## How we will achieve this

Development needs including the provision of new homes will be met in the most sustainable locations, balancing the efficient use of existing infrastructure, the ability to deliver new infrastructure, minimising the adverse impact on the natural and historic environment and maintaining the Metropolitan Green Belt where it continues to make a contribution to its nationally defined purposes.

Epping Forest will be conserved and enhanced and will continue to form a key part of the District's unique and distinctive identity. Residents will have enhanced access to open and natural spaces including the Forest, the Lee Valley Regional Park and the countryside.

The District's economy will continue to have its strong links with London whilst supporting significant economic growth planned for Harlow and London Stansted Airport. This will contribute to the wider economy whilst developing a more sustainable local economy which builds on its strengths and assets including tourism, aviation, research and development, food production and its variety of small businesses as well as the skills of local people.

The District will maintain a distinctive and attractive network of town and village centres which can be accessed by public transport, walking and cycling as an alternative to the car, and which support local communities. All new development will be to a high quality and development opportunities within existing settlements will be maximised without compromising that distinctiveness and attractiveness. In order to cater for the housing and economic needs of both the District and the wider area, including supporting regeneration and economic growth at Harlow, a significant proportion of new homes will be located around Harlow through the creation of new sustainable communities.

In addition, the settlements within the District will need to play a role in the delivery of the development strategy by accommodating some development on new sites in order to cater for more local needs, provide choice and support the achievement of mixed and balanced communities.

## Draft Plan Objectives

### A. Environment and design

- to protect the Metropolitan Green Belt within its revised boundary, and to encourage the re-use of previously developed land;
- to protect Epping Forest and its setting, including the buffer lands;
- to protect, and encourage appropriate management of other designated wildlife sites in the District, including the Lee Valley Special Protection Area, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites;

- to protect and encourage the enhancement of heritage resources including Scheduled Monuments, statutorily and locally listed buildings, Registered Parks and Gardens, and Conservation Areas;
- to ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area, is of a high quality and is designed so as to reduce opportunities for crime and anti-social behaviour; and
- to ensure new development takes full account of, and mitigates where necessary, potential problems from air pollution, land contamination and noise.

### B. Housing

- to make provision for objectively assessed market and affordable housing needs within the District, to the extent that this is compatible with national planning policy;
- to ensure that new homes provide an appropriate mix of sizes, types, forms and tenures to meet local needs and create balanced, mixed and well-integrated communities. This includes supported housing for elderly people and other groups with special needs; and
- to make provision for the identified needs of the Travellers and Travelling Showpeople.

### C. Economic Development

- to meet the objectively assessed economic and town centre needs in the District to the extent that this is compatible with national planning policy;
- to diversify the District's two Town Centres (Epping and Loughton High Road) and four District Centres (Loughton Broadway, Ongar, Waltham Abbey and Buckhurst Hill) to support their future vitality and viability by encouraging other forms of town centre uses including residential, cultural, leisure, tourist and commercial activities appropriate to their roles;
- to encourage the growth of local businesses and start-ups, through supporting home-working, provision of a range of flexible and affordable business facilities and the provision of high-speed broadband across the District;
- to support the diversification of the agricultural economy, including the expansion of the glasshouse horticulture industry, subject to appropriate environmental considerations; and
- to support the expansion of tourism in the District through the promotion of, and improving access to, a wide range of existing attractions in the District including Epping Forest, the Lee Valley Regional Park, the Royal Gunpowder Mills site, the historic towns, village centres and countryside, and through the provision of new visitor accommodation.

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#### D. Infrastructure and Movement

- to identify and help fund and facilitate the timely delivery of necessary infrastructure and services through a planned and coordinated Infrastructure Delivery Plan (IDP) working with relevant authorities, agencies, developers and stakeholders;
- to improve public transport, walking and cycling opportunities with the aim of promoting healthy lifestyles, reducing the effects of traffic congestion and improving accessibility to services and the countryside without requiring the use of the car; and
- to provide enhanced access to green spaces and leisure, play and sports facilities and to make appropriate provision in new development.

#### E. Climate Change and Flood Risk

- to locate new development where there are the greatest opportunities for utilising public transport and cycling and walking instead of private car use;
- to require development to meet high standards of energy efficiency and use of renewable energy;
- to ensure new development makes full provision for recycling and, where appropriate, encourages the production of energy from waste; and
- to ensure that new development is located away from areas at risk of flooding, and that such development will not increase flood risk elsewhere.

### The Strategic Policies

3.27 The overarching strategy of the Draft Local Plan is contained in the following six draft policies and their explanation. These sit within the context of the Plan vision and objectives outlined previously. The strategy sets out the overall approach to development in the District and in particular the amount of new homes and jobs that the Plan seeks to achieve, the distribution of that development between settlements, the overall approach to locating new homes and jobs, the future protection of the Green Belt and the approach to the natural environment and green infrastructure that partners new development. It also explains the approach of the Plan to addressing sustainable development and climate change. These threads of the strategy are viewed as equally important. It should be read in conjunction with Chapter 5 on the settlements in the District and Chapter 6 on Infrastructure and Delivery.

### Sustainable Development

#### Draft Policy SP 1 Presumption in Favour of Sustainable Development

##### The Issue

3.28 The fundamental purpose of the Local Plan is to deliver the vision, objectives and strategy for the District for the Plan period up to 2033 whilst contributing to sustainable development which can be described as positive growth that achieves economic, environmental and social progress (NPPF Paragraphs 6-7). This principle is supported internationally through United Nations definitions, and national policy makes it clear that its achievement is the purpose of the planning system. The challenge for the Local Plan is to address the economic, environmental and social facets of sustainable development jointly and simultaneously, seeking to achieve gains in all rather than, for example, achieving economic progress at the expense of social and environmental progress. The Local Plan will need to take advantage of economic opportunities, and meet the needs of existing and future residents, businesses and visitors, whilst protecting and enhancing the natural and historic environment and built heritage and addressing the impacts of a changing climate. The strategy and draft policies in this Plan as a whole seek to address the matter of sustainable development holistically and recognise the interrelationships between elements of new development and the existing settlements and countryside. Sustainable development is defined as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

3.29 The national presumption in favour of sustainable development means that unless specific policies in the NPPF indicate otherwise or adverse impacts would significantly and demonstrably outweigh the benefits, the Local Plan is required to:

- take a positive approach that reflects the presumption in favour of sustainable development;
- positively seek opportunities to meet the development needs of the District; and
- meet objectively assessed needs, with flexibility to adapt to rapid change.

##### What you told us?

3.30 Responses from the Community Choices consultation and stakeholder engagement included:

- support for the recognition of the dimensions of sustainable development and the need to achieve net gains across the three themes of economic, environmental and social progress.

##### Key Evidence

- National Planning Policy Framework;
- Sustainability Appraisal and Habitats Regulation Assessment.

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## Preferred Approach

- 3.31 The Council recognises the importance of pursuing sustainable development for the District, as noted in national policy, particularly in respect of paragraph 9 of the NPPF. This highlights that sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life including but not limited to: making it easier for jobs to be created in cities, towns and villages; moving from a net loss of bio-diversity to achieving net gains for nature; replacing poor design with better design; improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.
- 3.32 To ensure that all development reflects the presumption in favour of sustainable development the Local Plan needs to include an overarching policy so that it is clear that development proposed locally which is sustainable can be approved without delay. The Council is committed to help achieve sustainable development and will give favourable consideration to proposals which will contribute towards delivering: a strong, flexible and sustainable economy; the protection and enhancement of the natural, built and historic environment; the prudent use of natural resources; mitigation and adaptation to climate change; and which support strong, vibrant and healthy communities. This approach is embodied in Draft Policy SP 1 and is reflected in all draft policies in the Local Plan and planning decisions made by the Council.

### Draft Policy SP 1: Presumption in Favour of Sustainable Development

The Council will take a positive approach to the consideration of development proposals, reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council will work proactively with applicants to find solutions for development proposals that help to improve the economic, social and environmental conditions in the District.

Proposals which accord with the development plan will be brought forward and approved unless material considerations indicate otherwise. If the development plan contains no policy relevant to the consideration of a planning application or policies are out of date, the Council will grant permission unless the following indicate otherwise:

- policies in the National Planning Policy Framework; or
- other material circumstances.

## Alternative Options

To not include a policy relating to the presumption in favour of sustainable development	This would not accord with the NPPF and would not provide the framework for the development of all other policies. It would not achieve a 'positively prepared' Local Plan that reflects this fundamental premise of national policy.
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## The Spatial Development Strategy to support Housing and Economic Needs

- 3.33 This section looks at the amount of housing and employment growth that the Council will seek to facilitate over the Plan period. Other types of development will also be needed in the District over the Plan period including for example retail growth, infrastructure and community facilities. These requirements are explored further in the settlement chapter (Chapter 5) and the Infrastructure and Delivery chapter (Chapter 6).

## The Issue

### Housing

- 3.34 The Council has worked closely with East Hertfordshire, Harlow and Uttlesford District Councils to prepare a technical document known as the Strategic Housing Market Assessment (SHMA). The purpose of the SHMA is to objectively assess housing need taking into account population projections, affordable housing needs and jobs growth. The most recent, which was published in 2015 identified an objectively assessed housing need for 46,100 additional homes across the SHMA area. The SHMA identified that for Epping Forest District this equated to approximately 11,300 new homes over the Local Plan period (2011-2033). Since the publication of the 2015 SHMA, the Office of National Statistics and Department for Communities and Local Government have issued further population and household projections (in 2016). The authorities have undertaken some checking of the objectively assessed housing need in the light of the new projections and this has indicated that the Objectively Assessed Housing Need for the SHMA area is now approximately 54,600 new homes.
- 3.35 The local authorities have considered the most recent population and household projections. They have identified the potential to increase the level of housing to be delivered across the Housing Market Area but the level of infrastructure constraints, as well as environmental and policy designations are such that to provide for the full OAHN based on the 2016 figures would result in Local Plans which did not fully accord with other policies set out in the NPPF. This has shown that the maximum amount of growth for the Plan period is around 51,100 homes for the Strategic Housing Market Area.

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3.36 Taking this into account the Draft Memorandum of Understanding on the 'Distribution of Objectively Assessed Need Across the West Essex/East Hertfordshire Housing Market Area' identifies a need for Epping Forest District to accommodate approximately 11,400 new homes over the Local Plan period (2011-2033).

3.37 In order to meet this level of housing need the Draft Local Plan seeks to allocate a number of sites across Epping Forest District – the strategic sites around Harlow are identified in later in this chapter at paragraph 3.52 and the sites across the other settlements are set out in the individual sections in Chapter 5.

## Travellers and Travelling Showpeople

3.38 The Council is required by the National Planning Policy Framework (NPPF) to meet the accommodation needs of the population within their area. This includes the needs of the Traveller community and that of Travelling Showpeople. Local authorities have to assess the accommodation needs of Travellers and Travelling Showpeople alongside the settled population and develop a strategy that addresses any unmet need that is identified. Travelling is an integral part of cultural identity for Gypsy and Traveller households and Gypsies and Travellers are recognised ethnic groups and are entitled to the same access to housing as the settled community.

3.39 The Draft Local Plan seeks to establish how the Council will meet Traveller and Travelling Showpeople accommodation needs in the District until 2033 including setting pitch targets for Travellers and plot targets for Travelling Showpeople based on local evidence. The most up-to-date local evidence has identified a need for 38 pitches to support the needs of the Gypsy and Traveller community and 1 yard to support the needs of Travelling Showpeople over the period of the Local Plan (2011-2033). More information in respect of the development of the evidence base can be found in the Interim Note on Gypsy, Traveller and Travelling Showpeople Assessment (September 2016)

3.40 In order to meet this level of need the Local Plan has allocated a number of sites including provision within the strategic sites identified in paragraph 3.52 and sites across the other settlements are set out in the individual sections in Chapter 5.

## The Economy

3.41 In addition to housing need, the Council has also worked with our neighbouring authorities in order to understand how many new jobs are likely to be created in the Plan period. The latest evidence (produced by Hardisty Jones Associates) identifies a need in Epping Forest District over the Local Plan period of between 8,800 and 10,010 new jobs. This equates to between 400 – 455 new jobs per annum. This is slightly lower than the East of England Forecasting Model Baseline (2014) which suggested a requirement for 470 new jobs per annum. The latest

evidence recommends a lower requirement as a result of the impacts from planned growth at London Stansted Airport which would draw labour and economic activity away from other parts of the sub-region. Jobs growth is projected as a range per year for the Local Plan period because the evidence has analysed the projected jobs growth across the FEMA (the 4 local authorities) then modelled apportioning the 'share' of jobs in two different ways:

- (a) based on the historic share of FEMA jobs that each authority had; and
- (b) based on the likely future share of FEMA jobs that each authority was likely to have (according to the projections).

3.42 The evidence then provides these two figures as the range for each authority. From 2002 to 2013, Epping Forest District had the highest creation of jobs of the four Districts, with Uttlesford District having the second largest. East Hertfordshire District actually saw an overall decline in jobs over the period, and Harlow District remained almost neutral. It is important to note that the latest evidence makes allowance for the planned expansion of Stansted Airport. The airport is currently estimated to be handling about 21.95 million passengers per year. It also has planning permission to extend this to 35 million passengers per year, and is planning on more growth in future.

3.43 In order to help support jobs growth in the District, the Draft Plan seeks to ensure sufficient provision of land and premises for office, industrial and warehousing uses is provided. Further detailed work to identify required sites is being undertaken by the Council. In the meantime Draft Policy E 1 sets out the proposed approach.

## Key Evidence

- Economic and employment evidence to support the Local Plan and Economic Development Strategy (Hardisty Jones Associates, September 2015);
- Economic evidence to support the development of the OAHN for West Essex and East Herts (Hardisty Jones Associates, July 2015);
- Strategic Housing Market Assessment for West Essex and East Herts (ORS, September 2015);
- Note on updating the Overall Housing Need based on 2014 based projections for West Essex and East Herts (ORS, August 2016)
- Strategic OAHN Spatial Options Study for the West Essex and East Herts authorities (AECOM, August 2016);
- Harlow Strategic Sites assessment for West Essex and East Herts authorities (AECOM, August 2016);
- Draft Memorandum of Understanding on the Distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Area September 2016.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies'

- Draft Memorandum of Understanding on Highways and Transport Infrastructure for the West Essex/East Hertfordshire Housing Market Area September 2016
- Draft Memorandum of Understanding on managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation
- Stage 1 Assessment of the Viability of Affordable Housing, Community Infrastructure Levy and Local Plan (Dixon Searle June 2015);
- Strategic Land Availability Assessments (NLP 2016);
- Settlement Capacity Study (Fregonese Associates 2016);
- Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) July 2014, updated note for EFDC in September 2016 (ORS)
- Planning Policy for Traveller Sites August 2015 (Department of Communities and Local Government).
- Compulsory purchase process and the Crichel Down Rules: guidance (DCLG October 2015)
- Site Selection Report September 2016 (Arup)
- Authority Monitoring Reports (EFDC)
- Economic and employment evidence to support the Local Plan and Economic Development Strategy (Hardisty Jones Associates, September 2015);
- The Lea Valley Glasshouse Industry: Planning for the Future (Laurence Gould Partnership Ltd, 2012);
- Epping Forest District and Brentwood Borough Employment Land Review (Atkins, 2010);
- Epping Forest District Council Town Centres Study (Roger Tym and Partners, 2010);
- Settlement Hierarchy Technical Paper (EFDC, 2015);
- Economic Plan for Essex (Essex County Council, 2014); and
- Economic Impact of Tourism (Destination Research, 2014).
- establishing accurate forecasts for population growth and related new housing targets;
- some responders challenged the methodology for establishing need and/or questioned how the figures had been arrived at. This included suggestions that the outputs were based on statistics rather than real demand (reference was made to developments still awaiting completion); that the targets appeared to forecast significantly higher growth over the next 20 years rather than the actual growth that has occurred over the past 20 years; and that an aging population did not necessarily lead to an assumption that potential housing targets should be greater;
- the constrained capacity of the London Underground Central Line would reduce demand for new homes;
- some responders considered that the level of housing should be at the lower end of the range consulted on (6,400 – 10,200);
- considering the needs of residential boaters and associated moorings - there is a growing and recognised demand for such use on the Rivers Lea and Stort; and
- the majority of responders supported the inclusion of a density policy with the mix being dependent on the character of the area.

## Travellers and Travelling Showpeople

- There was an indication that the settled and travelling communities favoured a degree of separation from each other;
- Concerns about an over-concentration of Travellers in the parishes of Nazeing and Roydon;
- A desire not to see the expansion of existing sites;
- No further provision of sites within the Green Belt;
- That some communities lacked appropriate locations to support Traveller and Travelling Showpeople sites;
- Provision should be made elsewhere in or outside of Essex;
- The needs of the settled community should be paramount;
- The recognition of the need for additional accommodation for Travelling Showpeople, and the Council's intention to work with other local authorities was welcomed;
- That some Green Belt land may be required; and
- A request that the Local Plan include a definition of Travellers, including Travelling Showpeople

## What you told us?

3.44 Responses from the Community Choices consultation and stakeholder engagement included:

### Housing

- continuing to protect the Green Belt wherever possible;
- using "brownfield" (i.e. previously developed) land before releasing any Green Belt for development;
- full account should be taken of the contribution that windfalls make to the delivery of housing;
- preventing London from sprawling into the District and preventing larger urban areas (e.g. Harlow) from merging with nearby villages (e.g. Roydon);

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



## The Economy

- the need to establish as accurately as possible forecasts for the numbers of new jobs which would be needed during the Plan period;
- respondents advocated new ways of working, including the promotion for example, of business clusters, live/work units and home working;
- the need for a better balance of uses in the District's centres – although there was recognition that the Council had only limited influence over this;
- that the absence of larger chain stores means that residents will shop further afield for certain purchases;
- that the Local Plan needs to acknowledge agriculture as the major land use of the District;
- that farming supports the rural economy, addresses food security, reduces the need for food imports (in turn reducing CO<sub>2</sub> emissions), and protects the countryside;
- concerns about derelict agricultural and food production sites located in the Green Belt, and that these should be properly managed;
- some felt that derelict sites should be protected from other uses whilst others considered that the sites may be used for future housing or employment development as an alternative to developing more valued areas of Green Belt;
- concerns were raised in relation to the potential impacts from taller glasshouses within the Green Belt;
- glasshouse areas should be located near to main road routes;
- support for developing leisure and tourism uses to provide further employment;
- opportunity to raise the profile of the Upper Lee Valley as a more appealing leisure destination and link to sports facilities at the Lee Valley White Water Centre to create a regional centre that would attract visitors; and
- the Local Plan is important in terms of the protection, enhancement, development and management of the Lee Valley Regional Park and public enjoyment.

## Preferred Approach

### Housing: The Strategic OAHN Spatial Options Study

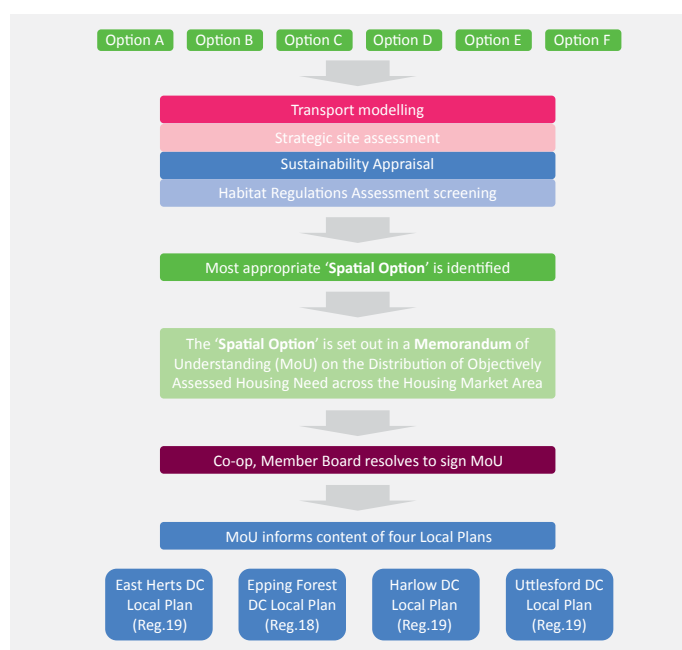
3.45 As part of their joint work the Cooperation for Sustainable Development Member Board (the Coop Member Board) considered six options (A-F) for accommodating new housing development across the West Essex and East Hertfordshire Housing Market (HMA) area up to 2033. These six options varied in terms of: (i) the overall amount of development to be provided for across the HMA (ranging from ~48,300 to ~57,100 new homes); and (ii) the spatial distribution of that development, in particular the

amount of new homes to be accommodated in and around Harlow Town. Varying the overall amount of development allowed the Co-op Member Board to test the implications of different levels of growth including: 46,100 (the figure for Objectively Assessed Housing Need in the Strategic Housing Market Assessment, SHMA); 49,638 (a figure based on the CLG 2012-based household projections); and 54,608 (an updated OAHN figure provided by Opinion Research Services (ORS), in order to inform testing taking account of the CLG 2014-based household projections and the 2014-based Sub-National Population Projections). Varying the spatial distribution of development allowed the Co-op Member Board to explore the implications of focusing different levels of development in different parts of the Housing Market Area (HMA). In particular, the options varied in terms of the level of development located in and around Harlow, the HMA's key urban centre.

3.46 The implications of the six options (A-F) were investigated through four means:

- transport modelling to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure;
- sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water;
- Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation; and
- strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.

Figure 3.2 - Strategic OAHN Spatial Options



The Local Plan should be read as a whole. Proposals will be judged against all relevant policies'

3.47 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver ~51,100 new homes across the HMA to 2033 broken down as follows:

**Figure 3.3** - Proposed sites

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	~18,000
Epping Forest District Council	~11,400
Harlow District Council	~9,200
Uttlesford District Council	~12,500
<b>Total across the HMA</b>	<b>~51,100</b>
...of which the area in and around Harlow* will provide	~16,100

\*in and around Harlow' refers to development in Harlow town as well as around Harlow in adjoining Districts

3.48 The Spatial Option was considered by the Coop Member Board as the most sustainable choice for the HMA on the following basis. At approximately 51,100 new homes, the planned level of housing growth is higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the CLG 2012-based household projections (49,638). It is lower than ORS' estimated OAHN figure taking into account recent information including the CLG 2014-based household projections (54,600). Overall, the figure of approximately 51,100 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF) and significantly boost the supply of housing (NPPF, para. 47) whilst taking of infrastructure and environmental constraints.

3.49 Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, London Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town.

3.50 The transport modelling undertaken to date demonstrates that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the Draft Highways and Transportation Infrastructure MOU are delivered during the Plan period. Evidence suggests that growth above this level beyond 2033 may be possible around Harlow within other Districts in the HMA subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures beyond those in the current draft MOU.

3.51 The Strategic Site Assessment indicates that sufficient suitable strategic sites are available in and around Harlow to deliver the figure of ~16,100 (together with sites either already completed or granted planning permission as well as urban brownfield sites within Harlow District which accounts for approximately 6,600 homes).

3.52 The ~16,100 dwellings identified in and around Harlow comprise the following sites identified in the Strategic Sites Assessment as the preferred locations for development:

**Figure 3.4** - Proposed sites in and around Harlow

Epping Forest District	Latton Priory	~ 1,000
	West Sumners	~ 1,000
	West Katherines	~ 1,100
	East of Harlow *	~ 750
	Riddings Lane	~ 50
	<b>Total</b>	<b>~ 3,900</b>
East Hertfordshire District	Gilston	~ 3,050
Harlow District	East of Harlow*	~ 2,600
	<b>Total in proposed sites</b>	<b>~ 9,550</b>

In addition Harlow District will deliver within the District ~ 6,600 on sites not included in the strategic sites assessment  
 \* The East of Harlow area is split between Harlow and Epping Forest Districts

3.53 The commitments within Harlow District including completions/permissions, urban brownfield and the Princess Alexandra Hospital provides for some 6,600 new homes. The Council is proposing to allocate sites around Harlow as identified through the outcome of this work with our Housing Market Area partners (including making provision for Travellers) to support the vision for the London Stansted Cambridge Corridor.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies'

3.54 The Council is proposing that the remaining housing need identified for Epping Forest District will be delivered by taking a sequential approach to where new homes will be provided. In determining the appropriate sites the Council has taken account of the previous consultation responses which considered that new housing should be distributed across the District together with the evidence on sites put forward and in the draft policy and environmental constraints in the District. The approach to the allocation of sites has been to take each settlement and consider the most appropriate sites in accordance with the following order of priority:

- 1 A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1
- 2 Sites located on previously developed land within settlements
- 3 Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement
- 4 Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015).
- 5 Greenfield/Green Belt land on the edge of settlements:
  - a. Of least value to the Green Belt if the land meets other suitable criteria for development.
  - b. Of greater value to the Green Belt if the land meets other suitable criteria for development.
  - c. Of most value to the Green Belt if the land meets other suitable criteria for development.
- 6 Agricultural land:
  - a. Of Grade 4-5 if the land meets other suitable criteria for development.
  - b. Of Grade 1-3 if the land meets other suitable criteria for development.
- 7 Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.

3.55 The Council will resist the loss of existing homes unless they are part of a wider scheme where there is an overall gain in the number of homes provided.

**Figure 3.5 - Housing land supply: 2011-2033**

Source – Epping Forest District Council records

The components of housing land supply over the period 2011-2033 are as follows	
Number of homes required to be built 2011-2033: 518 x 22	~11,400
Homes Built (Completions) 2011-2016 up to 31 March 2016	1,173
What is currently available in the future (supply)	
Sites with planning permission up to 31 March 2016	1,194
Windfalls 35 x 17	595
<b>Total supply</b>	<b>2,950</b>
Requirement met through strategic sites around Harlow within EFDC	3,900
Remaining requirement to be provided elsewhere in the district	4,550 plus reserve sites

<sup>2</sup> Please note that the figures may not add up due to rounding.

<sup>3</sup> Reserve sites are sites that can be released for allocation by the Council in the future should the need arise. The Council is required to ensure that the Local Plan includes sufficient flexibility to adapt to rapid change (para 14, NPPF). The inclusion of reserve sites in the Draft Local Plan includes some flexibility for sites dropping out during the consultation and up to examination and will provide flexibility once the Plan is adopted should allocated sites fail to deliver. This will also help to ensure that the Council can ensure that sufficient land can be made available to meet five year land supply requirements on an ongoing basis.

3.56 The Council recognises that land is a finite resource, and that the District is subject to policy and environmental constraints. It is therefore critical that land for development is used in an efficient and effective way as set out in Draft Policy SP 2. Consequently, the Council will expect new development to maximise densities on housing sites, whilst recognising that different density levels will be appropriate for different sites in different locations as set out in Draft Policy SP 4.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



## Travellers and Travelling Showpeople

3.57 The Council’s preferred approach is to provide sufficient sites for the Traveller and Travelling Showpeople communities as part of this Local Plan in order to meet the identified need for additional provision over the Local Plan period. Taking this approach will help to minimise the number of unauthorised sites within the District. Taking into account the Planning Policy Statement for Traveller sites published by DCLG in August 2015 the Council proposes to take a proactive and sequential approach in selecting sites:

- the sequential flood risk assessment – prioritising allocation of sites in Flood Zone 1 and proposing land in Flood Zone 2 where need cannot be met in Flood Zone 1;
- sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation;
- intensification of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission);
- extension of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission);
- new Traveller sites in non-Green Belt areas;
- new Traveller sites in Green Belt areas;
- where sufficient provision to meet identified need for additional pitches cannot be found from the above sources, provision will be made by allocating Traveller pitches within strategic housing site allocations around Harlow or on other strategic housing allocations.

**Figure 3.6** - Traveller and Travelling Showpeople Supply: 2011-2033

Source – Opinion Research Services, Epping Forest District Council records

The components of traveller and travelling showpeople supply over the period 2011-2033 are as follows:	
Number of pitches required 2011-2033 based on 2016 Interim Gypsy and Traveller Accommodation Assessment	38 pitches and 1 yard
No of pitches completed	16
Pitches with planning permission	4
Remaining requirement to be provided	<b>18 pitches and 1 yard</b> (identified in Draft Policy SP 3 and Chapter 5 of the Draft Local Plan)

3.58 The preferred approach to traveller site provision including size, number of pitches and location is set out in the Site Selection Report. This states, “Accommodating Traveller needs on sites of no more than five pitches was considered the most appropriate approach for new sites. Intensification or extension of existing sites should not exceed 10 pitches subject to detailed consideration of the suitability of each site and justification for exceeding the preferred maximum of 5 pitches”.

## The Economy

3.59 The Councils’ preferred approach to supporting the economy is to plan to meet higher level employment needs identified in the report produced by Hardisty Jones Associates (455 jobs per annum). This approach is supported by the latest evidence, and has been taken account of in the objectively assessed need for housing. By planning for the upper end of the range, the Council is planning for an aspirational level of employment and job growth over the Plan period. This reflects growth anticipated in association with London Stansted Airport and the growing needs of the sub-region, as well as the anticipated development of the glasshouse industry over the Plan period. It also provides added flexibility to account for future changes to market conditions, and to account for change of use through permitted development which may occur. However, it should be noted that this level of jobs growth will need to be considered further within the context of the levels of job growth being proposed by East Hertfordshire, Harlow and Uttlesford District Councils and therefore may be subject to review. This is to ensure that the number of jobs to be provided across the FEMA is aspirational but realistic.

3.60 The strategy for supporting the economic needs of the District will be delivered by retaining, enhancing and renewing existing employment sites where possible, and then allocating additional sites as required. The Council is currently undertaking further detailed work in order to identify sites required for allocation.

## Infrastructure and Delivery

3.61 When development occurs, it places additional demands on infrastructure, including water and energy supply, wastewater disposal, roads, education and healthcare as well as open space and green infrastructure. The delivery of key infrastructure will be vital to support the number of homes and jobs needed and the sequential approach proposed for their delivery seeks to make the best use of existing infrastructure as well as providing the best possible opportunity to provide additional infrastructure capacity. The provision of infrastructure together with the timing of its delivery is considered in more detail in Chapter 6 of this Plan.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>

## Draft Policy SP 2: Spatial Development Strategy 2011-2033

Within the period 2011-2033 the Council will provide for approximately 11,400 new homes and approximately 10,000 new jobs through the Local Plan.

A The new homes will be delivered by:

- i) permitting development proposals within the defined settlement boundaries where they comply with all other relevant policies of the Local Plan;
- ii) the development of sites around Harlow and at other settlements as allocated through this Local Plan (as identified in Policy SP 3 and Chapter 5) as follows;

Sites around Harlow	~ 3,900
Buckhurst Hill	~ 90
Chigwell	~ 430
Chipping Ongar	~ 600
Coopersale	~ 50
Epping	~ 1,640
Fyfield	~ 90
High Ongar	~ 10
Loughton	~ 1,190
Lower Sheering	~ 30
Nazeing	~ 220
North Weald Bassett	~ 1,580
Roydon	~ 40
Stapleford Abbots	~ 10
Sheering	~ 120
Theydon Bois	~ 360
Thornwood	~ 130
Waltham Abbey	~ 800

- iii) permitting rural exception sites in accordance with Policy H 3 and all other relevant policies of the Local Plan;
- iv) the delivery of sites identified in Neighbourhood Plans;
- v) making the best use of land by ensuring that development densities are appropriate to the location and size of the site in accordance with Policy SP 4; and
- vi) resisting developments which would result in a net loss of homes, unless it can be demonstrated that the benefits of doing so will materially outweigh the harm.

- B An additional 18 pitches and 1 yard will be provided through the allocation of sites in the Local Plan to accommodate the needs of Travellers and Travelling Showpeople as identified in Policy SP 3 and Chapter 5.

This provision will be delivered through the following sequential approach:

- i) the regularisation of existing sites with temporary permissions or other unauthorised sites where appropriate;
- ii) making the best use of existing traveller sites through intensification and extension, and the review of personal permissions where appropriate;
- iii) new sites in locations outside the Green Belt which are appropriately located in terms of access to healthcare, education and other services
- iv) new Traveller sites in Green Belt areas which are appropriately located in terms of access to healthcare, education and other services;
- v) The provision of land as part of the development of the strategic housing sites around Harlow and other allocated sites in this Local Plan and;
- vi) Permitting additional Traveller sites in accordance with Policy H 4.

C The new jobs will be delivered by:

- i) retaining, enhancing and extending existing employment sites where appropriate;
- ii) allocating new employment land at appropriate locations across the District to provide a flexible supply of future sites to cater for needs;
- iii) allocating new employment space at the strategic allocations to contribute to meeting the economic needs of the wider sub-region, and complement Harlow Enterprise Zone;

In addition, the Council will:

- iv) promote and support town centre development and regeneration;
- v) encourage town centres to complement other larger sub-regional and regional comparison retail destinations locations outside of the District;
- vi) promote and support growth in the food production and glasshouse industry;
- vii) promote and support growth in the tourism industry and visitor economy;

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- vii) seek to provide suitable training and skills development for local residents, to provide them with the skills needed to access future employment opportunities both within and outside the District;
- ix) seek to increase workforce participation and encouraging older workers to continue to work; and
- x) attract new businesses, encourage start-ups, and help growing businesses.

D Development proposals will be required to demonstrate that they accord with infrastructure requirements established through the Infrastructure Delivery Plan and all other policies of the Plan.



Development at Langston Road

- 3.62 The identified housing supply to 2033 exceeds the requirement. This serves two functions. Firstly, it provides a contingency to allow for flexibility. Contingency planning is necessary to allow for eventualities beyond the Council's control, including the economic cycle and factors relating to specific sites or developers, which could result in stalled sites. The Plan provides a range of sites in different locations which means that it is not reliant on delivery at a single location. A breakdown of the housing supply is included at Appendix 5.
- 3.63 Secondly, as identified in paragraph 3.48, the Council recognises that recent household projections demonstrate a further upward trend in housing need and the identification of additional sites demonstrates the Council's commitment to positive planning.
- 3.64 The Council's positive approach may also require it to use its compulsory purchase powers under section 226 of the Town and Country Planning Act 1990. That power gives the Council a positive tool to help to assemble land where this is necessary to implement proposals in the District Plan or where strong planning justifications for the use of the power exist. For the circumstances in which those powers may be exercised, see the Department for Communities and Local Government's "Compulsory purchase process and the Crichel Down Rules: guidance".

### Alternative Options – Housing

Set a Housing target based on capacity within existing settlements and use of brownfield sites only.

This would provide for only part of the District's Objectively Assessed Housing Need. Limiting the housing target to this level would not support the future needs of the residents of the District or its local economy. It would also result in growing affordability issues, would significantly limit the Council in fulfilling its wider housing obligations, increase the levels of commuting into the District and limit the opportunities to secure improvements in infrastructure. Furthermore, it would limit the opportunities for a number of communities across the District to be able to address their own more local housing needs and maintain mixed and sustainable communities because of the limitations on the availability of brownfield sites in some locations. Ultimately the Local Plan could not be considered to be 'sound' and therefore could not be adopted by the Council.

Set a housing target based on capacity within existing settlements, use of brownfield sites and strategic allocations around Harlow

This would provide for a greater proportion of the District's Objectively Assessed Housing Need. However, if would not, as with Option 1 above, support sufficient levels of housing to support the future needs of the residents of the District or its local economy. The issues identified in Option 1 are also pertinent to this Option.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



## Alternative Options – Travellers and Travelling Showpeople

<p>To not make specific provision for Travellers and Travelling Showpeople.</p>	<p>This would be contrary to national policy and have the following consequences:</p> <ul style="list-style-type: none"> <li>• Result in unauthorised sites and yards with the potential for creating community disquiet.</li> <li>• Would not ensure access to the support and services that Travellers and Travelling Showpeople need.</li> <li>• Reinforce a cycle of nomadism and homelessness for those within the communities who may prefer a more settled way of life.</li> <li>• Prevent the Council from fulfilling its duty under the Housing Act 2004</li> <li>• Restrict the Council’s ability to enforce against unauthorised development as it had not met the national policy requirements to meet the need for new provision.</li> </ul>
<p>Only include a criteria based policy.</p>	<p>This would be contrary to national policy, having particular regard to the extent of the Green Belt within the District.</p>

## Alternative Options - Economy

<p>Plan to meet the economic needs identified by the East of England Forecasting Model</p>	<p>The aspirational forecast economic needs arising from the East of England Forecasting Model equate to an additional 470 jobs per annum (approximately 10,300 additional jobs over the Plan period). Latest evidence suggests that a slightly lower target would be more appropriate, taking into account the objectively assessed needs for housing, local circumstances and the impacts of growth at London Stansted Airport. This option could potentially lead to surplus employment land in the future unless the level of housing planned for is further increased.</p>
<p>Plan to meet the economic needs based on the Lower Stansted Growth Scenario.</p>	<p>This scenario equates to an additional 400 jobs per annum (approximately 8,800 additional jobs over the Plan period). Latest evidence suggests that this option is at the lower end of the projected needs, taking into account the objectively assessed needs for housing and local circumstances. This would potentially reduce the opportunity for the Council to achieve its Vision and Objectives for the local economy.</p>

## Strategic allocations around Harlow

- 3.65 The Harlow Strategic Site Assessment Report was commissioned by Harlow, Epping Forest, East Hertfordshire and Uttlesford District Councils as part of the joint work being undertaken through the Cooperation for Sustainable Development Member Board, and the consideration of options for accommodating new housing development across the West Essex and East Hertfordshire Housing Market Area up to 2033.
- 3.66 The Assessment has considered and evaluated potential strategic sites in and around Harlow and forms an important part of the evidence base to support emerging Local Plans in the area. A range of sites are potentially available to accommodate future development in and around Harlow, subject to the consideration of infrastructure, landscape and policy (including Green Belt) constraints. The Assessment therefore provides robust evidence and a consistent basis to consider the range of potentially available sites across the area to meet the development and infrastructure needs of the constituent local authorities, and to enable the future economic and regeneration aspirations of Harlow Town to be met in the longer term.
- 3.67 The Assessment found a range of sites to the east and north of Harlow, that due to their comparative lack of constraints, stand out as sustainable locations for growth. The analysis suggests that there is potential for growth to the south, although the landscape ‘ridge line’ is an important boundary that should not be breached. Sites to the west of Harlow offer greater suitability for growth into less sensitive landscapes, provided that coalescence can be avoided, and local transport concerns can be mitigated.
- 3.68 The report identifies sufficient suitable sites in and around Harlow to accommodate approximately 16,100 dwellings, subject to a range of infrastructure requirements being met and landscape impacts being mitigated.
- 3.69 In accordance with the Assessment Report, and other relevant evidence base documents, the Draft Local Plan seeks to allocate a range of sites to the west, south and east of Harlow, but within Epping Forest District. These sites will play an important role in meeting the development and infrastructure needs of the District, and together with other sites within the Housing Market Area, will contribute significantly to meeting the growth ambitions for Harlow and the wider London-Stansted-Cambridge Corridor.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies!

3.70 Given the strategic importance and scale of these sites, development proposals will be required to accord with a range of place-shaping principles, and where applicable, it will be necessary to demonstrate compliance with these principles through the production of masterplans as stipulated.

### Draft Policy SP 3 Strategic Allocations around Harlow

A The following sites will be allocated to support the delivery of the spatial development strategy set out in Policy SP 2:

Site Reference	Location	Housing to be delivered
SP 3.1	Latton Priory and Riddings Lane	Approximately 1,050 homes (1,000 Latton Priory and 50 Riddings Lane)
SP 3.2	West Sumners	Approximately 1,000 homes
SP 3.3	West Katherines	Approximately 1,100 homes
SP 3.4	East of Harlow	Approximately 750 homes and the potential relocation of Princess Alexandra Hospital

B As well as the delivery of new homes sites SP 3.1 – 3.4 will be expected to make provision for an appropriate level of employment, retail, and community uses in accordance with other policies within the Plan. Sites must also provide the necessary infrastructure including highways and transport infrastructure (as identified in the relevant Memorandum of Understanding), schools, health, open space and green infrastructure provision. The Strategic Allocations must be planned and delivered as high quality, integrated, sustainable and distinctive developments supported by necessary infrastructure, services and facilities.

C Each site will be required to provide land for 0.5ha (up to 5 pitches), in order to accommodate the future needs of Travellers in the District, in accordance with the sequential approach set out within Policy SP 2.

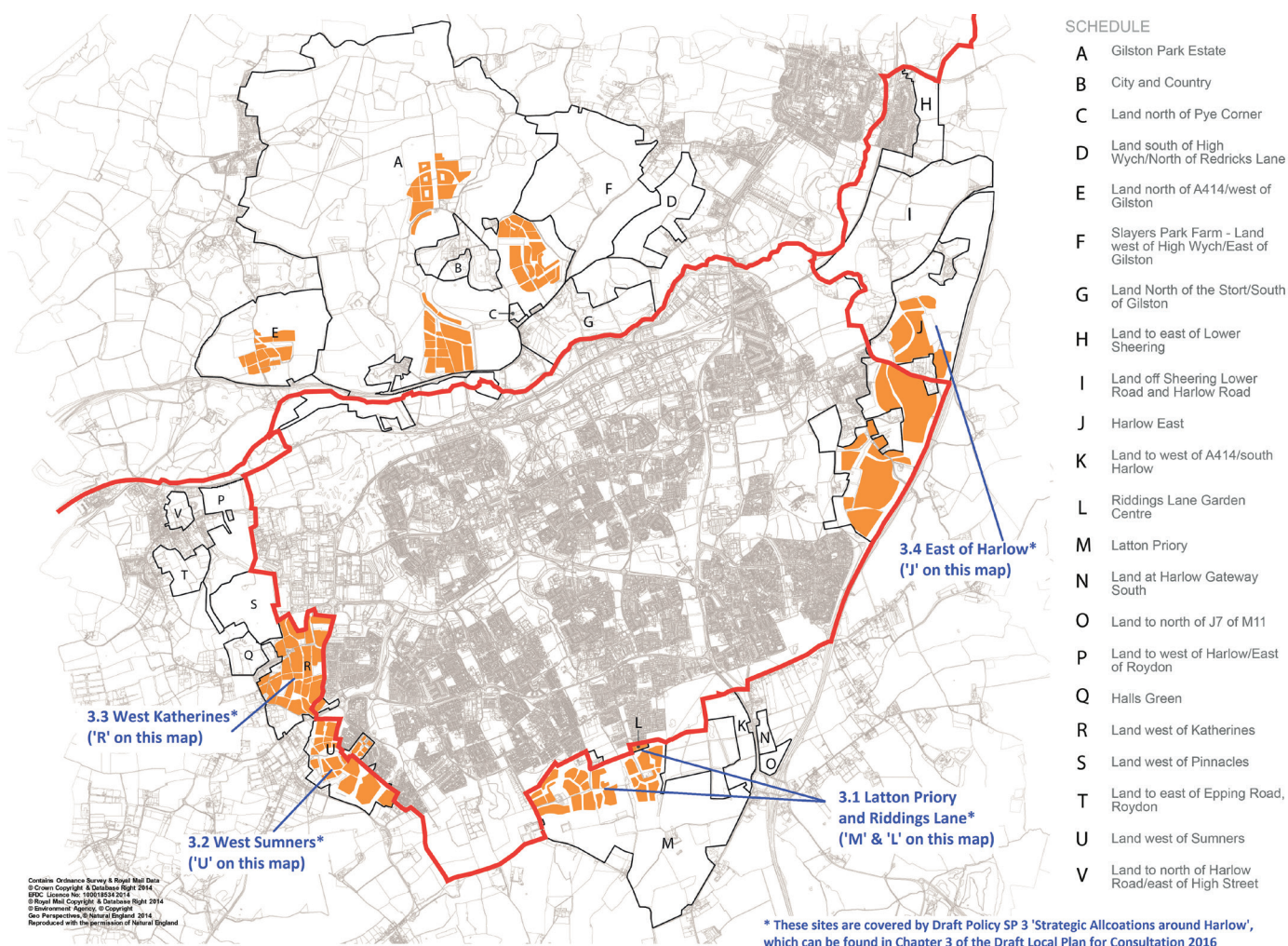
- D Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Development identified in this policy will be expected to make a contribution proportionate to its scale and impact for the delivery of Junction 7A of the M11, improvements to Junction 7 and other strategic infrastructure requirements.
- E In order to front-load the planning process and ensure that a comprehensive, joined up and cohesive approach is taken to the planning and delivery of high quality development and associated infrastructure, development proposals in relation to sites SP 3.1-3.4 will be required to be in accordance with a Strategic Masterplan which has been adopted by the Council. The Strategic Masterplan(s) will be produced by the applicant, in partnership with the Council and relevant stakeholders (including adjacent land owners, relevant parish / town councils, infrastructure providers and statutory consultees) and where relevant jointly with Harlow District Council. Strategic Masterplans should be prepared in consultation with the local community, and be capable of being adopted by the Council in due course as Supplementary Planning Documents. For sites in close proximity, joint Strategic Masterplans will be required.
- F Development proposals for the Strategic Allocations (and where applicable Strategic Masterplans) must reflect and demonstrate that the place shaping principles set out in Policy SP 4 have been adhered to.



M11

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>

**Figure 3.7 - Proposed Strategic Allocations in and around Harlow**



## SP 4 – Place Shaping

### The Issue

- 3.71** Place shaping is a holistic process that aims to bring together all the component parts of a successful place. It provides an opportunity to encourage an integrated approach to development by focusing on, and creating better social, physical and economic environments.
- 3.72** National Planning Policy Guidance emphasises the importance of high quality design and place shaping. It states that well designed places exhibit qualities that benefit users and the wider area. Development should ensure that new or changing places: are functional; support mixed uses and tenures; include successful public spaces; are adaptable and resilient; have a distinctive character; are attractive; and encourage ease of movement.
- 3.73** Allocations in the Local Plan (as identified in Draft Policy SP 3 and Chapter 5) need to be planned carefully to ensure that they become successful places. The Local Plan has an important role to play in the creation

of sustainable communities at these locations. It is important that these areas work as places and are attractive, prosperous and encourage safe communities where people want to live, work or visit.

### What you told us?

- 3.74** Responses from the Community Choices consultation and stakeholder engagement included:
- support for the recognition of the principles of sustainable development and the need to achieve net gains across the three themes of economic, environmental and social progress;
  - with respect to development the Council should require provision for multipurpose open space, and open space standards and links between open spaces. It should ensure the location is respected, for example outer edges of settlements require walking access to green areas, and inner open spaces that are green and accessible;

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- concern was expressed regarding the need to carefully manage the impact of development particularly on settlement edges, rights of way, biodiversity and landscape character. A careful approach to development on settlement edges is needed to ensure permeability to the countryside and development sympathetic to its location. This involves assessing and addressing the environmental impact of development and providing sustainable development policies.

3.79 The draft Place Shaping policy will ensure a holistic approach which will bring together all the component parts of a successful place.

## Key evidence

- National Planning Policy Framework;
- Planning Policy Guidance;
- Creating Garden Cities and Suburbs Today (TCPA, 2012);
- Site Selection Report September 2016 (Arup);
- Landscape Character Assessment (Chris Blandford Associates);
- Settlement Edge Landscape Sensitivity Study (Chris Blandford Associates);
- Sustainability Appraisal (AECOM)

## Preferred Approach

3.75 The Council's preferred approach seeks to achieve successful and desirable strategic developments. This draft policy sets out the framework and key principles that will guide the future development of allocations in the Local Plan (as identified in Draft Policy SP 3 and Chapter 5).

3.76 Given the importance and scale of the allocations, development proposals will be required to accord with a range of place-shaping principles, and where applicable, it will be necessary to demonstrate compliance with these principles through the production of masterplans as stipulated in Draft Policy SP 3 above.

3.77 The Council is committed to working with Harlow Council and East Hertfordshire District Council, Hertfordshire County Council and Essex County Council, in partnership with relevant Local Enterprise Partnerships to bring forward transformational growth at Harlow. The Councils have a strong collective commitment to achieving Garden City principles in strategically planned development. The partners understand and recognise the need to promote high quality, cohesive growth, supporting the core ethos and objectives set out in the Town and Country Planning Association's key guiding principles. Draft Policy SP 4 seeks to ensure that these aspirations can be achieved.

3.78 The appreciation of housing density is crucial to realising the optimum potential of sites. It is not appropriate to apply density ranges set out in Draft Policy SP 4 mechanistically but to consider the density appropriate to the location taking account of relevant factors to optimise potential including the local context, design, transport and social infrastructure.

## Draft Policy SP 4 Place Shaping

- A Development proposals for allocations in the Local Plan (as identified in Policy SP 3 and Chapter 5) and where applicable Strategic Masterplans must reflect and demonstrate that the following place shaping principles will be adhered to:
- strong vision, leadership and community engagement;
  - provide for the long-term stewardship of assets;
  - provide mixed-tenure homes and housing types that are genuinely affordable for everyone;
  - ensure a robust range of employment opportunities with a variety of jobs within easy commuting distance of homes;
  - provide high quality and imaginatively designed homes with gardens or access to usable and accessible amenity space, combining the very best of town and country living to create healthy homes in vibrant communities;
  - generous, well connected and biodiversity rich green space provision;
  - extend, enhance and reinforce strategic green infrastructure and public open space;
  - ensure that development enhances the natural environment;
  - deliver strong local cultural, recreational, social (including health and educational where required) and shopping facilities in walkable neighbourhoods;
  - positive integration and connection with adjacent rural and urban communities including contribution to the revitalisation of existing neighbourhoods;
  - ability to maintain and enhance the important features, character and assets of existing settlements;
  - conserve and positively enhance key landscapes, habitats and biodiversity;
  - provide for sustainable movement and access to local and strategic destinations (including rail, bus and pedestrians/cycling); and
  - positively respond to sustainable water management.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



B To ensure the best and most efficient use of land as a guide the Council will normally expect:

- i a greater intensity of development at places with good public transport accessibility;
- ii. densities above 50 dwellings per hectare in town and large village centres and along main transport routes and close to transport nodes;
- iii. in the areas outside town and large village centres, new residential development should achieve densities of between 30 and 50 dwellings per hectare, and should enhance the distinctive character and identity of the area;
- iv. lower density developments may be appropriate in certain areas of the District. Some parts of the urban areas and some villages are particularly sensitive to the impact of intensification and redevelopment because of the prevailing character of the area and the sensitive nature of the surrounding countryside or built form.

## Alternative Options

Alternative Options	
Not to include a Place Shaping policy	The Council considers that the inclusion of a policy which stipulates place shaping principles is required. Not to do so could result in development which does not meet the aspirations of the Council and its partners, and that is potentially of a lower overall quality. The inclusion of a Place Shaping policy will ensure that new allocations contribute to the creation of sustainable communities and successful places and make the most efficient use of land.

## SP 5 – Green Belt and District Open Land

### The Issue

- 3.80 Over 92% of the District is designated as Green Belt. The NPPF provides the context in respect of the role of Green Belts, together with the role of Local Plans regarding the establishment of Green Belt boundaries as follows:
- 3.81 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (paragraph 79).
- 3.82 Green Belt serves five purposes (paragraph 80):
- to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.83 Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period (paragraph 83).
- 3.84 When defining boundaries, local planning authorities should:
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
  - not include land which it is unnecessary to keep permanently open;
  - where necessary, identify in their plan areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan period;
  - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan Review which proposes the development;

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>

- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. (paragraph 85)

3.85 The evidence suggests that if the Council is to deliver the Vision and Objectives of the Local Plan as set out in Chapter 2, provide the development needed to support the long term sustainability of the District and the wider area as identified in Draft Policies SP 2 and SP 3, then there is a need to review the extent of the Green Belt within the District. In addition, the current Local Plan was adopted before the publication of the NPPF (which makes it clear that Local Plan policies should avoid repeating national policy) and prior to changes to nationally set Permitted Development Rights. As such a number of the policies are either out of date or are no longer applicable.

### Key evidence

- National Planning Policy Framework;
  - Green Belt Review Stage 1 (EFDC, 2015);
  - Settlement Capacity Study (Fregonese Associates, 2016);
  - Green Belt Review Stage 2 (LUC, 2016).
  - Report on Site Selection (Arup 2016)
- 3.86 Responses from the Community Choices consultation and stakeholder engagement included:
- Continued protection of the Green Belt in the District where possible, particularly in relation to preventing coalescence of settlements within and adjoining the District;
  - Brownfield land should be allocated for development before land in the Green Belt; and
  - A need for continuity of approach between neighbouring Local Authorities in respect of Green Belt Review. (The Council has involved the Co-operation for Sustainable Development Board established in October 2014 to discuss cross-boundary matters and report progress.)



Green Belt

### Preferred Approach

- 3.87 In order to achieve the delivery of sustainable development, in accordance with the Vision and Objectives of this Local Plan, the Council is proposing to alter the Green Belt boundary as currently identified on the Adopted Local Plan (1998) maps. This is in order to facilitate the delivery of the strategic sites identified in Draft Policy SP 3 above and those within Chapter 5 which would otherwise lie within the Green Belt.
- 3.88 The NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary, whether this is to remove or create areas of Green Belt. There is no clear definition of what amounts to exceptional circumstances, but case law is clear that any justification must be responsive to local conditions and take into account a range of factors.
- 3.89 No alterations have been made to Green Belt boundaries since the existing Local Plan was adopted in 1998. The alterations made at this time were relatively minor and related only to four specific locations. Proposed development sites within the 1998 Local Plan were not removed from the Green Belt as part of the process of allocating them for development. In addition to this historic position of only making very limited changes to the Green Belt, Epping Forest District has previously been considered as an area of development restraint by higher tier plans (e.g. County Structure Plans and Regional Strategies) with relatively low development needs allocated as a result. As set out in paragraphs 3.13-3.16 the Council has worked in partnership with neighbouring authorities within the defined Housing Market Area to identify the Objectively Assessed Housing Need (OAHN) for the Plan period. For Epping Forest District, the most recent OAHN represents a considerable increase over previous development rates. Case law makes clear that the need to make provision for development needs is not, in itself, sufficient to justify the exceptional circumstances necessary to make alterations to the Green Belt boundary. It is, however, part of the overall set of local conditions which come together to create a bespoke scenario for the District.



Green Belt

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>





Local trees

3.90 Through this Draft Local Plan, the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development whilst focusing development in the most sustainable locations. To the north of the District, Harlow has long been identified as an appropriate location for additional growth supported by regeneration within the existing town. Harlow is the largest settlement within the Housing Market Area, but the “new town” has suffered decline in recent years. There are overall aspirations for regeneration in employment, town centre and residential sectors, with the provision of new infrastructure in support of this. Successive studies have demonstrated that Harlow is a suitable location for growth, and that an element of this growth would need to be outside of the administrative boundaries of Harlow in Epping Forest and East Hertfordshire Districts. There is further discussion of the strategic sites for allocation around Harlow in Draft Policy SP 3. The delivery of the strategic sites around Harlow is dependent on the construction of key infrastructure, including improvements to Junction 7 and a new motorway junction (Junction 7A) to the north of existing junction 7 of the M11. The new motorway junction and associated access would be constructed across Green Belt land in both Epping Forest and Harlow Districts.

3.91 Beyond Harlow, the identification of possible locations for development has followed a sequential approach in which non-Green Belt land is prioritised for development over land within the Green Belt. The Strategic Land Availability Assessment (SLAA, 2016) provides the basis for identifying opportunities for development. This includes the additional sites from the Settlement Capacity Study (2016), which sought to ensure that potential opportunities to redevelop existing brownfield sites outside of the Green Belt were identified. One of

the key responses from the Community Choices consultation in 2012 was that the Council needed to be certain that all opportunities for the re-use of brownfield land were identified before land is released from the Green Belt. The approach taken demonstrates that this has been achieved.

3.92 Further to the SLAA, more detailed site analysis and filtering has been completed. The Site Selection Report sets out the approach taken in detail. This approach seeks to protect the most high value Green Belt land wherever possible, drawing on the findings of the Green Belt Review: Stage 2 in particular. It is clear from the Report on Site Selection that insufficient land outside the Green Belt exists to meet the development needs of the District within the Plan period. In order to meet the development needs identified, and achieve sustainable forms of development in and around existing settlements, alterations to the Green Belt boundaries are necessary.

3.93 The boundary alterations proposed to allow for the proposed site allocations have been kept to the minimum needed to deliver the Local Plan Strategy and result in approximately 500 hectares, or around a 1.5% reduction in the Green Belt within the District (excluding the release of Green Belt to facilitate the allocation of employment sites).



Forest trees

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies'



**Figure 3.8** - Proposed Green Belt boundary alterations to take account of proposed allocations



The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



## Anomalies

3.94 In addition, evidence contained within the Green Belt Review: Stage 2 identifies a number of areas in the District where development has already taken place within the Green Belt. In these locations there is a case for reviewing whether it is appropriate for these developed areas to remain within the Green Belt, or if a more defensible boundary would be appropriate in the long term. These areas have been termed 'anomalies within the Green Belt'. Using the Green Belt Review Stage 2's initial review, an assessment has been completed of the identified locations. Where appropriate, revised indicative Green Belt boundaries have been included within this Draft Local Plan (see Chapter 5). A total of eight areas are proposed for removal from the Green Belt as a result of this analysis. However it is recognised that the consultation process on the Draft Local Plan may identify further anomalies to assess. The background paper provides the methodology and detailed analysis.

## Proposed designation of District Open Land

3.95 In some locations the suggested alteration to the Green Belt boundary will remove areas of land that are not proposed for change. This is because it would not make sense to create 'holes' in the Green Belt. It is therefore proposed to apply an alternate designation that will provide the same level of protection as the Green Belt designation to these areas that are broadly in open space, recreation and leisure uses. In accordance with the NPPF a Local Green Space designation of "District Open Land" is proposed. In connection with the Green Infrastructure Strategy, opportunities will be sought to improve and enhance the newly defined District Open Land.

3.96 The NPPF (paragraph 77) requires the following tests are met in order to designate Local Green Space:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green space concerned is local in character and is not an extensive tract of land.

3.97 The two areas that have currently been identified to become District Open Land meet the above criteria and are identified in Chapter 5. Given the nature of the District, and the high proportion of Green Belt, it will also be necessary to identify land to be safeguarded to meet future development needs.

The extent to which safeguarded land will be required is not yet clear and will be the subject of further consideration prior to submission of the Plan for examination. The hierarchical approach taken as part of the preparation of this Draft Local Plan has identified all reasonably available land outside of the Green Belt for development in the first instance. For future Plan periods further land within the existing settlements may become available, but it is considered likely that further development on land that is currently within the Green Belt will be required. The NPPF does not define how much safeguarded land is required, only that it should "meet longer-term development needs stretching well beyond the Plan period" (paragraph 85). The Council will continue to consider this matter beyond the current consultation period.

3.98 The NPPF clearly sets out in paragraphs 87 – 92 (inclusive) the approach to planning applications for development proposals within the Green Belt. There are no locally specific matters which would warrant Green Belt policies over and above Draft Policy SP 5, the approach to the delivery of Rural Exception affordable housing sites as set out in Chapter 4 (Draft Policy H 3), and the site specific draft policies set out in Chapter 5. In addition, existing adopted policy GB14A has been superseded by changes in the national General Permitted Development Order and is now unenforceable.

### Draft Policy SP 5 Green Belt and District Open Land

#### Green Belt

A. The general extent of the Green Belt is set out in Figure 3.8. The detailed boundaries and inset settlements are defined in Chapter 5. The openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy.

#### District Open Land

B. The same level of protection will be applied to areas of District Open Land as is applied to Green Belt. The key characteristics of District Open Land are their openness, local significance, wildlife value and/or public accessibility. It is not necessary for each of these characteristics to be present to be designated or retained as such.

## Draft Policy SP 6: The Natural Environment, Landscape Character and Green Infrastructure

### The Issue

3.99 There is a need to provide a positive strategy for the protection and enhancement of the natural environment in the Local Plan and recognise its role in adapting to climate change. The District contains a rich diversity and heritage of countryside, woodland, trees, green lanes, rivers and water meadows and both rural and urban open spaces that are important culturally and for good health, whilst being valued for their landscapes, quiet enjoyment, recreation and the plants and animals they support. A key element of green infrastructure, and characteristic of the landscape in Epping Forest District is trees, as they are the key component of the ancient forests of Epping and Hainault, many woods and miles of ancient hedgerow as well as the dominant asset in urban areas. Particular attention is therefore paid to the importance of trees within the Local Plan strategy. National policy and legislation supports the protection and improvement of the natural environment through measures such as the development of green infrastructure networks and through habitat and species protection together with the achievement of net gains in biodiversity.

### What you told us?

- 3.100 Responses from the Community Choices consultation and stakeholder engagement included:
- elements of a positive strategy for improving the natural environment should include: preservation and enhancement of the natural environment; tree protection and additional tree planting to improve the density of trees; enhance and expand the tree and woodland resource including urban tree networks; the care of species and habitats including connecting habitats and providing buffers; supporting the health and wellbeing of residents; providing, protecting and enhancing urban open spaces; and supporting ecotourism. In addition, assessing the value of corridors through private gardens as well as more obvious public green routes;
  - the measure receiving the greatest support was the production of a District-wide green infrastructure strategy. The Council should include green infrastructure wherever possible and appropriate as well as ensuring that it is designed to deliver multiple functions, and water courses should be considered as green infrastructure. Strong support was expressed for an accessible green infrastructure network for: people including those with particular access requirements, animals, walking and cycling and enhancing open spaces;

Alternative Options	
Not to take land from the Green Belt to meet development needs	The comprehensive and robust process that has been followed to identify suitable locations for growth has found there is insufficient land outside of the Green Belt to meet the development needs of the District. Where appropriate, proposed brownfield development sites will be subject to higher density schemes than is the current norm, within the parameters of maintaining the existing character of the District. If no land were removed from the Green Belt to meet the objectively assessed development needs, the Council would not be able to meet the identified requirements and would be at risk of having the Local Plan be found unsound. The impact of this would be a continuation of the current position in that development takes place in an ad hoc manner, and the required infrastructure is not delivered in a planned and timely way.
To make no alterations to the Green Belt as a result of development already completed	The areas identified and assessed are all locations where substantial change has taken place within the Green Belt. Any further planning applications for change in these locations e.g. extensions to residential properties, are currently, and would continue to be, assessed against Green Belt policy. In these instances, this is inappropriate as substantive development has already taken place and the application of Green Belt policy is a misnomer.
Not to introduce a designation of District Open Land	In assessing the most appropriate adjusted Green Belt boundary in relation to anomalies identified in the Green Belt, it has become clear that whilst continued Green Belt designation may not be appropriate in some locations, a further designation to offer protection from development would be appropriate in specified locations where protection needs to be maintained. If such a designation were not introduced in place of the Green Belt designation, it would lead to significant pressures for development in locations that are in alternative appropriate use for open space purposes.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>

- protecting green assets particularly in sensitive landscapes is important;
- the importance of Epping Forest in terms of its size (5% of the District plus 2% buffer land) and its contribution to biodiversity should be fundamental to the strategy of the Plan which should recognise the context of the Forest in relation to the Green Belt and the networks of green infrastructure;
- the protection, enhancement, development and management of the Lee Valley Regional Park and the public enjoyment of its leisure, ecological heritage and sporting resources need to be recognised and supported – the Park is a key component of the region's green infrastructure;
- more meaningful green spaces and wildlife links should be created between the Epping Forest and Lee Valley Regional Park. Links between towns (in the east) and between the Lee Valley Regional Park and Epping Forest (including cycleway) should be made;
- with respect to development the Council should require provision for multipurpose open space, and open space standards and links between open spaces. It should ensure the location is respected, for example outer edges of settlements require walking access to green areas, and inner open spaces that are green and accessible;
- only apply off site mitigation on open space for development in exceptional circumstances and where possible provide alternative green spaces;
- setting general limits on development and thresholds for development to provide sufficient amenity space, robust landscaping design and maintenance;
- concern was expressed regarding the need to carefully manage the impact of development particularly on settlement edges, rights of way, biodiversity and landscape character. A careful approach to development on settlement edges is needed to ensure permeability to the countryside and development sympathetic to its location. This involves assessing and addressing the environmental impact of development and providing sustainable development policies;
- policy to manage and prevent significant harm to landscape character including buffers against development on ridges and valleys; hedgerows and the woodland patchwork; veteran and other trees, avenues and roadside trees;
- a sensitive approach to development on brownfield sites in sensitive locations such as the Epping Forest, respecting traditional businesses, and requiring zero carbon initiative;
- take all opportunities to enhance and support public transport to mitigate the impacts of air pollution on the natural environment and human health.

## Key evidence

- Council Directive 1992/43/EEC: Conservation of natural habitats and of wild fauna and flora;
- Directive 2009/147/EC: Conservation of wild birds;
- Convention on Wetlands of International Importance Especially as Waterfowl Habitat. Ramsar, 2/2/1971 as amended 3.12.1982;
- Wildlife and Countryside Act 1981;
- Town and Country Planning Act 1990;
- Natural Environment and Rural Communities Act 2006;
- 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' – DEFRA 2011;
- UK Post 2010 Biodiversity Framework JNCC and DEFRA 2012;
- National Planning Policy Framework: Section 11 Conserving and enhancing the natural environment;
- National Planning Policy Framework paragraphs 156 and 157;
- Planning Practice Guidance: Natural Environment;
- Circular 06/2005 Biodiversity and Geological Conservation;
- 'The National Pollinator Strategy: for bees and other pollinators in England' - DEFRA 2014;
- European Site Conservation Objectives for Epping Forest SAC (UK0012720) Natural England 2014;
- European Site Conservation Objectives for Lee Valley SPA (UK9012111);
- Essex Biodiversity Action Plan 2010-2020 , Essex Wildlife Trust 2011;
- Local Wildlife Sites (LoWS) Review, EECOS for EFDC 2010;
- Planning Practice Guidance: Natural Environment;
- National Landscape Character Areas - Natural England;
- Epping Forest District Council Landscape Studies – Landscape Character Assessment 2010;
- Epping Forest District Council Settlement Edge Landscape Sensitivity Study 2009; and
- Epping Forest District Historic Characterisation Study 2015.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies'

## Preferred Approach

3.101 The continued development of the District's green assets into networks is a critical plank of the strategy of the Local Plan and the Council seeks to address the matters raised in response to public and stakeholder engagement. The improvement of the natural environment is also a key aspect of the Council's response to climate change, providing opportunities to mitigate against the impacts of climate change and adapt to the changing climate. The Local Plan seeks to protect and improve upon the quality of the natural environment in the District, in tandem with providing for the necessary new development, through the continued development of green networks that provide for multi purpose open spaces, and increasing access to the natural environment for residents and visitors. The multi functional nature of the network includes the water environment of the District. Use of the District-wide network can include recreation, flood water storage, nature conservation, transport by walking, cycling and horse riding, provision of shade in urban areas, use of trees to alleviate air pollution, sustainable drainage, food production and a host of other uses that do not constitute buildings. This is commonly known as 'green and blue infrastructure' (the blue referring to the water environment) and any component can be termed an 'asset'.

3.102 The Council wishes all development to contribute to future accessible networks of green infrastructure as even the smallest site can provide for vegetation, trees or green roofs or walls with careful design. Larger sites can be designed to capitalise on the existing green and blue infrastructure assets by incorporating them into layouts and improving on provision whilst improving links between aspects of green infrastructure and the quality of the living environment for occupants. Therefore strategic Draft Policy SP 6 applies to all development.

3.103 Further draft policies are contained in the Development Management section of Chapter 4 of this Plan that sets out in more detail the Council's requirements.



Bee on a thistle

## Draft Policy SP 6 The Natural Environment, Landscape Character and Green Infrastructure

A. The Council will protect the natural environment, enhance its quality and extend access to it; this contributes to the health and wellbeing of its people and economic viability of the District. In considering proposals for development the Council aims to create a comprehensive network of green corridors and places, appropriate to the specific rural or urban setting. In so doing, it seeks to connect and enrich biodiversity through habitat improvement and protection at all scales, and extend access to and maximise the recreation opportunities of, our countryside and urban open spaces.

### B. The countryside:

- i) the Council will conserve and enhance the character and appearance of the countryside. Landscape character assessments will be used to assist in judgements on the suitability of new development;
- ii) the Council will act itself, and in relation to development proposals, to develop a multifunctional countryside, which is productive, rich in biodiversity at all scales, with a well-connected green infrastructure network that is accessible for quiet enjoyment, recreation and exercise.

### C. Towns and smaller settlements:

- i) the Council will protect the green infrastructure assets of the towns and smaller settlements and improve the quality of existing green space in towns and smaller settlements.
- ii) the Council will ensure that new development is designed to protect existing green infrastructure, enhance networks, secure better provision where deficiencies have been identified and deliver new green infrastructure to link to local or wider green infrastructure networks.
- iii) the Council will seek the provision of new quality green space appropriate to the scale of the development.

### D. Green Infrastructure:

The District's green infrastructure network will be extended, maintained and enhanced through the remaining policies in this Plan including:

- i) the location of development (Policy SP 2 and Chapter 5)
- ii) adapting to climate change
- iii) sustainable urban drainage systems (Policy DM 16)
- iv) supporting sustainable transport choices (Policy T 1)
- v) open space, sport and recreation provision (Policy DM 6)

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>



E. The Council will therefore expect all development proposals, where appropriate, to contribute towards the delivery of new green infrastructure which develops and enhances a network of multi-functional green+ and blue assets\* throughout the District. This will be proportionate to the scale of the proposed development and the rural or urban context. The Council will support development which contributes to the District's existing green infrastructure and where possible, enhances and protects networks. It will secure additional provision where deficiencies have been identified. Where on site provision is not feasible then the use of CIL/S106 agreements will be sought to contribute to green infrastructure.



Ponds and Wildlife

+ green corridors and places are any natural areas that can comprise spaces and corridors, so for example a hedgerow can provide a green corridor for wildlife, a green lane a corridor for both wildlife and people, and either of these can join a park with a wood for example – the park and wood being green places.

\* multifunctional green and blue assets – any corridor or place that has a number of purposes, for example a pond can provide flood water storage, a place to row a boat and a wildlife haven.



Tree planting with pupils



Local Wildlife

### Alternative Options

Retain existing policies	The existing policies were adopted prior to the publication of the NPPF, PPG and Directive 2009/147/EC. The current policies are not all compliant with the NPPF and therefore there is a need to review and update. In particular there is a need to update to ensure that there is a positive emphasis on enhancement and improvement via net biodiversity gains and the provision for the monitoring of impacts as well as the extension and development of a green and blue infrastructure network.
No policy	To not have a policy would mean that there would be no strategic framework within which more detailed policies can be developed and no positive strategy for the natural environment. It would therefore miss opportunities to ensure the enhancement and protection of the natural environment and not comply with the NPPF.

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies<sup>1</sup>