

## **Report to the Cabinet**

**Report reference: C-006-2013/14**

**Date of meeting: 10 June 2013**



**Epping Forest  
District Council**

**Portfolio: Planning**

**Subject: Responses to the Community Choices (Issues & Options) consultation for the Local Plan.**

**Responsible Officer: Ian White (01992 564066)**

**Democratic Services Officer: Gary Woodhall (01992 564470)**

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### **Recommendations/Decisions Required:**

- (1) To note the responses made to the Community Choices (Issues and Options) consultation for the Local Plan which was held between 30 July and 15 October 2012;**
- (2) To consider whether to adopt additional criteria for the Sustainability Appraisal (SA), as suggested by some of the responses – these are:**
  - (i) protection of highest grade agricultural land;**
  - (ii) comparison of housing sites to assess their deliverability and contribution to overall need; and**
  - (iii) ability of sites to make provision for new community services and facilities (Officers will give an oral update of discussions with the consultants providing advice on the SA); and**
- (3) To agree the publication of a summary report of the consultation responses for public distribution.**

### **Executive Summary:**

The Community Choices consultation document set out the main issues to be considered by the planning system over the next twenty years, and potential options to address these issues. The main purposes of the consultation were:

- (i) to ask our communities whether they considered all the relevant issues and options had been identified in the document;**
- (ii) to receive suggestions for additions, and**
- (iii) to seek views on the options presented in the document.**

Community Choices was not a policy document setting out an intended development plan. However, the consultation is an important part of the evidence gathering process which helps the Council to understand the opinions, concerns and interests of our local communities. This will assist the Council to make balanced decisions on land allocations

and other planning matters. The public consultation exercises, which are a fundamental part of the preparation of the new Local Plan, help the Council to engage with the local community, explain the need for change and to find the best solutions when planning new development.

The questionnaire contained 98 questions several of which were multi-choice. To simplify the presentation of the large amount of information and opinion included in the responses, this report is in two parts. The main report analyses the number of responses received by response method and location. A summary of responses in question order is followed by an outline of additional evidence base work followed by the next steps in plan preparation. The appendix to the main report contains all 98 questions and gives a detailed breakdown of the responses to each of the questions.

### **Reasons for Proposed Decision:**

Responses to public consultations are key parts of the evidence base for the Local Plan and will play an important role in helping Members to decide on distribution of new development, specific land allocations, and the policy direction the new Local Plan should be taking.

### **Other Options for Action:**

There is no credible alternative option – consideration of responses received to consultations is an essential part in the process of preparing a sound Local Plan.

### **Report:**

1. Preparation of a new Local Plan for the district is a corporate priority for the Council. The recent introduction of the National Planning Policy Framework (NPPF) and the revocation of the East of England Plan requires the Council to revise the existing Local Plan. The Council must demonstrate:

- (i) an adequate supply of housing land; and
- (ii) that new development is planned in a way which benefits the district as well as providing for future needs.

2. There are several stages to the preparation of the Local Plan, and some of these have already been completed. A wide range of evidence has already been collected and collated, which helps to inform the preparation of policies for the new Local Plan.

3. A 'Community Visioning' consultation period was held over the Winter 2010/2011, and asked a series of broad questions about the district. The full findings are available on the Council's website (<http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/109-community-visioning>), and these were taken into account in preparing the next stage of consultation.

4. The Issues & Options consultation (called 'Community Choices') for the new Local Plan took place between 30 July and 15 October 2012. A total of 3,556 'real' responses were received (see next section for explanation), representing a total of 5,989 people (because some responses were from groups).

5. The majority of responses (68.3%) were made via hard copy questionnaires or letters. 12.3% were made by email, and the remaining 19.4% used the online consultation system.

6. This report sets out an analysis of the responses received, including the proportion of respondents who selected particular options, and some qualitative comments on the reasons most often given for answers. N.B. the percentage figures for different questions shown from now on are of respondents rather than responses. For example, if a group response with 10 signatures answered no to a certain question, this would 'count' as 10 people answering no, rather than 1. Thus the percentages incorporate all of the respondents who commented on that question.

7. Also, the percentages shown for different answer options are for those who answered the question. Many responses only commented on one or two sections, and so the percentages shown reflect the proportion of those who answered that question.

### Number Of Responses To The Consultation

8. Overall, 4,083 responses were received, representing 6,537 people. However, some of these were duplicates, i.e. from the same person. This meant that there were actually 3,556 'real' responses representing a total of 5,989 people. Please note however that all of the responses have been considered and analysed, and are reported below, even if more than one was received from the same person. In considering the detail of the responses in the appendix, it is important to consider percentages in the context of the number of responses to individual questions.

9. The responses received were in three main ways; as a 'normal' response, i.e. from one person or a couple; a 'bulk' response, i.e. multiple copies of a standard letter with individual signatures, of which there were several; or a group response. The breakdown of how many of these were received and how many people they represented are as follows:

| Type of response                                  | Percentage of responses % | Representing what proportion of total respondents % |
|---|---------------------------|---|
| 'Normal' response                                 | 78.9%                     | 50.7%   |
| Part of a 'bulk' response<br>e.g. standard letter | 19.9%                     | 12.2%   |
| Group response                                    | 1.1%                      | 37.1%   |

[NB - Percentages may not total due to rounding].

10. The following is a breakdown of the types of respondent who commented on the consultation. There were three main types: statutory (i.e. a statutory body such as the Highways Agency); landowner (a landowner or their agent); resident (residents, including residents' associations, voluntary groups etc.):

| Respondent           | Percentage of responses % | Representing what proportion of total respondents % |
|----------------------|---------------------------|---|
| Statutory            | 4.6%                      | 2.9%  |
| Landowner (or agent) | 6.4%                      | 4.4%  |
| Resident             | 89.1%                     | 92.6%   |

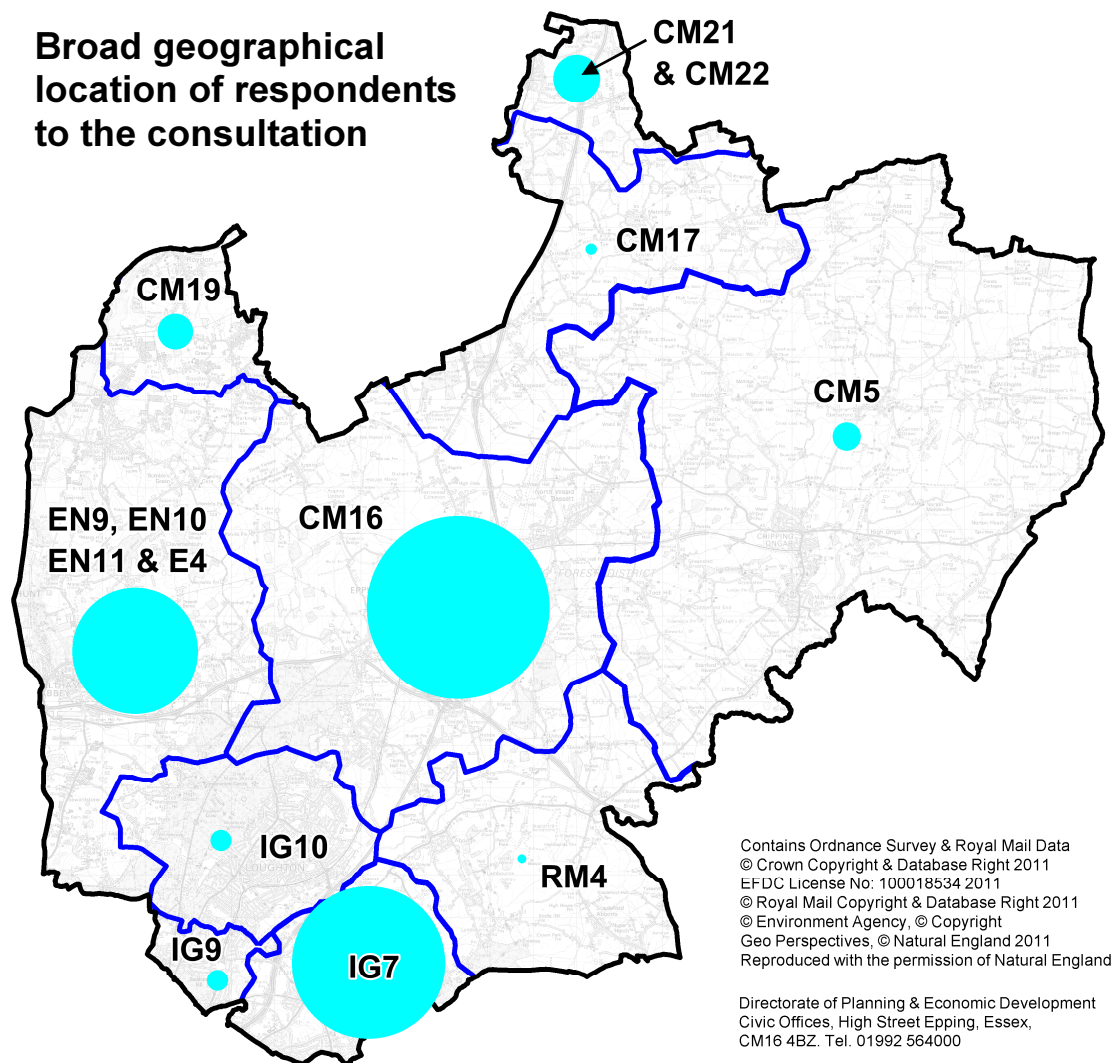
[NB - Percentages may not total due to rounding].

11. Responses were also received via three methods; in paper copy (as a questionnaire or a letter), by email, or via the online system:

| Method of commenting                 | Percentage of responses % | Representing what proportion of total respondents % |
|--------------------------------------|---------------------------|---|
| Paper copy (questionnaire or letter) | 68.3%                     | 57.7%   |
| Email                                | 12.3%                     | 13.6%   |
| Online                               | 19.4%                     | 28.7%   |

[NB - Percentages may not total due to rounding].

12. A broad analysis of the postcodes of the responders has led to the following indicative plan, which shows roughly what proportion of responses resulted from the postcode groups covering the district. This does not include the small percentage of respondents based outside the district (which include national bodies like the Highways Agency).



13. Responses were received from all but 8 of the district's Parish and Town Councils; these 8 covered some of the more rural areas. Of the ten equivalent planning authorities which adjoin this district, responses were received from nine of them - Brentwood Borough Council, Broxbourne Borough Council, Chelmsford City Council, East Herts Council, Harlow District Council, London Boroughs of Enfield, Redbridge and Waltham Forest; and Uttlesford District Council. The only one not responding was the London Borough of Havering. Comments were also made by other local authorities and equivalent bodies; Braintree District Council, the Conservators of Epping Forest (City of London Corporation), Essex County Council, the Lee Valley Regional Park Authority and Sawbridgeworth Town Council.

14. The Council also received responses from many statutory bodies and national organisations including the Environment Agency, Natural England, Transport for London, Highways Agency, Mayor's Office for Policing & Crime, Anglian Water, the Civil Aviation Authority, Epping Forest & Commons Committee, Essex Police, NHS North Essex, Sport England, Showmen's Guild of Great Britain, Stansted Airport Ltd, Thames Water Utilities Ltd, the Theatres Trust, The Canal & River Trust and CPREssex.

15. A recent edition of *The Forester* advised that the analysis of the consultation responses would be published on the Council's website. Everyone who included contact details in their response would also be notified when the results are available. Not everyone who responded has access to the website, so consideration needs to be given to how the content of this report can be made available in an accessible and easy-to-read/understand format. Given that many responses to the consultation were critical of the length of Community Choices and its questionnaire, the length of this report is likely to be just as off-putting to many residents. Officers will prepare a summary version, using eg pie-charts to illustrate how the more significant questions were answered, but this will take some time to prepare. This will be consistent with one of the principles of the Local Plan Communications Strategy, agreed at LPCC on 25<sup>th</sup> March which states – "accessible report summaries of planning documents should be produced where appropriate."

## SUMMARY OF RESPONSES

16. The consultation responses received are part of the evidence necessary to prepare a Local Plan, and must be used in conjunction with technical evidence. Both types of evidence will help to shape the emerging Local Plan.

### Introduction and Vision (questions 1 and 2)

17. These questions dealt with the change in scope of the Local Plan, and the vision and aims. The first covered the move from preparing a Local Development Framework, which meant a Core Strategy with separate Development Plan Documents, to a single volume Local Plan. It is clear from the responses that some respondents did not follow the explanation that was given. Many issues were raised in addressing the second question, but there were very strong opinions expressed about building on Green Belt land, particularly as most respondents to this question were not convinced that all brownfield land had been identified.

### Green Belt and Landscape (questions 3 to 5)

18. Some 77% said not all relevant issues for the Green Belt and landscape had been identified. As with the response to Q2, there is a large majority opposed to the principle of

development in the Green Belt, particularly before all brownfield land is reused. Many other issues were raised in answers to Qs 3 and 4 (Green Belt issues and options), the most prevalent being perceived inconsistency of approach, release of Green Belt land being prejudged, and concern about London sprawl and suburbanisation of settlements in the south of the district. There is similar concern about development of the Harlow boundary causing coalescence with Sheering, Lower Sheering and Roydon. There is also some suggestion that the results of the Community Visioning consultation have been ignored.

19. The most preferred options for addressing the issues were to 'prepare and implement a district-wide "green infrastructure" strategy' (18%) and 'review the outcomes and effectiveness of existing Tree Strategies' (17%). Green infrastructure (GI) refers to a network of high quality green spaces and other natural features (including rivers and ponds. The network should deliver a wide range of benefits for local communities – eg woodland, open spaces, parks, playing fields, allotments and connecting rights of way. The GI strategy would address planning and creating such a network by linking existing features with additional provision in new development.) The options to (i) 'identify the features of the landscape of the district that are integral to local character and the openness of the countryside' (12%); (ii) determine the amount of brownfield land within urban and rural areas' (14%); and (iii) 'identify strategic Green Belt gaps' (14%) were also relatively popular – this latter refers to particularly narrow gaps between settlements. As one of the purposes of including land in the Green Belt is to prevent towns from merging into one another, it was suggested in Community Choices that these gaps should be considered strategic. The least preferred options were to (iv) 'release land around some settlements' (3%); (v) 'investigate the potential for the relocation of some uses to land on the edge of settlements' (3%) and (vi) 'investigate the potential for the development of some urban green spaces' (3%).

#### Brownfield land and Green Belt Review

20. The NPPF (para 17) makes clear that Local Authorities should "...encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". A large number of respondents made reference to a need to undertake a "Brownfield Land Review", prior to considering any Green Belt land for development purposes. In an authority where such a high proportion of land (92%) is within the Green Belt, it is an important part of plan-making that alternatives for potential brownfield land development are fully investigated and taken up where possible. A key part of the evidence for ensuring such sites are identified is the Strategic Land Availability Assessment (SLAA), which considers potential development land from a number of sources. Appendix 1 of the SLAA shows the sources of these sites, and this includes a range of public and private land. This comprehensive process has highlighted a number of brownfield land opportunities. The Community Choices consultation also provided an opportunity for further brownfield and other sites to be suggested. Just over 70 responses have been received to date, and there continue to be intermittent further suggestions. Details of these will shortly be sent to the consultants Nathaniel Lichfield & Partners so that they can be subjected to the same SLAA process.

21. While the Council would obviously prefer to use brownfield land first, it is highly likely that some Green Belt land will have to be released to accommodate development needs over the next twenty years. The Council is committed to minimising the amount of Green Belt land required. In order to do this the Council will undertake a full and robust review of the Green Belt to ensure that this evidence is available to aid in the eventual selection of development sites. The criteria for a Green Belt boundary review were agreed by Local Plan Cabinet Committee on 3 September 2012. The review is currently being implemented by the Forward Planning team, and will consider all of the potential

development areas, and make an assessment in accordance with the purposes of including land within the Green Belt. This information will then be used in conjunction with other evidence, and the findings of consultation exercises, to allow Members to determine the most appropriate locations for future development.

#### Proposed Strategic Green Belt Gaps (question 6)

22. The majority of those who answered this question (94%) said the proposed gaps were not in the right place. Several comments referred to all Green Belt land being strategically important. A large number of additional responses suggested strategic gaps which together would cover a substantial amount of the district.

23. The intention behind the option was to highlight what are felt to be narrow and particularly vulnerable areas of the Green Belt where development of any significant size could threaten one of the purposes of including land in the Green Belt, ie preventing coalescence of settlements.

24. The NPPF (para 80) lists the five purposes of including land in the Green Belt, one of which is “to prevent neighbouring towns merging into one another”. Green Belt designation should therefore fulfil the intended aim of the “strategic gaps”

#### Biodiversity (questions 7 and 8)

25. Some 89% of respondents said no to both questions, i.e. have all relevant issues and options been identified. A common view was that Community Choices did not provide enough emphasis on the importance of wildlife sites, protected trees and hedgerows. It was also thought that the important role that Epping Forest and its buffer land play in biodiversity had not been considered and that any development, especially in the Green Belt, will impact on biodiversity. Respondents felt that the consequences of this have been ignored.

26. The page layout of Community Choices might have influenced some comments on the options for biodiversity. Para 3.15, which lists options, is split between pages 17 and 19 with diagram 3.1 (Potential Strategic Green Belt Gaps) on page 18. As a consequence some responses missed the fact that biodiversity options are listed on page 19.

27. Some respondents repeated that there should be no building on the Green Belt because it will affect biodiversity. Several comments shared a theme of promoting green corridors and linking wildlife sites as well as encouraging a joined-up approach which includes major landowners. Similar comments urged the Council to take a proactive approach to improving biodiversity rather than just monitoring.

#### Built Heritage (questions 9 to 11)

28. There are many highly valued built heritage assets within Epping Forest District. It is therefore appropriate for the Local Plan to identify the ways in which these assets might be protected and enhanced. The majority of residents agreed with the issues raised in the document, particularly in relation to the importance of conservation areas. However there was a general concern amongst respondents that the potential level of growth in the district might impact negatively on the character of historic towns and villages. In addition, it was felt by some that there needed to be a greater degree of protection for locally important heritage assets that are not identified as being nationally significant listed buildings.

29. Many respondents considered that the most effective method of protecting built heritage was to limit the amount of development in and around existing settlements and, in particular, to avoid locating development on Green Belt land. All five options identified for the purpose of preserving and enhancing the district's built heritage gained a high level of support, particularly (i) preparing conservation area appraisals; and (ii) reviewing the register of locally listed buildings on a regular basis.

#### Population/ household projections & potential growth targets (questions 12 to 14)

30. The Community Choices consultation presented three potential housing targets for the plan period (2011 to 2033), based on some of the population and household projections generated by the Essex-wide population forecasting project organised by the Essex Planning Officers' Association. The highest was 10,200 net dwellings (option A, based on the official governmental population projections); the middle option was for 8,900 (option B, based on a combination of the former East of England Plan and an update on the official population projections); and the lowest was 6,400 (based on the original East of England Plan target).

31. The majority (86%) of respondents did not think that the range of options for potential housing growth targets was right. Most implied that the targets should be lower. The most common reasons given were (a) questioning the projections used, as it was felt that population growth would not be as high as projected; and (b) that the district should not have to provide housing for migration (either internal or international). Many respondents felt that affordable housing should only be provided for local residents, and that the growth in the 'indigenous' population was unlikely to be high.

32. Chigwell Residents' Association and Chigwell Parish Council presented their own assessment of likely population growth, using the pattern of growth between 2001 to 2011, and the 'net-nil migration' population forecast. This discussed potential housing target options which were lower than the options consulted on in Community Choices. Their assessment queried the effect of net migration over the period between the two Censuses.

33. Many respondents felt that new homes should not be built in this district, but directed away to areas such as Harlow, Stratford, Leytonstone or Enfield. Many respondents also argued that their area had existing deficits in infrastructure and services, and that further housebuilding would only increase commuting due to a lack of local jobs.

34. Of those who did feel that the range of options was right, the majority stated that 6,400 homes (option C) should be the maximum target.

35. The consultation then asked whether the range of housing targets should be higher or lower. The vast majority (97%) of respondents said 'lower'. Of those who thought that the range was 'about right' or should be higher, reasons given included: the need to create a Local Plan that would be found sound at Examination in Public; the need for housing in general; the need to comply with the requirements of the National Planning Policy Framework (NPPF) in objectively assessing housing need; and the problem of affordability in the area.

36. Population projections (leading to potential growth levels) are, and are likely always to be, one of the most contentious topics for the new Local Plan. The Office of National Statistics (ONS) projections and the work already produced by Edge Analytics for the Essex Planning Officers' Association (EPOA fed into the consultation document, and have been scrutinised by Councillors, officers and members of the public alike.



37. The Council is concerned by some of the seemingly inflated projections for this area described in the 2010 sub-national population projections (particularly with regard to net internal migration). A large proportion of Local Plans are failing at Examination in Public due to challenges over population and growth figures. The Council must establish a position on population growth and housing which is defensible at Examination in Public, both against a higher target than is reasonable (which could damage environmental and other aspects of the district's character) and a lower target than is reasonable (which would risk the Plan being found unsound through non-compliance with the NPPF). Consequently the Council is seeking to obtain the most up to date assessment of future population growth in the district, which can be balanced against other pertinent issues such as planning constraints and land availability.

38. To this end Edge Analytics has been commissioned to prepare a revised set of population and related household and housing forecasts. This work will use detailed 2011 Census results, and newly released data comprising revised mid-year population estimates for the period 2001 to 2011 (ONS) and a new set of household projections (Department of Communities and Local Government (CLG)). Some of this work will look at population and housing changes at ward level between the two most recent Censuses as well. Once this work is complete, there will be a further Member workshop specifically to discuss population and household growth issues.

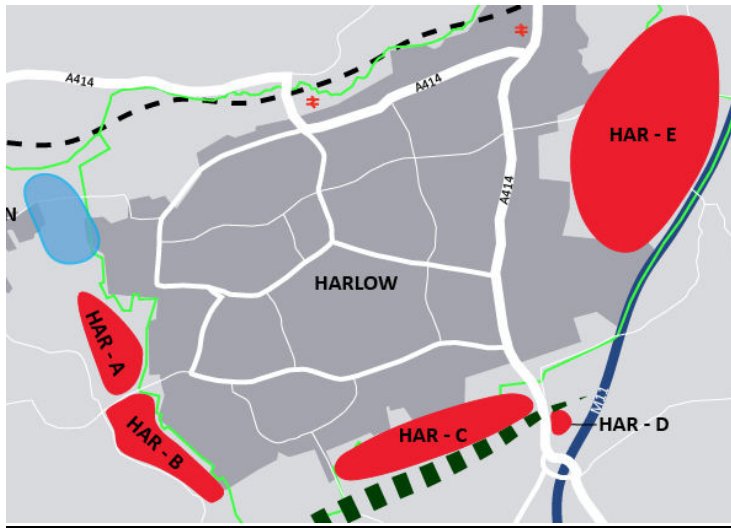
#### Employment Land – Potential Targets (Question 15)

39. The jobs growth section of the consultation document asked for comments on two potential job growth targets for employment land: 28.5 hectares (roughly 70 acres) based on the East of England Plan review target for the district (option 1); and 21.5 hectares (roughly 53 acres) based on the need identified by the Employment Land Review and the Town Centres Study (part of the evidence base). The two options had different breakdowns of uses, for example A1 retail use or B8 storage and distribution.

40. The consultation asked whether these options were the right ones. Over half of the respondents to the consultation did not answer this question, however, 93% of those who did answered 'no'. The most common reason given was that new business land and premises did not need to be provided as there were sufficient premises that were vacant or derelict. (The majority of those who gave this answer were contained within one large group response from the Waltham Abbey area). Many of the responses mentioned Chigwell specifically, stating that there were no job opportunities in Chigwell, and that therefore housing growth would mean an increase in commuting.

41. Other respondents questioned the economic forecasts, arguing that they cannot be relied upon in a recession. Some said that jobs should be provided outside the district, for example in East London or Harlow, and that if housing were not provided in this district then there would be no need to provide jobs either. Other respondents wanted further consideration of things like home working, newer technologies, high speed broadband, and agriculture/food production.

### Growth around Harlow (questions 16 to 18)



42. Harlow directly adjoins Epping Forest District, and despite being a separate administrative area, it is appropriate to consider whether some development could be accommodated on the current edges of the town.

43. Respondents to questions 16-18 expressed overall support for development on Harlow's boundary but within Epping Forest District (91% of those that responded are in favour). Several broad caveats were given within the responses, including that (i) development would be reliant on an additional motorway junction and further highway improvements; (ii) Green Belt land use should be minimised; and (iii) it should be ensured that services and facilities within Harlow are able to accommodate extra residents.

44. In respect of all the potential development areas, concern was raised over whether further development around Harlow would cause coalescence with neighbouring villages. There was overall support for maintaining the existing separation, with specific reference to the gap between Roydon and Harlow. While there was general support for all of the alternative development locations around Harlow, there was a stronger level of support for HAR-E to the east of the existing town. Much of this area is within Harlow District Council boundary, and therefore any development in this location would require extensive joint working with Harlow District Council to ensure delivery. Comments were raised about the size of HAR-E, with many suggesting that the area is too large. If HAR-E were to be taken forward, officers and Members would consider carefully the available land and whether it would all be needed for development purposes. Growth in this area, and in/around Harlow generally, would be dependent on a further motorway junction being added to the M11, north of existing junction 7.

45. Research undertaken by Harlow District Council in relation to the designation of the Enterprise Zones has shown that the existing road network is at capacity when taking into account committed levels of growth. Significant infrastructure improvements will therefore be necessary to support additional growth around Harlow. Essex County Council has been testing whether the new motorway junction is both necessary and technically possible, and is proposing a consultation on this in Autumn 2013. ECC's consultation response indicated that the overall residential capacity of HAR-E is significantly lower than the Community Choices document suggested.

46. HAR-A comments included inadequacy of rural roads. Essex County Council

supported the development of HAR-B for the education benefits a proposed replacement primary school would bring, although existing residents have expressed concerns about a number of issues, and have highlighted traffic levels in particular. Comments on HAR-C included (i) ensuring that the landscape ridge is not breached by development; (ii) the distance from the town centre and rail stations; (iii) traffic impact on junction 7 and Southern Way; and (iv) impact on existing communities in the southern part of Harlow. HAR-D is proposed for commercial development in the Community Choices, and whilst this is broadly supported, concerns were raised about the impact on the landscape ridge and access to the A414.

47. The Highways Agency has raised concern about the impact of any additional development on the motorway network. This applies district-wide as well as to Harlow.

#### Spatial Options – Potential Patterns For Distribution Of Growth (Questions 19 To 21)

48. The consultation document discussed seven different potential ‘Spatial Options’, i.e. distribution patterns for whatever level of development is eventually chosen. Spatial option 1 is the most ‘basic’ as it suggests that each area takes some development proportionate to its existing size. The other six options include focusing development (a) towards transport nodes e.g. Central Line stations and overground rail stations; (b) away from Central Line stations (because of capacity issues); and (c) only on the larger settlements in the district.

49. The seven options were:

- Spatial Option 1: Proportionate distribution
- Spatial Option 2: Transport Focus – proportionate distribution
- Spatial Option 3: Transport Focus – equal distribution
- Spatial Option 4: Development away from the Central Line – proportionate distribution
- Spatial Option 5: Development away from the Central Line – equal distribution
- Spatial Option 6: Large Settlements – proportionate distribution
- Spatial Option 7: Large Settlements – equal distribution

50. The consultation asked whether respondents preferred one or more options. The total number of ‘votes’ for each option was compared against the total for the other options, to assess levels of support and objection (this is reflected in the following percentages). There was a clear preference for the ‘basic’ Spatial Option 1: Proportionate distribution (24%). The next most preferred, which included a significant number of respondents from Chigwell, were Spatial Options 4 (15%) and 5 (14%), these being the two which focus development away from areas with Central Line stations. The other options had significantly less support. One large group response from Waltham Abbey stated that the group did not prefer any of the spatial options and felt that “A more tailored settlement specific approach is more appropriate”. This group response represented over 1,000 people (41% of respondents to this question).

51. The Conservators of Epping Forest (City of London Corporation) were concerned about the effects of increased pollution that development may cause. They preferred Spatial Option 5, keeping development away from the Central Line and thus away from much of the area of the Forest in the south of the district. Thames Water preferred Spatial Option 6, as focusing development towards larger settlements would mean that it could make the most use of its existing infrastructure.

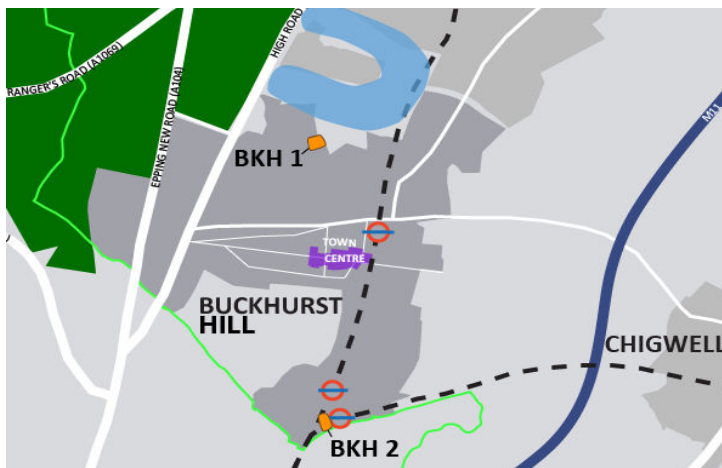
52. The consultation also asked whether a combination of the options might be better.

The vast majority of respondents did not answer this question, but those who did showed a very strong preference for combining Spatial Options 4 and 5 (focusing development away from areas with Central Line stations). Other combinations were much less commonly given.

53. Some respondents, including North Weald Bassett Parish Council, Epping Town Council and Thornwood Action Group, felt that Thornwood should be handled separately to Epping when discussing growth figures, as it is a much smaller, separate settlement. (In the consultation document, the potential growth tables included Thornwood within the ward of Epping Lindsey and Thornwood Common). These respondents argued that instead of being grouped with Epping, it should be listed separately and be allocated roughly 1/11th of the total growth in any table for 'Epping Lindsey and Thornwood Common', on the basis that it has approximately 1/11th of the population.

54. The consultation also asked whether other distribution patterns would be more appropriate. Not many answered this question, but of those who did, the most common suggestions made were to focus development where infrastructure can cope, on proximity to mainline rail stations (rather than Central Line stations), on proximity to jobs, and to direct more development to the Loughton/Debden area (which was not allocated much in the consultation document due to the constraints of the Roding Valley floodplain and Epping Forest).

#### Buckhurst Hill (questions 22 to 24)



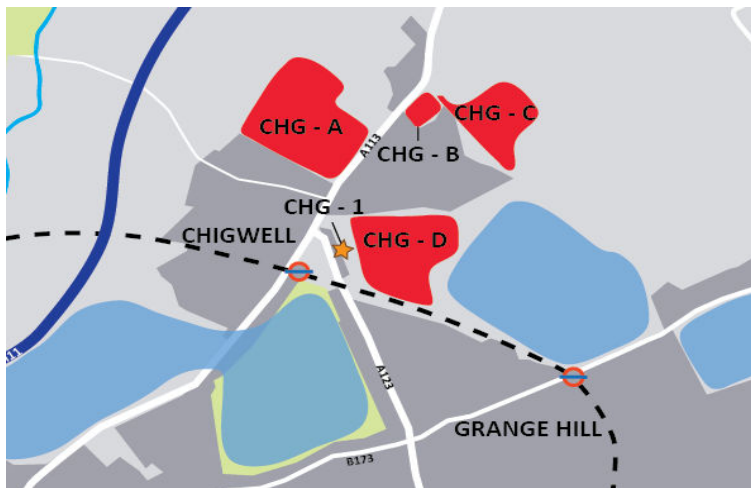
55. Community Choices identified two potential opportunity areas in Buckhurst Hill. The principle of directing any development to the town received a negative response with a number of consultees indicating that no further development should take place due to a perceived erosion of the semi-rural character of the settlement and also traffic congestion issues. Other respondents suggested that the level of services and facilities present in the town, as well as good access to public transport links, made it a sustainable location for growth. A number of people suggested that both sites were suitable on the basis that they are limited in size and therefore would have a minimal impact. 73% of respondents felt that the right development options had been identified, with 27% saying no.

56. BKH-2 gained a slightly greater level of support (83% compared with 75% for BKH-1). This was largely due to its location in an existing built up area and its proximity to the Underground station. Some respondents raised concerns about the current traffic congestion issues on and around Station Way and suggested that development of the site may exacerbate this problem. Transport for London contacted the Council in August 2012

to state that they no longer owned the site. It is therefore currently uncertain whether the site could be considered to be deliverable during the plan period.

57. There were several concerns raised in relation to BKH-1. In particular, a large number of respondents felt that development of the site would have a significant negative impact on Linders Field nature reserve. Others were concerned with the principle of developing a largely Green Belt site and the precedent that this would set. The importance of maintaining a Strategic Green Belt Gap between Buckhurst Hill and Loughton was also mentioned.

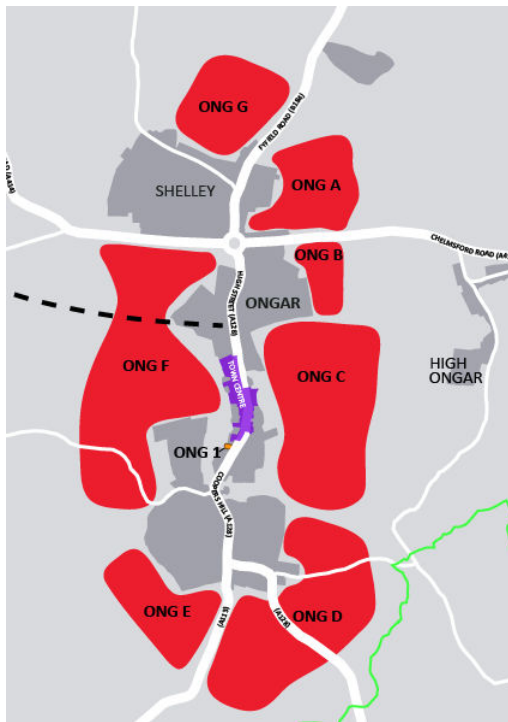
#### Chigwell (questions 25 to 29)



58. One potential opportunity area, in Hainault Road, and four potential growth areas were identified. One of the growth areas (CHG-A – the Metropolitan Sports Ground off Roding Lane) was subsequently withdrawn by the landowners. A resounding 94% of responses said the right development options had not been identified. 76% opposed the opportunity area and 87% objected to the three remaining growth areas.

59. The main reasons for objection are linked – opposition to development in the Green Belt, re-use of all brownfield land before any Green Belt land is taken, preventing London sprawl, and concern about Chigwell becoming another suburb with total loss of village character. Infrastructure deficits were also the subject of many objections. The NHS response confirmed that the Medical Centre in Fencepiece Road is currently over-subscribed by approximately 1,200 people.

### Chipping Ongar (questions 30 to 34)



60. One opportunity area and seven potential growth areas were included in Community Choices. A majority (81%) did not feel that the right potential development options had been identified. By far the most frequent reason given was that too much development had been proposed for Ongar. Respondents also objected to any development on Green Belt land, and felt that a lack of parking and the current congestion problem would be exacerbated by development. Many people also had concerns over the potential impact on (i) heritage assets (including the conservation area and the Castle); (ii) the landscape character and sensitivity of the immediate area; (iii) flood risk; and (iv) traffic congestion. With this latter point, a suggestion was made that the Epping Ongar Railway Line has the potential to provide a commuter service between the two towns.

61. NHS North Essex showed that Ongar has an overall patient list size and floorspace capacity deficit, which would be exacerbated by additional housing, and would require a significant financial contribution from developers to raise capacity of health service facilities in the town.

62. Some alternative sites were suggested. The full list is given in the appendix to this report, but the two sites which were suggested most frequently were the Fyfield Business and Research Park to the north of the town, and the old Leca works/amenity site in Mill Lane. (NB – the first was not included in the consultation as it already has planning permission for redevelopment for business use).

63. The majority of respondents (70%) objected to ONG-1, which is a small site within the town. The most common reason for objecting was that this site was “too small”. Almost all of those who gave this reason were contained within a group response from the North Weald area. Others were concerned about additional traffic, impacts on residential amenities and services, and landscape and Green Belt. Respondents also raised concerns over the lack of a secondary school in Ongar. Of those who supported development of ONG-1, most said that as it was a small site it would not need much infrastructure, it was a brownfield site within the existing town, and that it would not affect the Green Belt.

64. The majority of responses objected to all the potential growth areas. Over 80% of respondents objected to sites ONG-B, ONG-C, ONG-D, ONG-E and ONG-F. The remaining areas, ONG-A and ONG-G, had only slightly less objections (77% and 78% respectively). Discussions are currently on-going on a draft proposal for a 'free school' on part of ONG-A and ONG-G by an organisation called 'School4Ongar'.

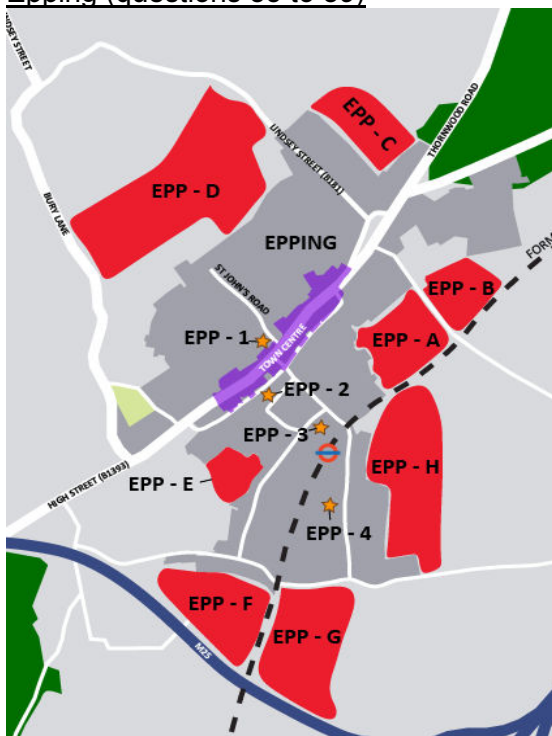
65. Ongar Town Council withdrew its area of playing fields from consideration (the north western corner of ONG-C). It supported ONG-1, ONG-A, ONG-D, ONG-E and ONG-G, but objected to ONG-B, ONG-C, and ONG-F. Great Stony Park Residents Association, which owns the north western corner of ONG-B, has also stated that it does not want its land considered for development.

66. Of those who objected to any of the areas ONG-A to ONG-G, the most common reasons given were: (i) an increase in traffic congestion; (ii) impacts on the landscape, Green Belt, flood risk, biodiversity, heritage assets and residential amenities; and (iii) the lack of school places (especially as Ongar has no secondary school).

67. ONG-C, ONG-D, ONG-E and ONG-F all contain veteran trees. ONG-E is also adjacent to a Local Wildlife Site, and ONG-F includes a Local Wildlife Site. High Ongar Parish Council objected to all the areas except ONG-1. Essex Wildlife Trust also objected to ONG-C, ONG-D, ONG-E and ONG-F.

68. Brentwood Borough Council felt that depending on scale, proposed new development in Ongar should provide new facilities including a secondary school. It also suggested that consideration should be given to competition between town centres in the district and those in Brentwood (e.g. Blackmore, Doddinghurst, Kelvedon Hatch etc.) Brentwood further recommended a 'brownfield first' approach, and an assessment of potential traffic impacts on roads including the A128 (High Street) and towards Brentwood, A414 West to Harlow and East to Chelmsford, and A113 South, which are all single carriageway.

#### Epping (questions 35 to 39)



69. Four opportunity areas and eight potential growth areas were identified in Community Choices. A significant majority of respondents (77%) said the right development options had not been identified. Many comments objected fundamentally to any development on the Green Belt around Epping, some of these going further to suggest that there should be no development in Epping at all. Reasons were mainly to do with existing problems of congestion and the capacity of existing services. There is also a feeling amongst many responders, however, that brownfield development would be generally acceptable if it prevents or reduces the amount of Green Belt land that will need to be released.

70. There was general support for all the opportunity areas. The majority of respondents felt that these sites were small and would have an insignificant impact on the town.

71. EPP-1 received the least support with 56% supporting and 44% objecting. This is the St John's Road site which is the subject of a separate development brief. A number of comments regarding this site suggest that a leisure/community facility as opposed to a supermarket would be the best use. The high number of objections is therefore related to the type of potential development rather than to the principle of redevelopment of the site.

72. EPP-2 received 86% support although there were some concerns about a replacement sports centre being less accessible than the current site which is an asset to the local community.

73. EPP-3 received the highest level of support with 89%. There were very few specific comments relating to this site.

74. EPP-4 also received a high level of support with 85%. Many comments noted that the potential change of use to residential would reduce HGV movements on the local roads.

75. The potential growth areas received a mixed level of support and a large number of comments. Several issues apply across the settlement:

- Traffic congestion is already a big problem;
- Parking problems, particularly around the Underground station;
- Impact on school and health centre capacities (the two health centres have a patient capacity deficit of nearly 4,100);
- Loss of agricultural land;
- Loss of Green Belt; and
- Impact on water and sewage systems – Thames Water would prefer the location of any new development to be to the north-west of the town. Development to the south-east would require significant network upgrades.

76. EPP-A received the most support (54%) of all potential growth area options. The positive comments regarding this area point to the area 'rounding off' the settlement pattern and being close to the town centre. Negative comments include (i) sensitivity of the area to change; (ii) impacts on protected trees, wildlife and (iii) use of the area by residents for recreation.

77. Some 90% of respondents objected to development of EPP-B. There were strong concerns over the loss of an area used by residents for recreation and impacts on wildlife and protected trees. The area is also adjacent to a local wildlife site which contains a UK Biodiversity Action Plan (BAP) habitat and there are concerns that development would have an adverse affect on this.



78. EPP-C has the lowest percentage of support (6%) compared with all other areas in Epping. The main concern identified by respondents is that it has flooding problems caused by a watercourse and the geology of the area. The objectors also point to difficulties in gaining access to the area and its proximity to the Site of Special Scientific Interest (SSSI) at Wintry Wood.

79. EPP-D attracted roughly the same amount of support as opposition (52% support, 48% objection). Specific concerns were raised regarding the potential increase of traffic on Lindsey Street and Bury Lane and potential impact on Swaines Green local wildlife site. It was also noted that the area is large relative to the size of the existing settlement, and this could create problems for the existing infrastructure. Others thought that the size was a positive factor because it could potentially take most of any development need in Epping.

80. EPP-E attracted 58% support. Positive comments referred to the site's proximity to the town centre and suggested that it would 'round off' the settlement pattern. However, concerns were raised regarding the potential impact on a local wildlife site and BAP habitat as well as losing an area used by local residents for walking.

81. EPP-F and G both received 60% objection. Comments reflected that both sites are within a proposed strategic Green Belt gap. Other responses were concerned with the noise and air pollution from the M25, poor access roads, flood potential and distance from the town centre.

82. EPP-H was an unpopular option with 86% of those who responded objecting to this area. The main concerns raised related to increased traffic on the local roads, loss of attractive fields, impact on the Essex Way and the reduction in Green Belt between Epping and Fiddlers Hamlet.

#### Loughton (questions 40 to 42)



83. Eleven potential opportunity areas were identified in Community Choices. The majority of respondents were supportive of some additional development in the town, particularly provision of additional retail and employment space. Prioritising development on brownfield sites first was considered important as was selecting sites in close proximity to town centre amenities and transport links.

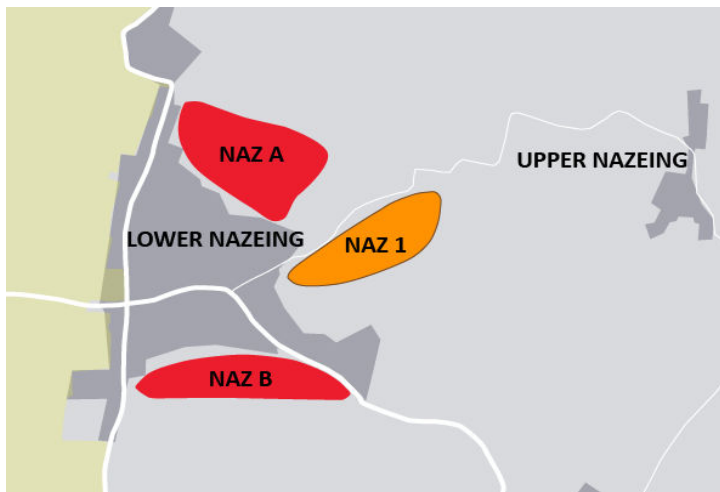
84. Of the options presented, all gained support from a large majority of respondents. Levels of support were broadly similar across all sites

85. Despite the generally high level of support, various concerns were raised about the options. Loss of Green Belt land was a significant issue for some respondents, particularly with regards to LOU-1. It was felt that development of this site could undermine the effectiveness of the proposed strategic Green Belt gap that separates Loughton and Theydon Bois. The potential impact of development on designated wildlife sites and other nature reserves was also seen as a concern, particularly in relation to LOU-2 and LOU-10.

86. While the idea of providing additional retail facilities within options LOU-3, LOU-5, LOU-7 and LOU-8 was generally very well supported, some respondents considered that this would impact negatively on existing provision on the High Road and The Broadway. In addition, concerns were raised about development of LOU-6 and LOU-9 resulting in the loss of car parking space which could impact negatively on the vitality of The Broadway as a local town centre.

87. A number of respondents also had concerns regarding LOU-10 and LOU-11 in terms of how development of these sites might impact on residential amenity and the character of the area.

#### Lower Nazeing (questions 43- 47)



88. One potential opportunity area and two potential growth areas were identified. The responses indicate that the majority of the respondents are opposed to development in and around the area, with 63% of the respondents objecting to NAZ-1, 66% objecting to NAZ-A and 73% objecting to NAZ-B.

89. Of those respondents that objected, the principal concern was the impact of development on the Green Belt, conservation area and wildlife, as well as additional traffic congestion. Hoe Lane has many problems with HGV movements and is considered unsafe for pedestrian use. Other respondents were apprehensive about the scale of the development and whether the services could support an increase.

90. Where respondents supported development, NAZ-A and NAZ-1 were favoured. The main reasons were that the change of use of these development sites from glasshouse and small industry to residential would reduce the intensity of HGV traffic and improve the character of the area.

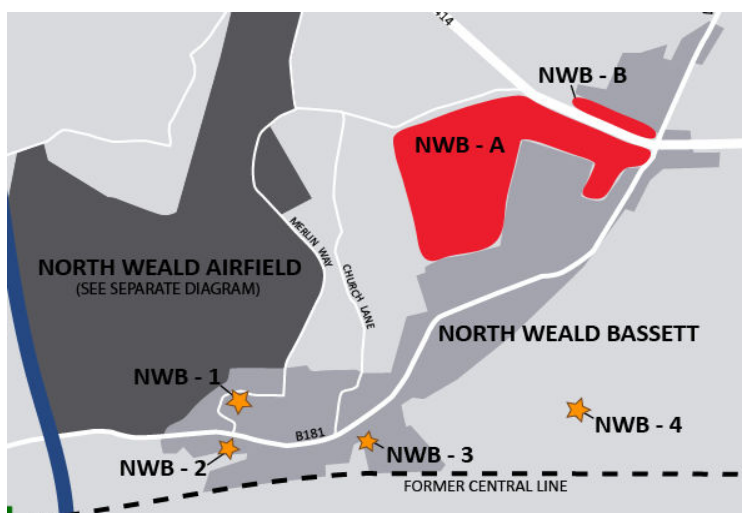
### Sheering and Lower Sheering (questions 48 to 50)



91. The majority of respondents disagreed with the options identified for Sheering and Lower Sheering with all five potential growth areas attracting similar levels of objections. In general, there was significant concern about developing Green Belt land and eroding the rural character of the area. A number of responses indicated that there were insufficient services, facilities and transport infrastructure in the area to support any additional development, and that additional growth would also have a significantly negative impact on neighbouring Sawbridgeworth.

92. It was considered by respondents that it would be more sustainable to direct development to land around Harlow and to the site of North Weald Airfield.

### North Weald Bassett and North Weald Airfield (questions 51 to 57)



93. There was a high level of support for NWB-1 (intensification of existing employment area) and NWB-2 (Leader Lodge, High Road). The NWB-1 area forms part of the wider study area for the further research on the future of North Weald Airfield that is currently underway. More information on the opportunities that may exist in this area is expected to emerge from this work. Leader Lodge is currently in the process of being sold by EFDC, and officers understand this will be renovated to a single family home. It is not necessary

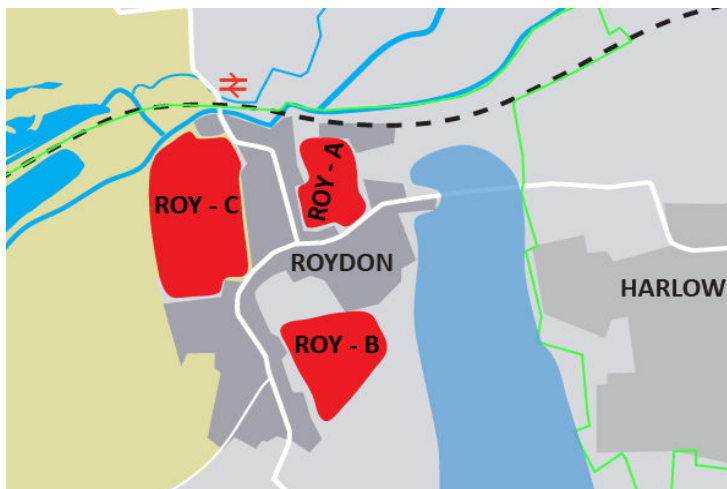
to pursue this small site any further through the Local Plan process.

94. Potential opportunity areas NWB-3 and NWB-4 both received objections from over 85% of those that responded. For NWB-3 concern was raised particularly about the loss of the car park to serve the King's Head pub. For NWB-4 the impact of enabling development on the landscape and Green Belt were the main areas for concern. Other objections were (i) loss of recreation land and public footpaths/bridleways; (ii) flood risk; (iii) traffic generation and congestion and (iv) primary school capacity. The current owners are promoting the Ongar Redoubt (Scheduled Monument - classified "At Risk" by English Heritage) for renovation and return to public use. Initial ideas identify several possible future uses, including a visitor/community attraction (either heritage or farming based), commercial use (although internal space has not been assessed), and a community park with the Redoubt being part of the public open space. The owners estimate that all of these alternatives would require approximately 200 houses to be sold on the open market, in addition to renovation and private sale of three derelict houses/buildings directly to the south west of the Redoubt, to enable delivery.

95. A slim majority supported NWB-A and NWB-B as locations for development, although much of the support for NWB-A was accompanied with the caveat that the area should be significantly smaller. Where objection was lodged, concern was raised about: (a) use of Green Belt land; (b) landscape impact; (c) ability of existing services/facilities to cope with additional residents; and (d) traffic generation, congestion and site access (particularly for NWB-A).

96. Many mixed views were expressed about the possible future for North Weald Airfield, and there was no clear consensus of opinion. Responses ranged from focusing all development for the Plan period at the Airfield, to never making a change from the current position, with all manner of options suggested in between. Consultants (Deloitte) have been commissioned to consider the future of the Airfield further, and the responses to the Community Choices document have been provided as part of this process. Further detailed consideration of the future of the Airfield will need to take place in light of the completed report (expected July 2013) which will test the viability and deliverability of the alternatives. The role of the Airfield in delivering the overall strategy for the district, whatever this turns out to be, can then be sensibly determined.

#### Roydon (questions 58 to 60)



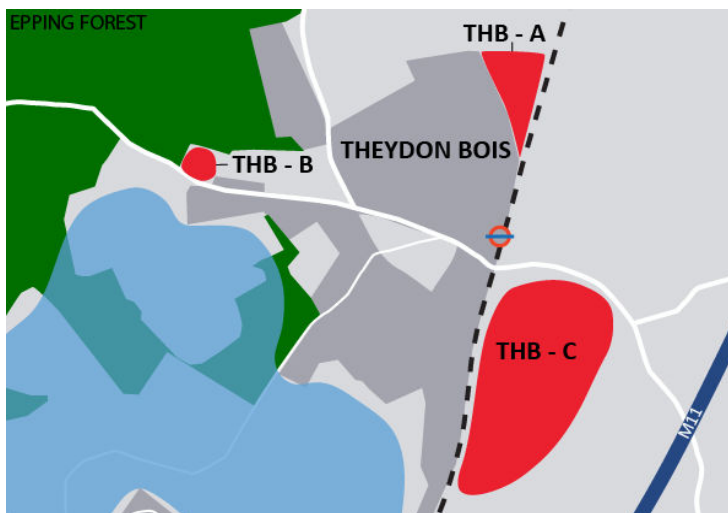
97. Three potential growth areas were identified. The responses indicated a relatively equal divide between those that supported and those that objected to development. It was

suggested that small pockets of infill development in and around the village would be preferable, and for a number of the developments to be allotted for affordable housing to support the needs of the local residents.

98. Of those respondents that supported development, ROY-A and ROY-C were considered to be more favourable given the sites proximity to the train station. It is also suggested that both sites could accommodate and potentially benefit from small pockets of sympathetic development near to existing residential settlements. Those that objected were concerned that additional development would increase existing traffic along Harlow Road.

99. ROY-B received less support than the other two areas, as it is expected to have the biggest impact on the character of the village. The respondents indicated that the area has considerable agricultural and recreational value.

### Theydon Bois (questions 61 to 63)



100. The level of objection to the three potential growth areas was very similar - 57% objected to THB-A, 59% to THB-B and 60% to THB-C.

101. Many comments objected fundamentally to any new development in Theydon Bois. There are strong concerns about the capacity of a number of services including electricity, gas, water, sewerage as well as schools and health facilities. The response from the NHS confirms that there are capacity problems at the medical centre in Theydon Bois. Responders are also concerned that the Central Line is already reaching capacity and that new development would increase the number of users further. Additionally the loss of agricultural land and effect on protected trees was also a concern for all of the areas in the village.

102. With regards to THB- A, a major concern is the topography of the site, which could lead to overlooking of existing dwellings as well as a visually conspicuous development. Other comments were:

- The boundary between this site and the existing built settlement is established; comprising a public footpath, watercourse and ancient tree/hedge line;
- Developing this land would be in conflict with the Theydon Bois Tree Strategy;
- Access to the site is constricted by narrowness of the approach road, Forest Drive/Dukes Avenue, and throughout the village;
- Building on this land would further aggravate surface water flooding in the village;
- A new conservation area for the village has been recommended by consultants and

major infrastructure changes and increased traffic would adversely impact on the proposed area; and

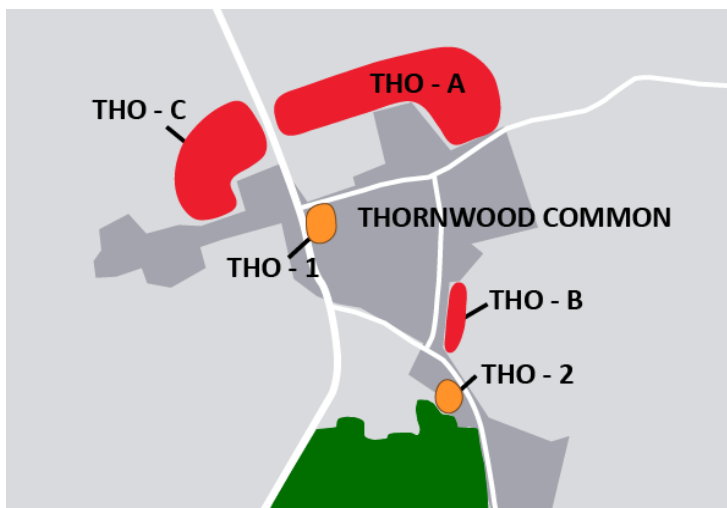
- This site is a long established and valuable amenity for local residents - there is a long history of all year round use for recreational activities.

103. The comments regarding THB-B were mainly concerned with the impact that development will have on Epping Forest SSSI and Special Area of Conservation (SAC). Previous planning applications on the site were refused due to inadequate sightlines.

104. Specific comments were raised about the size and location of THB-C. Several responders noted that the area is very large relative to the existing settlement and that the Central Line currently provides a strong village and Green Belt boundary. Several veteran trees in the north of the site could be threatened.

105. Some positive comments support development in Theydon Bois and refer to the good transport links provided by the Underground station.

#### Thornwood Common (questions 64 to 68)

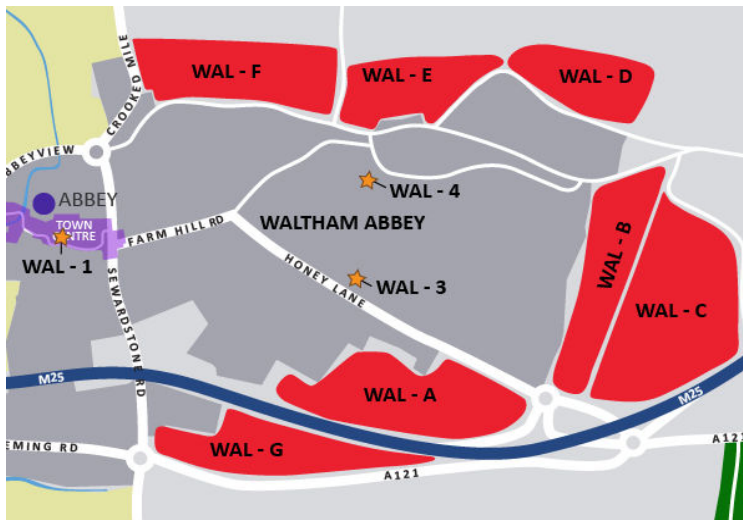


106. Two potential opportunity areas were identified along with three potential growth areas. There was significant concern amongst some respondents that Thornwood Common had been categorised with Epping in sustainability terms, and it was considered inappropriate to identify options in and around such a small village.

107. Nevertheless, THO-1 and THO-2 attracted a substantial level of support (92% and 85% respectively). It was generally felt that re-development of these industrial sites for residential purposes would enhance the character of the village, while provision of a new shop would benefit new and existing residents alike.

108. THO-A, THO-B and THO-C all received a substantially higher level of objection than support. The majority of objectors considered that developing Green Belt areas was inappropriate, particularly as all three were in agricultural use. In addition, many respondents felt that potential developments of that nature would be too large for a small village like Thornwood Common which only has limited services, facilities and other infrastructure.

### Waltham Abbey (questions 69 to 73)



109. Four potential opportunity areas and seven potential growth areas were identified. Responses about Waltham Abbey were entirely dominated by that from the Residents' Association – a group reply with 1,008 signatories. While not specifically objecting to the potential options, the Association makes it clear that it objects to potential growth of the town as significant infrastructure needs have been identified and are currently required for existing residents in the town. It cannot support any of the potential areas at this stage, pending receipt of further information about the various difficulties identified in Table 4.30 (of Community Choices). Consequently officers have interpreted the response from the Association as objecting to all the potential areas which means that objections to the opportunity areas are all just under 80%, and are between 92 to 95% for the growth areas.

110. Common concerns for the opportunity areas (three of which are in the town, the fourth being part of the Royal Gunpowder Factory site) are traffic congestion, inadequate health and education facilities, the town being big enough already and its character having suffered from too much development over the last forty years. The NHS response confirms that the net capacity deficit of the four health centres/surgeries is approaching 2,500 people.

111. These concerns are also prevalent for objections to the growth areas, although the main cause for concern with these is again development in the Green Belt.

112. A number of suggestions are made for additional areas for development, including Sewardstone and Sewardstonebury.

### Housing Issues and Options (questions 74 and 75)

113. In considering the issues for the delivery of new housing, a number of the same points were raised whether the response to either question was "yes", "no" or "comment". These were (a) continued protection of the Green Belt; (b) prioritisation of use of brownfield land, and delivery of infrastructure prior to development going ahead. There was some confusion around the use of the term "affordable housing". In planning terms it is used to refer to a range of (usually) social housing products, but in many of the responses reference was made to planning policy being used to restrict the price of new housing, so that people already living in the district on lower incomes have an opportunity to enter the housing market. It is important to note that the mechanism for controlling the sale price of open market housing does not exist within the Local Plan remit.

### Housing density (questions 76 and 77)

114. Q76 asked if the Plan should include policy seeking developments of a particular density. 91% of respondents said yes, with only 4% saying no, and 4% being undecided (percentages do not total due to rounding). Q77 offered four options for densities. 92% respondents thought that the Local Plan should seek to achieve a mixture of densities, depending on the character of the area. 7% chose 30 dwellings per hectare (dph) or less and 1% each chose 30-50 dph and 50 dph or more (again percentages do not total due to rounding).

### Affordable Housing & Space Standards (questions 78 to 80)

115. Provision of affordable housing is one of the Council's key priorities. Currently adopted policy seeks affordable housing on sites that are 15 units or more, or more than 0.5 hectare. 81% of respondents considered that the threshold for provision should not be any lower. Where respondents answered "yes", they were then asked whether the proportion of affordable housing sought should be different from the current policy approach (40%). The majority considered it should remain the same.

116. The size of new dwellings often causes concern, and Community Choices sought views on whether the Local Plan should include a policy which sets minimum space standards. 80% of respondents thought this should be included, to ensure that appropriate living standards are achieved. Of the 18% that said no (2% said "don't know"), most stated that buyers and the housing market should dictate what is required.

### Gypsy and Traveller provision (question 81)

117. 72% of those responding did not think that the identified options were the right ones for making provision for the travelling community. 23% were uncertain, and only 5% agreed with the options. Comments on the issue included concern about concentration in Nazeing and Roydon parishes.

118. Other comments included (i) no provision or short-term leases only because the community is nomadic; (ii) neither the settled nor the travelling community wishes to live next to the other, so there would be serious reservations about provision in urban extensions; (iii) no expansion of existing sites; (iv) no further provision in the Green Belt – some communities just do not have the right locations to support traveller sites any more; (v) look for provision elsewhere in, or outside, Essex; and (vi) the rights of the settled community should be paramount. The Showmen's Guild of Great Britain welcomed the recognition of need for (a) additional accommodation; (b) the Council to work with other adjacent local authorities. The Guild also stated that Green Belt land may be required, and requested that a definition of Travellers, including Travelling Showpeople, should be part of the Local Plan.

### Town Centres (questions 82 to 83)

119. The majority of respondents (84%) felt that the consultation did not identify all the issues relating to town centres. The most common reasons given were that (a) market and business demand will control employment provision, and that this cannot be influenced or controlled by the Council; and (b) rents and rates in the town centres are too high and are causing businesses to struggle. A large number of respondents also felt that the consultation document had not considered how to address out-of-town supermarkets.

120. Other common reasons for replying that all town centre issues and options had not



been identified were that (i) brownfield sites had been ignored (generally these respondents suggested North Weald Airfield, land South of Harlow and sites in London); (ii) North Weald Airfield had not been considered as a potential site for development; (iii) development should go outside the district e.g. in Harlow, Basildon, East London, Leytonstone, Stratford; and (iv) development should not be in the Green Belt.

121. Many respondents from Chigwell commented that the settlement was not mentioned in the Town Centres chapter of Community Choices, and that its infrastructure was inadequate and/or had not been properly assessed. The respondents stated that there were not many shops in Chigwell, which meant that many residents had to travel by car for shopping, and that there were serious traffic issues in Chigwell.

122. Other issues included (i) concern about the lack of car parking in town centres affecting businesses; (ii) the problems associated with commuter car parking in Central Line towns and villages; (iii) needing the right balance of uses in town centre areas; (iv) anti-social behaviour in Loughton High Road; (v) the need for support for local shops over chains; (vi) the need to be more strict on the design of shop fronts, particularly in areas of heritage importance; (vi) that some employment land near the Central Line station in Debden should be converted to residential; and (vii) that the consultation document had not considered how to address out-of-town supermarkets. A small number of responses highlighted a preference for a sports centre and/or community facility and/or housing on the St. John's Road area, rather than a supermarket.

123. Some respondents queried whether the retail leakage figures were correct, while others felt that it was not necessarily possible to cut retail leakage as the district does not have many large/chain shops and so residents would always need to go outside the district for certain purchases.

124. Epping Town Council's response highlighted the need to preserve Epping's identity with smaller boutique shops rather than large units, the value of the market, and the need to recognise other parts of Epping's economy e.g. civic and industrial employment. Loughton Town Council and Loughton Residents' Association noted their concern about anti-social behaviour in Loughton High Road, and argued again that retail leakage was not necessarily something that could be controlled given the offer of nearby centres.

125. Ongar Town Council raised the importance of strong policies for shop front design, and the need for an appropriate mix of retail shops. Theydon Bois Parish Council highlighted the need to address the impact of out-of-town supermarkets. Buckhurst Hill Parish Council did not feel that having additional large retailers within the town centre would be appropriate.

126. Loughton Town Council and Loughton Residents' Association suggested removing the 1970s shops on the north west of Loughton High Road, and replacing them with larger, rear-serviced units with flats above them. North Weald Bassett Parish Council and North Weald Residents' Association suggested that Epping Sports Centre should be relocated to North Weald Airfield, leaving the old site available for redevelopment.

#### Employment Land (questions 84 to 85)

127. Most respondents (72%) did not believe that all the relevant issues relating to employment land had been included in the consultation. The most common answers were that (i) existing vacant shops and business premises should be identified and used; (ii) local jobs should be provided; and (iii) the Council should survey the existing skills of local people within the district to enable local employment. (The vast majority of those who gave these reasons were contained within one large group response from the Waltham Abbey

area).

128. Many respondents from Chigwell commented that there are no job opportunities in Chigwell, and that land is expensive and so is more likely that to be used for residential rather than commercial development. Other respondents favoured promoting leisure and tourism. Some commented that many current residents commuted out of the district to work, and new residents probably would too.

129. Less common reasons given were that (a) jobs did not need to be provided in the district because there were more available elsewhere, e.g. in Harlow, or London; (b) the Council should work with these areas; (c) existing transport links are poor; (d) only brownfield sites should be developed; and (e) it was impossible to plan for jobs growth in a recession.

130. Essex Police recommended that the Council require new commercial developments to be compliant with 'Secured by Design' commercial standards, to make new developments safer.

131. The majority of those who responded (88%) felt that not all the relevant options for employment land had been identified. Many respondents commented that (i) there was a need for 'clearer statistics' on employment; (ii) tourism should be encouraged in the district (including promoting North Weald Airfield as a tourist destination); (iii) modern ways of working such as home working, business clusters, live/work units and high speed broadband should be encouraged; and (iv) better public transport was needed.

132. Others were split over whether or not some existing employment land should be used for housing. Some replies stated that it would not be possible to control commuting, as people would still live and work where they wanted to.

133. Loughton Town Council and Loughton Residents' Association suggested (a) prohibiting any change of use on Langston Road to A1 (retail); (b) re-using some existing employment land for housing; (c) developing some small-scale industry uses; and (iv) encouraging tourism through hotel provision in the district. North Weald Bassett Parish Council and North Weald Residents' Association argued that North Weald Airfield should be promoted for recreation and leisure facilities, and heritage and public events.

134. The Environment Agency supported the aim of business hubs to reduce commuting, and green technology, but advised that there should be a greater focus on public transport.

#### Rural Economy (questions 86 to 87)

135. By far the dominant response to these questions is that Community Choices failed to acknowledge farming as the major land use. Its importance and role in (i) supporting the rural economy; (ii) helping with food security; (iii) reducing CO2 emissions from the transport of imported produce; and (iv) protecting the countryside have not been acknowledged. There are mixed views about the conversion of agricultural buildings with some support for housing, some for commercial uses, and some concern that there may be unquestioning acceptance that buildings are surplus to needs.

136. There is concern about rural deprivation (mentioned in para 6.38 of Community Choices) because the document does not address the various issues. Unless it is given attention, the disparity between urban and rural economies will continue to expand. Transport infrastructure does not support a rural economy, and extra housing may not sustain local shops. There should be more emphasis on small business opportunities, provision of high speed broadband, the role of forestry and "semi-agricultural uses" such as

garden centres, and tourism including improving public rights of way and rural bus services.

#### Glasshouse horticulture (questions 88 to 89)

137. Opinions about the glasshouse industry vary widely, from (a) support for expansion, including larger and taller units, expansion of sites and designation of new sites elsewhere in the district, ie outside the Lea Valley, to (b) responses favouring the managed decline of this “ugly industry”. There are also some calls for replacing the designated sites approach with criteria-based policies. Concerns are also raised about HGV movements on unsuitable rural roads with the consequent need for a freight management strategy. The issue of re-use of derelict sites is raised, again with differing views – some saying housing would be suitable with others urging a return to Green Belt uses. There is some concern about the provision of suitable accommodation for seasonal workers, and the Lee Valley Regional Park Authority reminds the Council that its statutory remit does not include making provision for glasshouse horticulture.

#### Transport (questions 90 - 91)

138. Transport issues are one of the most commonly raised concerns of the consultation.. Issues were raised in response to the specific transport questions, and to potential development areas. There were a wide range of responses, which reflects both the early stage of plan-making and the diverse nature of the district. Many of the concerns raised will be addressed as plan-making progresses.

139. The use and capacity of the Central Line was one of the matters raised most often, including a significant number of responses from Chigwell. It is already operating over capacity during peak hours. Community Choices acknowledged this and included distribution options which would focus planned development away from stations in the district. Many respondents also pointed out that this option would likely result in additional commuting to the Central Line anyway, therefore exacerbating the existing situation and creating a higher demand for car parking.

140. Motorway connections and the capacity of the district’s road network were raised repeatedly, and the Highways Agency expressed concern about any development in the district that would cause additional traffic at the motorway junctions in particular. The Council is already part of discussions on the need for, and possible delivery of, a new junction north of junction 7 on the M11 (see discussion of Harlow above). Further investigation of additional north facing slip roads at junction 5 of the M11 will be required.

#### Infrastructure and Community Infrastructure Levy (CIL) (question 92)

141. The vast majority of responses suggested that the Council had not considered the most appropriate action to deliver infrastructure necessary to support new development in the district. The plans in Community Choices were criticised for being too vague to allow specific comments.

142. Responses indicated that certain areas are already under strain, with existing infrastructure not able to cope with current levels of population. These included Buckhurst Hill, Chigwell, Epping and Theydon Bois. Other areas suggested more specific items that they currently require – a village hall/community centre for Lower Nazeing, and a secondary school for Ongar.

143. Traffic was identified as a major issue, with roads currently struggling to cope with present levels. Chigwell, Theydon Bois, Buckhurst Hill and Epping all indicated this as an important factor to take into consideration when planning future growth. Public transport

has also been frequently suggested as under considerable strain, Theydon Bois and Epping suggested they have reached capacity (via London Underground) and North Weald and Ongar reported a lack of provision.

144. Water pressure and sewerage capacity were seen as issues within certain areas, specifically North Weald, Buckhurst Hill, Epping and Chigwell.

145. The lack of access to broadband in more rural areas, but also the additional strain on the existing broadband network, could be a potential issue for local residents and businesses.

146. Many were concerned with a perceived lack of existing recreational areas and sporting facilities. Green Belt, open space and countryside should be protected for the role they play in making provision for leisure activities.

147. The capacity of healthcare services was also identified as a problem, with many suggesting that current waiting times were already too long and appointments too difficult to arrange. These issues were raised particularly in responses from Buckhurst Hill, Chigwell and Roydon. There were also comments that the Council neglects the needs of the elderly.

#### Climate Change (questions 93 to 94)

148. 57% of respondents said relevant issues in relation to climate change had been identified in Community Choices (Q93). Despite this, many people considered that the potential level of growth to be delivered through the Local Plan was contrary to the aim of reducing the impacts of climate change. In particular, many people felt that in providing for significant new development across the district, there would inevitably be an increase in carbon emissions and other forms of pollution, and with it, greater air quality issues. In addition, a large number of respondents felt that population growth would add significant pressure to water supply in an area where this is already a major issue.

149. The options presented to help alleviate these problems were generally well supported, particularly with regards to including small scale carbon reduction and renewable energy schemes on domestic properties.

#### Community Facilities (questions 95 and 96)

150. The majority of respondents said that the relevant issues and options in relation to community facilities had not been identified. There is a perceived lack of facilities in some parts of the district. Waltham Abbey was suggested as one particular area where residents did not have sufficient access to community facilities. More rural areas suggested they do not have access to adequate community facilities e.g. Lower Sheering and Lower Nazeing do not have a village hall. Aside from its hall, Thornwood has no community facilities at all.

151. Many responses suggested that there are inadequate sports and leisure facilities, with Chigwell, Epping, Loughton (including the Athletics Club) and Theydon Bois being particularly mentioned. Sport England raised concerns that both the playing pitch assessment and the sports facility assessment are not considered to accord with paragraph 73 of the NPPF. Sport England expressed concern that the full extent of sports facility needs many not be identified or be inaccurate and that the Local Plan may not be addressing the appropriate community's needs. Officers will meet with Sports England to discuss these concerns.

152. There was strong support for the use of Green Belt and open spaces such as the

Metropolitan Police Ground (in Chigwell) to be maintained and used for leisure purposes. A large number of responses stated that EFDC was proposing the removal of open space and other facilities, rather than maintaining them. It was suggested that preservation of green space and leisure facilities should be of higher importance.

153. Some responses suggested a need for more facilities for children across the district, including provision for young adults and teenagers in Nazeing.

154. There were some comments that school provision was currently inadequate across the district, specifically with children in Chigwell and Ongar having to travel to schools in other districts. Some commented that, since the loss of Centre Point in Epping, there was a lack of Adult Education facilities in the town.

155. Many responses suggested that more weight should be given to Village Design Statements, and stronger community involvement within the Local Plan process. This would include local communities registering green space to be included in the Local Plan.

#### Additional Comments (question 97)

156. Responses to question 97 were varied, many relating to comments already made within other sections, but reinforced here. There were strong opinions about potential loss of Green Belt and countryside. Brownfield land should be used first wherever possible, and the 'correct balance' between housing growth needs and protection of the countryside should be a more explicit aim.

157. A large amount of responses to this question concerned issues with responding to the consultation itself. There was criticism of a lack of publicity for both drop-in sessions and the consultation itself. It was suggested that the Issues and Options document was too complex. Many found the online Questionnaire difficult to use, and suggested that it left some people unable to respond. Forward Planning Officers will look at how to best approach the next consultation.

158. More weight needs to be given to protection of the character of certain areas – responses particularly from Theydon Bois, Chigwell and Waltham Abbey mentioned this issue.

159. A lot of comments reinforced the view that certain types of infrastructure were not currently adequate across the district, including schools, roads, the Central Line and youth play areas. Responses from Chigwell, North Weald, Ongar and Theydon Bois highlighted these factors. Some responses suggested that, if growth is necessary, it should take place in areas with existing adequate infrastructure - specifically Harlow.

160. Some rural areas wanted protection of their playing fields, particularly Roydon and Willingale.

#### Interim Sustainability Appraisal (question 98)

161. Many of those who commented on this question said that the proposed criteria for the Sites Appraisal Proforma did not use the term "sustainability", so they were therefore not suitable. However, when these criteria are applied together, they will comprise an assessment of the relative sustainability of each potential development location. Where respondents made specific comments these will be taken on board for detailed site assessments and the overall review of Green Belt boundaries.

162. Local Plan Cabinet Committee agreed a separate set of criteria for assessing Green

Belt boundaries on 3 September 2012. Some respondents highlighted that the Sustainability Appraisal process and the Green Belt boundary assessment must be strongly linked. These processes are being taken forward in tandem by officers, and the outcomes will be presented to Members. It is important to ensure that landscape designations/areas are not confused with Green Belt policy designations. These matters have been kept separate in the two sets of criteria, although there is recognition that the landscape character is likely to contribute to the achievement of Green Belt purposes in some instances.

163. Some respondents felt that criteria should be included to assess the potential use of agricultural land for development, in order to ensure that the highest grade agricultural land is protected from development. Others suggested that the Housing section of the proforma should include mechanisms to show the relative deliverability of sites and the number of units that could be provided. This would allow comparison of alternative sites in terms of their contribution to overall housing supply, in accordance with the NPPF. Another suggestion was to include the ability for a potential site to provide new services, in the Community & Wellbeing section. Currently this only considers the proximity to existing services and facilities.

#### Additional Evidence Work

164. As mentioned earlier Edge Analytics have been commissioned to complete further population and household forecasting work to inform future stages of consultation on the Local Plan. This is due to be completed by early July.

165. Additional evidence work is shortly to be commissioned to further inform the preparation of the Local Plan, and to help Members make decisions on eventual site selections:

- District-wide transport assessment - required to investigate locations for growth, their likely impact on the existing network, and where additional highway infrastructure may be necessary.
- Strategic Flood Risk Assessment (Level 2) – required to investigate locations for growth, possible implications on and off site of development in that location, and the likelihood of increased flood risk.
- Horticultural Glasshouses – further to the study completed in July 2012, it may be necessary to investigate possible suitable sites for expansion of the industry, both within and outside the Lea Valley area where the majority of the industry is currently found.
- Gypsy & Traveller Accommodation Assessment – consultants have recently been commissioned to undertake this further assessment across Essex. The project is being led by Uttlesford District Council, and EFDC is part of the steering group. It is expected that this study will be completed in Autumn 2013.
- Habitat Regulations Assessment (HRA) & Air Quality Assessment – the HRA is a legal requirement of preparation of a Local Plan where there may be an impact on sites of European significance. There are two such sites in Epping Forest District – the largest part of the Forest (Special Area of Conservation) and an area of the Lea Valley (Special Protection Area). In respect of Epping Forest, the Council will need to take particular care over the impacts of the Local Plan on air quality as it affects the Forest, and further assessment may be required. Such work would also link with the district-wide transport assessment.
- Sustainability Appraisal (including Strategic Environmental Assessment) – this is a further statutory requirement for a Local Plan, and is an integral part of the process. Officers are incorporating the requirements of the Sustainability Appraisal into all site and policy assessment work, which will demonstrate a clear and comprehensive assessment of known alternatives. Support will be sought from URS (formerly Scott Wilson) as part of the

process to ensure that legal requirements are being met.

### Next Steps

166. As detailed above, further evidence based work is being commissioned which will feed into future consultations on the Local Plan. Officers are preparing assessments of individual sites and working on the Green Belt review. Once the further population work is complete there will be another Member workshop specifically to discuss population and household growth and its implications. Following finalisation of the additional evidence work listed in the previous section, a final Member workshop will be held, to enable Members to provide a steer on the 'preferred option(s)'. The ensuing 'Draft Plan' will be discussed and finalised at the relevant committees, and then public consultation will take place in 2014. A revised timetable, Local Development Scheme, project plan and updated budget report will be presented to Cabinet in July 2013.

### **Resource Implications:**

Analysis of the consultation responses was carried out by existing staff resources.

### **Legal and Governance Implications:**

Consultation responses are a key part of the evidence base for the Local Plan. A sound Plan relies on detailed analysis and consideration of the responses.

### **Safer, Cleaner and Greener Implications:**

The vision and aims of the Local Plan address these issues.

### **Consultation Undertaken:**

The report considers the outcomes of an 11-week public consultation exercise carried out between 30 July and 15 October 2012.

### **Background Papers:**

Community Choices Consultation Document and Questionnaire July 2012  
Copies of all the consultation responses

### **Impact Assessments:**

#### Risk Management

Not relevant to this report

#### Equality and Diversity

*Did the initial assessment of the proposals contained in this report for relevance to the Council's general equality duties, reveal any potentially adverse equality implications?* No

*Where equality implications were identified through the initial assessment process, has a formal Equality Impact Assessment been undertaken?* N/A

*What equality implications were identified through the Equality Impact Assessment process?*

N/A.

*How have the equality implications identified through the Equality Impact Assessment been addressed in this report in order to avoid discrimination against any particular group?*

N/A.