

Report to the Cabinet**Report reference: C-008-2017/18****Date of meeting: 11 July 2017**

**Epping Forest
District Council**

Portfolio: Planning & Governance

Subject: Epping Forest District Draft Local Plan Regulation 18 Consultation

Responsible Officer: Alison Blom-Cooper (01992 564066).

Democratic Services: Gary Woodhall (01992 564470).

Recommendations/Decisions Required:

- (1) **That the findings of the Draft Local Plan Consultation be noted;**
- (2) **That the update in relation to progress in the production of the Local Plan be noted.**

Executive Summary:

This report provides the findings of the Regulation 18 Draft Local Plan Consultation that took place between the 31 October 2016 and 12 December 2016. This follows the earlier report to Cabinet on 9 March 2017 that provided the interim findings of the consultation analysis, together with the updated Local Development Scheme. The Council received a large number of representations from a wide range of stakeholders to the Regulation 18 Draft Local Plan Consultation, and detailed analysis of the comments received has now been completed. The Council received 3,387 responses from 3,072 respondents. A summary of the key issues raised, together with the Council's response to these issues, is provided as Appendix A. An Executive Summary of the Consultation Report is provided as Appendix B. The Consultation Report provides both quantitative and qualitative analysis of the feedback received to the consultation.

The report also provides an update in relation to progress being made in the production and finalisation of the Local Plan. The Regulation 19 Pre-Submission Local Plan is due to be published in early 2018, at which stage the Council will invite comments in relation to the 'soundness' and 'legal compliance' of the Plan. The Local Plan will then be submitted to the Secretary of State for Examination-in-Public.

Reasons for Proposed Decision:

To provide Members with feedback from the Regulation 18 Draft Local Plan consultation and provide an update in plan preparation.

Other Options for Action:

Not to advise members of the key issues from the recent Draft Local Plan consultation.

Report:

1. In accordance with the agreed Local Development Scheme, the Cabinet considered the Draft Local Plan on 6 October 2016 and subsequently Full Council agreed the Draft Local Plan for consultation on 18 October 2016. The formal 6-week consultation started on 31 October 2016 and ended on 12 December 2016. Full Council also agreed on 18 October 2016 that the Draft Local Plan policies should be treated as a material planning consideration when determining planning applications. The Planning Policy Team has produced a guidance note to officers in Development Management to ensure consistency of approach – this note is available on the Council's website.
2. Consultation on the Draft Local Plan was carried out in compliance with the Council's agreed Statement of Community Involvement and as agreed by Cabinet on 1 September 2016. Full details of the consultation strategy utilised by the Council and the engagement methods were reported to the earlier meeting of the Cabinet on 9 March 2017, together with the interim findings from the Questionnaire responses to the consultation that had been analysed at that time.
3. Since the Cabinet meeting in March, the detailed processing and analysis of all remaining consultation responses, including those received via letter and email, has been completed.

Summary of the Consultation

4. The Council received 3,387 responses from 3,072 respondents. 7% of responses were received through 'hardcopy' questionnaires, 22% via letter, 23% via email and 48% via online questionnaires. Quantitative analysis has been undertaken on the results of the tick-box questions in the questionnaire. Qualitative analysis has been undertaken on the open text in the questionnaire, letters, emails and supporting documents received as attachments.
5. To manage the volume of responses and ensure that all responses were considered consistently, a classification process was utilised. This consisted of establishing a detailed 'classification tree', which comprised a list of wide ranging categories covering key topics raised by respondents. The open text of the responses was then classified against these categories. Where responses covered a number of separate points these were separately classified against their respective categories, splitting each response in to a series of 'comments'. This classification process has ensured that the breadth and frequency of comments received has been captured and understood against recurring issues, enabling a more detailed analysis against the individual points raised.
6. Within the classification of feedback, respondents were assigned to a 'contact' group so it was possible to track the number of resident, agent/landowner or developer, business and statutory consultee responses, as well as being able to track the number of petitions and 'group form' multiple signatory responses.
7. Through the analysis undertaken by Remarkable, it has been possible to identify the 10 most frequently stated comments to the Draft Local Plan consultation. These can be summarised as follows:
 - an increase in traffic congestion on local roads;
 - a negative impact on local schools;
 - increased pressure on the local healthcare provision;
 - a loss of car parking spaces and increased car parking pressure;

- a negative impact on the character of settlements;
- increased overcrowding on the Central Line;
- a loss of managed open space in the urban areas of the District;
- comments regarding Draft Policy P 2 on the proposed site allocations in Loughton;
- insufficient information about the infrastructure requirements of the District; and
- general comments disagreeing with the principle of development in the Green Belt.

Consultation Report

8. An Executive Summary of the Consultation Report is provided as Appendix B. The full Consultation Report prepared primarily by the consultants Remarkable provides detailed quantitative and qualitative analysis of the feedback received to the consultation, and is available as a background document to this report. Council officers were responsible for the sections summarising the comments received from stakeholders and other local organisations and those received from site promoters. The report includes details of:

- The Draft Local Plan Consultation Strategy (chapter 4);
- Who has responded to the consultation (chapter 5); and
- Analysis of responses received in relation to each section of the Draft Local Plan (chapters 6-15);

9. The appendices to the report also provide detailed breakdowns of the number of classified comments per topic / Draft Local Plan Policy.

10. 527 classified comments were received in support of the spatial strategy and site selection process. 240 of these stated a preference for allocating growth around Harlow, as identified in Draft Policy SP 3, and suggested that this was appropriate due to the new town status of Harlow and its associated infrastructure, as well as how it could benefit from additional investment. However, 2,180 classified comments disagreed with the site selection process (received from 966 respondents). This included 507 comments relating to sites that were perceived to be 'better' choices than those currently selected. 361 comments were received in relation to sites that are not identified for allocation. Whilst the majority of these came from site promoters for sites that have not been selected, this also included respondents who have questioned why a particular site they are aware of has not been selected, and feel is a better option for growth.

Statutory Consultees and Other Local Organisations

11. A summary of the key issues arising from the responses received from 'statutory consultees, Parish/Town Councils and other organisations' was included in the report to Cabinet on 9 March 2017 and further detail is set out in the Consultation Report. The Council is continuing to progress with responding to issues raised by way of further work as appropriate. The Council will continue to liaise closely with relevant statutory consultees in finalising the Local Plan and the evidence which supports it.

Site Selection Process

12. Since the previous cut-off date for the site selection process used to inform the Draft Local Plan 93 additional 'new' residential sites have been put forward for consideration by the Council in the finalisation of the Local Plan. Additionally, some landowners/site promoters have requested changes to the boundary of residential sites and 49 amended residential

sites will be assessed. Three sites have been withdrawn from consideration. The Council is now beginning the process of further detailed assessment of potential sites for consideration, taking into account comments received through the Draft Local Plan consultation, which will result in a further Site Selection process. The Site Selection process will also consider approximately 13 potential Employment and 14 potential Traveller sites, meaning that in total the Council will be assessing approximately 169 sites. The methodology for the site selection process will be published shortly on the Council's website. It is not possible to say at this stage whether or not any sites proposed for allocation in the Draft Local Plan will change through this process, but the Council is committed to assessing and evaluating all site options consistently and robustly in accordance with an agreed methodology and national planning policy guidance. This process will not consider sites which have been submitted to the Council after the cut-off date of 31 March 2017.

Further Work to Inform the Pre-Submission Local Plan

13. Work continues to progress key strands of the evidence base that will inform and support the Local Plan as follows:

(a) Work is continuing in partnership with Essex County Council to develop the Transport Assessment. Modelling is being undertaken in order to confirm the implications of planned growth on the transport network, and identify the necessary mitigation measures required to support future growth. This will include road and junction upgrades, in addition to sustainable transportation improvements to support a modal shift away from car use as far as possible.

(b) The Open Space, Playing Pitch and Indoor Sports Facilities Studies are progressing as scheduled. The studies will provide details of future standards, and identify where new provision is required, taking into account the growth plans set out within the Draft Local Plan.

(c) A programme of stakeholder engagement is underway in relation to the Infrastructure Delivery Plan (IDP). The IDP will detail the key infrastructure requirements associated with growth and development set out within the Local Plan, together with funding and delivery arrangements.

(d) Work is progressing to identify the future employment requirements for the Functional Economic Market Area and for the District, which will help to inform future employment allocations to be included within the Local Plan.

14. Officers are working to respond to the representations and feedback received to the Draft Local Plan consultation, and progress the Plan accordingly. The Regulation 19 Pre-Submission Local Plan is due to be published in early 2018, at which stage the Council will invite comments in relation to the 'soundness' and 'legal compliance' of the Plan. The Local Plan will then be submitted to the Secretary of State for Examination-in-Public.

15. As part of the finalisation of the Plan, the Council is required to produce a Consultation Statement. This will need to set out how the Council has involved the local community, stakeholders and statutory bodies in the formulation of the Local Plan. Importantly, it will need to provide a summary of the main issues raised by the representations made, and also how any representations made have been taken into account in the plan preparation process.

16. Accordingly, Appendix A sets out a summary of the main issues raised through the Draft Local Plan consultation, and how these are being taken into account in the further plan preparation process. It is intended that Appendix A will ultimately form part of the Local Plan

Consultation Statement.

17. The key issues in managing the programme relate to resources, the ability of external organisations such as Essex County Council in providing timely inputs into plan preparation largely outside our control and the interconnectivity of the various workstreams. The importance of maintaining a full team of appropriately skilled and effective officers and consultants cannot be underestimated and there have been resource concerns with staff leaving/going on maternity leave.

18. In addition, the avoidance of diversion of resource to other tasks is a key concern, yet matters such as neighbourhood plan advice, development monitoring and assistance do need to be provided. Whilst progressing the Local Plan, Officers are also working to progress matters associated with the delivery of the Harlow and Gilston Garden Town, as well as working to establish appropriate mechanisms internally within the Council to ensure that the Local Plan can be effectively implemented (as reported to Cabinet on 15 June 2017).

Resource Implications:

The budget for analysis of Draft Local Plan Regulation 18 consultation was approved as part of the Local Plan budget in December 2016.

Legal and Governance Implications:

The Council is required to prepare and maintain an up to date Local Plan to set out the strategic priorities for the area and the policies that address these.

Safer, Cleaner and Greener Implications:

The delivery of a Local Plan, informed by a robust evidence base, will contribute to safer, cleaner, greener objectives by planning for sustainable development.

Consultation Undertaken:

Full public consultation on the Draft Local Plan in accordance with Regulation 18 of the Local Plan Regulations 2012 and in accordance with the Council's Statement of Community Involvement involving residents, local businesses, neighbouring local authorities and statutory consultees as detailed in the report.

Background Papers:

- Epping Forest District Council Draft Local Plan Consultation Report (2017)
- National Planning Policy Framework (2012)
- Epping Forest District Draft Local Plan (2016)
- Local Plan Regulations (2012)
- Epping Forest Statement of Community Involvement (2013)
- Epping Forest Planning Policy Briefing Note version 2 (April 2017)

Risk Management:

The continued progression and implementation of the Local Plan is required in order to manage and mitigate the risks of potential speculative or uncoordinated development across the District. The adoption of the Local Plan will help to ensure that the Council is making adequate provision for the development and infrastructure needs of the District, including a sufficient supply of deliverable housing land as required by national planning policy.

The adoption of the Local Plan will ensure that the Council has a full suite of up to date planning policies to promote and manage high quality sustainable development in the District.

The Council needs to make timely progress on the preparation of a Local Plan to avoid the risk of intervention by the Secretary of State.

Key Issue	EFDC Response
Meeting the requirements for providing land for custom and self-build housing.	Draft Policy H 1 in the Draft Local Plan includes the Council's proposed policy for future housing mix and accommodation types, including self-build and custom-build housing. As required under Section 1 of the Self-build and Custom Housebuilding Act (2015), the Council currently maintains a register of individuals and associations of individuals seeking to acquire land for self- or custom- build housing. Should the SHMA be updated at a later date, this register will be used as evidence to identify the level of demand for custom and self-building housing.
Demonstrating a five year housing land supply and addressing an historic shortfall in housing delivery.	The Draft Local Plan includes a range of proposed housing allocations, including smaller sites which may be delivered relatively quickly, and other larger strategic sites of greater complexity which will may have longer lead-in times to delivery. Appendix 5 to the Draft Local Plan includes an indicative housing trajectory for residential allocations across the Plan Period. The Council will be undertaking further work to identify and demonstrate a five year supply of housing and to agree an approach to meeting any shortfall in housing supply in a way that is feasible. This will be informed by the further site selection work which is being carried out this year.

Key Issue	EFDC Response
<p>Identifying the District's full Objectively Assessed Housing Need.</p>	<p>The 2012 SHMA used as its starting point the DCLG household projections of 2012 to define the objectively assessed need for the West Essex/East Herts SHMA. This set out a combined level of housing need across the SHMA area of 46,058 homes for the period 2011-2033.</p> <p>Following the publication in July 2016 of the 2014 household projections updating the 2012 data the SHMA authorities undertook an update – see note on updating the overall housing need based on 2014 based projections (ORS August 2016). This note was used as the basis for preparing the Memorandum of Understanding (MoU) on the distribution of objectively assessed housing need across the West Essex/East Herts SHMA.</p> <p>The East Herts District Plan has been submitted for examination and in response to the Inspector's note of 16 May 2017 on the submitted plan the four authorities have commissioned a further update from ORS to review the overall housing need across the SHMA taking account of the latest ONS population estimates due to be published in June 2017. This will include clear recommendations on the OAN for the SHMA and individual authorities. It will include an update of the balance between the need for market housing and the need for affordable housing within the overall housing need. A final report is scheduled for 14 July 2017.</p> <p>The Draft Local Plan based the level of housing growth on the work undertaken for the four authorities and provides for in excess of 11,400 homes (the OAN) over the plan period. Further technical assessments following publication of more recent data may lead to changes to the proposed housing requirement and this will be kept under review between now and the examination of the Plan.</p>
<p>The appropriateness of the housing requirement set out in the Draft Local Plan.</p>	<p>As stated in paragraph 3.62 of the Draft Local Plan, the Council has made provision for sites above and beyond those required to meet the housing target of 11,400 dwellings. This is intended to provide flexibility in terms of managing economic cycles, factors relating to specific sites which may result in them being stalled or needing to be removed from the Plan, and to provide flexibility in case housing requirements increase prior to Examination. This demonstrates the Council's commitment to positive planning to meet the full Objectively Assessed Housing Need.</p>

Key Issue	EFDC Response
<p>The Council's preferred Spatial Strategy and the proposed distribution of growth across the District, including the number of new homes identified for each settlement, and whether this is proportionate.</p>	<p>The Council's preferred spatial strategy as set out in the Draft Local Plan is to focus growth around Harlow, which represents the most sustainable location, with the remaining housing need distributed housing across the settlements of the District. This approach was based on the outcome of the 2012 Issues and Options consultation along with planning judgement, taking account of:</p> <ul style="list-style-type: none"> - impact on the Green Belt and landscape - accessibility to services, - the level of growth need to ensure infrastructure can be supported and any specific needs identified, - the mixture of suitable, available and achievable sites within each settlement, - maximising the development potential within existing settlements focussing on brownfield land with higher densities where possible, - maximising opportunities for growth of North Weald Bassett in line with the Masterplanning Study, and - that development proposals should support the realisation of the emerging settlement visions. <p>Further testing of the proposed distribution of growth across the settlements in the District will be undertaken through options appraisal in the ongoing Sustainability Appraisal.</p>
<p>Ensuring adequate provision for older persons in the District.</p>	<p>In preparing the Draft Local Plan, the Council has used up-to-date evidence on housing needs, including careful consideration of future population projections. This evidence (set out in the SHMA 2015) identifies the need for specialist housing to support an ageing population, included assisted living and care homes over the plan period, and this is included within the general housing requirement. Draft Policy H 1 demonstrates that the Local Plan will require that future development includes an appropriate mix of housing to meet the needs of the ageing population in the District, and that development is located in the most sustainable locations and supported by the necessary infrastructure. Part C of Draft Policy H 1 makes provision for specifically designed housing to meet these specialist needs, including older persons accommodation, where there is a proven identified need, the location is appropriate and the proposals are well designed.</p> <p>Comments made on meeting older persons housing needs, including the potential for a new specific policy on older persons housing, will be considered by the Council as it finalises the Pre-Submission (Regulation 19) version of the Plan.</p>

Key Issue	EFDC Response
<p>The level of affordable housing provision required by Draft Policy H 2 and whether the approach provides sufficient flexibility, and is supported by evidence.</p>	<p>The Draft Local Plan sets out the approach to affordable housing in Draft Policy H 2. The approach to seeking a minimum of 40% affordable homes on sites of 11 or more dwellings is supported by evidence in the SHMA (2015) and the Stage 1 Assessment of the Viability of Affordable Housing, Community Infrastructure Levy and Local Plan (2015). This evidence suggests that the level of affordable housing is viable and deliverable. Further viability work will be undertaken to consider in more detail the viability of the Local Plan and its draft housing allocations, and the viability implications of the Starter Home requirements, and will take into account the responses received to the Draft Local Plan consultation.</p>
<p>The District's approach to managing impacts on Epping Forest Special Area of Conservation (SAC).</p>	<p>An HRA screening of the Draft Local Plan supported the approach outlined in the agreed Memorandum of Understanding (MoU) on managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation as a basis to achieve material improvements in air quality and nitrogen inputs to the Forest SAC by 2033. The MoU commits the authorities to prepare an action plan which will be taken forward to Regulation 19 publication. The Council is currently updating the transport modelling in this District to inform this work and will be looking to identify the requirements for accessible natural greenspace and financial contributions, working together with other relevant authorities.</p>
<p>Satisfying the Duty to Cooperate.</p>	<p>The four districts in the HMA for West Essex/East Herts (Epping Forest DC, East Herts DC, Harlow DC and Uttlesford DC) have a substantial history of coordinated working on strategic cross boundary planning issues including housing need, employment, transport etc. The Councils together with other adjoining authorities and the two Counties (Herts CC and Essex CC) established the Cooperation for Sustainable Development Member Board in October 2014. This has been meeting monthly and is serviced by an officer group. The authorities through the Board have commissioned a number of pieces of evidence to support the identification of the objectively assessed employment and housing need; to review strategic options for accommodating residential growth across the area; and to assess the potential for delivery of strategic sites around Harlow. Further work is programmed. There are now three signed MOUs on distribution of housing need, highway impact and air quality impacts on Epping Forest, and further evidence base work is underway to underpin a fourth MOU on the distribution of economic growth across the Functional Economic Market Area.</p> <p>The Council is satisfied that it is fulfilling the requirements of the Duty to Cooperate in the preparation of its Local Plan and continues to engage constructively, actively and on an on-going basis with relevant bodies on strategic planning matters.</p>

Key Issue	EFDC Response
Planning for the relocation / redevelopment of the Princess Alexandra Hospital.	The Princess Alexandra Hospital, which is located on a highly constrained site near Harlow town centre, faces a number of challenges in continuing to serve the needs of its catchment. One potential option is to relocate to a new site, and two potential new sites have been identified, one of which is in Epping Forest District and the other in East Herts District. The hospital is currently preparing a Strategic Outline Case in order to apply for the necessary funding from Government and the outcome of this work will be required before a decision is made on the future of hospital provision in the area.
Meeting the requirements for Sustainability Appraisal and Habitats Regulation Assessment.	An Interim Sustainability Appraisal and Habitats Regulation Assessment screening were published alongside the Draft Local Plan. Further work will be undertaken on SA and HRA as part of the Proposed Submission (Regulation 19) version of the Plan, and will consider comments made through representations.
The assessment of Strategic Options and sites around Harlow.	The AECOM study (August 2016) for the West Essex and East Herts authorities considered the strategic options for residential growth around Harlow, and the result of this work informed the proposed strategic site allocations. Further work is being undertaken by AECOM and a technical addendum is being prepared to support this work which will provide additional information. This will be published alongside the Pre-Submission (Regulation 19) version of the Plan and will consider the comments made through representations.
Consistency between the draft vision and objectives, draft policies and proposed site allocations in the Draft Local Plan.	Plan-making is an iterative process. The draft vision and objectives, draft policies and proposed site allocations have informed, and in turn have been informed, as the work to produce the draft Local Plan has progressed. Following Regulation 18 consultation, the vision and objectives, policies and site allocations will be revisited as part of preparation of the Proposed Submission (Regulation 19) version of the Plan.

Key Issue	EFDC Response
Infrastructure requirements and delivery, including provision for CIL charging schedule.	<p>A Draft Infrastructure Delivery Plan (IDP) was published alongside the Draft Local Plan for Regulation 18 consultation, which set out a baseline of existing infrastructure provision and areas of identified shortfall. The IDP is being developed iteratively, and the Council will be undertaking further modelling work on the proposed site allocations and policies in the Draft Local Plan. The updated IDP which will be prepared in support of the Pre-Submission (Regulation 19) version of the Plan will identify the infrastructure required to support planned growth, including the organisation responsible for delivering each infrastructure item, the period over which the relevant investment will be required, and the cost of each item and how it will be funded.</p> <p>A decision on whether to adopt a Community Infrastructure Levy (CIL) schedule for funding infrastructure has not yet been made. The Council will be undertaking further viability work on the proposals and policies in the Draft Local Plan to assess whether or not a CIL charging schedule would be viable and appropriate. This further evidence will then be used to inform the preparation of the Pre-Submission (Regulation 19) version of the Plan, and will be used to decide whether or not to progress with introducing CIL for the District.</p>
The identification of District Open Land in Draft Policy SP 5.	The rationale for identifying District Open Land is set out in Background Paper 4.
Concerns about traffic congestion and other transport issues (including cross-boundary issues), and how these are being addressed in the Plan.	The Council has undertaken a number of transport studies to inform the Draft Local Plan. Information on these can be found in Background Paper 2 and associated Technical Notes. Further transport modelling work has been commissioned to understand the detailed impacts of the draft local plan site allocations and identify interventions that may be required to mitigate any adverse impacts. The evidence produced as part of this further transport modelling will feed into final selection of sites in the Pre-Submission Publication Plan. A joint Transport Memorandum of Understanding has been signed between the HMA district authorities, Essex County Council, East Hertfordshire County Council and Highways England. The MoU sets out the collaborative working approach between the authorities to addressing strategic and cross-boundary highway and transport issues around Harlow.
The relationship between the Draft Local Plan and emerging and forthcoming Neighbourhood Plans.	We are aware that a number of Parish and Town Councils within the District are preparing neighbourhood plans for their areas. The Council will continue to provide advice and assistance to ensure that the Neighbourhood Plans are in general conformity with the strategic policies contained in the Local Plan and in line with national planning policy guidance.

Key Issue	EFDC Response
Development planned at North Weald Airfield.	The employment use(s) on North Weald Airfield over the Plan period, include the continued operation of the airfield, will be part of the further employment review work being undertaken by the Council.
How the North Weald Bassett Masterplanning Study has informed the Draft Local Plan.	<p>Allies and Morrisons Urban Practitioners (AMUP) were commissioned by the Council in 2014 to undertake a masterplanning study of North Weald Bassett which integrated the findings of earlier studies and public consultation to present a long term vision and aspirations for the village. The Study tested two spatial options to accommodate new homes, and concluded that Scenario B, which promotes development to the north of the settlement, was preferred.</p> <p>The outcome of the Study, using the higher growth option of 1,616 homes, was used to inform the selection and indicative capacity assessment of sites in North Weald Bassett, and to inform Draft Policy P 6 and the settlement vision in the Draft Local Plan.</p>
Consistency with the Housing White Paper.	Please see report to Neighbourhoods Select Committee on 21st March 2017, which includes as an appendix the Council's response to the Housing White Paper.
Suggested changes to the wording of policies in the Draft Local Plan.	Detailed comments on the wording of Development Management policies are noted and will be considered further by the Council's technical specialists in preparing the Regulation 19 Pre-Submission Local Plan.
Concerns regarding the capacity of the Central Line.	The Council is undertaking further work with Transport for London, LB Redbridge and LB Waltham Forest to ensure that there is sufficient capacity on the Central Line over the plan period.
The requirement to consider flood risk constraints through the Draft Local Plan.	The Council has undertaken an SFRA Stage 1, and used the Environment Agency's Flood Risk Zone mapping to assess sites proposed for allocation. The Council's strategy is to ensure that where possible all development is in Flood Zone 1 and only proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1.
Mitigating and managing the impacts of poor air quality.	The Habitats Regulation Assessment (HRA) has informed the MoU on the impact of air quality on Epping Forest SAC, and the Council will be developing an action plan with neighbouring authorities to mitigate any impacts on the Forest. Air quality was one of the assessment criteria undertaken at Stage 2 of the Site Selection process.

Key Issue	EFDC Response
The Lee Valley Regional Park and meeting the requirements under Section 14(1) of the Park Act.	The requirements under the Park Act have been met in sections 3.17 to 3.23 of the Draft Local Plan. Should the Lee Valley Regional Park Authority publish a updated Plan, this will be considered where necessary.
Strategic Masterplanning for strategic sites and Planning Performance Agreements.	Please see report to Cabinet Committee 15 June 2017 which sets out the Council's approach to Strategic Masterplanning and PPAs.
Concerns regarding the proposed Green Belt boundary alterations.	The Council has undertaken a Green Belt Review as part of the preparation of the Local Plan. This was one of the pieces of evidence taken into account in the site selection process. Further work to define detailed Green Belt boundary alterations will be undertaken prior to the Pre-Submission (Regulation 19) version of the Plan.
Requirement for further evidence on sports and recreation to support the policies in the Local Plan.	The Council is undertaking Open Space, Playing Pitch and Indoor Sports Studies in order to understand the current level of provision, and identify any additional requirements to provide sports and recreation facilities to meet the needs of the current and future population. This evidence will inform further site selection work, and any additional sports provision or policy will be set out in the Pre-Submission (Regulation 19) version of the Plan and the IDP.
Concern that the polices and proposals in the Draft Local Plan will result in a loss of car parking spaces or insufficient provision of new parking spaces.	As stated in the Draft Local Plan, the redevelopment of car parks are expected to include new homes and retention of the current car parking provision. The Council is pursuing a wider transport strategy that focusses on encouraging sustainable transport choices and reduction in car use, however it is committed to finding the right balance between accommodating the car and making the best use of land. For further information on the Council's approach to car parking standards, please see the Transport Background Paper.
Concern that the polices and proposals in the Draft Local Plan will result in a negative impact on the character of settlements.	The Site Selection Methodology had regard to settlement character under Stage 2 Criteria 5.2, which considered impact on heritage assets and their setting, Conservation Areas, landscape and built form amongst other factors, and these were also taken into account in the indicative capacity assessment. Additionally, Draft Policies DM 7, DM 8 and DM 9 make provision to protect heritage assets and ensure high quality design. Comments made will be considered further in preparing the Pre-Submission (Regulation 19) version of the Plan.

Key Issue	EFDC Response
Concern that the Draft Local Plan will result in a loss of public open spaces.	A small number of sites were put forward for assessment for development on land that is currently classified as managed open space within settlements. The site selection process concluded that a small number of sites which involve the loss of an element of open space should go forward as proposed allocations and for all, it is assumed that a minimum of 25% of the open space would be retained. This includes two proposed allocations on managed open space in Loughton and one in Chigwell. For more information see the background paper 3 on Open Space. Comments made will be considered as part of preparation of the Pre-Submission (Regulation 19) version of the Plan.
Concern regarding the potential impact of proposed new traveller sites and expanded existing traveller sites.	The potential impact of traveller sites on was considered as part of the site selection process. This included looking at candidate sites' relationship to existing settlements, services and facilities, and neighbouring uses. Detailed assessment of the impact of development is considered through the planning application process at a later stage.
The principle of releasing Green Belt land proposed in the Draft Local Plan and demonstrating exceptional circumstances for doing so.	<p>Government policy on the Green Belt, set out in the NPPF, is clear that Local Planning Authorities with Green Belts should establish Green Belt boundaries through their Local Plans. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Over 92% of Epping Forest District is designated as Green Belt and the Green Belt boundaries have not been reviewed since the existing Local Plan was adopted in 1998.</p> <p>The evidence base for the Local Plan (most importantly the Report on Site Selection 2016) indicates that providing for the development needs to support long-term sustainability of the District requires a review of the Green Belt boundary. While the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development, it is clear that insufficient land outside the Green Belt exists to meet the development needs of the District, and alterations to the Green Belt boundaries are necessary. These local conditions demonstrate exceptional circumstances that require the proposed release of Green Belt land. For further information, please see Background Paper 4.</p>
The estimated capacity and density of development on proposed allocation sites.	The Site Selection Methodology (2016) sets out how the more detailed indicative capacity assessment was undertaken at Stage 3 of the site selection process. More work will be undertaken on the proposed allocation sites in preparing the Pre-Submission version of the Plan (Regulation 19) and a revised site capacity may be included in site guidance

Key Issue	EFDC Response
Issues relating to Glasshouse evidence and policy in the Draft Local Plan.	Responses to the consultation generally supported the inclusion of Draft Policy E 3, whilst raising some concerns around managing the impact of HGV traffic on local roads particularly in Nazeing and Roydon. Comments will be considered and amendments will be made to Draft Policy E 3 where appropriate and supported by the evidence.
Comments relating to the forthcoming identification of employment sites for allocation in the Plan, and further employment land evidence.	Prior to the consultation on the Draft Local Plan, the Council completed Stages 1 and 2 of the Site Selection Methodology for employment sites. The remaining stages of the Site Selection Methodology will be completed prior to the Council publishing its Pre-Submission (Regulation 19) version of the Plan. To ensure that the consideration and assessment of known and potential employment sites within the District is up-to-date (in accordance with requirements in the National Planning Policy Framework), the Council has commissioned an Employment Review. This will review and, where relevant, update evidence currently held by the Council on the existing and potential future employment land supply in the District and the demand for employment land that is likely to arise over the Plan period. The outcomes from this work will inform further site selection work.
Suggestion for the need to undertake a Water Cycle Study.	The Council are currently discussing with neighbouring authorities, utility providers and statutory consultees including the Environment Agency, Thames Water and Affinity Water whether additional evidence to support the Local Plan is required.
Concern regarding proposed allocations for development on community facility sites.	The IDP will consider the need for community facilities alongside other infrastructure needs. Where the County Council has identified an existing community facilities site that it wishes to promote for development, this has been assessed through the site selection process. The Council will work with ECC to identify and deliver replacement facilities where these are required.
Queries and objections raised regarding the site selection process.	The Council is updating the Site Selection Methodology to take account of comments received and to set out clearly how it will consider new residential sites submitted, the reassessment of amended residential sites, employment sites and traveller sites. The updated methodology will be published on the Council's website.
Deliverability of the proposed allocation sites in the Draft Local Plan, including the provision for Small Sites.	The Council will be working with promoters of sites proposed for allocation in the Draft Local Plan through the Developer Forum to ensure that the sites are deliverable. The Council has made provision for a substantial proportion of the allocation to be 'small sites' (under 10 dwellings).

Key Issue	EFDC Response
Concerns regarding how previous consultation has been taken into account in formulating the Draft Local Plan.	Previous consultation responses, in particular the 'Community Choices' consultation carried out in 2012, were considered throughout the plan-making process and informed the draft policies, proposed site allocations, visions and objectives and spatial strategy set out in the Draft Local Plan. Previous consultation feedback was balanced with other material planning considerations, such as satisfying national planning policy requirements and taking into account the findings of more recent evidence base documents, in order to ensure that the Draft Local Plan is robust and justified.
Where new policies have been suggested, or changes to policy wording has been provided.	Comments received will be considered in the preparation of the Pre-Submission (Regulation 19) version of the Plan.
Concern that the Interim Sustainability Appraisal did not assessed enough reasonable alternative and that there is not sufficient justification for the spatial strategy.	The Sustainability Appraisal is an ongoing iterative process which informs and supports the Local Plan production. Comments received in relation to the scope of the Sustainability Appraisal will be considered and taken into account as the Sustainability Appraisal process continues.

Summary by Settlement - comments on proposed allocations		
Settlement	Summary of Comments	EFDC Response
Epping	SR-0113B (land to the south of Brook Road, Epping) and SR-0059 (land at Ivy Chimneys Road) were the two most frequently commented upon sites in Epping. Comments centred around concerns that the sites would result in higher levels of traffic on surrounding roads. There was also a relatively high number of comments relating to SR-0132Ci (Epping Sports Club and land west of Bury Lane, Lower Bury Lane). Residents expressed concern over the potential loss of a community facility on this site and wider impacts on healthy living. Other specific sites in Epping received comparatively fewer comments.	<p>The Council has reviewed in detail all of the comments submitted during the Regulation 18 consultation in relation to the proposed site allocations included in the Draft Local Plan. Many of the concerns raised related to: lack of clarity in relation to future infrastructure provision; concern in relation to future traffic congestion; concern in relation to potential loss of car parking facilities; and concern in relation to potential loss of leisure provision or open space. The Council is now undertaking further work which will directly address a number of the concerns raised. This includes the production of a number of studies which will inform and support the Pre-Submission (Reg 19) Local Plan, such as the Infrastructure Delivery Plan, Transport Assessment, Open Space, Built Facility and Playing Pitch Strategies. The Council is also considering comments received in relation to the proposed site allocations through further site selection work.</p>
Loughton	SR-0361 (Colebrook Lane / Jessel Drive Amenity Open Space) had a high frequency of comments, with residents expressing opposition to the loss of managed public open space in Loughton. SR-0226 (Loughton London Underground Car Park) and SR-0227 (Debden London Underground Car Park) were also frequently commented upon, with many expressing concern over the loss of car parking spaces and impact on commuter parking. SR-0356 (Borders Lane Playing Fields) and SR-0358 (Sandford Avenue/Westall Road Amenity Open Space) also received relatively high numbers of comments. Other specific sites in Loughton received comparatively fewer comments.	
Waltham Abbey	A relatively high number of comments were received in relation to SR-219 (Fire Station, Sewardstone Road) and SR-0541 (Waltham Abbey Community Centre, Saxon Way). Residents raised concerns that the Fire Station was an important emergency response service. Concern was expressed over the potential loss of a community facility at SR-0541. SR-0099 (Lea Valley Nursery, Crooked Mile) also received a similar level of comments, with respondents commenting that it was located on a dangerous road. Other proposed sites in Waltham Abbey received comparatively fewer comments.	
Chipping Ongar	The most frequently referenced site was SR-0848 (Chipping Ongar Leisure Centre), with many comments opposing the potential loss of this community facility that is in close proximity to the local community and Ongar Academy. Other proposed sites in Ongar received a relatively lower level of comments.	
Buckhurst Hill	All of the proposed sites in Buckhurst Hill received approximately similar levels of comments. SR-0176 (St Just, Powell Road) and SR-0225 (Lower Querens Road Car park) were commented on in relation to concern over the increase in traffic congestion and loss of car parking spaces. SR-0813 (stores at Lower Queens Road) received comments relating to the potential disruption to the local businesses currently on site.	
North Weald Bassett	The most frequently commented on site was SR-0119 (land at North Weald Airfield). Many comments were supportive of the employment designation as an opportunity to expand the offer of the airfield. The number of comments on other specific sites was relatively lower, with the next highest comments received relating to SR-0158A (land north of Vicarage Lane).	
Chigwell	By far the most comments were received on SR-0557 (the Limes Estate), with respondents concerned over the loss of open space and impact on local roads. Other proposed sites in Chigwell had a lower number of comments, with SR-0551 (Olympic Compound Site) and SR-0560 (Chigwell Civic Amenity Site) receiving the least.	
Theydon Bois	The sites in Theydon Bois all received similar levels of comments in the course of the Regulation 18 consultation. Key issues raised by respondents included the loss of Green Belt land and concern that the sites proposed in particular to the east of the railway line would feel separate to the existing settlement.	

Summary by Settlement - comments on proposed allocations		
Settlement	Summary of Comments	EFDC Response
Roydon	SR-0197 (land adjacent to Kingmead, Epping Road) was the most frequently commented on proposed site in Roydon, with respondents commenting on the loss of Green Belt land and the lack of pavements for pedestrians to use to get to the centre of Roydon. Other proposed sites received a relatively low level of comments.	
Nazeing	SR-0011 (St Leonards Road) and SR-0300 (land south of Nazeing) received a similar level of comments, with other proposed sites in Nazeing receiving comparatively few comments. Respondents commented on their experiences of the St Leonards Road site flooding, and the impact of future planned development on traffic congestion. Comments regarding SR-0300 mainly related to the loss of Green Belt land.	
Thornwood	Thornwood has one proposed residential site allocation of SR-0149 (Tudor House, High Street), with respondents primarily commenting on the increase in traffic congestion from the site.	
Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonebury, Sheering and Stapleford Abbots	Sites that received a high frequency of comments included SR-0405 (Coopersale Cricket Club and Coopersale and Theydon Garnon Primary School Playing Fields), with respondents concerned over the potential loss of open space and a well-used community facility. Other sites were SR-0073 (east of the M11) in Sheering due to the current levels of traffic congestion, and SR-0394 (land to east of High Ongar) with respondents commenting that High Ongar did not have the demand for such a large employment site.	

2017

**EPPING FOREST DISTRICT COUNCIL:
DRAFT LOCAL PLAN
CONSULTATION REPORT**



1 Executive Summary

Epping Forest District Council is producing a new up-to-date Local Plan, which will set out the plans and policies that will guide development in Epping Forest District up until 2033. A Community Visioning Consultation in 2010 and 2011, followed by subsequent evidence gathering and an Issues and Options consultation (Community Choices) undertaken in 2012, has informed the Draft Local Plan. Following agreement by Epping Forest District's Full Council on the 18th October, the Draft Local Plan was published for a six-week consultation between 31st October and 12th December 2016.

The Draft Local Plan is being reviewed and revised against the feedback received to this consultation and further evidenced gathered. The Local Plan that Epping Forest District Council intend to submit for external examination will then be published for a six-week period. There will be an opportunity at this stage to make representations on the 'soundness' of the Local Plan. The Council will then submit the Draft Local Plan to the Planning Inspector for Independent Examination, before it is adopted by Epping Forest District Council.

Epping Forest District Council undertook a number of consultation activities to let people know about the Draft Local Plan, the public consultation, and how they could get involved. Promotion of the Draft Local Plan took place between 15th September – 7th November 2016 and consultation and feedback during 31st October – 12th December 2016. As such, the following engagement was achieved:

- 3,387 responses were received from 3,082 respondents.
- 7% of feedback was received through the hardcopy questionnaires; 22% by letter, 23% by email and 48% by online questionnaires.
- 1,233 people attended the six staffed exhibition events.
- Nine e-bulletins were issued with an 'open rate' of 6,327 in total, along with 3177 direct engagements on Twitter and 1,211 engagements on Facebook.

This document provides quantitative and qualitative analysis of the feedback received to the consultation. Whilst this document will go into detail regarding the different policy areas of the Draft Local Plan, the ten most frequent comments made are listed below.

1.1 Ten frequent comments overall – all forms of feedback

- The policies and proposals of the Draft Local Plan will result in an increase in traffic congestion on local roads
- An overall opposition to principle of development in the Green Belt
- The policies and proposals of the Draft Local Plan will result in a negative impact on local schools
- The policies and proposals of the Draft Local Plan will result in increased pressure on the local healthcare provision
- The policies and proposals of the Draft Local Plan will result in a loss of car parking spaces, and increased car parking pressure
- Comments regarding Draft Policy P 2 Loughton/Loughton Broadway.
- The Draft Local Plan lacks sufficient information about the infrastructure requirements of Epping Forest District

- The policies and proposals of the Draft Local Plan will result in a negative impact on the character of the settlement
- The policies and proposals of the Draft Local Plan will result in increased overcrowding on the Central Line
- The policies and proposals of the Draft Local Plan will result in a loss of open space in the urban areas of the District

1.2 Overall vision, spatial strategy and distribution of housing – summary of issues raised

There was a low level of objection to the Draft Local Plan's vision and objectives within the Draft Local Plan. Generally, respondents supported the vision and objectives outlined, but did not consider the Draft Local Plan policies would deliver on these. Comments most frequently made were that the Draft Policies would not deliver on the intended protection of the Green Belt and the environment, would increase pressure on what is perceived to be overstretched local infrastructure, would damage the character of the area, and did not reflect the reality that residents experience in the District.

Many felt that the proposed distribution of housing would not deliver on the vision and objectives of the Draft Local Plan, and instead was looking at short term, easy solutions. It was also suggested that there was insufficient justification to 'breach' the Green Belt boundaries, and some settlements had been overlooked at the expense of sites promoted by developers, Green Belt sites and public open spaces. There was support in principle for the allocation of brownfield sites that are located in sustainable locations, particularly those with strong existing transport connectivity.

Other comments considered the Draft Local Plan would not deliver on sustainability. Some respondents felt that developing in the Green Belt and on public open spaces is not sustainable, as they are further away from settlements with sufficient facilities, and it could damage wildlife habitats. This was coupled with the concern that Draft Policies proposed to deliver new homes without a clear plan on how and where new infrastructure to support the growth will be delivered.

Responses from Statutory Consultees and local organisations were generally supportive of the values represented in the Draft Vision and Objectives and Draft Policies SP 1 and SP 2. Many Town and Parish Councils did not agree with the distribution of housing set out in the Council's spatial strategy. The loss of green belt land was commented upon by the London Green Belt Council and Campaign for Rural England.

Responses from site promoters expressed the view that further site allocations would be needed to meet the full Objectively Assessed Housing Need (OAHN) as set out in the Strategic Housing Market Assessment (SHMA). There were some queries regarding how the distribution of growth was informed by the Council's evidence base such as the Settlement Hierarchy Technical Paper, Green Belt Stage 2 and responses to the Community Choices consultation.

1.3 Green Belt and District Open Land – summary of issues raised

The Green Belt was one of the most frequent issues raised, and was an opposing argument of respondents across the majority of the policies proposed. The main concern was over the principle of development in the Green Belt. Residents highlighted the importance of the Green Belt to them, arguing that, not only does the Green Belt help to protect the District's rural character (a key attraction to living in the area), it also prevents the merging of settlements and becoming another suburb of London.

Although there was recognition that there is a need for new homes, respondents suggested there were alternatives available (such as a 'new town' or exhausting all Brownfield sites).

There was some concern expressed over the approach to and loss of green belt land, the demonstration of exceptional circumstances and the District Open Land designation by the London Green Belt Council and

Town and Parish Councils. Statutory Consultees and local organisations that stated support for Draft Policy SP 5 noted that it was in clear compliance with the NPPF.

Responses from site promoters stated support for limited Green Belt release to support the housing need in the district. Some respondents felt that the Council should release further Green Belt land to meet the full OAHN identified in the SHMA. Many site promoters provided alternative Green Belt reviews for their site and felt that the Green Belt Review Stage 2 was not robust or consistent.

1.4 Housing and Traveller site development – summary of issues raised

The main focus of comments on housing were in relation to Draft Policy H 4 Traveller Site Development. Respondents were of the view that proposed new traveller sites are overly concentrated in North Weald Bassett and Roydon.

Statutory Consultee and local organisation comments were generally supportive of the housing policies included in the Draft Local Plan, with many respondents making suggestions as to how the policies could be strengthened further to support a sustainable housing mix and tenure in Epping Forest District. In relation to Draft Policy J 4, Essex County Council suggested referencing transit site provision and the Lee Valley Regional Park questioned the sequential approach in relation to the pressure on traveller sites in the Green Belt.

The majority of site promoter responses were in relation to draft Policy H 2. The majority supported the affordable housing requirement set out in the policy, however those who disagreed with the requirement felt it was too high and that 40% should be a target and not a minimum.

1.5 The Economy and Town Centres – summary of issues raised

Draft Policy E 1 received some support for the local job opportunities it represents, but, this was tempered by the concern that there could be an increase in traffic on local roads, especially HGVs on rural roads. Respondents generally welcomed the support Draft Policy E 2 offered to local shops and services, especially in Waltham Abbey, Loughton Broadway and Epping. These towns were considered to need additional investment. Concerns were raised about the potential negative implications of the wider Draft Local Plan proposals on local shops; increased traffic on high streets and reduced car parking numbers which could make town and district centres unattractive places to visit.

Statutory Consultees and local organisations drew attention to the importance of retaining current employment sites and ensuring that new employment provision is joined up with housing provision. The Lee Valley Task Force commented that unsuitable employment sites should not be expanded. Draft Policy E 3 was welcomed by the Lea Valley Growers Association, Essex County Council and the Lee Valley Regional Park Authority in particular. Draft Policy E 4 was welcomed by some Town and Parish Councils and tourist attractions such as the Royal Gunpowder Mills.

Responses from site promoters were mainly in relation to Draft Policy E 1, with comments outlining that more information was needed on the amount of employment floorspace needed and the locations of future employment sites.

1.6 Transport – summary of issues raised

Transport and increased traffic was a common concern raised with many commenting on the need for adequate transport links and services to be in place before new development in the District is complete. Many responses to Draft Policy T 1 recognised the District's position in proximity to London, and the subsequent transport links that it is afforded due to its location, making it a desirable place to live.

The need to provide improved infrastructure for cycling and additional public transport was generally supported but there was criticism the policies and proposals in the Draft Local Plan do not do enough to

improve roads and cater for the high number of car users in the District. Responses to Draft Policy T 2 were supportive of Epping Forest District Council investment in key highway measures to meet future demand.

Essex County Council, Highways England and Transport for London all supported the commitment to encouraging a modal shift in the district. Transport for London confirmed that Central Line capacity should not act as a barrier to future housing development in Epping Forest district. Town and Parish Councils and local organisations expressed concern that there were no parking standards included in the Draft Local Plan.

There were relatively few comments from site promoters on Draft Policies T 1 and T 2, the details of the comments are set out in Chapter 10.

1.7 Natural Environment and Green Infrastructure – summary of issues raised

There was a low response rate to the policies for natural environment and green infrastructure. Responses to Draft Policy SP 6 generally supported the importance of the natural environment to the District, particularly the positive impacts these have on mental and physical wellbeing. Many comments focussed on the impact of the proposals to develop on public open space in the District, particularly in urban areas.

Statutory Consultees and local organisations welcomed the inclusion of policies relating to the natural environment and green infrastructure in the Draft Local Plan. In particular, the Lee Valley Regional Park Authority suggested a standalone policy that incorporated the strategic policies set out in the Authority's plan. The Environment Agency advised that there should be further mention of blue infrastructure.

Responses from site promoters expressed the view that it needed to be clearer what the requirements were for Suitable Accessible Natural Greenspaces and open spaces. Responses were generally supportive of policies on the Natural Environment included in the Draft Local Plan.

1.8 Historic Environment, Design and Place Shaping – summary of issues raised

Comments received on the Historic Environment, Design and Place Shaping highlighted the importance of heritage assets to the community of Epping Forest District, and the need to ensure that the design of new development considers their context and architectural style, particularly in conservation areas.

Draft Policy SP 4 was welcomed in particular by Sport England and Harlow District Council for its promotion of healthy and active lifestyles and garden city principles. The Campaign for Rural England suggested the inclusion of a Design Review Panel, and Essex County Council suggested that more mention was given to zero carbon buildings in the design policies included in the Draft Local Plan.

There were relatively few comments from site promoters on policies in Chapter 12. Site promoters outlined that more detail was needed on what requirements there are for developers in relation to Draft Policy DM 9; and that the requirements set out in Draft Policy DM 10 should only apply where the impact on viability has been considered. The majority of respondents that commented on Draft Policy SP 4 indicated they were supportive and intended to work positively with the Council to bring forward place shaping principles.

1.9 Climate Change and Environmental Policies – summary of issues raised

This chapter included responses to the Interim Sustainability Appraisal (SA), which was felt to be important to ensuring sustainable development in the District. Key topics in the responses regarding the SA focussed on the impact of new development on the local transport infrastructure. It was also felt, by some, that development on the Green Belt and on open public spaces contradicted the approach that Epping Forest District Council was seeking to take towards sustainability – although there was some recognition of the need to balance the need to protect the Green Belt and provide new homes.

There was general agreement with Epping Forest District Council's stated approach to flood management and drainage systems within the Draft Local Plan. There was also general support regarding the approach to

renewable energy technologies, but with clarification that the approach might be too prescriptive for future developers of a site.

North Weald Bassett Parish Council and Moreton, Bobbingworth and the Lavers Parish Council stated their support for the flood risk policies included in the Draft Local Plan in the context of a history of flood related issues in their respective areas. Thames Water and Anglian Water expressed support for Draft Policy DM 18 and Draft Policy DM 16 in particular. The Environment Agency gave policy wording suggestions to many of the policies in this section.

There were relatively few comments from site promoters on the policies on climate change and the environment, the details of the comments can be found in Chapter 13.

1.10 Infrastructure Delivery – summary of issues raised

Concern regarding existing infrastructure, and the impact on it of future development, was one of the most frequent comments raised, with respondents agreeing that it is important to ensure that ‘necessary’ infrastructure is provided to support new development. Traffic congestion concerns ranked highly, alongside increased pressure on schools, capacity of GP surgeries, lack of car parking spaces and increased overcrowding on the Central Line.

It was felt that there needs to be more information within the Draft Local Plan about when infrastructure would be delivered, where and how. It was felt there needed to be more certainty and consistency for each allocation to allow respondents to feel confident that infrastructure would be provided to support the increase in population in each settlement.

It was widely appreciated among Statutory Consultees and local organisations that there is further work to be completed on infrastructure that will detail the infrastructure required to support the draft site allocations. Essex County Council and neighbouring authorities welcome future co-operative working on infrastructure matters.

Responses from site promoters commented that there was not enough detail on infrastructure in the Draft Local Plan in relation to Draft Policy D 1. In particular it was felt that the infrastructure needed for each site should be outlined. Many site promoters commented on Draft Policy D 6, with the majority commenting in relation to the Chigwell Neighbourhood Plan.

1.11 Places – summary of issues raised

Amongst the 12 ‘place’ policies within the Draft Local Plan, Loughton received the highest number of comments, followed by Theydon Bois, Epping, North Weald Bassett and Chigwell. Statutory Consultees and local organisations made comments in relation to some of the Places policies, of which the key points have been presented in Chapter 15. The themes within the feedback to Draft Policy SP 3, Draft Policy P 1 to P 12 were:

Draft Policy SP 3 received a proportionally higher level of support amongst respondents compared to the other ‘place’ policies. Respondents generally supported the proposals for development around Harlow, viewing it as a suitable location to absorb growth. Respondents also considered the strategic sites around Harlow as being a better alternative than increased housing figures within the settlements of Epping Forest District.

General concerns were centred on an overall objection to development within the Green Belt and the impact upon the surrounding villages, which could result in merging of Roydon, Nazeing and North Weald Bassett with Harlow.

Some respondents stated they would prefer growth to be accommodated within a new town, rather than across multiple development sites and that this would be a more sustainable form of development.

Draft Policy P 1 Epping responses related to traffic congestion and how this would be exacerbated when the proposed allocated sites in Epping are developed. Epping High Street, Brook Road, Bridge Hill, Ivy Chimneys Road were referenced as roads that experience high levels of traffic. The proposed allocation site of SR-0113B, land to the south of Brook Road, Epping and SR-0069, Land at Ivy Chimneys Road raised concerns due to potential impacts on the local highways network. Some respondents felt there was a disproportionate level of growth being placed in Epping.

Draft Policy P 2 Loughton received a large number of comments. The most frequent comments were related to the concern that there would be an increase in traffic congestion within Loughton, and about the loss of public open space with the proposed site allocation of SR-0361, Colebrook Lane / Jessel Drive Amenity Open Space. It was felt that the loss of this open space could result in a negative impact on the quality of life of residents.

Draft Policy P 3 Waltham Abbey received a low level of response. The sites most frequently commented on were SR-0219 (Fire Station, Sewardstone Road) and SR-0541 (Waltham Abbey Community Centre, Saxon Way). Respondents were concerned that the Fire Station and Community Centre would not be replaced within Waltham Abbey once developed.

Draft Policy P 4 Chipping Ongar responses focused on the view that the proposed allocations in Chipping Ongar were disproportionate in comparison to other settlements. Many comments expressed a view that that this could lead to a change in character of the settlement, would impact on the Green Belt and there was a perceived lack of infrastructure or facilities to accommodate such a large increase in population. The site most frequently referenced was proposed allocation site SR-0848, Chipping Ongar Leisure Centre, with many opposing the loss of this community facility.

Draft Policy P 5 Buckhurst Hill responses related to the proposed allocation of sites SR-0176 (St Just, Powell Road) and SR-0225 (Lower Queens Road Car Park). Respondents felt that development of these sites would increase the pressure on car parking in Buckhurst Hill, and there was concern about the impact of this, alongside the construction disruption to shops on Lower Queens Road, which was felt to have a long lasting negative impact on their customer base.

Draft Policy P 6 North Weald Bassett responses included views that the level of growth proposed was disproportionate in comparison to the size of North Weald Bassett, and the level of development proposed in other settlements. Respondents disagreed with development on the Green Belt in North Weald Bassett, suggesting that it would negatively impact the character of the settlement and damage the quality of life of residents. In addition, it was raised the Green Belt acts as a buffer to flooding in the settlement, and it was felt that increased hardstanding could increase the likelihood of flooding.

Draft Policy P 7 Chigwell many responses referenced the site selection of SR-0557 (the Limes Estate). Respondents were concerned about the loss of open space on the Limes Estate and felt that managed public open space in Chigwell was being selected at the expense of other rural sites in the District. Some responses stated a preference for the direction of growth set out in Chigwell Parish Council Neighbourhood Plan.

Draft Policy P 8 Theydon Bois responses included views that the number of homes was too high for the village and would significantly increase the local population, with comments suggesting that local infrastructure is unable to cope with the current population. Some questioned why there was such a focus on the towns along the Central Line and queried the sustainability of developing on Green Belt sites in settlements without adequate infrastructure or facilities.

Draft Policy P 9 Roydon There were fewer comments on this policy in comparison to other place policies. Responses picked up on concerns regarding increased traffic congestion in the village, which would be exacerbated by the level crossing in the village and the use of rural roads by HGVs. The potential merging of Roydon with Harlow was also a key concern.

Draft Policy P 10 Nazeing response included a high frequency of comments that raised concerns regarding the traffic impact of the proposals. Concerns centred on congestion being exacerbated due to the population growth, but also the recent removal of bus services and the lack of a train station. Pressure on utilities was also raised as an ongoing issue in the village, in the context that it would not be able to cope with increased use.

Draft Policy P 11 Thornwood Some respondents saw an increase in population as an opportunity to deliver facilities for the village and to encourage a balanced community through delivery of homes for the retention of younger residents. A concern suggested that the village already experiences high levels of congestion due to the proximity to Harlow, the M11 and the M25, and as such, suffers from pollution because of this proximity.

Draft Policy P 12 other settlements Responses expressed some concern that the proposed site allocations represented a large increase in population for the villages, which was not felt to have the infrastructure to cope with this increase; that development on Green Belt sites does not reflect the objectives of the Draft Local Plan to protect the Green Belt and environment; and that the scale of development and its location on Green Belt sites would change the character of the villages and could lead to the eventual merging of settlements. However, it was also felt that this growth could promote self-sustainability of local businesses in the villages from an increased population.