
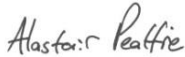
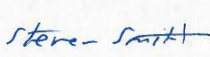
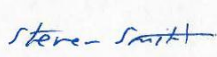


Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan

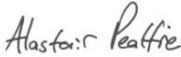
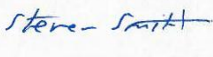
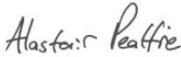



SA Report

December 2017

Quality information

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3	07 December 2017	Revised Draft for client review		Alastair Peattie	Principal Consultant
4	11 December 2017	Final Draft for client review		Alastair Peattie	Principal Consultant
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1. Introduction

1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) (incorporating Equalities Impact Assessment (EqIA)) in support of the emerging Epping Forest District Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

SA explained

1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²

1.3 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.4 More specifically, the SA Report must answer the following three questions:

1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan.
3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan?

This SA Report⁴

1.5 This SA Report is published alongside the Submission Version of Epping Forest Local Plan, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and, as such, each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

1.6 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

⁴ See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Overview

- 2.1 Once adopted, the Epping Forest District Local Plan will set out the proposed strategy for meeting the District's needs for the next 16 years, and will replace all of the saved policies of the Local Plan 1998 and the 2006 Local Plan Alterations.
- 2.2 The Plan will set out:
- the Council's vision and objectives for the District's development over the plan period;
 - policies to ensure that development delivers high quality, sustainable homes, drive the quality of design and maintains the high quality built and natural environment;
 - the future distribution for housing growth and requirements for affordable housing;
 - policies to build a strong, competitive economy and the future distribution for new employment land space and thus new jobs;
 - policies to maintain and enhance the vibrancy and vitality of towns centres;
 - policies to support a sustainable transport and road infrastructure network; and
 - proposals for delivery including an Infrastructure Delivery Plan (IDP) to demonstrate the infrastructure requirements necessary to support the site allocations and other proposals.
- 2.3 The Plan will shape how the District changes, and what is protected, by attracting and guiding investment in the District from the private sector, the Council itself, and other public bodies. Such investment will include new homes, new offices and other employment opportunities, colleges and schools, shops and leisure centres, GPs and clinics as well as improvements to existing physical and green infrastructure. It will guide decision making on planning applications to build or change the use of buildings and land. It will also provide the strategic policies that form the context for any neighbourhood plans produced in the District.

Plan vision and objectives

- 2.4 The vision for the District is as follows:
- A. By 2033 Epping Forest District will be a place where:
- i. residents continue to enjoy a **good quality of life**;
 - ii. **new homes of an appropriate mix of sizes, types** and tenures to meet local needs have been provided and well integrated communities created;
 - iii. development **respects the attributes** of the different towns and villages;
 - iv. development needs will be met in the most **sustainable locations**;
 - v. **Epping Forest** will be conserved and enhanced;
 - vi. the recreational aims of **Lee Valley Regional Park** will be supported;
 - vii. a more **sustainable local economy** including tourism, aviation, research and development, and food production will be developed;
- B. a **distinctive and attractive network** of town and village centres will have been maintained;
- C. **access** to places by public transport, walking and cycling will be promoted; and
- D. **significant residential development** will be located around Harlow to support the economic regeneration of the town.

2.5 The Plan objectives are as follows:

A. Environment and design

- i. to protect the Metropolitan Green Belt within its revised boundary, and to encourage the re-use of previously developed land;
- ii. to conserve and enhance Epping Forest and its setting, including the buffer lands;
- iii. to protect, and encourage appropriate management of other designated wildlife sites in the District, including the Lee Valley Special Protection Area, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites;
- iv. to protect and encourage the enhancement of heritage resources including Scheduled Monuments, statutorily and locally listed buildings, Registered Parks and Gardens, and Conservation Areas;
- v. to ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area, is of a high quality and is designed so as to reduce opportunities for crime and anti-social behaviour; and
- vi. to ensure new development takes full account of, and mitigates where necessary, potential problems from air pollution, land contamination and noise.

B. Housing

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

C. Economic Development

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

D. Infrastructure and Movement

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

E. Climate Change and Flood Risk

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

What is the Local Plan not seeking to achieve?

- 2.6 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites/establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage). The strategic nature of the Local Plan is reflected in the scope of the SA.

3. What is the scope of the SA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) SA.
- 3.2 Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix II**.

Consultation on the scope

- 3.3 The Environmental Assessment of Plans and Programmes Regulations 2004 require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were consulted on the SA scope in 2010. Since that time, the SA scope has evolved somewhat as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2010.⁶

Key issues / objectives

- 3.4 **Table 3.1** presents the sustainability objectives - grouped under eleven topic headings - established through SA scoping, i.e. in light of context/baseline review and consultation.
- 3.5 Taken together, the sustainability topics and objectives presented in **Table 3.1** provide a methodological 'framework' for undertaking appraisal.

Table 3.1: SA topics and objectives (i.e. the SA framework as broadly agreed in 2010)

SA Topics	SA Objectives
Air quality	<ul style="list-style-type: none"> Avoid worsening of existing issues through minimising traffic congestion
Biodiversity and green infrastructure	<ul style="list-style-type: none"> Avoid direct impacts to important biodiversity sites and linear features Avoid more indirect impacts (e.g. through pollution or development preventing adaptation of biodiversity to climate change) Carefully plan and implement multifunctional green infrastructure Support initiatives that seek to achieve biodiversity benefits, including through targeted habitat creation and enhancement Plan for biodiversity at a 'landscape scale'
Climate change (mitigation & adaptation)	<ul style="list-style-type: none"> Lower greenhouse gas emissions Increase the amount of renewable and decentralised energy generation Drawing on the SFRA⁷, take a pro-active approach to reducing flood risk and mitigate risk associated with new development where it occurs
Community and wellbeing	<ul style="list-style-type: none"> Address pockets of deprivation Meet the health and social needs of a growing and ageing population, including through ensuring good access to community infrastructure Address all aspects of equality, where relevant to spatial planning

⁵ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

⁶ The SA Framework currently comprises 34 objectives, presented under 11 topic headings. Originally, in 2010, there were also a further 36 objectives presented under five area specific headings; however, the focus here is only on the thematic topic headings and the objectives assigned under each.

⁷ Strategic Flood Risk Assessment

SA Topics	SA Objectives
	<ul style="list-style-type: none"> Address issues specific to rural communities Provide facilities and infrastructure to support active living
Economy and employment	<ul style="list-style-type: none"> Maintain a diverse economy including through supporting existing sectors (inc. rural) Taking a long term view, support initiatives that capitalise on local strengths, including tourism potential (e.g. resulting from attractive towns and countryside) Ensure local job creation in line with local housing growth Maintain the key functions of local centres (also a 'community and wellbeing' issue) Address deprivation issues through targeted economic growth
Historic environment	<ul style="list-style-type: none"> Protect the District's heritage assets and their settings from inappropriate development Ensure that development respects wider historic character
Housing	<ul style="list-style-type: none"> Meet identified needs through providing new housing of the appropriate type (e.g. to reflect the ageing population and trend towards more single person households) Increase the provision of affordable housing Meet the needs of Travellers
Land and waste	<ul style="list-style-type: none"> Protect Green Belt that meets the nationally established objectives Make efficient use of land, accounting for land quality, and previously developed land Support good waste management
Landscape	<ul style="list-style-type: none"> Direct development away from the most sensitive landscapes and landscape features Maintain and enhance characteristic landscapes and landscape features
Transport	<ul style="list-style-type: none"> Bring about a modal shift in terms of commuting patterns, away from car dependency Promote and support investment in sustainable transport infrastructure, including in rural areas where access to services and employment is an issue
Water	<ul style="list-style-type: none"> Minimise water use to mitigate the worsening problem of 'serious water stress' Maintain and improve water quality / water courses in line with legislative requirements Direct development to areas with sewerage infrastructure capacity

'Equalities' considerations

3.6 As a public sector organisation, Epping Forest District Council has a duty under the Equality Act 2010⁸ and associated Public Sector Equality Duty (PSED) to ensure that the objectives and proposals within the Epping Local Plan eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with a protected characteristics⁹ and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

3.7 Equalities issues were already being considered through the SA process under the Community and Wellbeing Topic. However, in 2017 the Council decided to fully integrate EqIA into the SA process. As a result, it was decided that a separate SA topic ('Equality, Diversity and Inclusion') should be established in order that equalities issues could be clearly addressed. This will help to ensure that equality issues/ impacts are considered and discussed as part of the appraisal of the Submission Plan and reasonable alternatives. It should be noted that the baseline information (**Appendix II**) was updated to include evidence related to protected characteristics.

⁸ Equality Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents>

⁹ Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

Part 1: What has plan-making /
SA involved up to this point?

4. Introduction (to part 1)

- 4.1 Local plan-making has been underway since 2010, with three consultations having been held under Regulation 18 of the Local Planning Regulations prior to this current stage (Regulation 19), with Interim SA Reports having been published in 2012 and 2016. These Interim SA Reports are available to view and download on the Council's website.¹⁰
- 4.2 In-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the Submission Version Local Plan.
- 4.3 This part of the report sets out to present information regarding the consideration of reasonable alternatives, in particular District-wide spatial strategies, i.e. alternative approaches to the allocation of land to meet housing (and economic) needs. This information is important given regulatory requirements.¹¹

What about other plan issues?

- 4.4 Whilst the plan will set policy in relation to a range of range of issues aside from spatial strategy, it is clear that setting spatial strategy is at the heart of the plan. It is the key issue to be addressed, and taken to be the primary objective of the plan. Hence it is considered reasonable¹² that alternatives appraisal should focus on this matter and this is reflected within this part of the report.
- 4.5 A number of strategic spatial options for the delivery of traveller accommodation were explored by the Council. A discussion around these options is provided in **Appendix III** in order to avoid confusion with the development of spatial strategy alternatives to deliver housing and employment needs set out in Chapters 5 to 8.
- 4.6 Furthermore, while the plan will set policy to address a range of other thematic issues (both strategic, e.g. in relation to "The Natural Environment, Landscape Character and Green Infrastructure"; and development management, e.g. "Heritage Assets") these policy areas have not been a focus of alternatives appraisal, and are not discussed further within this part of the Report.

Structure of this part of the report

- 4.7 This part of the report is structured as follows:

Chapter 5 briefly sets out the responses received in relation to the Community Visioning consultation in 2010/11 and then alternatives developed and appraised as part of the Community Choices consultation in 2012.

Chapter 6 explains the reasons for selecting the District-wide alternatives dealt with at the Draft Local Plan stage, presents a summary appraisal of the reasonable alternatives; and explains reasons for selecting the preferred option in 2016.

Chapter 7 explains the reasons for selecting the District-wide alternatives dealt with at the Submission Local Plan stage, presents an appraisal of the reasonable alternatives; and explains reasons for selecting the preferred option in 2017.

¹⁰ <http://www.efdclocalplan.org/technical-information/>

¹¹ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. Whilst this report is not the SA Report, it is appropriate to present this information nonetheless for the benefit of stakeholders.

¹² Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

5. Reasonable Alternatives in 2012

- 5.1 Two rounds of initial consultations were undertaken by the Council in 2010/11 (Community Visioning) and 2012 (Community Choices) prior to the publication of the Draft Local Plan in 2016.

Community Visioning (2010/11)

- 5.2 The Community Visioning consultation in 2010/11 sought to understand what the planning issues are for the local community and how people would like to see the area develop in the future.¹³ The Council asked three key questions and proposed a number of potential options under each of them. The questions and support for the various options are provided in the Figures below.

Figure 1: Response to Question 1 - What do you think the priorities are for the District over the next 20 years?¹⁴

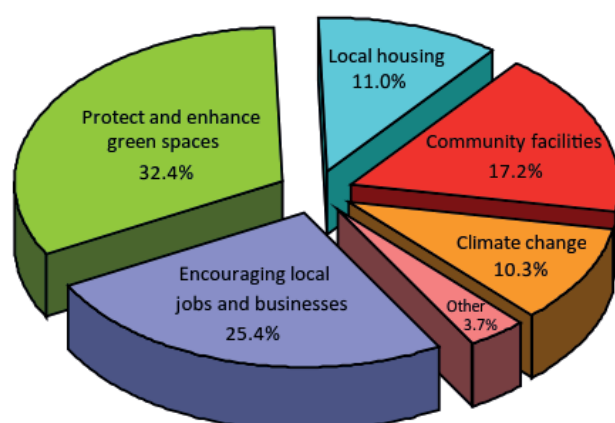
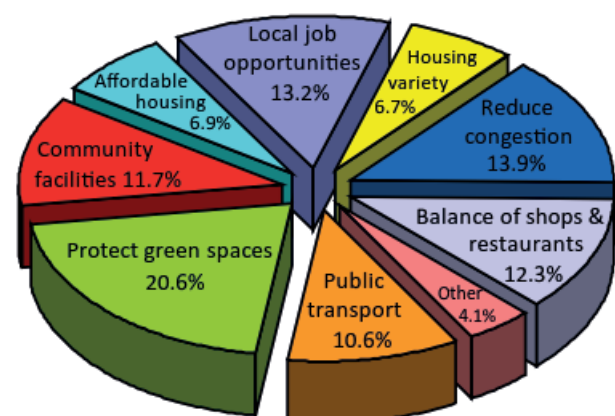


Figure 2: Response to Question 2 - What planning issues do you think most need to be addressed in your local area?¹⁵

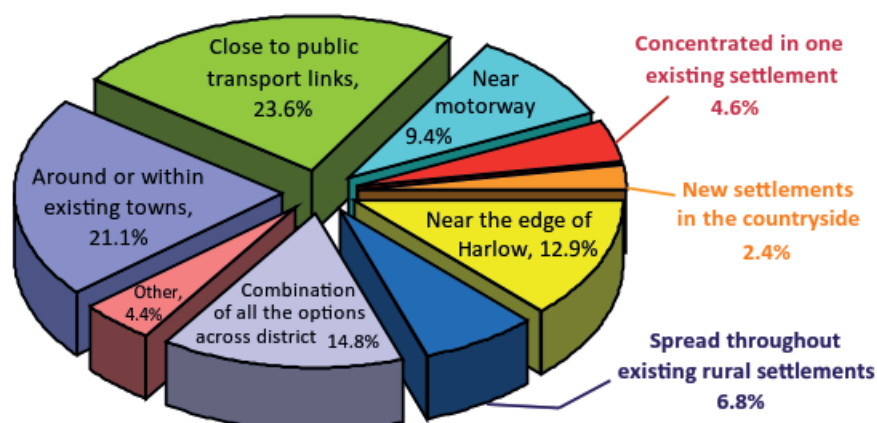


¹³ www.efdclocalplan.org/community-visioning-and-community-choices/

¹⁴ Epping Forest District Council (2012) Consultation Results. www.efdclocalplan.org/community-visioning-and-community-choices/

¹⁵ Ibid.

Figure 3: Response to Question 3 - Where do you think new houses and jobs should be located?¹⁶



Community Choices (2012)

5.3 Following on from the 2010/11 consultation, alternative approaches were explored for addressing the emerging key plan issues. The Community Choices document set out the main issues that needed to be considered and addressed by the Local Plan over the next 20 years, as well as potential options to address these issues. The reasonable alternatives identified and appraised through the SA process in 2012 are set out below. The detailed findings of the SA are available in the Interim SA Report that accompanied the Community Choices Document on consultation in 2012.¹⁷

Alternatives for spatial issues

'Housing target'

5.4 Three reasonable alternatives were identified for the housing target and subject to appraisal through the SA process:

- A. Official population projections at that time, 11,448 new homes;
- B. Combined East of England Plan/Update¹⁸ of official population projections, 10,128 new homes; or
- C. East of England Plan target updated for 2011-33 of 7,700 new homes.

5.5 The following scenarios were not considered reasonable alternatives for the reasons set out below:

- Zero (overall) migration - would not assess the implications of migration so would therefore not meet the policy requirements of the NPPF;
- Revised East of England Plan target - review of the East of England Plan was not adopted, and has therefore not been subject to public scrutiny;
- Adopted East of England Plan target (excluding proposed growth at Harlow) - did not make adequate provision for housing growth to meet the population needs of the District;
- Revised East of England Plan (excluding proposed growth at Harlow) - did not make adequate provision for housing growth to meet the population needs of the District, nor was the target subject to public scrutiny; and

¹⁶ Ibid.

¹⁷ Epping Forest District Council (2012) Interim SA Report. Prepared by URS (now AECOM).
<http://www.efdclocalplan.org/technical-information/>.

¹⁸ Note that the East of England Plan was revoked in January 2013.

- Employment - derived from an economic growth forecast, this scenario did not take into account the number of the working age population that left the District for work, and sought the balance housing and local job supply. Given the proximity to London, and ease of access via the Central Line it was not considered that this level of growth would be reasonable in a primarily Green Belt authority.

‘Employment land’

- 5.6 Two reasonable alternatives were identified for employment land based on the evidence at the time and subject to appraisal through the SA process:
- A. Regional Spatial Strategy target of 28.5ha; or
 - B. Need identified by evidence base 21.5ha.

‘Growth around Harlow’

- 5.7 Two reasonable alternatives were identified for growth around Harlow and subject to appraisal through the SA process:
- A. Pursue development around the boundaries of Harlow to meet some of the housing & employment needs of Epping Forest District (as well as within the remainder of Epping Forest District); or
 - B. Pursue development only within the remainder of Epping Forest District.

‘Distribution of growth around the remainder of Epping Forest’

- 5.8 The Community Visioning exercise in 2010/11 made clear that local residents favoured a development pattern which focuses development ‘close to public transport links’ and ‘around or within existing settlements’. Slightly less popular choices were ‘A combination of all the options spread throughout the district’, ‘Near the edge of Harlow’, and ‘Close to the motorway network’. The remaining three options identified were unpopular, including the delivery of a new settlement in the countryside only favoured by 2.4% of those responding. Taking the consultation response into account and that no suitable or available sites had been identified that could deliver a new settlement in the countryside, it was determined that this was not a reasonable alternative for the distribution of remaining growth in the District.
- 5.9 Taking the consultation responses into account along with available evidence it was determined that a number of alternatives for the distribution of growth around the remainder of the District were not reasonable and should not be progressed further through plan-making and the SA process. This included the delivery of a new settlement in the countryside, concentrating growth in one existing settlement and focusing growth at the rural settlements. There were no available sites of sufficient size to deliver a new settlement within the countryside; delivering all the growth at one settlement would not meet the needs in the rest of the District and focussing growth in the rural areas with poor access to public transport and services/facilities would not result in sustainable development.
- 5.10 In recognition of the consultation responses and that the largest settlements have the greatest range of services and facilities, and also give rise to the largest level of population growth, a proportionate distribution pattern was considered reasonable by the Council at the outset. However, the largest town in the District, Loughton, is also one the most constrained and at the time only had identified capacity for a small number of dwellings. The same issue also applied to Buckhurst Hill (large village). It was therefore necessary to amend the proportionate distribution pattern to reflect this. All subsequent distribution options took into account the constrained capacity of Loughton and Buckhurst Hill.
- 5.11 Four options were developed around the existing public transport network, which also took advantage of good access to the motorway network. There were two pairs of options developed with a transport focus; the first focused development in and around all towns that have good access to the public transport network; and the second which recognised that capacity on the Central Line is a particular issue and could constrain development in those towns that have a station on the underground network. Growth under these options could either be distributed proportionately in accordance with the existing population or equally.

- 5.12 Finally, two options were developed around the eight largest settlements in the District, in recognition that these have the largest number of services and facilities and that growth could be distributed around these towns/villages. As above, growth could be distributed proportionately in accordance with the existing population or equally.
- 5.13 Seven reasonable alternatives were identified for the distribution of growth around the remainder of the District and subject to appraisal through the SA process:
- A. Proportionate distribution;
 - B. Transport focus - Proportionate distribution;
 - C. Transport focus - Equal distribution;
 - D. Development away from the Central Line - Proportionate distribution;
 - E. Development away from the Central Line - Equal distribution;
 - F. Large settlements - Proportionate distribution; or
 - G. Large settlements - Equal distribution;

‘Directions for growth beyond existing settlement boundaries’

- 5.14 All of the main settlements were assessed, to identify opportunities for growth or change within the settlement boundaries. The Council also explored potential directions for growth outside of the existing boundaries for the following settlements:
- Harlow;
 - Chigwell;
 - Ongar;
 - Epping;
 - Nazeing;
 - Lower Sheering;
 - Sheering;
 - North Weald Basset;
 - Roydon;
 - Theydon Bois;
 - Thornwood Common; and
 - Waltham Abbey.

- 5.15 The directions for growth identified for each of the settlements above were subject to appraisal through the SA process.

‘North Weald Airfield’

- 5.16 Four reasonable alternatives were identified for the North Weald Airfield based on the evidence at the time and subject to appraisal through the SA process:
- A. Maintain existing policies and approach to use of the airfield including encouraging existing operators to expand their business and small new operators to start business within current policy parameters;
 - B. Moderate expansion of commercial activity around the NWA, with retention of current level of aviation use;
 - C. Active development of commercial aviation; or
 - D. Cease aviation uses - pursue alternative use.

Alternatives for thematic issues

'The Lea Valley Glasshouse Industry'

- 5.17 Two reasonable alternatives were identified for the Lee Valley Glasshouse Industry based on the evidence at the time and subject to appraisal through the SA process:
- A. Introduce a policy of 'managed decline' for the industry; or
 - B. Put in place measures to support the industry, including potentially: permitting larger, higher glasshouses within designated areas, consider expanding existing areas designated for glasshouses, and designating new sites for glasshouse development, not restricted to the Lea Valley.

'Managing existing employment sites'

- 5.18 Two reasonable alternatives were identified for managing existing employment sites based on the evidence at the time and subject to appraisal through the SA process:
- A. Resist redevelopment of designated employment sites for uses other than employment; or
 - B. Allow the redevelopment of existing sites which are vacant/derelict and have been for some time, for other uses e.g. housing.

'Balance of retail shops and other services'

- 5.19 Five reasonable alternatives were identified for the balancing of retail shops and other services based on the evidence at the time and subject to appraisal through the SA process:
- A. Reduce the 70% minimum retail frontage threshold to e.g. 50%;
 - B. Relax the existing policy completely to allowing changes of use to non-retail uses within key frontages;
 - C. Re-classify the towns and relax the existing policy within the small District centres only (Waltham Abbey, Loughton Broadway, Ongar, and Buckhurst Hill);
 - D. Maximise the individual strengths of each centre, i.e. have a different approach for each of the 6; or
 - E. Keep the current policy approach.

'Dwelling size and design'

- 5.20 Two reasonable alternatives were identified in terms of dwelling size and and subject to appraisal through the SA process:
- A. Adopt policy which dictates the proportions of different size dwellings to be achieved in various locations around the District; or
 - B. Leave the market to determine the most appropriate houses to be built.

'Green Belt and density'

- 5.21 Around 92.4% of Epping Forest District is within the Green Belt. Analysis of the existing towns and villages demonstrated that there is not sufficient capacity to accommodate even the lowest alternative for growth outside of the Green Belt. It was therefore necessary to carefully plan for some release of land from the Green Belt.
- 5.22 The density of development in the District will have an impact on the area of land that will need to be released from the Green Belt. In very crude terms, higher density development would mean that less land would need to be released from the Green Belt.
- 5.23 Two reasonable alternatives were identified in relation to the Green Belt and density and these were subject to appraisal through the SA process:

- A. Encourage high density development (50 dph or more) to reduce the amount of land that will need to be released from the Green Belt; or
- B. Seek development of around 30dph to allow larger residential gardens and space for car-parking, meaning that more land will need to be released from the Green Belt.

Consultation responses

5.24 The key issues raised during the consultation included:

- continue to protect the Green Belt;
- use of “brownfield” (i.e. previously developed) land before releasing any Green Belt for development;
- prevent London from sprawling into the District and prevent larger urban areas (e.g. Harlow) from merging with nearby villages (e.g. Roydon);
- establish accurate forecasts for population growth and related new housing targets;
- establish accurate forecasts for new numbers of jobs which would be needed;
- whether local services have the capacity to cope with the current population and any future growth, e.g. schools, GP surgeries, public transport including the Central Line and rural bus services, sports, leisure and other community facilities, town centre car parking, and sewerage (in some parts of the District). Traffic congestion, the general capacity of local roads and motorway junctions, and problems with commuter parking near Central Line stations were also frequently raised issues;
- protect the countryside and landscape including Epping Forest, and acknowledge the importance of agriculture in the District; and
- protect the heritage and character of the District’s towns and villages.

5.25 In response to the seven alternatives proposed for the distribution of growth around the remainder of Epping Forest, Option A (proportionate distribution) was the most popular of all the options proposed with 24% of respondents in support. Options D (Development away from the Central Line - proportionate distribution) and E (Development away from the Central Line - equal distribution) were next, with 15% and 14% of respondents supporting them respectively. The other four options were only supported by 1 to 2% of respondents. The majority of respondents at 41% did not prefer any of the proposed distribution options and suggested that a more tailored settlement specific approach would be more appropriate. It should be noted that the vast majority of respondents who suggested this alternative approach were contained within one large group response from Waltham Abbey.

6. Reasonable Alternatives in 2016

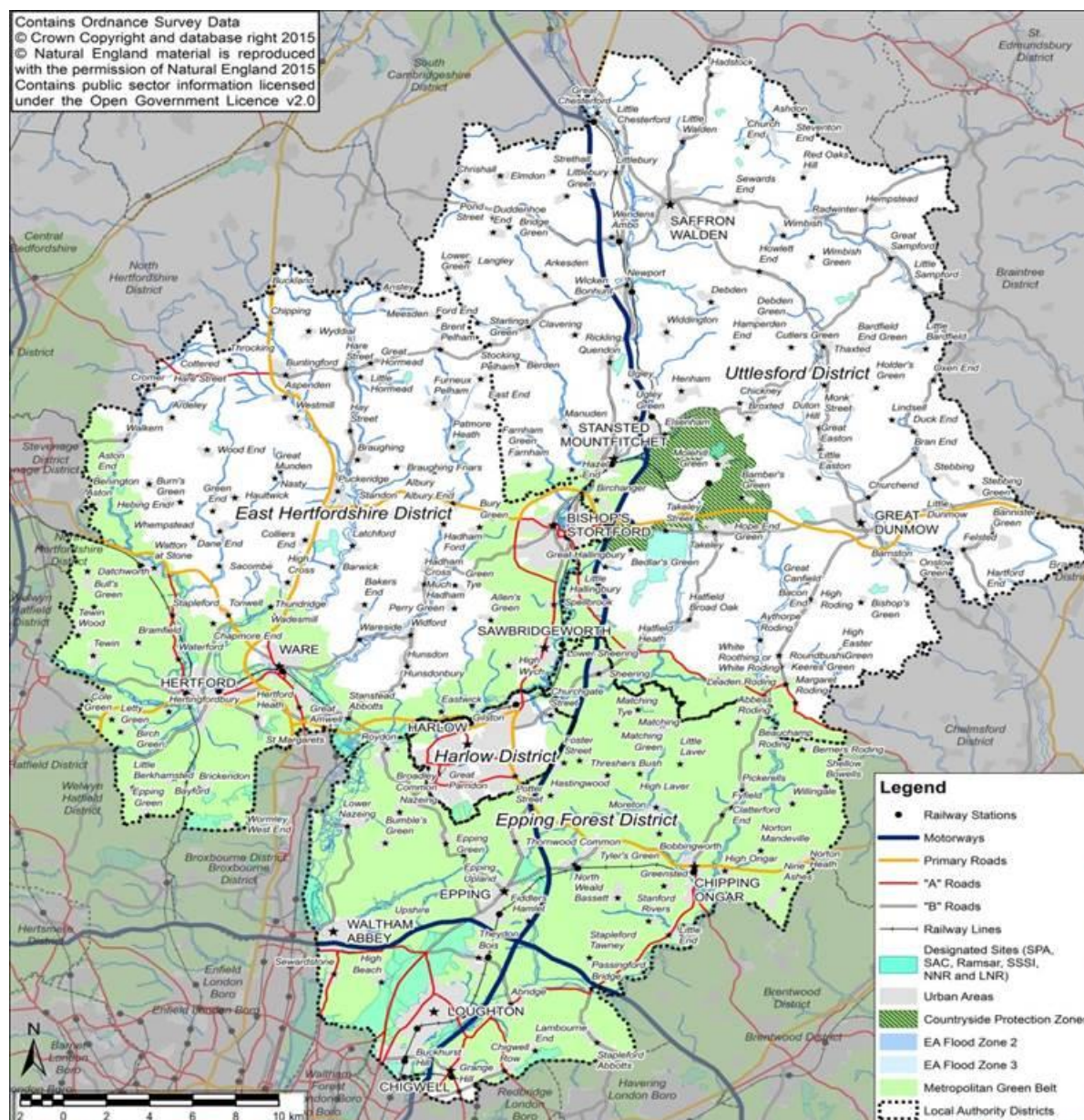
Developing the Reasonable Alternatives in 2016

- 6.1 In 2016 it was recognised that there was a need to revisit and refine the understanding of ‘the reasonable alternatives’ in light of:
- 1) HMA level considerations - including joint work undertaken amongst the four authorities that comprise the West Essex and East Hertfordshire Housing Market Area (HMA) to establish Objectively Assessed Housing Need (OAHN) for the HMA and how this need should be apportioned between the four authorities (and, in particular, how the growth of Harlow should be best accommodated); and
 - 2) District level considerations - work undertaken by Epping Forest District Council to assess the sites put forward through the Strategic Land Availability Assessment (SLAA) 2016 and rolling call for sites in the District, and identify those that were candidates for allocation. This included the identification and assessment of strategic options (i.e. directions of growth) for settlements to inform the selection of candidate preferred sites and the detailed site assessment of each site which was undertaken in line with SA objectives.
- 6.2 We briefly explain (1) and (2) in turn, and then conclude by explaining how the evidence-base was drawn on to establish District-wide reasonable alternatives for appraisal in 2016.

Housing Market Area (HMA) level considerations

Overview

- 6.3 A three step approach was taken, which ultimately resulted in the establishment of a preferred broad spatial strategy for the West Essex and East Hertfordshire HMA see **Figure 4**, including a decision on the approach to growth in and around Harlow. Harlow was recognised as the most sustainable location within the HMA to focus residential development given its role as a sub-regional centre for employment, its Enterprise Zone status; its important location on the London Stansted Cambridge corridor and the wider economic growth aspirations for the town.

Figure 4: West Essex and East Hertfordshire Housing Market Area**Step 1 - Establish understanding of housing and economic needs**

6.4 A joint Strategic Housing Market Assessment (SHMA) was undertaken for the four authorities of the HMA - East Herts District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council - in order to establish Objectively Assessed Housing Need (OAHN) for the HMA.

6.5 The SHMA was published in September 2015 which identified OAHN for the HMA to be 46,100 dwellings over the period 2011 - 2033, equivalent to an average of 2,095 dwellings per year. This included an Objectively Assessed Need for Affordable Housing of 13,600 dwellings.¹⁹

6.6 The SHMA provided a break-down OAHN for each authority, as follows:

- 16,400 dwellings in East Hertfordshire (745 per year);
- **11,300 dwellings in Epping Forest (514 per year);**

¹⁹ Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings <http://www.efdclocalplan.org/technical-information/>.

- 5,900 dwellings in Harlow (268 per year); and
 - 12,500 dwellings in Uttlesford (568 per year).
- 6.7 In addition, the SHMA highlighted that DCLG's 2012-based household projections showed the number of households in the HMA increasing from 175,189 to 224,827 over the 22-year period 2011-33. The SHMA explained that:

“PPG [Planning Practice Guidance] identifies that the starting point for estimating housing need is the [D]CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, **653 in Epping Forest**, 326 in Harlow and 498 in Uttlesford.”

- 6.8 In August 2016, Opinion Research Services (ORS) updated the OAHN (but without undertaking a full review of the SHMA) to take into account more recent information including the DCLG 2014-based household projections and suggested a revised OAHN for the HMA of 54,608 disaggregated as follows:
- 19,427 dwellings in East Hertfordshire (883 per year);
 - **13,278 dwellings in Epping Forest (604 per year);**
 - 7,824 dwellings in Harlow (356 per year); and
 - 14,080 dwellings in Uttlesford (640 per year).

N.B. Alongside the SHMA, the four authorities commissioned a study to consider the Objectively Assessed Economic Need of the Functional Economic Market Area (FEMA),²⁰ which considers a wider area than that of the HMA.²¹ This was published in 2015 and provided an up-to-date assessment of jobs growth need in the FEMA for the period 2011-2033. The study identified a net jobs growth per year of 1,890 for the FEMA. For the West Essex and East Hertfordshire authority areas, this translated into the following ranges in jobs growth: 435 – 505 jobs per year in East Herts; 400 – 455 jobs per year in Epping Forest; 325 – 335 jobs per year in Harlow; 665 – 675 jobs per year in Uttlesford.

Step 2 - Develop and appraise strategic spatial alternatives

- 6.9 In response to a need to fulfil Duty to Cooperate requirements, and to adhere to the spirit of the NPPF which requires that local authorities ‘... *demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*²²’ the West Essex and East Hertfordshire authorities explored options for meeting Objectively Assessed Need in the sub-region. This included the consideration of a range of locational options for delivering housing.
- 6.10 To support this process the four authorities commissioned a study which:
- identified options for spatially distributing the housing need identified in the SHMA (2015), the DCLG 2012-based household projections and the August 2016 advice from ORS across the HMA, based on an analysis of the policy context and evidence base;
 - provided an evidence-based Sustainability Appraisal setting out the anticipated significant positive and negative impacts of each option (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and
 - facilitated the development of a Memorandum of Understanding (MoU) between the four authorities which sets out a high level agreement as to how new housing should be distributed across the HMA.

²⁰ Hardisty Jones Associates (September 2015) Economic Evidence to Support the Development of the OAHN for West Essex and East Herts <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=5438&p=0>

²¹ The FEMA covers the four authority areas, but also includes: Broxbourne, a fringe area comprising all of the immediately adjacent local authorities; and a link to central London.

²² Paragraph 181, National Planning Policy Framework
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- 6.11 These activities are collectively referred to as the Strategic Spatial Options Study. It is anticipated that the study will provide a critical piece of evidence for demonstrating to the Planning Inspectorate at the independent examinations into the four local plans that the key strategic issue of housing growth has been robustly addressed and that the Duty to Co-operate has been clearly complied with.
- 6.12 As part of the Strategic Spatial Options Study, a range of spatial options for distributing housing across the HMA were considered. Three levels of growth were considered:
- ~46,100 new homes in line with the 2015 SHMA
 - ~49,638 new homes in line with the DCLG 2012-based household projections
 - ~57,400 new homes in line with early advice from ORS in light of more recent information including the DCLG 2014-based household projections (NB this figure was later revised down to 54,608 – see above)
- 6.13 In particular, the spatial options explored different levels of growth in and around Harlow, a key urban centre within the HMA:
- ~10,500 (lower growth)
 - ~14,150 (medium growth)
 - ~17,650 (higher growth)
 - ~20,985 (maximum growth)
- 6.14 The study identified the following reasonable strategic spatial options:
- **Spatial options to deliver ~46,100 new homes across the SHMA area:**
 - A. Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)
 - B. Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)
 - C. Less development at Harlow and two new settlements in East Herts (NB ~10,500 at Harlow)
 - D. Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA²³)
 - **Spatial option to deliver ~49,638 new homes:**
 - E. Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)
 - **Spatial option to deliver ~57,400 new homes:**
 - F. Maximum growth across the HMA (NB ~ 20,985 at Harlow)

Step 3 - Identify the preferred strategy

- 6.15 To assist in discharging the Duty to Co-operate, the Co-operation for Sustainable Development Member Board (the Co-op Member Board) considered six options (A-F) for accommodating new housing development across the West Essex and East Hertfordshire Housing Market (HMA) area up to 2033. These six options varied in terms of: (i) the overall quantum of development to be provided for across the HMA (ranging from ~48,300 to ~56,250 new houses); and (ii) the spatial distribution of that development, in particular the amount of new housing to be accommodated in around Harlow town. Varying the overall quantum of development allowed the Co-op Member Board to test the implications of different levels of growth including: 46,100 (the figure for objectively assessed housing need in the Strategic Housing Market Assessment, SHMA); 49,638 (a figure based on the CLG 2012-based household projections); and 54,608 (an updated OAHN figure provided by Opinion Research

²³ Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion.

Services, ORS, in light of recent information including the CLG 2014-based household projections). Varying the spatial distribution of development allowed the Co-op Member Board to explore the implications of focusing different levels of development in different parts of the HMA. In particular, the options varied in terms of the level of development located in and around Harlow, the HMA's key urban centre.

- 6.16 The implications of the six HMA spatial strategy options (A-F) were investigated through four means:
1. Transport modelling by Essex County Council to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure;
 2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water. The findings of the SA were published in 2016;²⁴
 3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation; and
 4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.
- 6.17 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver c. 51,000 new homes across the HMA to 2033 broken down in **Table 6.1** below.

Table 6.1: The preferred broad strategy for the HMA

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	c. 18,000
Epping Forest District Council	c. 11,400
Harlow District Council	c. 9,200
Uttlesford District Council	c. 12,500
Total across the HMA	c. 51,100
...of which the area in and around Harlow ²⁵ will provide	c. 16,100

- 6.18 The preferred strategy was established drawing on evidence available at the time on the basis that:
- At c. 51,000 new homes, the planned level of housing growth is higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the CLG 2012-based household projections (49,638). It is lower than ORS' estimated OAHN figure taking into account recent information including the CLG 2014-based household projections (54,608) but nonetheless represents good progress towards this higher figure. Overall, the figure of c. 51,000 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF), and, furthermore, significantly boosting the supply of housing (NPPF, para. 47).
 - Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for

²⁴ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

²⁵ 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

the town. The findings and recommendation of the London Stansted Cambridge Corridor (LSCC) Growth Commission report, published in July 2016, stated that “*Broxbourne, Harlow and Stevenage have significant strategies and ambitions for growth and development. They can play an important role in supporting the Corridor’s tech and life sciences clusters. Current development and future plans will greatly improve the industrial, commercial and residential offer. These areas must be supported to provide the right types of development that enhance the quality of place for the Corridor’s knowledge-based industries and residents*” (our emphasis).²⁶

- The transport modelling to date demonstrated that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the then Draft [now signed] Highways and Transportation Infrastructure MoU for the West Essex and East Hertfordshire HMA are delivered during the plan period. Evidence suggested that growth beyond 2033 is likely to be possible subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures.
- The Strategic Site Assessment (AECOM, September 2016) indicated that sufficient suitable strategic sites are available in and around Harlow to deliver the figure of c. 16,100 (together with sites either already completed or granted planning permission as well as urban brownfield sites). The Strategic Site Assessment is available on the Council’s Local Plan evidence-base webpage.²⁷

District level considerations

Overview

6.19 The HMA work discussed above resulted in an understanding of the preferred strategic sites within Epping Forest District around Harlow, and resulted in an understanding of the housing requirement which would need to be delivered through other sites within Epping Forest District. There remained a need to develop a District-wide understanding of the site options available within the wider District to deliver the remaining housing requirement. The Council updated its SLAA in 2016 taking account of further sites submitted and the sites identified through the settlement capacity study.

Housing, traveller and employment sites

6.20 In order to assess the sites submitted through the call for sites and identified through other evidence base studies across the District, the Council applied a bespoke site selection methodology, which sought to identify the most suitable sites for allocation in the Local Plan to meet the Districts’ housing, traveller and employment needs. The site assessment process undertaken to inform the Draft Local Plan involved a number of key stages and these are set out below:

- **Stage 1** - Major policy constraints - Residential sites were considered against six major policy constraints and employment sites five. A site was not progressed to the next stage if it was affected by one or more of the major policy constraints.
- **Stage 2** - Quantitative and qualitative assessment - A more detailed assessment was carried out against a range of criteria to identify the relative suitability of sites for development. The site assessment criteria were developed with the explicit purpose of reflecting the SA framework. No sites were rejected at this stage. The site selection process for employment sites was put on hold at this point until the Employment Land Supply Assessment could be updated.
- **Stage 3** - Identify candidate preferred sites - The purpose of this stage was to identify the candidate preferred sites, which were then subject to further capacity and deliverability assessment. The focus at this stage was to identify the ‘best’ fit sites for a particular

²⁶ London Stansted Cambridge Corridor Growth Consortium (2016). Findings and recommendation of the London Stansted Cambridge Growth Commission www.lscggrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf.

²⁷ Harlow, Epping Forest, East Herts and Uttlesford District Councils (2016) Harlow Strategic Site Assessment. Prepared by AECOM. www.efdclocalplan.org/technical-information/

settlement rather than those sites which might be 'best' at the District scale (please refer to strategic options for settlements below).

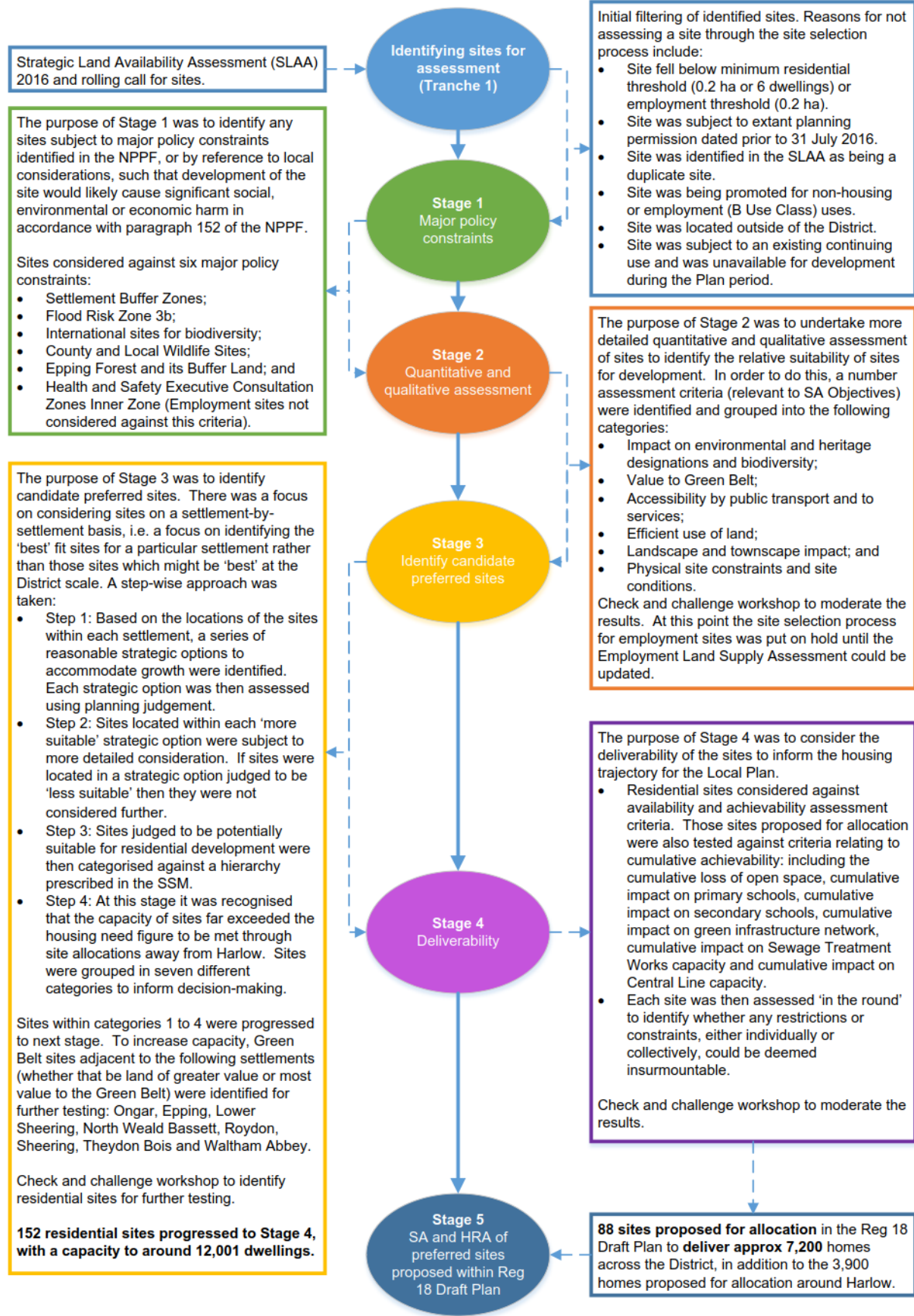
- **Stage 4 - Deliverability** - This stage considered the deliverability of the sites to inform the housing trajectory for the Draft Local Plan.

- 6.21 There was also an initial stage, prior to Stage 1, that involved a filtering process to sift out sites that had been identified through various sources, including the Council's Strategic Land Availability Assessment (SLAA; March 2016)²⁸, but were considered unsuitable for assessment through the site selection process.
- 6.22 It should be noted that a separate methodology was followed by the Council for identifying and selecting preferred traveller site allocations in the Local Plan. Please refer to the Site Selection Report for further details.²⁹
- 6.23 The site assessment process for housing and employment sites in 2016 is summarised in **Figure 5**.

²⁸ More information on the SLAA can be found on the Council's Local Plan evidence-base webpage. Also, note that the long-list comprised a small number of sites that were submitted to the Council subsequent to the SLAA cut-off date but prior to a final cut-off date of 17th May 2016.

²⁹ Epping Forest District Council (2017) Report on Site Selection. Prepared by ARUP. www.efdclocalplan.org/technical-information/

Figure 5: Site selection process in 2016 (Tranche 1)



Stage 1 - Major policy constraints

6.24 The purpose of Stage 1 was to identify any sites subject to major policy constraints identified in the NPPF, or by reference to local considerations, such that development of the candidate site would likely cause significant social, environmental or economic harm in accordance with paragraph 152 of the NPPF. Residential sites were considered against six major policy constraints and employment sites five:

- Settlement Buffer Zones - sites were removed from further consideration where no part of the site was located within the settlement buffer zones (as identified in the Council's Settlement Hierarchy Technical Paper (2015)).
- Flood Risk Zone 3b - sites were removed from consideration where the site was entirely located within Flood Risk Zone 3b.
- International sites for biodiversity - sites were removed from consideration where the site was entirely located within internationally designated sites of importance for biodiversity (Special Area of Conservation, Special Protection Area or RAMSAR).
- County and Local Wildlife Sites - sites were removed from consideration where the site was entirely located within an Essex County Council owned or managed wildlife site or Council owned or managed Local Nature Reserve.
- Epping Forest and its Buffer Land - sites were removed from consideration where the site was entirely located within Epping Forest or Epping Forest Buffer Land.
- Health and Safety Executive Consultation Zones Inner Zone - sites were removed from consideration where the site was entirely located within the Health and Safety Executive Consultation Zones Inner Zone (Employment sites not considered against this criteria).

Stage 2 - Quantitative and qualitative assessment

6.25 The purpose of Stage 2 was to undertake more detailed quantitative and qualitative assessment of sites to identify the relative suitability of sites for residential development.

6.26 In order to do this, a number of assessment criteria were identified and grouped into the following categories:

- Impact on environmental and heritage designations and biodiversity;
- Value to Green Belt;
- Accessibility by public transport and to services;
- Efficient use of land;
- Landscape and townscape impact; and
- Physical site constraints and site conditions.

6.27 The criteria were developed to be in-line with the SA framework and topics identified at the scoping stage. The criteria and their links with the SA process are presented **Appendix IV** of this SA Report. The assessment applied a RAG (Red/Amber/Green) rating system utilising a scale of three to five scores.

6.28 Each site subject to Stage 2 was assessed against the aforementioned criteria, using a combination of GIS analysis and planning judgement. The output of Stage 2 was an assessment 'proforma' for each site.

Stage 3 - Identify candidate preferred sites

6.29 The purpose of this stage was to identify the candidate preferred sites, which would then subject to further capacity and deliverability assessment. The focus at this stage was to identify the 'best' fit sites for a particular settlement rather than those sites which might be 'best' at the District scale.

6.30 The Council explored strategic options to accommodate growth at settlements within the District. Directions for growth or 'strategic options' at each settlement (e.g. North, South West), including intensification of the existing urban area, were identified based on the sites identified

through the site assessment process and considered through Stage 2. For each strategic option a planning judgement was made using evidence available including the Landscape Character Assessment Study, Green Belt Study, was made about whether the option represented a more or less suitable location for growth. For further information on strategic options please refer to later in this Chapter under the heading 'strategic options for settlements'. Step 2: Sites located within each 'more suitable' spatial option were subject to more detailed consideration. If sites were located in a spatial option judged to be 'less suitable' then they were not considered further.

6.31 Those sites located within the more suitable settlement alternatives were then assessed in order to identify the 'best' fit sites in that settlement. To guide the identification of the most suitable candidate Preferred Sites, each settlement was considered in turn. The assessment considered the relative merits of the sites and combinations thereof and identified the more appropriate sites. A sequential approach to site selection was applied, in accordance with the following:

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

6.32 At this stage it was recognised that the capacity of sites identified as potentially suitable for allocation far exceeded the housing need figure to be met through site allocations away from Harlow. To assist in identifying which sites should be subject to further testing, sites were grouped into the following categories:

- Category 1 - sites located within flood zone 1 and on previously developed land within settlements.
- Category 2 - sites located within flood zone 1 and comprising land which is urban open space (both designated and non-designated).
- Category 3 - sites located within flood zone 1 and on land located on previously developed Green Belt land.
- Category 4 - sites located within flood zone 1 and on land of least value to the Green Belt adjacent to the settlement.
- Category 5 - sites located within flood zone 1 and on land of greater value to the Green Belt adjacent to the settlement.
- Category 6 - sites located within flood zone 1 and on land of most value to the Green Belt adjacent to the settlement.

- Category 7 - contains the remaining suitable sites, which includes: sites located within flood zone 1, which are Green Belt but not adjacent to the settlement; sites located within flood zone 1, which are not designated Green Belt but are designated agricultural land; and all other sites located in other flood zones (regardless of the type of land the site is located on).
- 6.33 It was determined that all sites located within categories 1 to 4 for all settlements should be taken forward for more detailed testing. However, in total the capacity of these sites did not provide a sufficient quantum given the additional capacity and deliverability assessment that would be undertaken. Also, some settlements had none or very few sites located within the first four categories and it was felt that more sites needed to be put forward for testing in these locations in order to support a distributed pattern of growth across the District as supported through the Community Choices consultation in 2012 and realisation of emerging settlement visions. Therefore, all sites located in Green Belt adjacent to the following settlements were identified for further testing, whether that was land of greater value or most value to the Green Belt:
- Ongar - to ensure sufficient sites were put forward for testing to support the settlement remaining self-sustaining, to ensure that sufficient homes are built to support existing services and to maximise the opportunities provided by the new secondary academy and capacity in the two primary schools.
 - Epping - to provide sufficient choice of sites to enable the settlement to continue to grow at a rate that enables Epping to continue in its role as one of the main towns within the District.
 - North Weald Bassett - to enable sites identified in to the north of the Settlement as the preferred direction of growth in the North Weald Bassett Masterplan to be subject to more detailed testing.
 - Waltham Abbey - to ensure sufficient sites are considered to provide a sustainable level of housing which supports regeneration of the settlement and retention of town centre services.
 - Theydon Bois - to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement.
 - Lower Sheering, Roydon and Sheering - to enable sufficient sites to be put forward to meet local needs.

Stage 4 Deliverability

- 6.34 The purpose of Stage 4 was to consider the deliverability of the candidate Preferred Sites to inform the housing trajectory for the Submission Version Local Plan. Stages 1, 2 and 3 considered the suitability of the site and, therefore, this stage focused on whether a site was deliverable, specifically:
- Whether the site is available now or will become available during the Local Plan period
 - Whether development will be achievable within the appropriate timescales.
- 6.35 A series of questions were posed to land promoters/developers through a survey. The responses to this survey along with other technical information were used to undertake assessment of the following criteria:
- Availability: site ownership, existing uses, on-site restrictions and site availability.
 - Achievability: site viability, on-site physical and infrastructure constraints, impact on capacity of primary and secondary schools, access to open space, access to health facilities and impact on mineral deposits.
 - Cumulative achievability: cumulative loss of open space, cumulative impact on primary schools, cumulative impact on secondary schools, cumulative impact on green infrastructure network, cumulative impact on Sewage Treatment Works capacity and cumulative impact on Central Line capacity.

- Overview assessment of constraints: insurmountable constraints.
- 6.36 The availability and achievability assessment provided a more nuanced picture of the appropriateness of sites for allocation. Availability of sites in particular was an important issue given that the landownership information had not been identified for all sites assessed through the SLAA and, even where landownership details were known, the timescale for the site being brought forward for development was not. The criteria used and their links to the SA Framework are provided in **Appendix IV** of this report.

Strategic options for settlements

- 6.37 Responses received from the Community Choices consultation in 2012 led to the view that growth should be distributed across the District and prioritised within or adjacent to settlements to support sustainability (please refer to Chapter 5).
- 6.38 In order to reflect the consultation responses and inform the selection of sites, the Council explored strategic options to accommodate growth at settlements within the District.³⁰ The strategic options were essentially directions for growth at each settlement (e.g. North, South West) and were developed based on the sites identified through the site assessment process and considered through Stage 2. It should be noted that for all settlements a strategic option for intensification of the existing urban area was also explored.
- 6.39 For each strategic option a planning judgement was made using evidence available including the Landscape Character Assessment Study, Green Belt Study, was made about whether the option represented a more or less suitable location for growth. Each of the strategic options was considered through the SA process, which highlighted the key constraints as well as SA topics/objectives where an effect could arise as a result of development in those areas. The findings of this work are presented in **Appendix V** of this SA Report along with the Council's justification for why a strategic option is more or less preferred. It should be noted that the strategic options were refined following consultation responses and updated in 2017, please refer to Chapter 7.
- 6.40 The strategic options work informed the site selection process at Stage 3. Sites located within a 'more suitable' spatial option were progressed through the site assessment process and were subjected to more detailed consideration. If sites were located in a strategic option judged to be 'less suitable' then they were not considered further as part of the site assessment process.

Establishing the District-wide Reasonable Alternatives in 2016

- 6.41 The outcome of the Issues and Options consultation had led to the Council's approach to distribute development across the District, maximise development within existing settlements on brownfield land and minimise the release of Green Belt land in the District. Informed by the assessment of sites set out above, including strategic options for settlements, a series of District-wide spatial strategy alternatives were developed based on outcome of the Issues and Options consultation in 2012 and findings of the Interim SA Report (2012). The alternatives varied in terms of distribution only (recognising that the housing requirement for the District has been determined at the sub regional, HMA scale). All involved delivering the housing requirement of around 11,400 new homes arrived at on the basis of HMA level work, and broadly involved delivering the spatial strategy set out below, i.e. the alternatives varied only in limited respects. These are set out below:
- Option 1 was the preferred strategy (which was consulted on in the Draft Local Plan) to emerge from the HMA level work and site assessment process, which involved:
 - 1) A sequential flood risk assessment - proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
 - 2) Sites located on previously developed land within settlements;

³⁰ In some settlements only a single broad option was identified, while in other settlements the location of some sites was not considered to justify identification of a broad option.

- 3) Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;
 - 4) Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015);
 - 5) Greenfield/Green Belt land on the edge of settlements:
 - a. Of least value to the Green Belt if the land meets other suitable criteria for development.
 - b. Of greater value to the Green Belt if the land meets other suitable criteria for development.
 - c. Of most value to the Green Belt if the land meets other suitable criteria for development.
 - 6) Agricultural land:
 - a. Of Grade 4-5 if the land meets other suitable criteria for development.
 - b. Of Grade 1-3 if the land meets other suitable criteria for development.
 - 7) Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.
- Options 2 - 5 are as set out below and described in **Table 6.2**.

Table 6.2: The reasonable District-wide alternatives in 2016

Option	Quantum	Distribution
1 The preferred option		The preferred strategy
2 Lower growth at North Weald Bassett		Lower growth at North Weald Bassett, and consequentially higher growth elsewhere (dispersed)
3 Higher growth at North Weald Bassett	Meet the housing requirement of ~11,400 homes	Higher growth at North Weald Bassett, and consequentially lower growth elsewhere (dispersed)
4 Lower growth at urban greenspaces		Lower growth at urban greenspace sites, and consequentially higher growth elsewhere (dispersed)
5 Higher growth along the Central Line		Higher growth at settlements served by the Central Line, and consequentially lower growth elsewhere (dispersed)

6.42 The above District-wide spatial strategy options were considered to be the ‘reasonable’ alternatives at that stage in plan-making, in that their appraisal would enable and facilitate discussion of important issues/opportunities for the District. Whilst it was recognised that there are other options that could potentially have featured, there is a need to limit the number of alternatives, with a view to facilitating engagement.

6.43 The reasons for rejecting other alternatives for the distribution of the remaining growth in the District considered at earlier stages in plan-making - including a new settlement in the countryside, focussing all growth at one existing settlement and focussing growth in rural settlements - were still considered valid by the Council (please refer to Chapter 5).

SA of the District-wide Reasonable Alternatives in 2016

6.44 The options in **Table 6.2** were appraised through the SA process with the findings presented in the Interim SA Report that accompanied the Draft Local Plan on public consultation in October 2016.³¹ A summary of the SA findings for the District-wide spatial strategy alternatives in 2016 is provided below.

6.45 Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side categorised the performance of each option in terms of ‘significant effects’ (using **red** / **green**) and also ranked the alternatives in relative order of performance. Also, ‘ = ’

³¹ Epping Forest District Council (2016) Interim SA Report. Prepared by AECOM. www.efdclocalplan.org/technical-information/

is used to denote instances where the alternatives performed on a par (i.e. it not possible to differentiate between them). A star was used to highlight the option or options that were preferred from an SA perspective.

Table 6.3: Summary of SA findings for District-wide reasonable alternatives in 2016

Summary findings and conclusions					
Topic	Categorisation and rank				
	Option 1 The preferred option	Option 2 Lower growth at North Weald Bassett	Option 3 Higher growth at North Weald Bassett	Option 4 Lower growth at urban greenspaces	Option 5 Higher growth along the Central Line
Air quality	=	=	=	=	=
Biodiversity and green infrastructure	★1	★1	★1	★1	5
Climate change (mitigation and adaptation)	★1	★1	★1	★1	5
Community and wellbeing	=	=	=	=	=
Economy and employment	=	=	=	=	=
Historic environment	=	=	=	=	=
Housing	=	=	=	=	=
Land and waste	2	3	3	5	★1
Landscape	=	=	=	=	=
Transport	=	=	=	=	=
Water	=	=	=	=	=

6.46 All of the options were found to have the potential for a significant long-term positive effect in relation to communities and wellbeing as well as housing. The appraisal also found all to have the potential for a significant negative effect in terms loss of agricultural and greenfield land.

6.47 Option 1 involves a distribution as per the preferred strategy to emerge from the site selection work. This is a tailored approach that performs broadly well in terms of a range of sustainability objectives. It seeks to ensure that growth is well distributed between settlements, and also makes efficient use of land/minimises the loss of Green Belt land. However, it is also associated with certain draw-backs. The 'pros and cons' of the preferred approach are highlighted through the discussion of the alternatives presented below.

6.48 Option 2 proposes a lower level of growth at North Weald Bassett. It would result in a higher level of growth in other areas of the District; however, the precise level of this displaced growth and its location is not known at this stage. This option:

- is likely to have a reduced positive effect for the communities in and around North Weald Bassett compared to the other options given the lower level of housing proposed and associated improvements in terms of access to public transport, employment and services/facilities;

- offers opportunities to direct displaced growth towards areas that could potentially have better access to public transport, employment and services/facilities but this would not help to address existing sustainability issues or maximise opportunities for improvement within North Weald Bassett.
- 6.49 Option 3 proposes a higher level of growth at North Weald Bassett. It would result in a lower level of growth in other areas of the District; however, the level of growth and the precise areas it would be diverted from are not known at this stage. This option:
- is likely to have an enhanced positive effect compared to other options for communities in North Weald Bassett as a greater level of housing development is proposed; and
 - is more likely to take advantage of and maximise identified opportunities as well as better address existing issues for the town in relation to poor access to public transport and services/ facilities.
- 6.50 Option 4 proposes less development on greenspaces within the urban areas. This option:
- could result in a need to divert growth to locations on the edge of Loughton (in order to avoid unreasonably low growth at the town) that are sensitive in terms of flood risk and/or biodiversity (e.g. given the River Roding) and/or landscape (e.g. given the important Loughton/Theydon Bois gap);
 - performs poorly compared to the other options in terms of the efficient use of land as there will be lower growth within the urban areas, which would result in a higher level of growth and therefore loss of greenfield sites and agricultural land on the edge of settlements;
 - could help to ensure good access to open/green space; however, this is uncertain given evidence to suggest that the open spaces in question are under used, and that sufficient capacity would remain.
- 6.51 Option 5 proposes a higher level of growth in and around the settlements in the south of the District that are served by the Central Line. This option:
- is less likely to take advantage of and maximise opportunities for development in areas and settlements away from the Central Line, e.g. at Ongar and Waltham Abbey, where there are particular growth related opportunities;
 - directs growth to areas with good access to public transport, employment and services/facilities;
 - performs poorly compared to other options against biodiversity as it proposes a higher level of growth in close proximity to sensitive and designated nature conservation sites, leading to the prediction of a 'significant negative effect';
 - directs growth away from the best and most versatile Grade 2 agricultural land situated in the northern areas of the District; and
 - is more likely to result in the loss of Green Belt land in the south of the District, which provides gaps that are important in terms of maintaining separation between settlements.

The Council's response/justification for the preferred approach in 2016

- 6.52 The Council's justification for the preferred approach in 2016 was set out at paragraph 3.54 of the Draft Local Plan (2016), as reflected in Draft Local Plan Policy SP 2. That justification is summarised below.
- 6.53 The preferred approach - Option 1 - made provision for 11,400 homes over the plan period through a distribution strategy that emerged subsequent to work with neighbouring authorities and a detailed site selection process and reflected the following broad principles:
- Allocating sites around Harlow in accordance with the vision of the London Stansted Cambridge Corridor Core Area and to recognise its role from an economic perspective;
 - Maximising opportunities for development on previously developed land within the existing settlements of the District;
 - Utilising open space within settlements where such selection would not adversely affect open space provision within the settlement and making the best use of existing land without compromising local character;
 - Utilising previously developed land within the Green Belt;
 - Allowing for a limited release of Green Belt land to provide for housing on the edge of settlements to distribute housing across the District, in keeping with Green Belt policy that exceptional circumstances must be demonstrated for Green Belt release; and
 - Enabling small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.
- 6.54 Options for lower (Option 2) and higher (Option 3) growth at North Weald Bassett were not progressed as the Council at that time determined that the 2014 masterplan for the area should be realised with development to the North of the village in order to have a sufficient quantum of growth to ensure that infrastructure requirements could be met and a new village centre created and meet the Council's aspirations for its land at North Weald Airfield. Traffic and the impact of increased movements on the Forest was also a consideration. Again a difficult balance was struck in order to ensure that the Green Belt land take was minimised.
- 6.55 Lower growth at urban greenspaces (Option 3) was not progressed as to do so would have resulted in additional land take from the Green Belt and on balance further loss of Green Belt was deemed to be more detrimental to the future growth of the District. This was because it would have resulted in less sustainable development and overall the District enjoys good access to open space provision particularly in the South with Epping Forest and the Roding Valley. Clearly neither loss of urban green space nor loss of Green Belt is desirable but the housing need in the District means that an appropriate balance must be struck.
- 6.56 Higher growth along the Central Line (Option 5) was not progressed due to issues relating to existing capacity on the Central Line, the proximity of these sites to the Forest and concerns relating to impact on air quality/recreational pressure. There are significant traffic pressures in the South of the District which are difficult to mitigate which may limit opportunities for sustainable growth above and beyond that proposed. More growth along the Central Line corridor would have meant the identification of more sites which were less suitable in planning terms when compared to sites available elsewhere in the District. In addition the Council wanted to ensure that the villages and smaller settlements had a sufficient level of growth to ensure their future sustainability. Again a balance was struck between growth along the Central Line and elsewhere in the District.

7. Reasonable Alternatives in 2017

Developing Reasonable Alternatives in 2017

- 7.1 Subsequent to the consultation on the Draft Local Plan and Interim SA Report in 2016, the representations received were collated and reviewed. On the basis of the responses received as well as updated evidence, it was considered appropriate to give further consideration to District-wide reasonable alternatives.
- 7.2 Building on the work carried out in 2016 and explained above, the discussion below is again structured according to the following:
- 1) HMA level considerations relating to the broad strategy for the sub-regional HMA (including sites on the around Harlow); and
 - 2) District level considerations relating to site options within the rest of Epping Forest District.
- 7.3 As for the previous work again we consider (1) and (2) in turn, and then conclude by explaining how the updated evidence-base was drawn on to establish and refine District-wide reasonable alternatives for appraisal in 2017.

Housing Market Area (HMA) level considerations

- 7.4 Since the Draft Local Plan consultation in 2016, a further SHMA update was carried out in 2017 taking into consideration the latest relevant evidence including the Department for Communities and Local Government's 2014 based household projections (July 2016). These updates led to a revised objectively assessed housing need (OAHN) for the HMA of 51,710 dwellings from a previous figure of 46,100 while the need for affordable housing remained largely unchanged from the 2015 SHMA.
- 7.5 The latest updates identified a slightly increased OAHN for three of the four local authorities in the HMA. However, as the increase had been largely anticipated and accounted for in the HMA level work and preferred strategy, the updated overall housing need across the entire HMA remained broadly consistent with what had already been agreed (signed Memorandum of Understanding, March 2017). As stated in paragraph 47 of the National Planning Policy Framework (NPPF), local authorities should "...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."
- 7.6 It was not considered necessary to revisit alternatives for the level and distribution of growth for the HMA set out in the signed MoU (March 2017). The SA of Strategic Spatial Options published in 2016 considered three alternatives for the overall level of growth in the HMA, which included the delivery of ~ 46,000, ~ 49,638 and ~ 57,400 new homes within the HMA.³² As such, higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level pioneering work.
- 7.7 As a result, the HMA authorities are satisfied that the approach set out within the MoU will ensure that the predicted housing need of the HMA will be met over the course of the Local Plan periods.³³ Epping Forest District Council's housing requirement therefore remains 11,400 dwellings as set out within the signed MoU (March 2017).

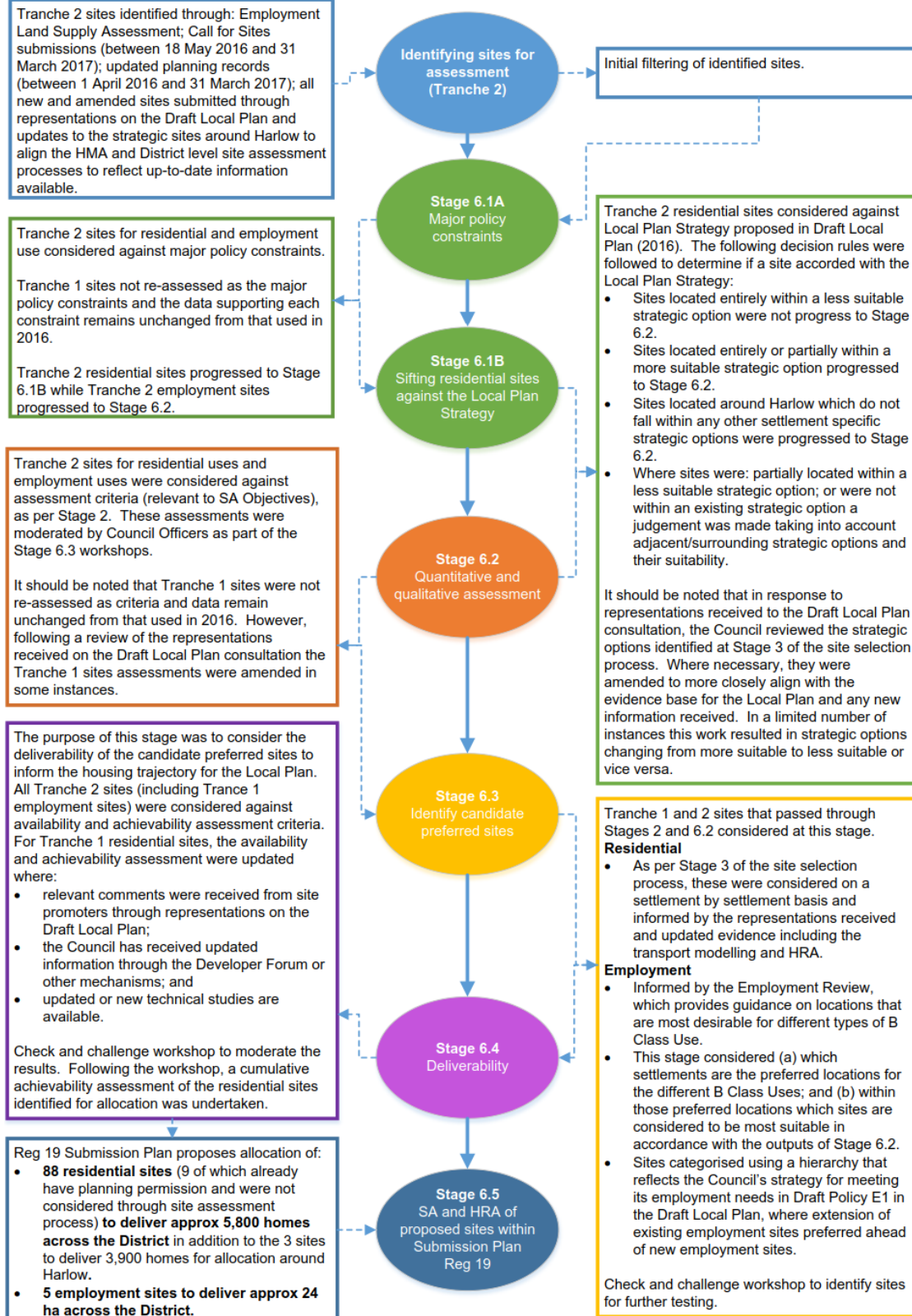
³² Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

³³ It should be noted that Uttlesford District Council published a Regulation 18 Local Plan for consultation in July 2017, which includes a housing target of 14,100 dwellings.

Housing, traveller and employment sites

7.8 Following the Draft Local Plan consultation in 2016, further work was carried out on the Site Selection Methodology (SSM). This further work is explained in detail in an updated SSM Document, which is available on the Council's website³⁴, and summarised in **Figure 6** below.

Figure 6: Site selection process in 2017 (Tranche 2)



³⁴ <http://www.efdclocalplan.org/wp-content/uploads/2017/07/Updated-EFDC-Site-Selection-Methodology-Post-Reg-18.pdf>

- 7.9 The sources of information for identifying additional sites to be subject to the SSM post-Draft Local Plan consultation (referred to as Tranche 2 sites) are different to that used for the Tranche 1 sites in 2016. In order to identify Tranche 2 sites the following sources were used:
- Employment Review³⁵ and Employment Land Supply Assessment³⁶ studies;
 - Call for Sites submissions received between 18 May 2016 and 31 March 2017;
 - Refused and withdrawn planning applications, live planning applications and pre-application enquiries received between 1 April 2016 and 31 March 2017;
 - Representations from site promoters received in response to the Draft Local Plan consultation which identify new sites and/or amended proposals for Tranche 1 sites which are materially different from that previously assessed; and
 - Updates to the strategic sites around Harlow to align the HMA and District level site assessment processes to reflect up-to-date information available.
- 7.10 It should be noted that Tranche 1 site assessments were amended in some instances to reflect responses received from the Draft Local Plan consultation in 2016.

Stage 6.1A: Major Policy Constraints

- 7.11 As in 2016, the Tranche 2 sites were screened against the major policy constraints using a GIS database. Tranche 1 sites were not re-assessed as the major policy constraints and the data supporting each constraint remained unchanged from that used in 2016.

Stage 6.1B: Sifting residential sites against the Local Plan Strategy

- 7.12 The Council set out its Local Plan Strategy for residential sites in the Draft Local Plan (2016). This was informed by the site selection work undertaken for Tranche 1 sites and reflects the broad principles set out in Paragraph 4.49 earlier in this Chapter. The Local Plan Strategy is also supported by the strategic options identified through Stage 3 of the site selection process, which identified more or less suitable strategic options for each settlement. Following a review of the representations received to the Draft Local Plan consultation, the Council continued to believe that the Local Plan Strategy it consulted upon remained the most appropriate strategy for accommodating growth in the District over the Plan period. Therefore, given that the context in which the site selection process is being undertaken had changed, and that the NPPF indicates that local planning authorities should take a proportionate approach to evidence collection, the Council considered that sites which do not accord with the Local Plan Strategy should not be assessed at Stage 6.2.
- 7.13 In order to determine whether a site proposed for residential development accords with the Local Plan Strategy and should progress to Stage 6.2, the following rules were followed:
- Sites located entirely within a less suitable strategic option will not progress to Stage 6.2.
 - Sites located entirely or partially within a more suitable strategic option will progress to Stage 6.2.
 - Sites located around Harlow which do not fall within any other settlement specific strategic options will progress to Stage 6.2.
 - Where sites are: partially located within a less suitable strategic option; or are not within an existing strategic option a judgement will be made taking into account adjacent/ surrounding strategic options and their suitability. Where a site is located partially within or near a less suitable strategic option, the applicability of the constraints identified for that strategic option to the particular site will be taken into account.
- 7.14 The Tranche 2 residential sites meeting the rules above were then progressed to Stage 2 for detailed assessment.

³⁵ Epping Forest District Council (2017) Employment Review. Prepared by Hardisty Jones Associates.
www.efdclocalplan.org/technical-information/

³⁶ Epping Forest District Council (2017) Employment Land Supply Assessment. Prepared by Arup.
www.efdclocalplan.org/technical-information/

7.15 It should be noted that in response to representations received to the Draft Local Plan consultation in 2016, the Council reviewed the strategic options identified at Stage 3 of the site selection process. Where necessary, they were amended to more closely align with the evidence base for the Local Plan and any new information received. In a limited number of instances this work resulted in strategic options changing from more suitable to less suitable or vice versa. Please see below for further information.

Stage 6.2: Quantitative and qualitative assessment

7.16 As for the Tranche 1 sites, all Tranche 2 sites that successfully passing Stage 1 were then subject to further quantitative and qualitative assessment. The same assessment criteria were used as in 2016 and these are presented in **Appendix IV** of this SA Report.

7.17 This stage was only undertaken for Tranche 2 sites. Tranche 1 sites were not re-assessed as the criteria and the data supporting them remained unchanged from that used in 2016. However, site assessments for Tranche 1 sites were reviewed against the comments raised in site promoter's representations to the Draft Local Plan consultation. The Report on Site Selection³⁷ will include a table that identifies those sites for which representations from site promoters were made and where a change was made to the assessment in response to the representation.

Stage 6.3: Identify candidate Preferred Sites

7.18 The purpose of this stage was to identify the candidate preferred sites, which best meet the Council's preferred growth strategy. This stage considered Tranche 1³⁸ and Tranche 2 sites assessed at Stages 2 and 6.2, respectively, and will be undertaken in parallel for residential, employment and traveller sites.

7.19 Tranche 1 sites were not assessed at this stage if they had been re-assessed as part of a Tranche 2 site or the site had been withdrawn for consideration through the site selection process. During this Stage, the judgements made in relation to the suitability of Tranche 1 sites in 2016 were not re-visited except where they met one or more of the following criteria:

- the suitability of a strategic option had changed from less suitable to more suitable (as detailed at Stage 6.1B);
- an error had been identified in the previous assessment (either the Stage 2 assessment or Stage 3 site suitability assessment), which may materially alter the judgement previously reached; and
- the site was not proposed for allocation in the Draft Local Plan but was identified by promoters through their representations as potentially being capable of making a contribution to the Council's five year housing land supply.

7.20 The process followed for Stage 6.3 was broadly consistent with that followed for Stage 3. It should be noted that some additional factors were taken into account when determining which sites should be taken forward for further testing. This included:

- The outcomes of the transport, infrastructure and HRA modelling of the Draft Local Plan sites should this indicate constraints to delivering growth in particular settlement(s).
- The Council's latest housing trajectory should this indicate that a particular size or type of site may be required in order for the Council to demonstrate a five year land supply.
- Refined settlement visions and work on place-making taking account of consultation comments and further evidence based work.
- The size of the sites taken forward including whether there are sufficient small sites identified to comply with the emerging policy requirement set out in Housing White Paper where at least 10% of the sites allocated for residential development should be sites of half a hectare or less.

³⁷ Epping Forest District Council (2017) Report on Site Selection. Prepared by ARUP. www.efdclocalplan.org/technical-information/

³⁸ Unless a Tranche 1 site has been re-assessed as part of Tranche 2 or has site has been withdrawn for consideration through the site selection process.

- Progress with emerging and made Neighbourhood Plans which include site allocations.
- 7.21 A workshop will be held with the Local Plan Officer Working Group to identify candidate Preferred Sites. This included consideration of whether sites should comprise mixed use development to meet the District's residential and employment needs.
- 7.22 All Tranche 1 and Tranche 2 site identified at Stage 3/Stage 6.3 were subject to more detailed capacity assessment.

Stage 6.4: Deliverability

- 7.23 The process followed for Stage 6.4 was broadly consistent with that followed for Stage 4 in 2016. See **Appendix III** for the criteria and links to the SA Framework. In 2017, all Tranche 2 sites and Tranche 1 sites not previously subject to Stage 4 were assessed. Where Tranche 1 sites were assessed at Stage 4, the assessment was re-visited at Stage 6.4 where they met one or more of the following criteria:
- relevant comments were received from site promoters or other parties (where appropriate) through their representations to the Draft Local Plan;
 - where the Council had received updated information through the Developer Forum or other mechanisms; and
 - where updated or new technical studies were available which informed the assessment. This included, for example, up-to-date information and/or data on site access, surface water flood risk, open space, GPs and schools

Strategic Options for Settlements

- 7.24 Since a number of Tranche 2 sites were located fully or partially outside an existing strategic option or straddled more than one strategic option a review of the strategic options was undertaken to determine whether there was a need to amend the boundary of any strategic option to incorporate a site or whether a new strategic option was required. In determining whether the boundary of a strategic option should be amended or a new strategic option should be introduced regard was had to the following:
- the characteristics of the land within and proposed for inclusion within the strategic option to see whether they are comparable; and
 - whether the justification for the existing strategic option would be applicable to the land proposed for inclusion.
- 7.25 A limited number of amendments were identified to the existing strategic options follow the review. These can be summarised as follows:
- Chigwell - amendment to the boundary of the Northern Expansion strategic option to include two additional sites.
 - Epping - amendments to the boundaries of the Intensification, Eastern Expansion and Southern Expansion strategic options to better align with the boundaries of sites considered at Stage 6.3.
 - Harlow - minor amendments to the Harlow Strategic Sites strategic option to better reflect revised site boundaries.
 - Lower Nazeing - amendment to the Eastern/north-eastern infill and expansion strategic option to include an additional Tranche 2 site.
 - North Weald Bassett - minor amendment to the boundaries of the South-western Expansion strategic option to remove a site, and amendment to the northern boundary of the Northern Expansion strategic option to better align with the boundaries of sites considered at Stage 6.3 and reflect the potential for settlement rounding to the north of Vicarage Lane West.
 - Roydon - spatial expansion of the Eastern Expansion strategic option to include strategic sites to the north-west of Harlow and east of Roydon reflecting the strong functional

relationship between these areas, in terms of the potential for very high impact upon the Green Belt and prevalence of environmental constraints; minor boundary amendments were also made to the Intensification and Western Expansion strategic options to move one site from one option to the other.

- Theydon Bois - boundary amendments to the Intensification strategic option to better align with site boundaries, and to the North-eastern Expansion strategic option to include an additional site.
- Waltham Abbey - boundary amendment to the Northern Expansion strategic option to include an additional site.

7.26 The Appendices to the Site Selection Report will contain a map illustrating the strategic options identified for each settlement. **Appendix V** sets out the justification for the strategic options as amended. Each of the strategic options was considered through the SA process, which highlighted the key constraints as well as SA topics/objectives where an effect could arise as a result of development in those areas.

Establishing the District-wide Reasonable Alternatives in 2017

7.27 Building on the work carried out in 2016 and informed by updated evidence - which includes the assessment of new/amended sites submitted since the 2016 site selection work through the rolling call for sites/Tranche 2 sites (for housing, traveller and employment uses); the updated SHMA³⁹, Employment Review⁴⁰, Employment Land Supply Assessment⁴¹ and Gypsy and Traveller Accommodation Assessment⁴² - the consideration of District-wide reasonable alternatives at this stage focused on exploring variations in terms of distributing the housing and employment needs based on the preferred spatial strategy.

7.28 It was not considered necessary to re-visit broader District-wide spatial strategy alternatives at this stage. The SA process appraised alternatives to the preferred spatial strategy for the delivery of ~ 11,400 homes in 2016, with the findings published in the Interim SA Report (2016).⁴³ The representations received in relation to the Draft Local Plan and Interim SA Report along with the updated evidence do not suggest that there are any new District-wide spatial strategy alternatives that need to be explored or that the appraisal needs to be re-visited.

7.29 The alternatives in 2017 were defined in order to test the parameters of the potential changes under consideration by the Council, following consideration of the latest evidence and responses to the Draft Local Plan consultation. The alternatives were developed to enable further consideration of the following in relation to the Draft Local Plan:

- Whether transport impacts on Epping could be minimised;
- Whether air quality impacts on Epping Forest could be minimised;
- Whether transport impacts and congestion generally across the District could be minimised;
- The Potential impacts from decisions on key infrastructure - particularly Princess Alexandra Hospital and the location of two new secondary school(s);
- Contribution to five year land supply within the Local Plan; and
- Potential alignment with emerging Neighbourhood Plans.

³⁹ Opinion Research Services (July 2017) West Essex and East Hertfordshire Strategic Housing Market Assessment: Establishing the Full Objectively Assessed Need. <http://www.efdclocalplan.org/technical-information/>.

⁴⁰ Epping Forest District Council (2017) Employment Review. Prepared by Hardisty Jones Associates. www.efdclocalplan.org/technical-information/

⁴¹ Epping Forest District Council (2017) Employment Land Supply Assessment. Prepared by Arup. www.efdclocalplan.org/technical-information/

⁴² Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. www.efdclocalplan.org/technical-information/

⁴³ Epping Forest District Council (2016) Interim SA Report. Prepared by AECOM. www.efdclocalplan.org/technical-information/

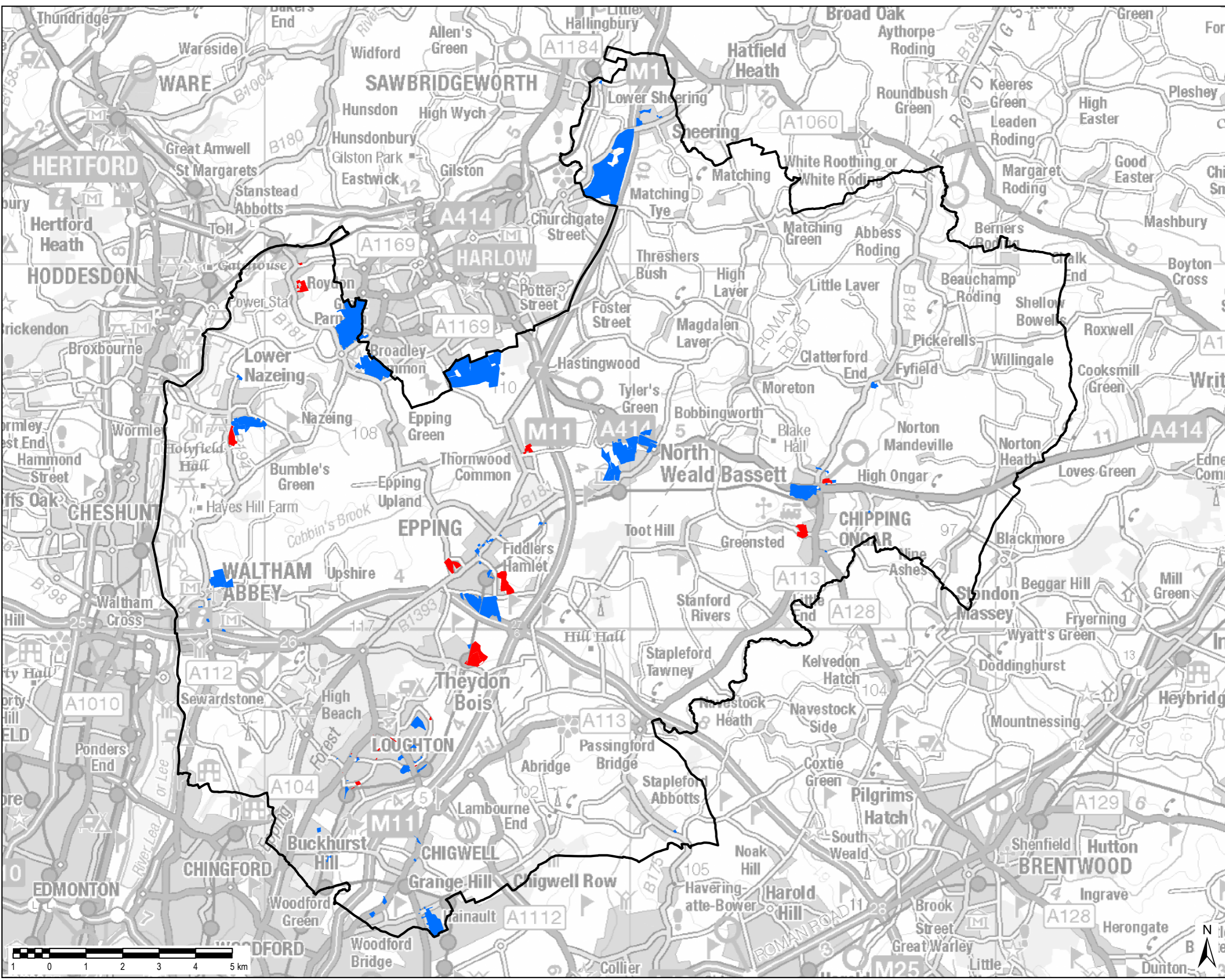
7.30 This would help to inform the Council's decision-making on proposed site allocations in the Submission Local Plan. Based on the above, three reasonable District-wide alternatives were identified and these are set out in **Table 7.1** below.

Table 7.1: The District-wide Reasonable Alternatives in 2017

	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patters	Alternative C School variation across the District
Description	This distribution took the sites from the Draft Local Plan together with the new and amended sites from Tranche 2 as part of the site selection process and assessed whether they would be suitable based on the notion of minimising the level of change to the Draft Local Plan.	This distribution set out to assess the impacts of changing the distribution of sites on the travel patterns across the District, using both the allocated and new and amended sites from tranche 2 of this round of the site selection process.	This distribution set out to assess the impacts of the location of schools in the District, using both allocated and new/amended sites from Tranche 2 of the site selection process.
Residential	<ul style="list-style-type: none"> • More growth at Epping and Theydon Bois. • More growth on suitable brownfield sites in Loughton (emerging through Tranche 2) and less on the managed open space sites. 	<ul style="list-style-type: none"> • Less growth at Epping and Theydon Bois. • More growth at Ongar and north of Waltham Abbey. 	<ul style="list-style-type: none"> • More growth at Epping (same level as Alternative A). • Less growth at Theydon Bois (same level as Alternative B). • More growth at Ongar (same level as Alternative B). • More growth on brownfield sites in Loughton (emerging through Tranche 2) and less on the managed open space sites.
Employment	<ul style="list-style-type: none"> • Lower growth at North Weald Basset. • Higher growth at Waltham Abbey, primarily to the south. • Lower growth at Harlow Strategic Sites. 	<ul style="list-style-type: none"> • Higher growth at North Weald Basset. • No growth at Waltham Abbey. • Higher growth at Harlow Strategic Sites. 	<ul style="list-style-type: none"> • Higher growth at North Weald Basset. • Growth at Waltham Abbey. • Higher growth at Harlow Strategic Sites.
Infrastructure	<ul style="list-style-type: none"> • Two new secondary schools at Harlow Strategic Sites - Latton Priory and East of Harlow • Expansion of Waltham Abbey and Loughton secondary schools. 	<ul style="list-style-type: none"> • New secondary school at East of Harlow. • New secondary school at Waltham Abbey to the north. • Expansion of Loughton secondary schools. 	<ul style="list-style-type: none"> • New secondary school at East of Harlow. • New secondary school at Epping. • Expansion of Loughton/Waltham Abbey secondary schools.

7.31 It was understood that the sites ultimately identified for allocation in the Submission Version Local Plan would represent a hybrid of the three alternatives above, taking into account the findings of the technical assessment work (transport modelling, education requirements and the SA process).

7.32 The varying distribution of housing under the three alternatives is illustrated in **Figures 7 to 9**. Broad locations for employment and new secondary schools were explored as part of the alternatives rather than specific sites. These broad locations are identified in **Table 7.1** above. As a result, the broad locations are not included as part of the figures to avoid confusion with the specific residential sites.



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LEGEND

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- Residential sites for testing**
- Constant
- Variable

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Purpose of Issue

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EPPING FOREST DISTRICT COUNCIL

Project Title
SA FOR EPPING FOREST DISTRICT LOCAL PLAN

Drawing Title
Alternative A

Drawn SM	Checked CN	Approved AP	Date 01/12/2017
AECOM Internal Project No. 60555508		Scale @ A3 1:95,000	

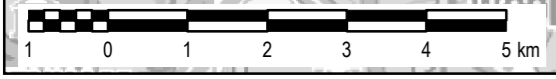
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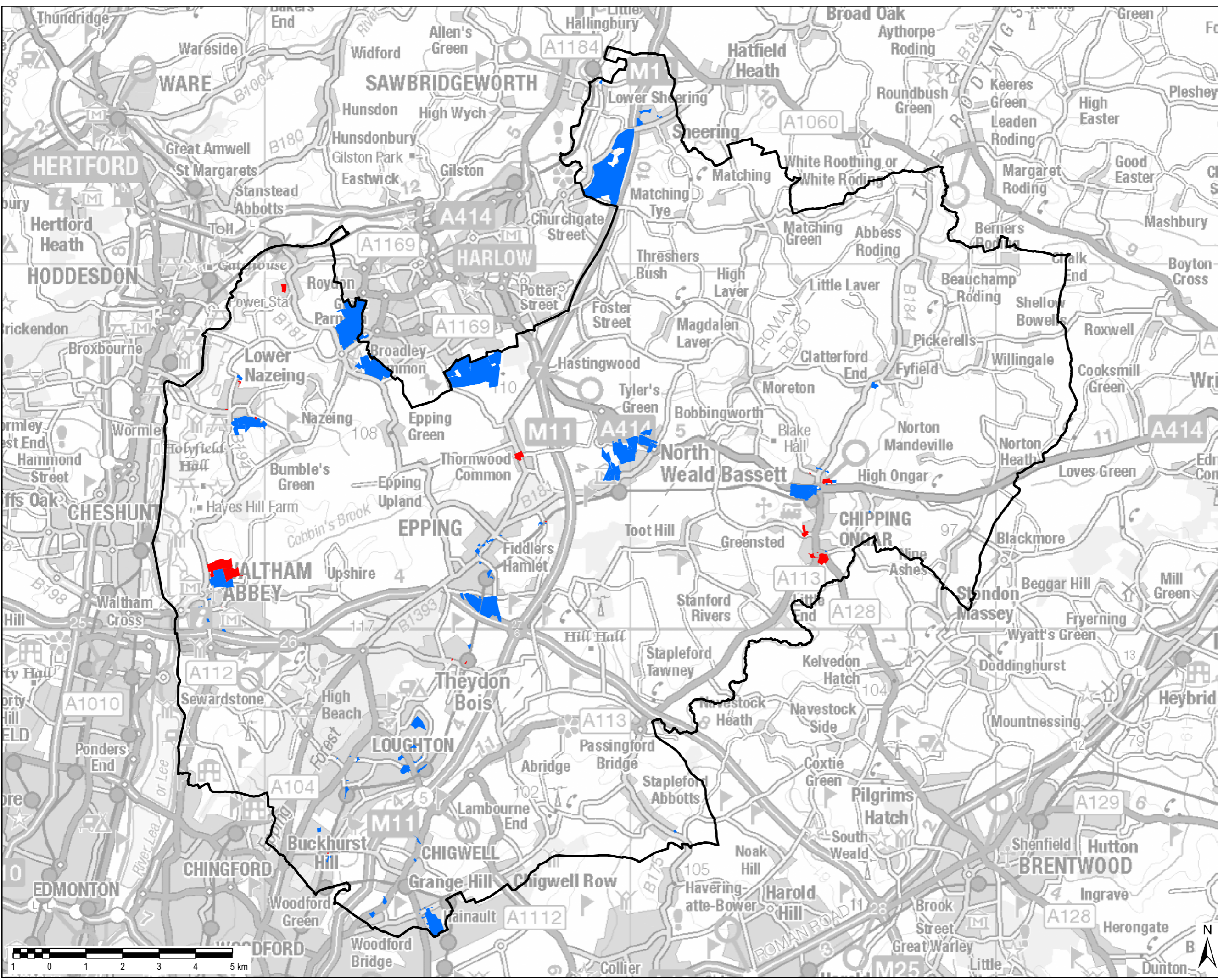
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Purpose of Issue

Client
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Project Title
 SA FOR EPPING FOREST DISTRICT LOCAL PLAN

Drawing Title
 Alternative B

Drawn SM	Checked CN	Approved AP	Date 14/11/2017
AECOM Internal Project No. 60555508		Scale @ A3 1:95,000	

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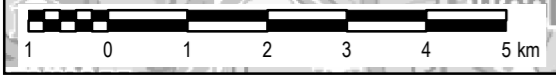
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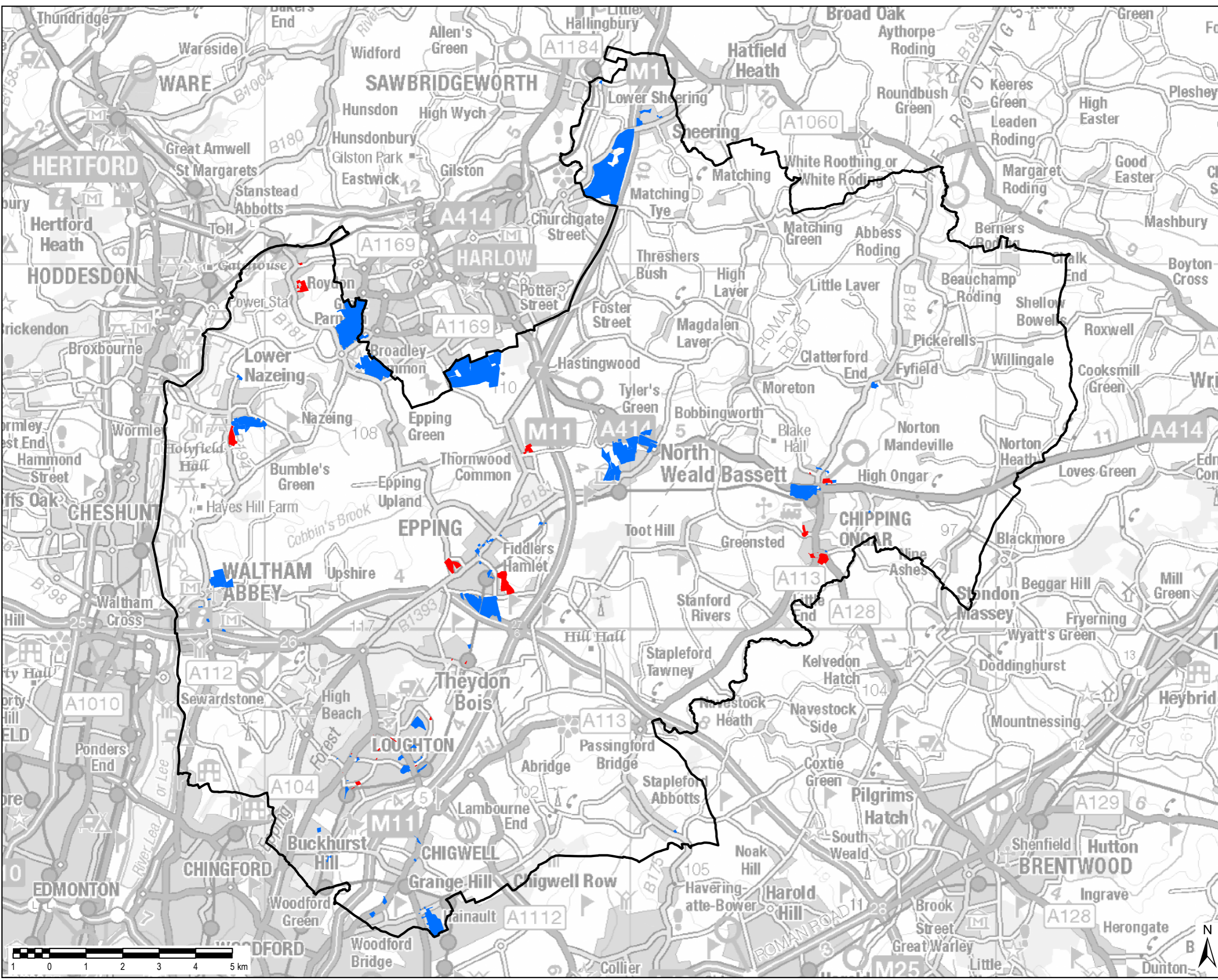
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FIGURE 8

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Purpose of Issue

Client
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Project Title
 SA FOR EPPING FOREST DISTRICT LOCAL PLAN

Drawing Title
 Alternative C

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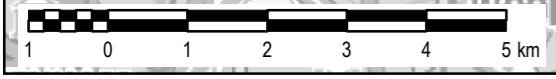
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Appraising the Reasonable Alternatives in 2017

Introduction

7.33 The aim of this chapter is to present summary appraisal findings in relation to the reasonable alternatives introduced above. Detailed appraisal findings are presented in **Appendix VI**.

Summary alternatives appraisal findings

7.34 **Table 7.2** presents summary appraisal findings in relation to the three alternatives introduced above. Detailed appraisal methodology is explained in **Appendix VI**. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using **red / green**) and also rank the alternatives in relative order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them). A star is used to highlight the option or options that are preferred from an SA perspective.

Table 7.2: Summary spatial strategy alternatives appraisal findings

Summary findings and conclusions			
Topic	Categorisation and rank		
	Option A Minimising change to the Draft Local Plan	Option B Exploring alternative travel patterns	Option C School variation across the District
Air quality	=	=	=
Biodiversity and green infrastructure	2	2	★1
Climate change (mitigation and adaptation)	★1	2	2
Community and wellbeing	=	=	=
Economy and employment	=	=	=
Equality, diversity and inclusion	=	=	=
Historic environment	=	=	=
Housing	2	★1	2
Land and waste	★1	3	★1
Landscape	=	=	=
Transport	★1	3	2
Water	=	=	=

7.35 The appraisal found that for a number of SA topics the differences in terms of distribution do not result in any significant differences between the alternatives or are likely to generate any significant effects at a District scale. There are differences between the alternatives at a local level, in terms of positive and negative effects, against the majority of SA topics. This in particular relates to biodiversity, landscape, historic environment and transport. It is not appropriate to go into detail about these localised effects within the NTS - as where they occur reflects the distribution of growth. They were also found by the appraisal to not be significant once mitigation is taken into account.

7.36 In terms of significant effects the appraisal found the following:

- There is the potential for all the alternatives to have a **significant long term positive effect** on SA topics relating to community and wellbeing, economy and employment and housing. The delivery of delivery of housing and employment as well as associated improvements to infrastructure, including community facilities/services and public transport, will help to meet the needs of communities and have a positive effect for the District. Alternative B performed slightly better against the housing topic compared to the others as it would deliver a slightly higher level of overall housing growth.
- There is the potential for all the alternatives to have a **significant negative effect** on the land and waste SA topic through the loss of greenfield and agricultural land. While the Local Plan Strategy and therefore all of the alternatives seek to minimise the loss of both where possible, there will still be a loss that is of significance in order to ensure that housing needs are being met. Alternative B performs worse against this topic as it proposes less brownfield development in Loughton compared to the others.

7.37 While the appraisal did not identify any further significant effects, it did highlight some differences between the alternatives for the following topics:

- **Biodiversity** - Alternative C performs slightly better than the others as it directs more growth away from the sensitive receptors, such as Epping Forest and the Lee Valley, situated in the South West and West of the District.
- **Transport** - There are existing congestion issues in the south of the District and focusing development there could exacerbate this. However, the settlements in the south of the District have good access to the Underground network and services/facilities. Housing within and around these settlements accompanied with associated improvements to public transport infrastructure could potentially help to reduce use of the private vehicle and therefore traffic by encouraging the use of other, more sustainable modes of transport. Alternative A proposes the greatest level of growth along the Central Line, so it performs better against the transport topic compared to the other alternatives. It is followed by Alternative C with Alternative B performing less well as it proposes directs growth away from the Central Line.
- **Climate Change** - Linked to the findings of the appraisal for transport, the appraisal found that Alternative A performs slightly better against the climate change topic as it is more likely to reduce the need to travel/ use of the private vehicle so is therefore more likely to minimise transport related CO₂ emissions.

Developing the preferred approach in 2017

Introduction

7.39 The aim of this Chapter is to present the Council's response to the alternatives appraisal / the Council's reasons for developing the preferred strategy in-light of alternatives appraisal.

The Council's outline reasons

7.40 The three alternatives outlined earlier in **Table 7.1** were tested through transport modelling, sustainability appraisal, education requirements (principally assessing the impacts of different secondary school locations) and contribution to the five year land supply. The findings were used to inform the allocation of sites to be included in the Submission Version of the Local Plan.

7.41 The transport modelling found key traffic impacts are likely to arise in Epping and Waltham Abbey and that the Wake Arms Roundabout is a key constraint. The modelling found the following in terms of differences between the alternatives:

- **Wake Arms roundabout** - Alternative C performs slightly worse in the AM and there are no significant differences between Alternatives A and B in the AM. There are no significant differences between the alternatives in the PM. The modelling found that all the alternatives are likely to have reduced traffic impacts compared to the Draft Local Plan (2016).
- **Epping** - Alternative B performs best in the AM and PM as it proposes the lowest level of growth. Alternative C performs worse in the AM as a result of the delivery of a new secondary school. Alternative A falls between B and C in the AM and performs similarly to Alternative C in the PM. The modelling found that all the alternatives are likely to have increased traffic impacts compared to the Draft Local Plan (2016), apart from Alternative B in the PM.
- **Loughton** - All the alternatives perform similarly in the AM and PM. The modelling found that all the alternatives are likely to significantly reduce traffic impacts, particularly in the AM, compared to the Draft Local Plan (2016).
- **Waltham Abbey** - Alternative B performs significantly worse in the AM and PM. There are no significant differences between Alternatives A and C. The modelling found that all the alternatives are likely to have and increased traffic impact compared to the Draft Local Plan (2016).
- **Harlow** - Alternative B performs worse in the AM and PM followed by Alternative C. Alternative A performs better in both the AM and PM. This is likely due to the higher level of employment growth proposed at the Harlow Strategic Sites under Alternatives B and C. The modelling found that all the alternatives are likely to have increased traffic impacts compared to the Draft Local Plan (2016), apart from Alternative A in the PM.

7.42 In terms of education requirements, all of the alternatives scored similarly with regard to primary schools. The location of new secondary schools is a key issue in terms of education provision during the life of the Local Plan. A new secondary school on the East of Harlow Site is included under all the alternatives and can be accommodated. There are significant doubts that a new secondary school could be provided at Waltham Abbey due to transport issues and whether the level of growth would be sufficient to deliver it. Essex County Council's preferred location for the second secondary school is Latton Priory as they consider it will have a comparatively reduced impact on traffic. It is assumed that secondary schools in the south of the District will expand to cater for growth in needs. There is potential for the relocation of King Harold School onto the new masterplan area to the North of Waltham Abbey.

7.43 The SA found that for the majority of SA topics the differences in terms of distribution do not result in any significant differences between the alternatives or are likely to generate any significant effects at a District scale. There will be differences between the alternatives at a local level, in terms of positive and negative effects, against SA topics relating to the landscape,

historic environment, biodiversity, economy, communities and transport. Some of the differences identified through the SA are highlighted below:

- **Biodiversity** - Alternative C performs slightly better against biodiversity as it proposes less growth in the south west of the District where there are sensitive receptors.
- **Climate change** - Alternative A performs slightly better in terms of transport related CO2 emissions given the focus of growth around the Central Line and therefore access to public transport.
- **Housing** - Alternative B performs slightly better against the housing topic as it proposes a slightly higher overall level of growth compared to the other alternatives.
- **Land and waste** - Alternatives A and C perform slightly better against this topic as they take advantage of the brownfield sites emerging in Loughton through the site assessment process (Tranche 2), whereas Alternative B does not.
- **Transport** - The settlements in the south of the District have good access to the Underground network and services/facilities. Housing within and around these settlements accompanied with associated improvements to public transport infrastructure could potentially help to reduce use of the private vehicle and therefore traffic by encouraging the use of other, more sustainable modes of transport. Alternative A proposes the greatest level of growth along the Central Line so it performs better against this topic.

7.44 The results from the technical assessments of alternatives set out above, together with analysis of the Draft Local Plan consultation feedback and the updated evidence base, fed into the Council's preferred approach and led to the following:

- Less growth overall in Epping but higher growth in the South of the settlement, to reduce impacts on traffic congestion and air quality on Epping Forest. Focus on non-urban brownfield sites to the south of the settlement to ensure greater alignment with the emerging Epping Neighbourhood Plan that reflects local aspirations for a greater level of growth in the South of the settlement.
- Less growth at Theydon Bois due to potential impact on Epping Forest due to increased recreational pressure.
- Less growth at North Weald Bassett to reduce impacts on traffic as well as concerns raised through the Draft Local Plan consultation.
- A new secondary school and additional growth to support this at Waltham Abbey (as per Alternative B) not supported by the County due to traffic impacts and insufficient growth to sustain it. However, there is the potential to support the relocation/extension of existing secondary school. Epping not the preferred location for second secondary school due to impact on traffic.
- Employment growth to be focussed in Waltham Abbey to the South of the M25 and at North Weald Airfield.
- Reduction in growth to be delivered on managed open space sites in Loughton, to reflect consultation responses on the Draft Local Plan.

7.45 The preferred approach at this stage represents a hybrid of the three alternatives. It supports strategic priorities - including the London Stansted Cambridge Corridor Core Area Strategic Vision and the Memorandum of Understanding agreed by the Cooperation for Sustainable Development Member Board to meet the objectively assessed housing need for the Housing Market Area - and meets the identified needs of communities while reflecting significant constraints, including the Metropolitan Green Belt and environmental assets within the District, such as Epping Forest and the Lee Valley.

7.46 The allocation of land for new homes and the opportunities for delivering the associated supporting infrastructure around Harlow meets part of the District's housing requirement - the overall capacity around Harlow (including sites within Harlow and East Herts Districts) was assessed as being about 17,000 due to transport infrastructure constraints. The spatial strategy underpinning the remaining requirement to be met through the Local Plan therefore

focuses on opportunities for accommodating new homes within existing settlements and on brownfield sites before any Green Belt release. This strategy has identified only limited opportunities in terms of overall numbers and so the Council has identified sites on the edge of settlements which reflect the opportunities to create sustainable communities of different sizes and which can support sustainable transport choices to reduce the need to travel by car, thus reducing impacts on the Epping Forest in particular. The Plan has also sought to recognise and reflect the emerging work of Neighbourhood Plans in Chigwell and Epping. In doing so the Local Plan provides a balance between supporting the Council's strategic priorities, reducing any likely significant effect on environmental assets, minimising the need as far as possible to develop on Green Belt land whilst supporting local priorities and opportunities.

- 7.47 The Local Plan allocates the remaining housing requirement identified for Epping Forest District by taking a sequential approach to where new homes will be provided. In determining the appropriate sites the Council has taken account of the previous consultation responses which considered that new housing should be distributed across the District, together with the evidence on sites put forward and the policy and environmental constraints in the District. The approach to the allocation of sites has been to take each settlement and consider the most appropriate sites in accordance with the order of priority identified previously in Paragraph 6.41, in Chapter 6 of this SA Report.
- 7.48 The spatial distribution of the employment sites has sought to reflect the needs identified across the District, particularly taking into account the need for additional space to serve employment markets in the south of the District, including at Loughton and Waltham Abbey. Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Enterprise Zone, and further small-scale employment uses will also be provided within the Garden Town Communities to promote the sustainable growth of Harlow and reduce out-commuting.
- 7.49 It is important that Epping Forest District makes provision for employment in other areas where new homes are to be provided, where there is market appetite to develop and to manage the level of traffic growth generated in order to minimise pressure on the roads through Epping Forest. Taking this approach makes a positive contribution toward the delivery of the London-Stansted-Cambridge Corridor Vision, the employment needs across the Functional Economic Market Area, and the needs of the District.
- 7.50 The Council also recognises that a significant proportion of new floorspace is capable of coming forward through the regeneration of existing employment sites. Therefore in order to both protect existing stock wherever possible and provide certainty for future investors the Plan allocates existing employment sites where it has been appropriate to do so.

Part 2: What are SA findings at this current stage?

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present an appraisal of the Submission Local Plan, as currently published under Regulation 19 of the Local Plan Regulations 2012.

Methodology

8.2 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the sustainability topics/objectives identified through scoping (see **Table 2.1**) as a methodological framework. In total, there are twelve topics relating to:

- Air quality
- Biodiversity and green infrastructure
- Climate change
- Community and wellbeing
- Economy and employment
- Equalities, diversity and inclusion
- Historic environment
- Housing
- Land and waste
- Landscape
- Transport
- Water

8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.

8.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.⁴⁴ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/accessibility).

Adding structure to the appraisal

8.5 Whilst the aim is essentially to present an appraisal of 'the plan' under each of the SA objective headings,⁴⁵ it is appropriate to also give stand-alone consideration to elements of the Plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct elements of the Plan, before the discussion under a final sub-heading concludes on the Submission Plan as a whole.

8.6 Within these narratives, specific policies are referred to only as necessary (i.e. it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability topic/objective).

⁴⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁴⁵ Regulations require simply an appraisal of 'the plan'.

9. Appraisal of the Submission Local Plan

Introduction

- 9.1 As introduced above, the aim of this chapter is to present an appraisal of the Submission Plan under the SA framework.

Air quality

Commentary on the spatial strategy

- 9.2 There is currently one Air Quality Management Area (AQMA), declared for Nitrogen Dioxide on High Road, Epping (Bell Common). Epping High Street had an AQMA that was revoked in 2011, and the Essex Air Quality Consortium suggest that there may be a need to declare further AQMAs in Epping and Loughton, for Nitrogen Dioxide arising from stop-start traffic, depending on whether or not improvements in cleaner vehicle technology deliver the desired results.
- 9.3 The spatial strategy involves a dispersed approach with a focus of development at the Garden Town Communities around Harlow. Traffic modelling and air quality impact assessment was undertaken to support the assessment of the different HMA options as part of the Strategic Spatial Options Study (please refer to Section 6 for further information). Options A to E were found to have similar effects on traffic increases within the areas declared as AQMAs, which includes the High Road AQMA within Epping Forest District. Potential effects on the Lee Valley SPA/Ramsar and Epping Forest SAC were considered through the air quality assessment process undertaken with respect to the HMA strategic spatial options. This considered atmospheric pollution and concluded that none of the HMA options would result in significant adverse effects on any European sites.
- 9.4 Epping Forest District Council has also carried out further transport modelling to inform the Local Plan and this concluded that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of growth proposed through the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered.⁴⁶
- 9.5 It should be noted that the Council's site selection process included criteria (at Stage 2 and 6.2) relating to air quality and traffic impacts. This helped to identify if a site fell within an area of poorer air quality and if risks could be mitigated as well as considered potential impacts on congestion at peak times. This informed the development of the spatial strategy and selection of site allocations.
- 9.6 The HRA for the Submission Local Plan found that there would not be any adverse effects on the integrity of Epping Forest SAC as a result of proposed growth. It concluded that a firm commitment to the development of mitigation strategies to address air quality around Epping Forest SAC, the commencement of work on those solutions, the agreement to a deadline for devising those strategies, and the authorities commitment to monitor the efficacy of those strategies put a sufficient framework in place to ensure no adverse effect arose on the integrity of the SAC.⁴⁷
- 9.7 Development in the south of the District has good access to public transport and services/facilities and therefore good potential to support modal shift away from car dependency; however, there are existing problems of traffic congestion (in some cases with air

⁴⁶ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

⁴⁷ Epping Forest District Council (2017) HRA of Epping Forest District Council's Regulation 19 Local Plan. Prepared by AECOM. www.efdclocalplan.org/technical-information/

quality implications) that could be worsened. Transport modelling work to date concludes that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan.⁴⁸

- 9.8 Harlow itself provides a good opportunity to focus development in a sustainable location. The Council has been working with neighbouring planning authorities, Essex and Hertfordshire County Councils, and Natural England to identify the necessary measures needed to support new growth in this location. A signed Memorandum of Understanding (MoU) (Feb 2017) has been produced, which identifies a number of commitments to mitigate impacts on air quality. This includes, most notably, a commitment to data collection, including highways infrastructure changes and visitor numbers and behaviour in relation to the Epping Forest SAC. Based on this data, assessments will be made of the ecological impacts that would be the consequence of predicted/likely changes in air pollution and recreational pressures to allow for avoidance and mitigation measures.

Commentary on other policies

- 9.9 Policy DM 22 (Air Quality) is the key policy relating to this SA topic, seeking to ensure that residents of all development and the Epping Forest SAC are protected from the impacts of air pollution. Policy DM 22 sets out measures to ensure that larger proposals or those that have potential to produce air pollution, are appropriately designed to include mitigation measures. The policy further states that Air Quality Assessments will be required where there is potential for significant effects on sensitive receptors. All assessments for air quality shall be undertaken by competent persons, and will include an assessment of emissions and calculation of the cost of the development to the environment.
- 9.10 There are a number of other policies that are likely to help to mitigate the potential negative effects arising as a result of development proposed through the spatial strategy.
- 9.11 Policy T 1 (Sustainable Transport Choices) seeks to manage traffic congestion as well as improve access to sustainable transport modes. Development should seek to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. In this context, the policy requires the provision of electric vehicle charging points within all new developments which make provision for car parking for vehicles. It is also required that any development proposal likely to generate significant movements is supported by a Transport Statement or Transport Assessment; and a Travel Plan will normally be required.
- 9.12 In order to encourage the use of low emission vehicles to support improvements in air quality, Policy T 1 commits to working in partnership with Essex County Council to achieve the appropriate provision of electric vehicle charging points, particularly on strategic housing and large scale commercial/retail developments, with further work to focus on parking standards.
- 9.13 Policy DM 2 (Epping Forest SAC and the Lee Valley SPA) expects all relevant development proposals to assist in the conservation and enhancement of the Lee Valley SPA and Epping Forest SAC.
- 9.14 Policy DM 21 (Local environmental impacts, pollution and land contamination) requires that the local environmental impacts of all development proposals do not lead to detrimental impacts. The Council will: resist development that leads to unacceptable local environmental impacts, including, but not limited to, air pollution; require that activities likely to generate pollution are located away from sensitive uses and receptors where possible; and require development to mitigate and reduce to a minimum any adverse local environmental impacts and activities that may have wider cumulative effects.
- 9.15 Policy D 1 (Delivery of Infrastructure) seeks to ensure that new development is served and supported by appropriate infrastructure and services identified through the Infrastructure Delivery Plan, which includes necessary transport infrastructure. It is also noted that the site

⁴⁸ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

allocation/place policies require supporting infrastructure to be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Policy T 2 (Safeguarding of routes and facilities) protects the land required for proposed transport schemes from 'sterilising' development.

Appraisal of the Plan as a whole

- 9.16 There are existing congestion and air quality issues in the south of the District and, as such, the focus of development in this location could exacerbate these concerns. However, on the other hand, settlements in the south of the District have good access to public transport (in particular the Central Line), employment and services/facilities. Growth at North Weald Bassett and Epping also gives rise to some potential issues, given the District's only designated Air Quality Management Area (AQMA) is located on the southern edge of Epping; however, the findings of work to examine strategic growth options at the HMA scale serves to allay concerns (albeit this work was focused on impacts to the condition of Epping Forest SAC, as opposed to the matter of worsening air quality within the AQMA).
- 9.17 It should be noted that the transport modelling work to date concludes that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered.⁴⁹
- 9.18 Localised air quality issues throughout the District are addressed through Chapter 5 of the Plan, within area specific policies. In the context of Epping Forest SAC, the HRA (2017) considers that the Plan's firm commitment to the development of mitigation strategies to address air quality around Epping Forest, the commencement of work on those solutions, the agreement to a deadline for devising those strategies, and the authorities' (West Essex and East Hertfordshire HMA Local Authorities, Essex and Hertfordshire County Councils, City of London Corporation and Natural England) commitment to monitor the efficacy of those strategies provides a sufficient framework to ensure no adverse effect will arise from air quality on the integrity of the SAC.
- 9.19 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline. It is recognised that the updating of traffic and air quality modelling and the testing and securing of specific mitigation measures will clearly be an iterative process.

Biodiversity and green infrastructure

Commentary on the spatial strategy

- 9.20 Important biodiversity designations are predominantly located in the south and south west of the District and include the Lee Valley and Epping Forest nature conservation designations (SAC, SPA, Ramsar, SSSI).
- 9.21 Potential cumulative effects on Epping Forest SAC and the Lee Valley SPA/Ramsar were considered through the HRA process undertaken with respect to the HMA strategic spatial options. This considered: disturbance from recreational activities and urbanisation; atmospheric pollution; water abstraction; and water quality.
- 9.22 In terms of recreational pressures, whilst significant effects from the HMA options considered were not anticipated on the European sites, it was recommended that all new development should deliver greenspace in-line with the Natural England Alternative Natural Greenspace (ANG) standard to ensure self-sufficiency. In relation to air quality, it was considered that the options considered would not lead to a likely significant effect upon the European sites either alone or in combination with other projects or plans. In relation to water abstraction, it was concluded that delivery of the options would not result in adverse effects on the Lee Valley

⁴⁹ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

- SPA/Ramsar site through excessive water drawdown, either alone or in combination with other plans and projects. It was also evaluated that there would not be a water quality effect from the options on Lee Valley SPA/Ramsar site either alone or in combination with other projects and plans.
- 9.23 The spatial strategy involves a dispersed approach with a focus of development of Garden Town Communities on the fringes of Harlow. There is development proposed in the south of the District within and around settlements near to the important biodiversity designations referred to above. This includes Loughton, Epping and Waltham Abbey; however, preferred sites to emerge are those that tend to be least sensitive from a biodiversity perspective. The Council's site selection process includes a number of criteria relating to biodiversity which informed the spatial strategy and selection of site allocations. This includes consideration of impacts on designated sites (international, national and local) as well as priority habitats and species during Stage 2 and 6.2 (Quantitative and Qualitative Assessment) of the site assessment process. As part of the cumulative achievability assessment at Stages 4 and 6.4 in the site selection process the potential for proposed site allocations to enhance green infrastructure was also taken into account.
- 9.24 The preferred strategy helps to allay the concerns that inevitably result from housing growth. Policies P 1, P 2, P 3, P 5, P 6, P 8, P 9, P 10 and P 11 all require development of allocated sites, due to their proximity to Epping Forest SAC, to make a contribution to the access management and monitoring of visitors to the Forest in accordance with Policy DM 2 (Epping Forest SAC and the Lee Valley SPA). All proposals on these sites are also required under policy to undertake an air quality assessment that identifies the potential impact of the development, together with contributions towards air quality monitoring within the Epping Forest SAC.
- 9.25 The potential effect of the Submission Local Plan on European sites has been considered through the Habitats Regulations Assessment (HRA) undertaken for the Local Plan (2017). In terms of potential in-combination effects (notably air quality and recreational pressure (including urbanisation)), recommendations have been made and incorporated into the plan policies to ensure that any potential impacts on Epping Forest SAC can be identified and addressed before they result in a likely significant effect. The HRA concludes that the spatial strategy will not result in a likely significant effect, either alone or in combination, upon any European sites.⁵⁰
- 9.26 The plan includes a number of policies that will help to avoid and mitigate potential negative effects on biodiversity and green infrastructure and these are considered further below. It will be important to minimise the loss and in particular the fragmentation of habitats and ecological corridors within and extending outside the District.

Commentary on other policies

- 9.27 There are a number of policies that are likely to help to mitigate the potential negative effects arising as a result of development proposed through the spatial strategy.
- 9.28 Policy SP 7 (The Natural Environment, Landscape Character and Green Infrastructure) seeks to protect the natural environment, enhance its quality and extend access to it. It aims to create a comprehensive network of green corridors and places, connecting and enriching biodiversity through habitat improvement and protection at all scales. Furthermore, the policy expects all development proposals, where appropriate, to contribute towards the delivery of new green infrastructure.
- 9.29 Policy DM 1 (Habitat Protection and Improving Biodiversity) seeks all development to deliver a net biodiversity gain and integrate biodiversity through their design and layout, including through the provision of connections between networks. Development proposals must protect and enhance natural habitats and areas of biodiversity, and should not negatively impact upon areas of international or national designation.

⁵⁰ Epping Forest District Council (2017) HRA of Epping Forest District Council's Regulation 19 Local Plan. Prepared by AECOM. www.efdclocalplan.org/technical-information/

- 9.30 Policy DM 2 (Epping Forest SAC and the Lee Valley SPA) expects all relevant development proposals to assist in the conservation and enhancement of the Epping Forest SAC and the Lee Valley SPA. In line with recommendations made by the HRA (2017), and to mitigate against potential or identified adverse effects of additional development in the District, in particular from strategic developments, on the Epping Forest SAC, the Council will ensure the provision of a meaningful proportion of Natural Green Space or access to Natural Green Space. This will enhance the green links between these two sites and ensure access to new and existing green spaces across the District.
- 9.31 Policy DM 5 (Green Infrastructure Design of Development) further ensures that development proposals demonstrate that they have been designed to retain and, where possible, enhance existing green infrastructure (GI) and incorporate appropriate provision of green assets or space. Where appropriate development proposals will also be expected to provide open space through Policy DM 6 (Designated and undesignated open spaces).
- 9.32 Policy DM 9 (High Quality Design) requires development proposals to demonstrate how the landscaping and planting has been integrated into the development as a whole and that it responds to the biodiversity of the site and its context.
- 9.33 Policy DM 17 (Protecting and Enhancing Watercourses and Flood Defences) ensures that the Council will resist proposals that would adversely affect the natural functioning of main rivers and ordinary watercourses, including through culverting. Development on or adjacent to a watercourse must not result in the deterioration of the quality of that watercourse and must not impact on the stability of the banks of the watercourse or river.
- 9.34 Policy DM 21 (Local Environmental Impacts, Pollution and Land Contamination) requires that the local environmental impacts of all development proposals do not lead to detrimental impacts. These potential impacts can include, but are not limited to, air and water (surface and groundwater) pollution, dust, noise, vibration, light pollution, odours, and fumes as well as land contamination.

Appraisal of the Plan as a whole

- 9.35 Whilst housing growth gives rise to a concern that there will be impacts to important natural environment assets locally and, more generally, an impact to biodiversity at the District scale, the spatial strategy serves to allay concerns, in particular given its avoidance of sensitive settlement edge locations in the south of the District. In line with the recommendations of the HRA (2017), the Plan seeks to deliver accessible natural greenspace to mitigate against potential or identified adverse effects of additional development in the District. In this context, focus is placed on the Garden Town Communities around Harlow and the opportunity for recreational self-sufficiency at a strategic scale.
- 9.36 Chapter 5 of the plan includes area specific policies which have been developed to prioritise nature conservation, and consider recreational pressure on the Epping Forest SAC. Mitigation proposed includes contributing to the access management and monitoring of visitors to the Forest in accordance with Policy DM 2 (Epping Forest SAC and the Lee Valley SPA). The HRA (2017) concludes that the plan will not lead to likely significant effects, alone or in-combination, on European designated sites.
- 9.37 Area-specific policies also reflect the nature conservation and green infrastructure priorities locally. While there is the potential for cumulative negative effects on wider designated and non-designated biodiversity, it is considered that the mitigation provided through the plan policies and available at the project level (e.g. through planning conditions) will reduce the significance of any residual negative effects.
- 9.38 On balance, it is appropriate to conclude **uncertain minor negative effects** at this stage, recognising that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Climate change (mitigation and adaptation)

Commentary on the spatial strategy

- 9.39 With regards to climate change mitigation, key issues relate to A) the need to capitalise upon opportunities to design-in low carbon infrastructure, and therefore reduce per capita related CO₂ emissions; and B) the need to reduce car dependency and distance travelled by private car, and therefore per capita transport related CO₂ emissions. In relation to the latter point, the Council's Carbon Reduction and Renewable Energy Assessment (2013) concluded that renewable and low carbon electricity and heat generation schemes of all kinds can be feasible and viable on larger schemes in the District.
- 9.40 With regards to climate change adaptation, a key issue is flood risk. The Strategic Flood Risk Assessment (SFRA) Level 1 Update 2015 identifies that the forms of flooding experienced in the District are: 'fluvial' from rivers and other watercourses; 'pluvial' from rain i.e. surface water flooding resulting from precipitation; and 'groundwater' flooding which is the emergence of water from the ground away from river channels. The corridors of the River Lea and River Roding, including their main tributaries, the Cobbins and Cripsey Brooks, contain the majority of the flood risk zones in the District - i.e. areas at risk from flooding by rivers; and the rapid onset, flash flooding of the smaller watercourse system is identified as an issue.
- 9.41 In relation to reducing CO₂ emissions from transport, the spatial strategy has some merit as, while development is dispersed, there is a focus in areas of the District where there is good access to public transport and services/facilities, such as Harlow and the south of the District, and therefore good potential to support modal shift away from car use. However, it should be noted that North Weald Bassett is less well linked (albeit there is potential for enhancement) and Ongar is a rural settlement where car dependency is likely to be entrenched and the need to travel long distances by car is anticipated.
- 9.42 It is important to note that the Council's site selection process includes a number of criteria at Stages 2 and 6.2 that relate to accessibility to public transport and services/facilities as well as the impacts on traffic. This informed the development of the spatial strategy and selection of site allocations.
- 9.43 The spatial strategy, in relation to reducing CO₂ emissions from the built environment potentially has merit; however, there is an element of uncertainty at this stage until further project level work is carried out through the development management process. The largest proposed site allocation is at North Weald Bassett (NWB.R3), which at 728 dwellings would potentially give rise to the opportunity to deliver a Combined Heat and Power (CHP) scheme (particularly the case given that there is a proposed employment allocation adjacent); and there are also a number of adjacent allocations elsewhere in North Weald Bassett that could potentially be delivered in a coordinated fashion, although this can prove difficult in practice.
- 9.44 The spatial strategy performs well in relation to minimising flood risk, with this objective having been a clear focus of the site selection process. The overall aim is to steer new development into Flood Zone 1 or to areas with the lowest probability of flooding. Policies P 1 - P 14 state that, in accordance with Policy DM 15 (Managing and Reducing Flood Risk), any proposals on new residential or traveller sites must locate development within Flood Zone 1.
- 9.45 Flood risk was taken into account throughout the Council's site selection process. Sites were not progressed past Stage 1 (Major policy constraints) if they fell within Flood Risk Zone 3b. Flood risk at sites was then considered again at Stages 2 and 6.2 using more detailed criteria. A sequential approach to flood risk was taken for the spatial strategy, allocating land in Flood Zones 2 and 3 only where need cannot be met in Flood Zone 1.
- 9.46 Areas of fluvial flood risk have therefore been avoided, including those associated with the River Roding on the eastern edge of Loughton, a factor that has had a bearing on the decision to allocate urban open space within the town. Surface water flood risk has been considered through site specific work, including on the basis that sites can potentially have an impact in combination. Site specific requirements have been identified and where necessary, capacity of

sites have been reduced to avoid any potential adverse effects. It is also noted that the preferred strategy performs well in respect of avoiding the floodplain of the River Lea, which runs along the western boundary of the District, to the west of Waltham Abbey and Lower Nazeing as well as the west and north of Roydon.

Commentary on other policies

- 9.47 There are a number of policies that will help to minimise per capita CO₂ emissions from transport as well as per capita CO₂ emissions from the built environment.
- 9.48 Policy T 1 (Sustainable Transport Choices) seeks to improve access to sustainable transport modes. Development should seek to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. Furthermore, the policy requires that any development proposal likely to generate significant movements is supported by a Transport Statement or Transport Assessment; and a Travel Plan will normally be required. The preparation of a travel plan is further supported by Policy DM 22 (Air Quality), to facilitate the uptake of sustainable transportation choices.
- 9.49 In order to encourage the use of low emission vehicles to support improvements in air quality, Policy T 1 commits to working in partnership with Essex County Council to achieve the appropriate provision of electric vehicle charging points, particularly on strategic housing and large scale commercial/retail developments, with further work to focus on parking standards.
- 9.50 In accordance with Policy DM 22 (Air Quality), once mitigation has been taken into account, no development shall lead to an increase in air pollution such that it will be necessary to designate an AQMA.
- 9.51 Policy DM 20 (Low Carbon and Renewable Energy) encourages the incorporation of low carbon and renewable energy measures in new and existing development, which includes standalone installations and micro renewables integrated into development. The use of CHP, and/or combined cooling, heat and power (CCHP) will also be encouraged in new developments. Furthermore, all major development will be required to incorporate infrastructure for District heating, and will be expected to connect to any existing suitable systems (including systems that will be in place at the time of construction), unless it is demonstrated that this would render development unviable.
- 9.52 In relation to climate change adaptation, Policy DM 15 (Managing and Reducing Flood Risk) ensures that all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding elsewhere. The overall aim is to steer new development into Flood Zone 1 or to areas with the lowest probability of flooding. Also, all proposals for new development will be required to manage and reduce surface water run-off, in line with Policy DM 16 (Sustainable Drainage Systems) and manage water discharges, in line with Policy DM 18 (On-site Management of Waste Water and Water Supply). This includes requiring the incorporation of Sustainable Drainage Systems (SuDS) and all major developments to reduce surface water flows to the 1 in 1 greenfield run-off rate.

Appraisal of the Plan as a whole

- 9.53 Whilst housing growth in itself does not give rise to concerns regarding climate change mitigation, there is a need to minimise per capita emissions. This means distributing development to locations where car dependency and the need to travel long distances by car are minimised (with 'modal shift' supported), and supporting larger, strategic-scale development schemes that give rise to the greatest opportunity to design-in low carbon infrastructure. In both respects the spatial strategy performs well, and robust development management policies are set to be put in place to ensure that opportunities are realised; however, there is always the potential to 'go further', and climate change mitigation should be a focus of ongoing work (e.g. to ensure that adjacent development sites coordinate efforts).

- 9.54 Housing growth within the densely populated southern part of the District does give rise to concerns in relation to flood risk (the key climate change adaptation issue) given the presence of the River Roding to the east of the Central Line; however, the spatial strategy directs growth away from areas of greatest risk, and again there is robust policy framework proposed that should help to ensure that residual risk (in particular in relation to surface water flood risk) is mitigated through the implementation of Sustainable Drainage Systems (SuDS).
- 9.55 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.⁵¹

⁵¹ In relation to climate change mitigation, there is very little potential to conclude that a Local Plan will result in significant effects, recognising the climate change mitigation is a global issue.

Community and wellbeing

Commentary on the spatial strategy

- 9.56 Priority issues relate to the need to address pockets of relative deprivation locally; plan for an ageing population; and ensure that new and existing communities have adequate access to community infrastructure, including health and education facilities.
- 9.57 The District's Infrastructure Delivery Plan sets out the key infrastructure requirements to support the proposed growth for the District as identified in the Plan. Accordingly, Policies D 1 to D 5 set out the policies by which the Council will seek to ensure that investment in infrastructure keeps pace with growth.
- 9.58 From a communities perspective there is merit to broadly distributing growth in accordance with the existing settlement hierarchy, and the spatial strategy is set to do this to a large extent. The spatial strategy will ensure that the housing, employment and infrastructure needs of all communities within the District are met; although there are certain settlements that are set to be a particular focus of growth. Notably, Harlow, Epping, Loughton, North Weald Bassett and Waltham Abbey will be a focus of growth, which is supported given the greater accessibility to facilities/services at these settlements and particular opportunities to deliver new community infrastructure. It should be noted that the spatial strategy also ensures that the needs of the traveller community are met through the delivery of an additional 38 pitches and 1 yard during the life of the plan.
- 9.59 While the spatial strategy allows for some growth on open space within settlements, this is dependent on an adequate provision of open space being maintained within that settlement. Policy SP 3 also requires any proposal to demonstrate how it will extend, enhance and reinforce strategic green infrastructure and public open space. It should also be noted that in the first instance the spatial strategy seeks to deliver growth on previously developed land within settlements thereby helping to reduce the amount of open space lost in order to meet identified housing and employment needs.
- 9.60 Policy SP 3 seeks development proposals to demonstrate positive integration and connection with adjacent rural and urban communities thereby contributing to the revitalisation of existing neighbourhoods.

Commentary on other policies

- 9.61 The majority of policies in the Plan will affect this topic in some way, either directly or indirectly, by helping to meet the needs of communities. The policies of particular importance are identified below.
- 9.62 Policy H 2 (Affordable Housing) sets out the requirements for the provision of affordable homes and ensures that all new homes will be up to accessible and adaptable home standards. Policy H 3 (Rural Exceptions) supports small-scale affordable housing schemes within the smaller settlements subject to a number of criteria.
- 9.63 Policy T 1 (Sustainable Transport Choices) seeks to promote a safe, efficient and convenient transport system which will improve accessibility as well as promote and improve safety, security and healthy lifestyles. Development should be of high quality, sustainable in design, construction and layout, offering maximum flexibility in the choice of travel modes, including walking and cycling, and with accessibility for all potential users.
- 9.64 Policy DM 5 (Green Infrastructure Design of Development) requires development proposals to demonstrate that they have been designed to enhance connectivity and integration by providing pedestrian/cycle access to existing and proposed Green Infrastructure networks and established routes, including footpaths, cycle ways and bridleways/Public Rights of Way. Furthermore, proposals must demonstrate that they have been designed to enhance the public realm through the provision and/or retention of trees and/or designated and undesignated open spaces within built up areas.

- 9.65 Policy DM 9 (High Quality Design) requires design-led development proposals that meet the diverse needs of people and reduce social exclusion, the risk of crime and the fear of crime. Furthermore, where appropriate development proposals must contribute positively to the public realm and public spaces around development as well as maximise connectivity within and to the surrounding areas, which includes the provision of high quality and safe pedestrian and cycle routes.
- 9.66 Policy DM 4 (Green Belt and Development) recognises the need to preserve the openness of the Green Belt and requires that permitted development does not conflict with the Green Belt purposes, maintaining characteristic settlement patterns and preventing coalescence of towns and communities.
- 9.67 Where development is permitted within the Green Belt, it is highlighted in Policy DM 4 that this may include that which contributes positively to the local community; including local transport infrastructure, facilities for outdoor sport, outdoor recreation, and cemeteries. Community infrastructure is primarily addressed through Policy DM 1 (Delivery of Infrastructure), which seeks to ensure that new development is served and supported by appropriate infrastructure and services identified through the Infrastructure Delivery Plan. It is also noted that the site allocation/place policies require supporting infrastructure to be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.
- 9.68 Policy D 2 (Essential Facilities and Services) ensures that proposals will only be permitted where they provide or improve essential facilities and services required to serve the development proposed. The policy also supports proposals for new facilities where they will meet an identified local need.
- 9.69 Policy D 4 (Community, Leisure and Cultural Facilities) permits development proposals where they retain and maintain existing facilities which are valued by the community and improve the quality and capacity of facilities valued by the community; and Policy D 5 (Communications Infrastructure) promotes enhanced digital connectivity throughout the District by supporting high speed broadband and telecommunications infrastructure.

Appraisal of the Plan as a whole

- 9.70 The Submission Plan will help to meet the housing and employment requirements of existing and new communities within the District and the HMA. Throughout the District, housing and employment growth will be supported by upgrades to community infrastructure, ensuring capacity and accessibility, to the benefit of new and existing residents.
- 9.71 The focus of growth in the Garden communities around Harlow and at the larger settlements provides an opportunity to deliver high quality development, which is phased and underpinned by a comprehensive package of infrastructure as set out within the Infrastructure Delivery Plan and schedule. This will contribute towards the development of sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all.
- 9.72 While there are concerns in relation to the loss of some amenity open space within Loughton and Chigwell, policy requirements include provision of open space throughout the settlements, to offset any potential loss. Additionally, existing green space provision within the settlements is good, and there is sufficient access to the wider green infrastructure network. On balance, it is appropriate to conclude that the Submission Plan would have **significant positive long term effects** on communities and wellbeing.

Economy and employment

Commentary on the spatial strategy

- 9.73 The preferred strategy is to allocate employment land to support job creation in accordance with the findings of the West Essex and East Hertfordshire Assessment of Employment Needs 2017 prepared in coordination with neighbouring authorities within the sub-regional Functional Economic Area (FEMA) and to reflect the employment needs identified across the District (from the Employment Review 2017) particularly taking into account the need for additional space to serve employment markets in the south of the District including at Loughton and Waltham Abbey.
- 9.74 Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Enterprise Zone, and further small scale employment uses within the Garden Town Communities to promote the sustainable growth of Harlow and reduce out commuting. The spatial strategy is therefore a balance to support employment growth within the M11 corridor in particular - recognising its regional importance given Stansted Airport - and it is set to achieve this both through employment and housing growth.
- 9.75 Other positive aspects of the preferred strategy relate to: housing growth in the Harlow and Gilston Garden Town therefore supporting its expansion as an employment centre; support for the continued expansion of North Weald Bassett as an employment location; and also support for targeted employment expansion at Waltham Abbey and Loughton. Another specific issue locally is the need to support the ongoing operation of the horticultural glasshouse industry reflected in Policy E 3.

Commentary on other policies

- 9.76 Policies seeking to improve connectivity and accessibility (including T 1 (Sustainable Transport Choices)), have the potential for a positive effect on businesses that rely on distribution, which includes the glasshouse industry. The provision of necessary infrastructure (T 2 (Safeguarding of Routes and Facilities)) and DM 1 (Habitat Protection and Improving Biodiversity)) to support new development is an important aspect of this. Policies that seek to protect and enhance the natural environment (including SP 7 (The Natural Environment, Landscape Character and Green Infrastructure), DM 1 (Habitat Protection and Improving Biodiversity) and DM 17 (Protecting and enhancing watercourses and flood defences)), and built heritage (DM 7 to 10) also have the potential for indirect positive effects on businesses that rely upon them.
- 9.77 Policies that more directly relate to the economy and employment include Policy E 1 (Employment Sites), which seeks to retain and where necessary enhance existing employment sites and premises. It also resists the change of use of existing employment sites or premises, through designating 53 existing employment sites, equating to approximately 109 hectares of land for future employment use. It proposes the allocation of new sites for employment to meet future needs and ensure sufficient flexibility. These allocations/designations are in line with Policies SP 2 (Spatial Development Strategy 2011-2033), SP 5 (Garden Town Communities) and those set out in Chapter 5. In addition, the Garden Town Communities (SP5.1 - SP5.3) and other appropriate locations will be required to make provision for an appropriate level of employment floorspace. Policy E 1 supports and encourages the development of flexible local employment space to meet the employment and economic needs of the District. All new employment space should seek to meet the needs of local businesses and attract inward investment.
- 9.78 Policy E 2 (Centre Hierarchy/ Retail) sets out the Town and District Centre hierarchy and supports proposals for retail, leisure, entertainment, offices, arts and culture, tourism and other main town centre uses within these areas where they will maintain and enhance the vitality and viability of town centres.

- 9.79 Policy E 3 (Food Production and Glasshouses) supports new or replacement glasshouse, any ancillary packhouse development, any ancillary low carbon energy generation facilities, and Combined Heat and Power (CHP) facilities, subject to a number of criteria.
- 9.80 Policy E 4 (The Visitor Economy) supports opportunities for the sustainable development of the visitor economy where they are of a scale, type and appearance appropriate to the locality and provide local economic benefits.

Appraisal of the Plan as a whole

- 9.81 The Submission Plan is set to deliver on District-wide housing and employment land requirements and support the regeneration of Harlow, which should help to ensure that sub-regional economic growth objectives are realised. There is also an appropriate focus of growth within the key transport corridor(s), integrating new communities to Harlow, the Enterprise Zones and other employment areas. There is also a commitment to the delivery of sustainable transport corridors as part of the Garden Town Communities around Harlow. Policy E 1 provides a flexible supply of future sites to cater for needs, while also seeking to retain and enhance existing employment sites and premises. This will positively contribute towards (Policy E 2) maintaining the role of existing centres, and supporting the Glasshouse Industry, which is addressed primarily through development management policies. On balance, it is appropriate to conclude that the Submission Plan would have **significant positive effects** on economy and employment.

Equalities, Diversity and Inclusion

Commentary on the spatial strategy

- 9.82 The broad spatial strategy is set to support development in many locations; depending on the type of development and location this can have positive or negative impacts for groups with protected characteristics identified under the Equality Act (2010). It is recommended that local level EqIA screening should be undertaken for individual development schemes.
- 9.83 The spatial strategy will help to support a diverse population of young people, families and the elderly, improving levels of equality through provision of high quality new residential development in sustainable locations. Cohesive communities in the District are promoted through area specific policy: towns such as Epping and Waltham Abbey are focus areas for growth, and seek to maximise retail, employment, and tourism based opportunities, promoting socio-economic activity in the District. The spatial strategy also seeks to accommodate for the Traveller community of the District, delivering 38 pitches and 1 yard in key locations identified through the policies.
- 9.84 The spatial strategy places significant focus on the development of Garden Town Communities around Harlow, demonstrating the Council's ongoing commitment to equality. The Garden Town Communities are proposed to deliver sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all to local employment opportunities, a range of community services and facilities including health, education, retail, culture, community meeting spaces, multi-functional open space, the Green Wedge Network, sports and leisure facilities and high quality digital infrastructure. This is a considerable opportunity for the area, which will in turn increase economic activity and the diversification of local communities. The aspirations set out within Policy SP 2 (Spatial Development Strategy 2011-2033) will also contribute towards reducing health inequalities in the District.

Commentary on other policies

- 9.85 A large number of policies in the Plan will affect this topic in some way, either directly or indirectly, through promoting equality, diversity and inclusion. The policies of particular relevance are identified below.
- 9.86 Policy H 1 (Housing Mix and Accommodation Types) considers, as set out in national planning policy, the housing needs of different sectors within the community. This is to ensure that the right size and type of new homes are provided across the District to meet the needs of existing and future residents and to ensure the creation of mixed and balanced communities. Policy H 1 positively addresses the disability status of residents, stating that proposals for housing specifically designed to meet the requirements of people with support needs (including older people and those with disabilities) will be encouraged.
- 9.87 Policy H 2 (Affordable Housing) further addresses the housing needs of the community; setting out the requirements for the provision of affordable homes and ensuring that all new homes will be up to accessible and adaptable home standards. Policy H 3 (Rural Exceptions) supports small-scale affordable housing schemes within the smaller settlements subject to a number of criteria. The provision of affordable housing should have positive impacts for younger people and those from lower income economic groups. However, we recommend that individual EqIAs are undertaken at the development level to ensure that the affordable housing benefits are being realised and that levels of rent are 'affordable'.
- 9.88 Policy H 4 (Traveller Site Development) seeks to meet the needs of Gypsies and Travellers through the provision of plots and/or pitches as part of allocations as set out in Policy SPc2 (The Spatial Development Strategy 2011-2033), Policy SP 4 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) and Chapter 5. Each Garden Town Community allocation will be required to provide land for 0.5 ha (up to 5 pitches), in order to accommodate the future needs of Travellers in the District, in accordance with the sequential approach set out within Policy SP 2. Chapter 5 of the Submission Local Plan seeks to meet

- local Traveller need through the provision of pitches within Policies P 3, P 6, P 13 and P 14, and a yard in P 12. This will help support the availability of Traveller provision in the District.
- 9.89 Outside of those sites allocated, Policy H 4 states that applications for traveller sites will be considered based on a set of criteria. This includes whether proposed sites have access to services, facilities and potential sources of employment, and whether they will promote inclusive communities, and not impact on the physical and visual character of the area. Policy H 4 therefore seeks to regulate the delivery of Traveller sites, ensuring quality provision that meets local needs.
- 9.90 Policy DM 9 (High Quality Design) requires design-led development proposals that meet the diverse needs of people and reduce social exclusion, the risk of crime and the fear of crime. Furthermore, where appropriate, development proposals must contribute positively to the public realm and public spaces around development, making a positive contribution to a place. This could help to contribute towards reducing health inequalities in the District, and maximising connectivity and integration within and to the surrounding areas.
- 9.91 Recently some local authorities have identified poor quality materials used for cladding in low cost and social housing refurbishments. The effects of using these materials have had significant negative impacts on communities particularly affecting groups with protected characteristics. It is recommended that Policy DM 9 (High Quality Design) clearly references safety when referring to building materials and a statement should be included stating that high quality materials should be used regardless of the type or cost of residential development.
- 9.92 Policy DM 5 (Green and Blue Infrastructure) further requires development proposals to demonstrate that they have been designed to enhance integration by providing pedestrian/cycle access to existing and proposed Green Infrastructure networks and established routes, including footpaths, cycle ways and bridleways/Public Rights of Way.
- 9.93 Policy D 1 (Delivery of Infrastructure) recognises that significant investment in infrastructure is required to meet the needs of residents and businesses. This will support the socio-economic growth of the District, ensuring that new development is served and supported by appropriate infrastructure and services identified through the Infrastructure Delivery Plan.
- 9.94 Policy D 2 (Essential Facilities and Services) states that proposals for new facilities will be supported where they meet identified local need, contributing towards creating balanced and sustainable communities that promote social inclusion. The Council will work alongside local communities and support proposals to retain, improve or re-use essential facilities and services, to promote accessibility and equal opportunities for all community groups. This includes those set out in Neighbourhood Plans or Development Orders, including Community Right to Build Orders, along with appropriate supporting development which may make such provision economically viable.
- 9.95 Policy D 4 (Community, Leisure and Cultural Facilities) recognises that National policy emphasises the need for local authorities to plan for healthy and inclusive communities (NPPF Section 8: Promoting healthy communities). As such, Policy D 4 requires that development improve the quality and capacity of facilities valued by the community; allowing for relocation and replacement of facilities where there will be a net gain in terms of quality.
- 9.96 Policy D 5 (Communications Infrastructure) promotes enhanced digital connectivity throughout the District by supporting high speed broadband and telecommunications infrastructure. This could have a positive effect for communities with poor access to public transport.
- 9.97 Policy E 4 (The Visitor Economy) encourages sustainable tourism in rural areas, which will include better linkages between the towns and rural surroundings. This will support rural businesses, maintaining the vitality of rural settlements, and in turn avoiding issues of rural deprivation.

Appraisal of the Plan as a whole

9.98 The assessment of the plan as a whole has been broken down in relation to the protected characteristics as listed in the Equalities Act (2010).

Age (all groups but particularly children, younger people, and older people)

9.99 The Submission Plan will help to support people of all ages within the District through providing a high quality environment to work and reside. It seeks to ensure that the right size and type of new homes is provided across the District to meet the needs of specialist groups, particularly older people. This reflects the evidence as set out in the SHMA and the 2017 update that there is an existing need for accessible housing in the District that will continue taking into account the ageing profile of the District's population over the period of the Local Plan.

9.100 The mix of housing supported through the plan includes affordable housing, specialist accommodation, and self-build/custom build housing. The provision of specialist housing will support those vulnerable and requiring assistance, responding to the variation in needs shaped by health, income/equity, level of activity, and lifestyle. A minimum of 40% affordable housing is to be delivered on development sites of 11 or more homes, which will encourage young people and families on to the housing ladder.

9.101 The spatial strategy sets out in policy how the District's population of young people and families' needs will be met, including through the regeneration of towns to provide employment opportunities in sustainable locations. The continued expansion of North Weald Bassett as an employment location, and the targeted employment expansion at Waltham Abbey are expected to be particularly beneficial for young people in these locations, through job creation. It is also noted that strategic employment growth is proposed along the M11 corridor, which will provide high tier job opportunities for young people to aspire to.

9.102 Additional secondary schools on the sites to the East of Harlow and Latton Priory and the expansion of primary schools (for example at Ongar, North Weald Bassett, and Waltham Abbey) will provide additional capacity and facilities, and therefore will positively impact children. In this context, further education provision will also provide opportunities for, but not exclusively, younger people. Improving access to education and training will result in new skills development, reducing rates of unemployment in the area and improving living environments. This could be particularly beneficial for young people, families and older lower skilled people.

9.103 The Garden Town Communities are proposed to deliver sociable, vibrant, healthy and walkable neighbourhoods. This includes improvements to the sustainable transport network, which will positively affect the elderly population and also younger residents that do not have access to a car/are unable to drive. The provision of new and/or improved sustainable transport infrastructure (including greater frequency of bus/train services and road widening improvements) would have improving mobility for these groups, providing greater access to day-to-day services and facilities, and neighbouring settlements.

9.104 The Garden Town Communities also seek to deliver access to multi-functional open space, the Green Wedge Network and sports and leisure facilities. This will have a positive impact on older people, younger people, and families with young children, facilitating the uptake of exercise and community engagement. This will contribute positively to the physical and mental health of all groups. Overall health will also be improved through increased access to, and provision of, health facilities. New and/or improved GP surgeries where there is local need will have a positive impact on children, younger and older people.

9.105 Air quality improvements are promoted through the plan through sustainable transport and the requirement for all new developments to provide electrical vehicle charging points. Children are likely to be more vulnerable to exposure to poor air quality compared to adults, and as such objectives and policies within the plan which seek to reduce pollution will positively impact this group.

Disability (all forms of disability recognised under the Equalities Act)

- 9.106 The plan recognises the importance for a proportion of new homes to provide for the needs of those with, or who may develop, accessibility needs. This includes support for housing specifically designed to meet the identified needs of disabled people. The Council's approach is that all new homes should be built to Category 2: Accessible and Adaptable Homes standards, in order to maximise choice in the type, size and location of new homes available. This should ensure that there is sufficient provision to meet the specific needs of disabled people.
- 9.107 Infrastructure delivery in the plan area seeks to meet the aspirations set out within the spatial strategy. Promotion of additional community facilities including recreation and health facilities is likely to encourage the integration of disabled people into the community, contributing positively towards overall quality of life and community cohesion. The provision of GP surgeries in local areas will further help to reduce local health inequalities, contributing towards the improvement of levels of disability in the District. Epping town centre in particular includes the appropriate provision of health facilities identified within the Infrastructure Delivery Plan.
- 9.108 As discussed under 'Age', improvements to the sustainable transport network through the regeneration of existing centres and the development of the Garden Town Communities would improve accessibility for residents. This is of particular importance to disabled people where their disability can inhibit mobility. Improvements to/the provision of new bus services, train services, and footpath improvements (i.e. widening) would improve disabled peoples access both day-to-day local services and facilities, and to neighbouring settlements.
- 9.109 The plan includes objectives to facilitate working from home, which would widen employment opportunities for disabled residents, reducing inequality in the workplace.

Gender (including males, females, and gender reassignment)

- 9.110 No significant effects have been identified for this protected characteristic.

Marriage and civil partnership

- 9.111 No significant effects have been identified for this protected characteristic.

Pregnancy and maternity

- 9.112 The plan includes objectives to facilitate working from home, which would likely provide additional employment flexibility during pregnancy and maternity. This will be supported by improvements to high speed broadband and telecommunications infrastructure.
- 9.113 The provision of new and/or improvements to health facilities in the District is likely to have a positive impact on women during pregnancy and maternity by ensuring facilities are easily accessible and have capacity, considering the likely increased use of the facilities for this group. This will be facilitated through the delivery of the Garden Town Communities, and also in locations such as Epping, Loughton and Waltham Abbey (if required), where sustainable, inclusive communities are promoted.
- 9.114 In addition to health facilities, the plan seeks to develop communities with good access to public transport; and with safe and pleasant routes for cyclists and pedestrians. This will have a positive impact on pregnant women or women with small children, improving access to outdoor recreation and the uptake of healthier modes of travel. This is also expected to positively affect quality of life and neighbourhood satisfaction for this group.

Race (all ethnic groups)

- 9.115 The plan encourages the development of flexible local employment space to meet the employment and economic needs of the District. This may include local ethnic owned businesses, having a positive effect on the economic prosperity of these groups.

Religion or belief (all religions and groups)

- 9.116 Infrastructure delivery in the plan area seeks to meet the aspirations set out within the spatial strategy. The provision of, and improvements to, community facilities may positively affect religious groups depending on the type of facility and intended use. Positive effects are

expected where community facilities include places for worship and religious activities. This may include cultural facilities and community meeting spaces proposed through the Garden Town Communities around Harlow. However it is noted that the change of use of community facilities could result in negative impacts; and as such it is recommended that specific EqlAs should be undertaken for planning applications where necessary.

- 9.117 The protection and enhancement of designated and non-designated heritage assets may have a positive impact for religious groups who have connections to these assets, for example places of worship. The plan policies seek to sustain and enhance the significance of heritage assets for long-term enjoyment and conservation.

Sexual orientation

- 9.118 No significant effects have been identified for this protected characteristic.

Socio-economic status (lower economic status and deprived areas)

- 9.119 The plan will help to support deprived areas, improving levels of equality through provision of high quality new residential development in sustainable locations. Residential development to be delivered will include a mix of affordable housing units in terms of affordable rent and intermediate housing, to accord with the latest available evidence set out in the SHMA. This will support local housing need, positively addressing levels of deprivation across the District.
- 9.120 The plan supports interconnected communities, identifying socio-economic objectives at the local and strategic level through Chapter 5 and the spatial strategy. This will maximise infrastructure delivery and employment opportunities in areas of lower economic status. A considerable opportunity for this will be delivered through the Garden Town Communities around Harlow, which seek to diversify existing local communities. Towns such as Epping and Waltham Abbey are also focus areas for growth, meeting the needs of the towns and promoting the general well-being of all levels of the community.
- 9.121 The provision of retail facilities within local villages and smaller settlements will provide positive impacts for those from lower socio-economic groups that may not have a car, facilitating access to day-to-day services and amenities.

Conclusion

- 9.122 The plan seeks to promote accessibility and connectivity to housing, employment, education and leisure facilities throughout the District. Specialist groups are supported through policy requirements, ensuring that an appropriate mix of housing and accommodation types is provided to meet the needs of all residents. This includes support for proposals for housing specifically designed to meet the identified needs of older people, specialist accommodation and self-build/custom build housing.
- 9.123 The plan demonstrates the Council's ongoing commitment to equality, promoting cohesive communities in the District through area specific policy. Chapter 5 of the plan and the spatial strategy highlight the support for diverse interconnected communities, identifying socio-economic objectives at the strategic and local level. This will maximise infrastructure delivery and employment opportunities in areas of lower economic status, contributing towards addressing deprivation. Taking this into consideration, it is appropriate to conclude that the Submission Plan would have **significant positive long term effects** on this topic at this stage.

Historic environment

Commentary on the spatial strategy

- 9.124 There are a large number of designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks & Gardens) spread across the District, and built heritage makes an important contribution to local character. Epping, Ongar and Waltham Abbey are market towns of medieval origin, and several villages have designated Conservation Areas.
- 9.125 While the spatial strategy seeks to distribute growth around the District using the sequential approach set out in Policy SP 2, there are notable areas where development is focussed. In particular the Garden Town Communities around Harlow as well as at Epping, Loughton, Waltham Abbey, North Weald Bassett and Ongar. The focus of development in these areas will have impacts on the local character and historic environment surrounding the settlements through the loss of greenfield and agricultural land. The cumulative effect of proposed development in the HMA on the historic environment was considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA.⁵²
- 9.126 It is important to note that in trying to distribute the remaining housing and employment needs throughout the District the plan has sought to direct development in areas that avoid designated heritage assets and are less sensitive in landscape terms. Stages 2 and 6.2 (Quantitative and Qualitative Assessment) of the site selection process included criteria relating to designated heritage assets, archaeology, landscape sensitivity, and settlement character sensitivity. This work informed the development of the spatial strategy and the selection of site allocations, seeking to direct growth towards those sites that are less likely to have impacts on the landscape and historic environment or where there is the potential for mitigation.
- 9.127 Ultimately the nature and significance of effects are uncertain at this stage as they will be dependent on the precise design and layout of development as well as mitigation measures delivered. There may be opportunities to enhance the historic environment, particularly through the regeneration of brownfield land within settlements; however, this is uncertain at this stage. The plan includes a number of policies that will help to ensure that development avoid as well as reduces the significance of negative effects on the historic environment and these are considered in more detail below.

The Commentary on other policies

- 9.128 The key policy that relates to the protection of the historic environment is Policy DM 7 (Heritage Assets), which seeks to protect heritage assets. It requires that works which would cause harm to the significance of a heritage asset (whether designated or non-designated) or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question. Policy DM 8 (Heritage at Risk) expects property owners/ partners to work proactively with the authority in bringing forward proposals for the conservation and enhancement of Heritage Assets at Risk, to secure their future and a viable use consistent with heritage significance.
- 9.129 Other policies that relate to high quality design also have the potential for a positive effect on the historic environment. This includes Policy DM 9 (High Quality Design), which requires all new development to achieve a high specification of design and contribute to the distinctive character and amenity of the local area. The policy also requires development to relate positively to the locality, having regard to distinctive architectural styles and materials.
- 9.130 Other policies include Policy DM 13 (Advertisements), which does not permit internally illuminated signs where heritage assets, a listed building or a conservation area is harmed.

⁵² Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

Policy DM 20 (Low Carbon and Renewable Energy) permits low carbon and renewable energy provided that a positive assessment is provided demonstrating how any impacts on the environment and heritage assets can be avoided or mitigated, e.g. through scale and design.

- 9.131 There are also a number of policies that seek to protect and enhance the landscape character of the District, which is important in terms of protecting the setting of designated heritage assets within the District. These include Policies SP 7 (The Natural Environment, Landscape Character and Green Infrastructure), DM 3 (Landscape Character, Ancient Landscape and Geodiversity) and SP 6 (Green Belt and District Open Land).

Appraisal of the Plan as a whole

- 9.132 Housing, traveller and employment growth does not necessarily lead to conflicts with the historic environment, given the potential to address heritage at risk and improve the appreciation of heritage assets; however, there is some potential for conflict locally, e.g. given the potential for impacts to the setting of heritage assets, and the potential for traffic through town and village centres to impact on heritage appreciation. It is noted that these issues are taken into account through site guidance requirements and capacity assessments for the sites. Perhaps the most notable aspect of the spatial strategy is the concentration of development at North Weald Bassett, which on balance is supported from a heritage perspective, given that the proposal is to deliver growth broadly in accordance with the North Weald Bassett Masterplan 2014.
- 9.133 On balance, it is appropriate to conclude **uncertain minor negative effects** at this stage, particularly given the findings of the appraisal for landscape. It is recognised that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Housing

Commentary on the spatial strategy

- 9.134 The strategy is to allocate sites to support housing growth in accordance with the identified requirement of 11,400 homes over the plan period. It also seeks to accommodate for the Traveller community of the District, delivering 38 pitches and 1 yard in key locations identified through the policies. These figures have been established in coordination with neighbouring authorities within the sub-regional Housing Market Area (HMA) and the SHMA 2015 and subsequent updates and the Essex wide GTAA.
- 9.135 The spatial strategy will have a significant long term positive effect by meeting the housing requirement, delivering housing across the District and focussing it in areas where it is needed most. It will also ensure that Traveller accommodation needs are met in full.

Commentary on other policies

- 9.136 Policy H 1 (Housing Mix and Accommodation Types) seeks to ensure that an appropriate mix of housing and accommodation types is provided to meet the needs of all residents. This includes support for proposals for housing specifically designed to meet the identified needs of older people, specialist accommodation and self-build/custom build housing.
- 9.137 Policy H 2 (Affordable Housing) seeks to ensure that an appropriate level of affordable housing is provided as part of any new development. The policy requires a minimum of 40% affordable housing to be delivered on development sites of 11 or more homes. The mix of affordable housing units in terms of affordable rent and intermediate housing will be required to accord with the latest available evidence set out in the SHMA. Policy H 3 (Rural Exception Sites) supports small-scale affordable housing schemes within the smaller settlements subject to a number of criteria.
- 9.138 Policy SP 2 (Spatial Development Strategy 2011-2033) sets out the spatial development strategy and is considered above. Policy SP 5 (Garden Town Communities) allocates a number of Garden Communities around Harlow to support the spatial strategy. There are also a number of policies in Chapter 5 that allocate sites for residential development to support the spatial strategy set out in Policy SP 2.
- 9.139 Policy SP 5 (Garden Town Communities) requires each site allocation around Harlow to provide land for 0.5 ha (up to five pitches) in order to accommodate the future needs of Travellers in the District. Policy H 4 (Traveller Site Development) seeks to meet the identified need for Travellers through the provision of plots and/or pitches as part of allocations set out in policies SP 5 (Garden Town Communities), P 3 (Waltham Abbey), P 6 (North Weald Bassett), P 12 (Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbots), P13 (Rural sites in the east of the District) and P 14 (Rural sites in the west of the District). In total, the plan proposes the delivery of up to 38 pitches and one yard across the District up to 2033. While this figure is in excess of the identified minimum Traveller accommodation need, the approach should ensure a sufficient number of sites/flexibility should the status of any of the sites identified for allocation change during the Local Plan consultation or up to examination of the Local Plan. The approach performs well as it provides flexibility should the availability of sites change, allocates pitches as part of strategic sites and distributes the provision of pitches across the District.

Appraisal of the Plan as a whole

- 9.140 The strategy is to allocate sites to support housing growth to meet the housing requirement of 11,400 homes over the plan period. This has been established in coordination with neighbouring authorities within the HMA and is set out the Memorandum of understanding agreed in March 2017. The strategy seeks to recognise the strategic economic role of Harlow and seeks to distribute the remaining housing requirement across all the main settlements in the District; therefore, helping to meet the needs of all communities. It is possible to conclude

that the Submission Plan would have a **significant positive long term effect** on this topic. The plan is also to provide for Traveller accommodation needs in full, and distributes new sites to appropriate locations.

Land and waste

Commentary on the spatial strategy

- 9.141 Key issues locally include the efficient use of land, whether there are potential contamination issues, the agricultural quality of land, and how waste issues will be managed; however, the spatial strategy, as understood at the current time, has limited implications.
- 9.142 Policy SP 2 (Spatial Development Strategy 2011-2033) supports the development of sites located on previously developed land within settlements and the Plan has sought to maximise the allocations on these sites. However, the proposed allocations do involve the loss of some greenfield and agricultural land. This includes loss at North Weald Bassett, Epping, Ongar and Waltham Abbey. It is important to note that opportunities to redevelop brownfield sites both within settlements and within the Green Belt are set to be maximised, and it is also the case that development of under-used urban open spaces can potentially be considered an efficient use of land.
- 9.143 In respect of agricultural land quality, the best and most versatile (Grade 2) agricultural land is found in the northern part of the District. The presence of high grade agricultural land is one of the assessment criteria within the site selection process at Stage 2 and 6.2, and has therefore been fully taken into account.
- 9.144 Over 92% of the District is currently within the Metropolitan Green Belt. The Council has taken a sequential approach to the identification of possible locations for development in the District, in which non-Green Belt land is prioritised for development over land within the Green Belt. The approach taken through the site selection process seeks to protect the most high value Green Belt land wherever possible, drawing on the findings of the Green Belt Review: Stage 2 in particular. It is clear from the Report on Site Selection that insufficient land outside the Green Belt exists to meet the development needs of the District within the Plan period. In order to meet the development needs identified, and achieve sustainable forms of development in and around existing settlements, alterations to the Green Belt boundaries are necessary.
- 9.145 As a result of this, the spatial strategy will result in the loss of Green Belt land, which includes some areas identified as 'high quality', i.e. identified as contributing strongly to the Green Belt purposes. Alterations to the Green Belt boundaries to support the proposed allocations are proposed including at Epping, Ongar, Waltham Abbey, North Weald Bassett, Chigwell, Theydon Bois, Roydon, Nazeing, Thornwood and for the Garden Communities around Harlow. As noted above, while the preferred strategy will result in the loss of some Green Belt land (around 2.6% of the current Green Belt), the site selection process has sought to minimise the use of Green Belt for development purposes, drawing on the available evidence from both stages of the completed EFDC Green Belt Review. Efficient use of land has been sought by incorporating careful assessment of the potential capacity of sites, also as part of the site selection process.

Commentary on other policies

- 9.146 Although a number of references are made to encouraging the use of previously developed land throughout the Plan (including the sequential approach proposed in Policy SP 2), there is no specific policy which relates to the use of previously developed land; this is however adequately addressed by the NPPF.
- 9.147 In line with Policy SP 2 (Spatial Development Strategy 2011-2033), Policy E 3 (Food Production and Glasshouses) seeks to support food production of the glasshouse industry.
- 9.148 Policy DM 21 (Local Environmental Impacts, Pollution and Land Contamination) promotes the remediation of contaminated land through development where possible. Furthermore, the policy also seeks to manage and limit environmental disturbances during construction and demolition as well as supporting the use of sustainable design and construction techniques, including where appropriate the local or on-site sourcing of building materials enabling reuse and recycling on site.

9.149 Policies SP 6 (Green Belt and District Open Land) and DM 4 (Green Belt and Development) set out the approach to development within the Green Belt. Policy DM 4 states that within the Green Belt planning permission will not be granted for inappropriate development, except in very special circumstances, in accordance with national policy. In this context, allocation policies SP 2 (Spatial Development Strategy 2011-2033) and SP 5 (Garden Town Communities) collectively identify that Green Belt land to be used for development purposes has been minimised in line with the stated objectives of the Plan. Policy SP 2 highlights the following sequential approach for allocating greenfield/Green Belt land on the edge of settlements:

- Of least value to the Green Belt if the land meets other suitable criteria for development.
- Of greater value to the Green Belt if the land meets other suitable criteria for development.
- Of most value to the Green Belt if the land meets other suitable criteria for development.

9.150 Policies within Chapter 5 of the Submission Local Plan identify the indicative alterations to Green Belt boundaries to be made as a result of the site allocations and identified developed anomalies (areas where development has already taken place within the Green Belt).

9.151 Policy DM 11 (Waste Recycling Facilities on New Development) requires all new development that generates waste to make on-site provision for general waste and the separation of recyclable materials and organic material for composting. The policy also sets out requirements for new multi storey flatted residential development, including temporary storage space within each flat and adequate communal waste storage.

Appraisal of the Plan as a whole

9.152 The Submission Plan clearly involves the loss of greenfield and agricultural land; however, opportunities to redevelop brownfield sites - both within settlements and within the Green Belt - are set to be maximised and it is also the case that development of under-used urban open spaces can potentially be considered an efficient use of land. On balance, it is appropriate to conclude **negative effects**; however, this conclusion is uncertain, given that there would be greenfield loss under a 'no plan' (or 'future baseline') scenario and that all the alternatives would result in a similar conclusion. It is not clear that more could be done through the spatial strategy to minimise greenfield land take.

Landscape

Commentary on the spatial strategy

- 9.153 While the spatial strategy seeks to distribute growth around the District using the sequential approach set out in Policy SP 2, there are notable areas where development is focussed. In particular the Garden Town Communities around Harlow as well as at Epping, Loughton, Waltham Abbey, North Weald Bassett and Ongar. The focus of development in these areas will have impacts on the local character surrounding the settlements through the loss of greenfield and agricultural land. It should be noted that the cumulative effect of proposed development in the HMA on the landscape was considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA.⁵³
- 9.154 The sensitivity of the different Landscape Character Types and Areas to change within the District was considered through a Landscape Character Assessment published in 2010, with seven different broad Landscape Character Types identified, and a number of Landscape Character Areas being distinguished within each.⁵⁴ A Settlement Edge Landscape Sensitivity Study was also carried out and published in 2012.⁵⁵ The spatial strategy has been developed on the basis of this evidence base, and also on the basis of local knowledge regarding how settlement edge sensitivity varies at each settlement (in particular through consultation with local Councillors). Furthermore, the Council's site selection process has sought to avoid areas that are highly sensitive in landscape terms. Stages 2 and 6.2 (Quantitative and Qualitative Assessment) in the site selection process include criteria relating to landscape sensitivity and settlement character sensitivity.
- 9.155 Ultimately the nature and significance of effects are uncertain at this stage as they will be dependent on the precise design and layout of development as well as mitigation measures delivered. There may be opportunities to enhance landscape/townscape, particularly through the regeneration of brownfield land within and outside of settlements; however, this is uncertain at this stage. The plan includes a number of policies that will help to ensure that the impacts of development on the landscape and townscape are minimised and these are considered in more detail below.

Commentary on other policies

- 9.156 Policy SP 7 (The Natural Environment, Landscape Character and Green Infrastructure) seeks to protect and enhance the natural environment, landscape character and GI. The policy seeks the conservation and enhancement of the character and appearance of the countryside, proposing that landscape character assessments will be used to assist in judgements on the suitability of new development. Furthermore, the policy expects all development proposals, where appropriate, to contribute towards the delivery of new green and blue infrastructure proportionate to the scale of development and the rural or urban context.
- 9.157 Policy DM 3 (Landscape Character, Ancient Landscapes and Geodiversity) supports development proposals where applicants are able to demonstrate that the proposal will not, directly or indirectly, cause significant harm to landscape character or the nature and physical appearance of ancient landscapes. Proposals should be sensitive to their setting in the landscape, and its local distinctiveness and characteristics as well as use techniques to minimise impact on, or enhance the appearance of, the landscape.
- 9.158 The protection and enhancement of the landscape or character of the District is also referred to within a number of other policies, including Policies E 3 (Food Production and Glasshouses), DM 2 (Epping Forest SAC and the Lee Valley SPA), DM 5 (Green Infrastructure: Design of Development) and DM 20 (Low Carbon and Renewable Energy).

⁵³ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

⁵⁴ Epping Forest District Council (2010) Landscape Character Assessment. Prepared by CBA. www.efdclocalplan.org/technical-information/

⁵⁵ Epping Forest District Council (2012) Settlement Landscape Sensitivity Study. Prepared by CBA. www.efdclocalplan.org/technical-information/

Appraisal of the Plan as a whole

9.159 The spatial strategy has been developed, and individual sites have been assessed, to take into account landscape character assessment work and settlement edge landscape sensitivity studies. Consideration has also been given to local knowledge, regarding how settlement edge sensitivity varies at each settlement (in particular through consultation with local Councillors and town and parish councils). Where possible sensitive areas have been avoided and suitable mitigation proposed to reduce the significance of impacts. On balance, it is appropriate to conclude **uncertain minor negative effects** at this stage, recognising that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Transport

Commentary on the spatial strategy

- 9.160 An initial analysis of traffic growth across the District has shown that, even without development in the future, parts of the highway network will be operating over-capacity, in some cases by 2026 and in other cases by 2036. Whilst some junctions could be improved most physically cannot be improved or would have environmental consequences if they were. For example, traffic congestion and delays that occur on the routes south of Epping could only be resolved by using land which forms part of Epping Forest.
- 9.161 The transport modelling work to date indicates that the proposed level of development in the Submission Local Plan would increase traffic levels significantly across the network. However, the Highways Assessment Report (2017) found that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered. It identifies a number of potential improvements to bus services, cycling infrastructure and proposed sustainable corridors within the District. It concludes that through further work the scale of mitigation required will be refined as part of ongoing assessments of the Submission Plan.⁵⁶
- 9.162 The spatial strategy involves a dispersed approach with a focus of development of Garden Communities around Harlow. There is a commitment to the delivery of sustainable transport corridors as part of the Garden Town Communities around Harlow. Development directed towards the south of the District has good access to public transport and services/facilities and therefore good potential to support modal shift away from car dependency; however, there are existing traffic problems that could be worsened. There is also the potential to exacerbate capacity issues on the Central Line outside of the District. Advice from Transport for London (TfL) however suggests that there is sufficient capacity on the Central Line within the District. Epping Forest District Council have been in discussion with TfL as well as the London Boroughs of Redbridge Waltham Forest Councils to consider and understand the effects of growth further down the Central Line. It should also be noted that the Council's site selection process took into account the potential cumulative impacts of development at each settlement on the capacity of the Central Line.
- 9.163 There is some growth proposed in areas where there is poorer access to public transport and services/ facilities and employment, such as Ongar; however this helps to reduce the potential impacts of traffic and reduced air quality at Epping Forest.
- 9.164 While the evidence suggests that the most significant impacts of proposed development on the highway network can be mitigated, there is still likely to be some residual minor negative effects. The plan seeks to avoid and reduce the significance of these effects as much as possible through the provision of new and improved infrastructure delivered at the appropriate time as well as other mitigation measures through plan policies that are considered in more detail below.
- 9.165 It should be noted that the cumulative effect of proposed development in the HMA on the highways network considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA. This work was also informed by transport modelling.⁵⁷ A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).

⁵⁶ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

⁵⁷ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

Commentary on other policies

- 9.166 Policy T 1 (Sustainable Transport Choices) ensures that the Council will work in partnership to promote a safe, efficient and convenient transport system. This will be achieved by improving strategic road and rail connections, promoting transport choice through improvements to public transport services as well as promoting improved access to the town centres and sustainable transport modes by all forms of transport. It also seeks to manage congestion and promote and improve safety, security and healthy lifestyles, encouraging the use of walking and cycling.
- 9.167 The policy states that development should seek to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. In order to encourage the latter, Policy T 1 commits to working in partnership with Essex County Council to achieve the appropriate provision of electric vehicle charging points, particularly on strategic housing and large scale commercial/retail developments, with further work to focus on parking standards.
- 9.168 Furthermore, the policy requires that any development proposal likely to generate significant movements is supported by a Transport Statement or Transport Assessment; and a Travel Plan will normally be required.
- 9.169 Policy T 2 (Safeguarding of Routes and Facilities) protects the land required for proposed transport schemes from developments which would prevent their proper implementation. It also protects local filling stations and supporting facilities from redevelopment for other uses.
- 9.170 Policy D 1 (Delivery of Infrastructure) seeks to ensure that new development is served and supported by appropriate infrastructure and services identified through the Infrastructure Delivery Plan, which includes transport infrastructure. It is also noted that the site allocation/place policies require supporting infrastructure to be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.

Appraisal of the Plan as a whole

- 9.171 The spatial strategy involves a dispersed approach to development across the District with a focus on development around Harlow. Development directed towards the south of the District will have good access to public transport and services/facilities and therefore good potential to support modal shift away from car dependency; however, there are existing traffic problems that could be worsened.
- 9.172 The transport modelling work to date indicates that the proposed level of development in the Submission Plan would increase traffic levels across the network. The Highways Assessment Report (2017) found that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered. It identifies a number of potential improvements to bus services, cycling infrastructure and proposed sustainable corridors within the District. It concludes that further work is needed and the scale of mitigation required will be refined as part of ongoing assessments of the Submission Plan.⁵⁸
- 9.173 A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).
- 9.174 On balance, it is appropriate to conclude **uncertain positive effects** at this stage, recognising that there is some uncertainty at this stage and the need for further assessment and refinement as identified within the Highways Assessment Report (2017).⁵⁹ Furthermore, a robust development management policy framework is proposed, which serves to allay concerns to

⁵⁸ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

⁵⁹ Ibid.

some extent, e.g. helping to ensure that developments are designed with sustainable transport modes in mind.

Water

Commentary on the spatial strategy

- 9.175 Water is a key issue given water scarcity in the sub-region, and an issue that will be exacerbated through the effects of climate change and increasing demand. Consideration has been given to ensuring water demand and waste water infrastructure capacity can be managed throughout the Plan period; however, there is little to indicate that this is a key issue for the spatial strategy.
- 9.176 At most sites it should prove possible to ensure that adequate water supply and sewerage infrastructure are provided alongside development, although costs may vary, and in respect of Waste Water Treatment Works (WWTWs) there is thought to be no significant capacity issues locally.

Commentary on other policies

- 9.177 Policy DM 19 (Sustainable Water Use) requires development proposals to demonstrate that water efficiency measures have been incorporated and that they meet a water efficiency standard of 110 litres or less per person per day. New non-residential development of 1,000 sqm gross floor area or more should aim to achieve at least a 30% improvement over baseline building consumption. The policy states that where new national standards exceed those set out above, the national standards will take precedence.
- 9.178 Policy D 1 (Delivery of Infrastructure) seeks to ensure that new development is served and supported by appropriate infrastructure and services identified through the Infrastructure Delivery Plan, which includes transport infrastructure. It is also noted that the site allocation/place policies require supporting infrastructure to be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.
- 9.179 Policy D 3 (Utilities) states that the Council will only permit development where there is sufficient capacity within the utilities infrastructure to meet the needs of the development. Importantly, where there is a capacity problem and no improvements are programmed by the utility provider, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development. The policy also acknowledges the importance of the phasing of developments, in particular for large sites, so that any required upgrades can take place prior to occupation.

Appraisal of the Plan as a whole

- 9.180 There is a need to ensure that water demand/resources and waste water infrastructure capacity can be managed throughout the plan period; however, there is little to indicate that this is a key issue for the spatial strategy. At most sites it should prove possible to ensure adequate water supply and sewerage infrastructure is provided alongside development, although costs may vary, and in respect of Waste Water Treatment Works (WWTWs) there is thought to be capacity locally. It is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.

Part 3: What happens next?

10. Introduction (to Part 3)

10.1 The aim of this chapter is to explain next steps in the plan-making / SA process.

Plan finalisation

10.2 Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then submit the plan (and the summary of representations received) for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

10.3 If found to be 'sound' the plan will be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

10.4 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The Submission Plan includes a range of proposed monitoring measures. The table below lists a selection of the Council's proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

Table 10.1: A selection of the Council's potential monitoring measures

SA topic	Proposed measure (given appraisal findings)
Air quality	<ul style="list-style-type: none"> Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose a number of monitoring measures.
Biodiversity and green infrastructure	<ul style="list-style-type: none"> Net gain/loss of habitat arising from development proposals. New linkages between habitats by location. Epping Forest SAC & Lee Valley SPA: <ul style="list-style-type: none"> Net gains/ losses of buffer land and alternative green space by function. Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose a number of monitoring measures.
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> New developments containing electric charging points by land use type. Number, location and type of proposals achieving low carbon design. Number of decentralised low carbon and renewable energy schemes approved in development. Approvals of development in flood risk zones 2, 3a and 3b by use class and flood risk compatibility. Number of approvals and refusals in Local Flood Risk Zones.
Community and wellbeing	<ul style="list-style-type: none"> Indices of multiple deprivation scorings. Number of new connections made in the green infrastructure network. Area of new accessible natural spaces provided through development proposals. Areas of improved access to natural green spaces provided through development proposals. Number and amount by area and type of new accessible space created by development e.g. woodland, hedgerow, ponds, parks, allotments etc. Linkages between new and existing development and the countryside/ other spaces. Loss/ gain of public open space by type e.g. park, children's playground, allotment.
Economy and employment	<ul style="list-style-type: none"> Overall employment and unemployment rate. Net additional employment floorspace. Net additional floorspace of commercial development by location. Area and number of new glasshouses constructed by location.

SA topic	Proposed measure (given appraisal findings)
	<ul style="list-style-type: none"> Annual tourism income.
Historic environment	<ul style="list-style-type: none"> Number type and location of approved developments impacting on a heritage asset. Number of heritage assets improved and raised out of the 'at risk' category.
Housing	<ul style="list-style-type: none"> Five year housing land supply. Number of pitches for travellers and travelling show people provided. Regular updates to the Gypsy and Traveller Accommodation Assessment. Number of affordable homes completed in the reporting year. The number of homes completed by type and bedroom size in the reporting year. The number of homes completed through the provision of specialist housing in the reporting year. The number of self-build/custom build homes completed in the reporting year.
Land and waste	<ul style="list-style-type: none"> Applications refused on the grounds of harm to the Green Belt or District Open Land.
Landscape	<ul style="list-style-type: none"> Positive landscape impact assessments on proposals approved. Negative landscape impact assessments by EFDC on proposals refused.
Transport	<ul style="list-style-type: none"> Road junction improvements. Improvements in accessibility scoring by location for walking and cycling. Improvements in public transport networks. Numbers of Transport Plans agreed by location and land use type. Additional kilometres of public rights of way.
Water	<ul style="list-style-type: none"> Number and location of schemes implemented with sustainable drainage serving existing as well as new development. Number and location of developments contributing to maintenance of watercourse infrastructure. Number and location of developments including watercourse re-naturalisation or flood storage areas. Number and location of non-domestic schemes achieving a 30% reduction in water usage over base line. Number of dwellings signed off as meeting (or not meeting) Part L optional standard for water efficiency.

Appendices

Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation.

Table A: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Questions answered		As per the regulations...the SA Report must include...	
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes 	
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Submission Plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Submission Plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Questions answered by the SA Report, in accordance with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost *broadly* how/where this report presents the information required of the SA Report by the Regulations, as a supplement it is also helpful to present a discussion of *more precisely* how/where regulatory requirements are met - see **Table C**.

Table C: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What's the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2010.
3. The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA Framework', and this is presented within Chapter 3 ('What's the scope of the SA').
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	More detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented within Appendix II.
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The context review is provided in Appendix II of this SA Report.</p> <p>The context review informed the development of the SA framework and topics, presented in Chapter 3, which have been used to Taken together, which provide a methodological 'framework' for appraisal.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>" -</p> <ul style="list-style-type: none"> • Chapters 5, 6 and 7 explain how reasonable alternatives were established in 2012, 2016 and 2017 in-light of earlier consultation/SA. • Chapter 7 set out the summary findings of the appraisal of the District-wide reasonable alternatives in 2017, with the detailed appraisal provided in Appendix VI. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 9 sets out the findings of the appraisal of the Submission Version Local Plan.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	<ul style="list-style-type: none"> • Chapter 7 sets out the summary findings of the appraisal of the District-wide reasonable alternatives for the Submission Version Local Plan (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation), with the detailed appraisal provided in Appendix VI. • Chapter 9 presents the Submission Local Plan appraisal. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>
7. The measures envisaged to prevent, reduce and as	The appraisal of reasonable alternatives presented in

Regulatory requirement	Discussion of how requirement is met
fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 5, 6 and 7 and of the Submission Local Plan in Chapter 9 identify how the plan might potentially 'go further' in certain respects, and makes a number of specific recommendations.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 5, 6 and 7 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 6 and 7 explain the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal) in 2016 and 2017. Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/assumptions are also discussed as part of appraisal narratives.
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 10 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided in a separate document.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	An Interim SA Report was published alongside the Communities Choices document for consultation in 2012. An Interim SA Report was also published alongside the Draft Local Plan for consultation in 2016. These reports set out the findings of the SA for the preferred approaches and alternatives at that time. At the current time, this SA Report is published alongside the Submission Local Plan, under Regulation 19, so that representations might be made ahead of submission.
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The SA Report must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Reports published in 2012 and 2016, alongside consultation responses received, when finalising the Submission Local Plan for publication. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).
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Appendix II: Scoping information

Introduction

As discussed in Chapter 2 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline', analysis of key issues, and consultation. The detailed scoping information was presented in a draft scoping report sent to statutory consultees in May 2010. A final scoping report was produced taking into account responses in October 2010 and is available on the Council's website.⁶⁰

The aim of this appendix is to present a summary of the scoping information and ensure that the information required under Schedule 2 of the SEA Regulations is provided.

Relationship with other plans and programmes

The following plans and programmes provide the key policy context for the Epping Forest Local Plan:

- **National Planning Policy Framework (NPPF):**⁶¹ sets out the Government's planning policies for England and how these are expected to be applied. The framework acts as guidance for local planning authorities, covering a range of environmental, social and economic themes, including:
 - The commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible;
 - Adopting proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure;
 - Considering the potential cumulative impact of a number of smaller developments on air quality as well as more substantial ones;
 - Using technology to reduce the need to travel;
 - Encouraging land use and transport development which support reductions in greenhouse gas emissions and reduced congestion; and
 - Supporting new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- **National Planning Practice Guidance (NPPG):**⁶² provides relevant, technical planning practice guidance for local authorities, including:
 - Local Plans should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area;
 - Local Plans should support the delivery of appropriately sited green energy and the management of greenhouse gas emissions through energy efficiency measures;
 - Local Planning Authorities should "*adopt proactive strategies to mitigate and adapt to climate change*". Climate change can be mitigated through Local Plans by reducing the need to travel, providing opportunities for renewable and low carbon energy technologies, identifying opportunities for decentralised energy and heating and through the design of new development to reduce energy demand;

⁶⁰ www.efdclocalplan.org/technical-information/

⁶¹ Department for Communities and Local Government (2012) National Planning Policy Framework [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf Accessed Nov 2016

⁶² Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/> Accessed Nov 2016.

- Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to those of a higher quality; and
 - It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.
- **Biodiversity 2020 Strategy**⁶³: A strategy for England's wildlife and ecosystem services, 2011: builds on the Natural Environment White Paper and set out the "strategic direction for biodiversity policy for the next decade". Aims to halt biodiversity loss and improve the ecological networks and ecosystems for all peoples.
 - **Climate Change Act 2008**⁶⁴: established a framework to develop an economically credible emissions reduction path. The Act sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.
 - **Flood and Water Management Act (2010)**⁶⁵: sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).
 - **Essex Local Flood Risk Management Strategy (2013)**⁶⁶: sets out what needs to be done to tackle flooding in Essex. The strategy focuses on 'local flood risk', assessing levels of risk from different flooding sources.
 - **Essex and Suffolk Water, Water Resource Management Plan (2014)**⁶⁷: sets out how Essex and Suffolk Water will manage the balance between water supply and demand over a 25 year period up to 2040. Non-household demand is forecast to be lower at the end of the period than it is today and this follows the trend of the last 20 years although the rate of decline is forecast to be much more modest. It concludes that in 2040, Essex will have a demand of around 11 Mega litres per day less than today, despite a population increase of 100,000 people.
 - **Essex & Southend Waste Local Plan**⁶⁸: Management of waste is guided by the Essex & Southend Waste Local Plan (adopted, 2001); the Replacement Waste Local Plan has been submitted for Examination and will address waste planning until 2032 including allocations for sites.
 - **The Greater Essex Integrated County Strategy (2010)**⁶⁹: provides a shared vision across all local authorities in Greater Essex, identifying the priorities needed to achieve increased economic growth. The broad strategic focus of the strategy is on the Thames Gateway, key towns and low carbon energy.
 - **Essex Transport Strategy - the Local Transport Plan for Essex**⁷⁰: sets out the County Council's aspirations for improving travel in the county. Priorities include providing for and promoting access by sustainable modes of transport to and from development areas; improving journey times on congested routes; improving the attractiveness of cycling; and improving access to green spaces. Consideration will also need to be given to other Non-

⁶³ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at:

<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

⁶⁴ Climate Change Act 2008 [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents>

⁶⁵ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

⁶⁶ Essex County Council & Capita Symonds (2013) Essex County Council Local Flood Risk Management Strategy available [online] <https://www.essex.gov.uk/environment%20planning/environment/local-environment/flooding/flood-water-management-strategies/Pages/default.aspx>

⁶⁷ Essex and Suffolk Water (2014) Water Resources Management Plan [online] available at:

https://www.eswater.co.uk/assets/documents/ESW_Final_Published_PR14_WRMP_Report_-_V3_-_08OCT14.pdf

⁶⁸ Essex County Council & Southend Unitary Authority (2001) The Essex and Southend Waste Local Plan [online] available at:

<https://www.essex.gov.uk/Environment%20Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Pages/Replacement-Waste-Local-Plan.aspx>

⁶⁹ Essex County Council (2014) Integrated County Strategy [online] available at: <http://www.essex.gov.uk/Your-Council/Strategies-Policies/Integrated-County-Strategy/Pages/Default.aspx>

⁷⁰ Essex County Council (2012) Local Transport Plan [online] available at: <http://www.essexhighways.org/Highway-Schemes-and-Developments/Local-Transport-Plan.aspx>

Motorised Users (NMUs) such as equestrians, as well as ensuring the connectivity and accessibility between the sustainable transport modes.

- **Epping Forest Climate Change Strategy (2009)**⁷¹: seeks to reduce the greenhouse gas emissions from its own operations and from the District as a whole. It also aims to prepare the Council and District for the potential impacts of climate change.
- **Putting Epping Forest First: Sustainable Community Strategy 2010-2031**⁷²: One Epping Forest is the Local Strategic Partnership (LSP) for the District and has developed the District's Sustainable Community Strategy that must be taken into account when preparing the LDF. One of the key objectives for the Strategy is to *"build better links with partners in London, Hertfordshire and across Essex to deliver more integrated community safety programmes."*
- **Epping Forest Contaminated Land Strategy (2006)**⁷³: has been produced for inspecting land within the District. The Strategy describes the strategic approach taken to the identification of contaminated land in the District. There is also a narrative on the District's area and how its particular characteristic impact on the inspection strategy.

Baseline information (environmental characteristics, problems and evolution without the plan)

Overview

Epping Forest District, which has a population of approximately 124,660 (in 2011), is located in Essex County to the north east of London. There are five main towns - Loughton/Debden and Buckhurst Hill in the south, Waltham Abbey to the west, Epping in the centre of the District, and Ongar towards the east. Villages and smaller settlements are dispersed throughout the rest of the District. The majority of the population is located in the south of the District - the combined populations of Buckhurst Hill, Chigwell and Loughton/Loughton Broadway (55,473) account for about 44.5% of the District's total population.

The District's six main retail/service centres are at Loughton, Loughton Broadway, Epping, Ongar, Buckhurst Hill and Waltham Abbey. These main centres are all fairly small compared with much larger centres nearby – notably Brookfield Shopping Park (in Broxbourne Borough), Chelmsford, Harlow Town, Romford and Westfield Stratford City; this causes significant and growing competition. In addition to the main retail/service centres, the main employment sites within the District are in Debden, Epping, Nazeing, North Weald Bassett (including the Airfield) and Waltham Abbey, where the larger industrial estates are located. Around half of the District's working residents commute out of the District for work, with the largest proportion travelling to London.

Housing affordability in the District has been a significant problem in more recent times. This is the same for similar areas situated on the border of Greater London, which are attractive to city commuters. Over the period from 2001 to 2013 housing was less affordable in the District than in England as a whole, and broadly comparable to that in East Herts District, Uttlesford District and Greater London as a whole.

The District is largely rural and over 92% of the land is currently designated as being in the Metropolitan Green Belt. The countryside of the District is gently undulating, dissected by two river valleys (the Lea and the Roding) and their tributaries. The District has an abundance of areas of importance for conservation and leisure for both the local and London's population. Epping Forest, which is owned and managed by the City of London Corporation, is a key natural feature of the District. Built and natural heritage features are an important part of the character of the District.

⁷¹ Epping Forest District Council (2009) Climate Change Strategy 2009 [online] available at:

http://www.eppingforest.gov.uk/Library/files/Environmental_Health/EFDC/Climate%20Change%20Strategy%20Final.pdf

⁷² Epping Forest District Council (2010) Putting Epping Forest First The Community Strategy [online] available at:

<http://www.efdclocalplan.org/technical-information/>

⁷³ Epping Forest District Council (2006) Statutory Contaminated Land Strategy Framework Document [online] available at:

<http://www.eppingforestdc.gov.uk/index.php/residents/planning-and-building/planning-development-control/contaminated-land-development-conditions>

The District is bisected the M11 and M25 motorways which by are key parts of the strategic roads infrastructure. Incidents on both of these roads very quickly can result in impacts on the operation of the local road network within the District. The reverse can also happen. The consequences of this include:

- potential road safety issues, when the slip roads cannot clear resulting in stacking back onto the motorways;
- impacts on journey time reliability for both residents and businesses; and
- slow moving traffic increasing impacts on air quality with resultant health consequences to both residents and the District's environmental assets, such as Epping Forest.

Air quality

The Essex Air Quality Consortium suggests that traffic is the main source of air pollution within the District, which is bisected by the M11 and M25 motorways. Incidents on both of these roads can very quickly result in impacts on the operation of the local road network within the District. The reverse can also happen. The consequences of this include slow moving traffic increasing impacts on air quality with resultant health consequences to both residents and the District's environmental assets, such as Epping Forest.

There is currently one Air Quality Management Area (AQMA) declared within the District for Nitrogen Dioxide on High Road, Epping, just north of the M25. The Essex Air Quality Consortium suggest that there may be a need to declare further AQMA's in Epping and Loughton for Nitrogen Dioxide from stop-start traffic depending on whether or not the general improvements in cleaner vehicle technology deliver the desired results.

Biodiversity and green infrastructure

Epping Forest in the south of the District is designated as a Special Area of Conservation under the European Habitats Directive, which is primarily designated for its beech forest and stag beetles. The Lower Forest is also one of 8 'Sites of Special Scientific Interest' in the District which also affords a significant degree of protection. Nearby, the Turnford and Cheshunt pits in the Lea Valley are a 'Special Protection Area' which falls partly within the District. Special Protection Areas are internationally important for birdlife, and in this instance for wetland birds. There is also a designated Lea Valley 'Ramsar' site (a wetland of international importance), covering the part of the Turnford and Cheshunt pits within Epping Forest District.

Nine local nature reserves have been designated and the Essex Wildlife Trust has identified over 220 local wildlife sites. In addition to Epping Forest there are several other ancient woodlands in the District, including remnants of Hainault Forest, together with a significant number of ancient and veteran trees, including hedgerow pollards. Most of the western edge of the District (excluding the built-up areas of Waltham Abbey and Nazeing) is included in the Lee Valley Regional Park (LVRP). This is managed by the LVRP Authority as a place for leisure, recreation, sport and nature conservation.

Climate change (mitigation and adaptation)

The Government has set a target under the Climate Change Act 2008 to reduce CO2 emissions by 80% by 2050, with an interim target of 34% by 2020, both against a 1990 baseline. The Government requires local planning authorities to adopt proactive strategies to mitigate and adapt to climate change and reduce the consumption of natural resources. For example, the impact of new development on climate change can be reduced by locating it where possible in places where it is not entirely necessary to rely on having access to a car; and by the design of carbon neutral homes which seek to achieve energy and water efficiency through sustainable construction and by increased use of renewable energy.

With regards to 'sustainable design and construction', the Local Plan's role is more limited, following Government's withdrawal of the Code for Sustainable Homes in March 2015. There is, however, the

potential to minimise carbon emissions from the built environment by supporting decentralised, low carbon heat and electricity generation/transmission.

The Council's Carbon Reduction and Renewable Energy Assessment (2013) found that the potential in the District for large scale renewable energy production is hampered by the policy designation of the Green Belt. More positively, the Assessment concluded that small scale renewable energy schemes of all kinds can be accommodated in the District and incorporation in the design of development on larger sites is feasible and viable as would be installations on individual buildings. It also found the potential for combined heat and power (CHP) networks in the glasshouse industry to be significant in terms of carbon savings – if powered by traditional energy sources this is heavily reliant upon the fuel markets and there are viability concerns. However, if it is practical to provide through renewable energy sources then there is potential.

According to government statistics, Epping Forest District's total per capita CO₂ emissions in 2013 were the second highest in Essex (only behind Uttlesford) and above both the county average and England as a whole. However, it is noted that there has been a gradual decrease in per capita CO₂ emissions in the District since 2005.

The Strategic Flood Risk Assessment Level 1 Update 2015 (SFRA1) identifies that the forms of flooding experienced in the District are: 'fluvial' from rivers and other watercourses; 'pluvial' from rain i.e. surface water flooding resulting from rain; and 'groundwater' flooding which is the emergence of water from the ground away from river channels. Locations within the District have experienced flooding that has caused damage to property.

The SFRA 1 identified surface water run off as the greatest risk to the District with regard to flooding. Due to the underlying geology and the presence of water courses in the area there will continue to be flood risks. The corridors of the River Lee and River Roding, including their main tributaries Cobbins and Cripsey Brooks contain the majority of the flood risk zones in the District – i.e. areas at risk from flooding by rivers. In particular the rapid onset, flash flooding of the smaller watercourse system is identified as an issue.

The improvement of the natural environment is a key aspect of the Councils response to climate change, providing opportunities to mitigate against the impacts of climate change and adapt to the changing climate.

Community and wellbeing

The District has five towns – Loughton/Debden and Buckhurst Hill in the south, Waltham Abbey to the west, Epping in the centre of the District, and Ongar towards the east. Epping, Ongar and Waltham Abbey are market towns of medieval origin. Villages and smaller settlements are dispersed throughout the rest of the District. The overall result is a significant concentration of population in the south of the District – the combined populations of Buckhurst Hill, Chigwell and Loughton/Loughton Broadway (55,473) accounted for about 44.5% of the District total as of the time of the 2011 Census.

The District has 20 parish councils and 4 town councils and covers an area of approximately 130 square miles. The 2011 Census recorded a population of about 124,660 people living in close to 54,400 dwellings. The District's population increased by almost 17,000 between the Censuses of 1961 and 2011. Government estimates that the District's population has risen by just over 5,000 since 2011. In 2011, compared to the rest of England, the District had smaller proportions of people aged under 30 and a larger proportion of people aged 45 to 64, and 65 and over. By 2033, projections suggest the proportion of people aged over 65 will rise sharply compared to the other age bands, and that there will be a significant drop in the proportion of people aged between 30 and 64. Projections also suggest that the proportion of those between 15 and 29 will drop slightly, and that the proportion of people aged 0 to 14 will rise a little.

The 2011 census found that the majority of the population described their ethnic group as 'White' (90.5%). A further 1.9% described their ethnic group as 'Black African/ Caribbean/ or Black British', 4.7% as 'Asian or Asian British' and the remaining 2.7% as 'mixed/ multiple ethnic groups' or as 'other ethnic' groups. These broad numbers include 80.5% of people who describe their ethnic identity as English, Welsh, Scottish or Northern Irish and 0.1% who describe it as Gypsy or Irish Traveller. This

broad ethnic group breakdown is very similar to that of Essex, the East of England Region, and England as a whole.

Internal migration is projected to be the largest contributor to population growth most likely as a result of the District's location on the edge of London. Natural change (the net gain of births minus deaths, of District residents) is projected to be a relatively steady, smaller gain for the District. International migration is more difficult to measure, but is projected to form only a small proportion of the population change, being much less than internal migration. Whilst future migration trends may be affected by the UK leaving the EU; and whilst it is currently unclear what arrangements might be put in place to restrict immigration, the likely implications will need to be kept under review. It is however important to recognise that the ONS 2014 data already project that net international migration to England will reduce from 304,700 persons in 2014-15 to 169,500 per year from 2020-21 onwards; so rates would need to be lower than this for the population and associated household projections to reduce.

Government's Indices of Deprivation (2015) measure how deprived a 'Lower Super Output Area (LSOA)' area (this is usually equal to or smaller than an electoral Ward) is compared with all of the other areas in the country, using a range of indicators. It then ranks them in order of deprivation with 1 being the most deprived area in the country, and 32,844 being the least deprived. There are a total 78 Lower Super Output Areas within the District. The majority of the District experiences less 'deprivation' than the rest of the country, according to the Indices of Deprivation (2015). However, there are pockets of deprivation within the District when looking at factors including access to housing and services, and adult skills.

None of the areas within the District ranked within the 10% most deprived nationally (also known as the 1st decile). Parts of Loughton Alderton and Waltham Abbey Paternoster wards were ranked within the 20% most deprived (2nd decile), with parts of Grange Hill, Waltham Abbey North East and Waltham Abbey High Beach wards in the 30% most deprived (3rd decile). The District's pockets of deprivation are found both in urban and rural areas. The rural areas often (but not exclusively) score worse on the Index of Multiple Deprivation solely due to sub-rankings relating to the distance to specific local services and access to affordable housing.

Overall, measures for health are good, however the rankings show that there is some variation at a more localised level. Although average life expectancy is higher than the national average, it varies significantly in different areas within the District. It is 5.3 years lower for men and 4.6 years lower for women in the most deprived areas compared with in the least deprived areas.

Births and deaths within the District have remained relatively steady in the District since 2007. There are more births than deaths, contributing to a rise in population. Life expectancy at birth in Epping Forest District in 2010-12 was higher than the national and the Essex averages, and similar to that of the East of England region. The District's life expectancy at birth has risen overall since 2000.

Economy and employment

The District's six main retail/service centres are at Loughton, Loughton Broadway, Epping, Ongar, Buckhurst Hill and Waltham Abbey. These main centres are all fairly small compared with much larger centres nearby – notably Brookfield Shopping Park (in Broxbourne Borough), Chelmsford, Harlow town, Romford and Westfield Stratford City; this causes significant and growing competition. In common with all other main retail/service centres, the growth of internet shopping is also an increasing threat to the viability and vitality of the District's retail/service centres.

In addition to the main retail/service centres, the main employment sites within the District are in Debden, Epping, Nazeing, North Weald Bassett (including the Airfield) and Waltham Abbey, where the larger industrial estates are located. Around half of the District's working residents commute out of the District for work, with the largest proportion travelling to London.

In 2014 there were 44,100 employee jobs based in the District, of which approximately 64.8% were full-time and 35.2% part-time. The District is particularly strong on jobs related to 'Construction', far outstripping the East of England and England average percentages. It is also stronger than average on 'Accommodation and Food services', and on 'Financial and other business services'.

Large employers in the District include: Kier and Higgins (with headquarters in Debden); Sainsbury's (with a distribution centre in Waltham Abbey and stores in Loughton, Debden and Ongar), Tesco in Waltham Abbey, Epping Forest District Council, Sports and Leisure Management (SLM, which manages the Epping Forest District Council's leisure centres), Essex County Council, the National Health Service, the Bank of England Printing Works, Epping Forest College and the working glasshouses which form the Epping Forest District part of the Lea Valley glasshouse industry.

The horticultural glasshouse industry has a long-standing and visible presence in Epping Forest District, as the larger part of a concentration of activity in the Lea Valley. This has somewhat declined from its peak in the 1950s as competition from overseas growers has increased. Nevertheless it still provides significant crops for the London and UK markets.

Economic activity rates in the District are high for both men and women, with 76.9% of 16-64 year olds in employment in April 2015 to March 2016; this number is higher than the average for England as a whole (73.9%), and very slightly lower than the average for the East of England (77%). Within this overall employment, male employment was 80.4%, and female employment was 73.5%. Self-employment accounted for 13.9% of all people employed in the District, compared to 10.3% in the East of England and 10.4% in England as a whole; demonstrating strong entrepreneurship in the local area. In June 2016 only 1.1% of 16-64 year olds were claiming Job Seekers Allowance, compared with 1.2% in the East of England and 1.7% nationally.

The types of jobs are categorised into Standard Occupation Classification (SOC) groups 1 to 9. In 2015-16 the District had more of the 'higher' classification jobs, such as managers, professional occupations etc., than the average for the East of England, or England as a whole.

A large proportion of businesses in the District in 2015 were 'micro' (0 to 9 employees – one person who is self-employed and has no employees counts as zero) or 'small' (11- 49 employees). The District has a higher proportion of 'micro' businesses than the averages for Essex, the East of England or England as a whole, showing how important they are to the local economy. There is also a high level of business start-ups in the District. Between 2009 and 2014 there was an 11.7% rise in the number of active enterprises in the District, which is higher than the percentage rise for Essex overall (7.60%), for the East of England region (6.45%) and for England as a whole (9.57%).

In 2015, the proportion of the District's residents with no qualifications was lower than the average for the East of England and for England as a whole. However, less of the District's residents had qualifications from an NVQ1 or above, to an NVQ 3 or above, than the average for the East of England or the average for England as a whole. Nevertheless, there are more of the District's residents with NVQ4 and above (i.e. all higher education qualifications) than the average for the East of England.

Equality, Diversity and Inclusion

The communities section (above) reveals that In 2011, compared to the rest of England, the District had smaller proportions of people aged under 30 and a larger proportion of people aged 45 to 64, and 65 and over. It is also highlighted that the Government estimates that the District's population has risen by just over 5,000 since 2011. By 2033, projections suggest the proportion of people aged over 65 will rise sharply compared to the other age bands, and that there will be a significant drop in the proportion of people aged between 30 and 64. The District has a slightly higher proportion of females compared to national and regional averages, with a lower proportion of males.

In terms of disability within the District, Epping Forest generally has a smaller percentage of disability living allowance claimants in its population than national and regional comparators. Claimants ages over 60 is the one notable exception, where the District has a higher percentage of claimants than regionally and nationally. Approximately 10% (12,809 people) of the total population in the District provide some form of unpaid care with the majority providing 1 to 19 hours of unpaid care per week. Around 3.2% (3,939 people) of the total population provide unpaid care for over 20 hours per week.

The marital and civil partnership status of residents in the District is varied compared with the region and nationally. The District has a higher proportion of individuals that are married and a lower proportion of individuals that are single compared to national averages; however, it is almost identical

to the regional averages. There is also a lower number of divorced or formerly in a same-sex civil partnership which are now legally dissolved compared to regional and national averages.

A breakdown of the ethnic diversity of the District is also discussed within the communities section (above), which highlights that the broad ethnic group breakdown for the area is very similar to that of Essex, the East of England Region, and England as a whole. Looking at the religious breakdown of the District, Epping Forest has a notably large Jewish population compared to regional and national comparators. In contrast, the percentage of the District that is Muslim is smaller than the regional and national averages.

The economy and employment section above sets out the population's socio-economic classification. In 2015-16 the District had more of the 'higher' classification jobs, such as managers, professional occupations etc., than the average for the East of England, or England as a whole. In terms of levels of deprivation across the District, the communities section highlights that none of the areas within the District ranked within the 10% most deprived nationally (also known as the 1st decile). It is noted that the rural areas often (but not exclusively) score worse on the Index of Multiple Deprivation solely due to sub-rankings relating to the distance to specific local services and access to affordable housing.

Historic environment

Built and natural heritage features are an important part of the character of the District. 25 conservation areas have been designated and there are over 1,300 listed buildings. In addition, there are over 30 scheduled monuments ranging from the earthworks of a Norman castle, to a Second World War fortification. There are currently a further 300 "locally listed" buildings as well as several registered parks and gardens. Epping, Ongar and Waltham Abbey are market towns of medieval origin.

Housing

It is expected that the total number of households (a household being a single person who lives alone, or a group of people who live together) in 2011 was roughly 52,000. This is expected to rise to approximately 66,460 by 2033. The household projections suggest that by 2033, there will be proportionately more households consisting of one person, or a family with dependent children, and proportionately less households consisting of one couple.

Housing affordability in the District has been a significant problem in more recent times. This is the same for similar areas situated on the border of Greater London, which are attractive to city commuters. Over the period from 2001 to 2013 housing was less affordable in the District than in England as a whole, and broadly comparable to that in East Herts District, Uttlesford District and Greater London as a whole.

The Council's housing waiting list stood at 1,360 households in August 2016. It has in previous years been significantly higher, but it dropped in 2013 when a revised Housing Allocations Scheme was applied, requiring applicants to have lived within the Epping Forest District for at least 3 years (or 2.5 for current tenants).

Land and waste

The District is largely rural and over 92% of the land is currently designated as being in the Metropolitan Green Belt. Agriculture is mainly arable, particularly in the north east of the District. The Council's Contaminated Land Strategy (2000) provides an overview of the District and identifies particular industries that have had an impact in terms of contamination as well as areas that may be affected.

Landscape

National policy and legislation supports the protection and improvement of the natural environment through measures such as the development of green infrastructure networks and through habitat and species protection together with the achievement of net gains in biodiversity.

The countryside of the District is gently undulating, dissected by two river valleys (the Lea and the Roding) and their tributaries. The District has an abundance of areas of importance for conservation and leisure for both the local and London's population. Epping Forest, which is owned and managed by the City of London Corporation, is a key natural feature of the District. The main part of the Forest runs from Wanstead (in London) along the north-west boundary of Buckhurst Hill, Loughton and Theydon Bois and extends to the southern end of Epping. A separate area (The Lower Forest) abuts Epping on its north-eastern edge.

Construction from the mid to the late 19th century of what is now part of the London Underground Central Line, and the proximity to London, have greatly influenced the scale and location of development in the District. Significant growth of Buckhurst Hill and Loughton/Loughton Broadway and, to a lesser extent, Chigwell, Epping and Theydon Bois, followed the development of the railway. The post-World War II London overspill estates led to considerable expansion of Waltham Abbey and Debden (also known as Debden).

Transport

The M25 runs east-west through the District, with a local road interchange at Waltham Abbey. The M11 runs north-south, with a full interchange (Junction 7) at Hastingwood just south of Harlow, and a northward-off/southward-on interchange (Junction 5) at Loughton. There is also a motorway only interchange with the M25 south-east of Epping (Junction 6). The A414 is a key east-west route and this crosses the District from Harlow to Ongar on the way to Chelmsford and the Essex coast. Incidents on the M11 and M25 can quickly result in impacts on the operation of the local road network within the District.

An initial analysis of traffic growth across the District has shown that even without development in the future parts of the highway network will be operating over-capacity, in some cases by 2026 and in other cases by 2036. Whilst some junctions could be improved most physically cannot be improved or would have environmental consequences by doing so. For example, traffic congestion and delays that occur on the routes south of Epping could only be resolved by using land which forms part of Epping Forest.

The south-west of the District is served by the London Underground Central Line (both the main line and the 'Hainault via Newbury Park' loop). Epping Station is the eastern terminus and there are 7 other stations in service in the District. There is one national railway station in the District – at Roydon on the Liverpool Street to Stansted and Cambridge line, although other railway stations (Broxbourne, Sawbridgeworth, Harlow Town and Harlow Mill) are close to, and accessible from, the District. The Central Line used to run further than Epping, through stations at North Weald and Blake Hall to the end of the line at Ongar, but this section of the line was closed in 1994, with Blake Hall station being closed in 1981. In recent years the 'Epping and Ongar Railway' has been established, a nationally recognised heritage rail service running on this former Central Line track from Epping to Ongar. There is currently no operational rail connection between the heritage rail line and the Central Line track at Epping, but the 'Epping and Ongar Railway' runs some shuttle bus services locally.

The greatest number of those who commute into the District come from Harlow and the London Borough of Redbridge, and the greatest number of District residents commuting out go to Westminster (City of London), and boroughs within London. District residents most commonly travel to work using a car or van (or taxi), following the pattern for Essex, the East of England and England as a whole. However, there is far higher use of 'Underground, metro, light rail or tram' public transport for commuting from the District than any of those other three areas, due to the proximity of London and the presence of any London Underground Central Line stations in the District.

There is evidence of proportionally high levels of working from home in the District. In 2011, 4.05% of the District's employed residents (16-74 years) worked 'at or from home', which was slightly higher than the average numbers for Essex, the East of England region, and in England as a whole.

Water

National policy sets out that local authorities should adopt proactive strategies in regard to climate change resilience and take full account of water supply and demand considerations. They should

include local plan policies to deliver the provision of infrastructure including waste management, water supply and wastewater.

The River Roding flows from the north to the south along parts of the eastern boundary of the District. A major tributary to the River Roding is the Cripsey Brook. The Lee Navigation, Old River Lee and Lee Flood Relief Channel (FRC) flow along the western boundary of the District and the River Lee's catchment occupies the western third of the District. The upstream catchment is largely rural, while the Lower Lee catchment is heavily urbanised with the combination of man-made, impermeable surfaces and low permeability clay soils. The two main tributaries of the Lower Lee are the Nazeing Brook and Cobbins Brook.

A small proportion of the north of the District falls into the catchment of the River Stort, and finally, the River Ingrebourne catchment is located on the south eastern boundary of the District.

Evolution of the baseline without the plan

There can be many factors that might influence the District's baseline in the future. In terms of biodiversity, habitats and species have the potential to come under increasing pressure from the provision of new housing, employment and infrastructure in the District, including at designated sites. The potential loss and fragmentation of habitats will be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Climate change is anticipated to have major effects on other constraints in the District; including the extent and frequency of flooding. There is a need to take cross-cutting action through spatial planning to address flood risk, as without this there will be missed adaptation opportunities and the effects of climate change may be more severe. Strong, spatial planning also has the potential to drive forward change in terms of energy efficiency and the incorporation of renewable energy within the built environment. Without which, CO₂ emissions for the District will likely continue to rise. Rising CO₂ emissions can be attributed to future transport problems, such as those relating to urban-rural connectivity, and as a result of the expansion to Stanstead Airport. New housing and employment provision has the potential to increase traffic flows without appropriate locational policies and interventions. Areas of particular sensitivity to increased traffic flows are likely to be routes with the largest congestion issues, including the designated AQMA in Epping.

Existing planning policy encourages the efficient use of land and a preference for the development of brownfield land where possible. Future housing, employment and infrastructure growth is likely to result in further loss of greenfield and agricultural land, and may also impact on the fabric and setting of cultural heritage assets. This includes through inappropriate design and layout. It should be noted, however, that existing historic environment designations will offer a degree of protection to cultural heritage assets and their settings. New development without the Plan also has the potential to lead to incremental changes in landscape and townscape character and quality in and around the District. This includes from the loss of landscape features and visual impact.

The rural economy will continue to play a large part in the economic vitality of the District, however the capability of settlements provide the required facilities or supportive infrastructure to deliver the growth ambitions of the District is not clear without the Plan. The vision and plans set out within the Sustainable Community Strategy will also be harder to implement without the Plan, with the disparity between disadvantaged and more prosperous areas within the District likely to continue. It is however, recognised that the District generally has good levels of health and low levels of crime, and this trend is also likely to continue.

Due to increasing legislative and regulatory requirements, there are increasing pressures to improve recycling and composting rates and move towards zero waste to landfill. However, potential population increases within the District may increase pressures on recycling and waste management facilities.

Appendix III: SA of alternatives for traveller accommodation

Spatial options

Historically, a particular issue within Epping Forest District has been and remains the concentration of existing traveller sites. In 2017, 107 of the 139 permanently authorised pitches (some 77%) were concentrated in two parishes (Nazeing and Roydon) in the District. This concentration is attributed to the proximity of the parishes to the main urban areas, the former link with the glasshouse industry in these parishes, and availability of small plots of land and glasshouse and chalet plots.

In terms of site location previous responses⁷⁴ received from the settled community living in Roydon and Nazeing parishes expressed a clear preference for wider dispersal of any additional traveller provision across the rest of the District. Residents and Town/Parish Councils with little or no existing traveller provision generally opposed this alternative. Occupiers of existing pitches also tended to be opposed to wider dispersal; favouring instead concentration of provision within existing areas to enable them to live in close proximity to family members. Respondents also cited access to healthcare as being the most important factor closely followed by access to schools. Access to work was also a significant factor.

The GTAA (2014) found there to be no reported issues amongst the traveller community in accessing employment with a number of travellers being self-employed or engaged in casual labour such as groundwork and tree surgery. However, access to the countryside and green spaces was important, particularly for families living in close proximity to one another.

Therefore, in ensuring sustainable locations are chosen, the provision of additional traveller pitches should avoid locations that are too remote from settlements. Access to a town and the services and facilities provided, is desirable. However, it is acknowledged that respondents⁷⁵ considered that locating sites too near existing settlements is likely to be unpopular with both the traveller and the settled communities and therefore reduces the prospects for promoting the peaceful and integrated co-existence that the PPTS advises local planning authorities should seek.

Whilst the GTAA (2014) found no reported specific community cohesion difficulties in relation to existing sites, it was acknowledged that proposals or planning applications for sites often meet with significant opposition from the settled community. The update to GTAA (2017) provided no additional qualitative information.

As part of the site selection process for Traveller sites, the Council explored potential spatial options for the distribution of Traveller accommodation in the District. The development of these options took into account the responses to various consultations as set out above. Three broad spatial options for accommodating traveller needs were identified. These were:

⁷⁴ Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District. This document was produced following receipt of a direction from Government to produce a Plan by 30 September 2009. The Plan was not completed.

⁷⁵ Based on responses to Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District in 2008 and the Community Choices consultation in 2012.

- distribute pitches across the District;
- focus pitches in parts of the District traditionally favoured by the travelling community; and
- focus pitches in parts of the District traditionally not favoured by the travelling community.

The table below sets out the options identified and provides a high level SA commentary that sets out the key issues for each option in relation to the SA Framework. The final columns in the table set out if the spatial options were identified by the Council as being 'more' or 'less' suitable to accommodate development and provides justification for this planning judgement.

Table A: SA of spatial options for Traveller accommodation

Spatial option	SA commentary	Suitability	Council justification
Distribute pitches across the District	<p>Distributing pitches across the District would promote accessibility to traveller accommodation by delivering a greater number of smaller traveller sites across the District. It is assumed that these would be delivered near to settlements in order to provide access to services, facilities and employment.</p> <p>Consultation respondents⁷⁶ cited access to services/facilities, in particular healthcare as being the most important factor closely followed by access to schools. Previous responses received from the settled community living in Roydon and Nazeing parishes expressed a clear preference for wider dispersal of any additional traveller provision across the rest of the District, to avoid significant growth in any one location. In terms of employment, the GTAA (2014) found there to be no reported issues amongst the traveller community in accessing employment with a number of travellers being self-employed or engaged in casual labour such as groundwork and tree surgery.</p> <p>Distributed growth through the delivery of a greater number of smaller sites would help to reduce the significance of effects at any one settlement, in terms of the capacity of local services/facilities and the highway network. Smaller sites are also more likely to effectively integrate with existing communities with a positive effect on SA topics relating to community and wellbeing, and equality, diversity and inclusion.</p> <p>This option is also likely to increase accessibility for residents to the countryside and green spaces throughout the District. This was highlighted as important in the GTAA (2014), particularly for families living in close proximity to one another. Access to high quality green infrastructure will be a key contributor to health and wellbeing in the District.</p> <p>The delivery of smaller sites would help to reduce localised impacts on SA topics relating to the environment, although it is recognised that this would have impacts over a greater area of the District.</p>	More suitable spatial option	This option balances the preferences of the travelling community with not placing undue pressure on services in a single location.

⁷⁶ Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District. This document was produced following receipt of a direction from Government to produce a Plan by 30 September 2009. The Plan was not completed.

Spatial option	SA commentary	Suitability	Council justification
Focus pitches in parts of the District traditionally favoured by the traveling community	<p>This option would deliver additional pitches near to existing communities in Roydon and Nazeing parishes. This could place significant pressure on local infrastructure and services in the area, which could have a negative effect on the community and wellbeing SA topic.</p> <p>It is acknowledged that respondents⁷⁷ considered that locating sites too near existing settlements is likely to be unpopular with both the traveller and the settled communities and therefore reduces the prospects for promoting the peaceful and integrated co-existence that the PPTS advises local planning authorities should seek. This option could therefore result in a greater number of traveller sites in close proximity to existing settlements. Particular concerns have been raised for this option about an over-concentration of Travellers in the parishes of Nazeing and Roydon; and a desire not to see the expansion of existing sites. This option could therefore have a negative effect on SA topics relating to community and wellbeing and equality, diversity and inclusion; resulting in possible segregation between the existing community and travellers.</p> <p>Conversely, this option is preferred by occupiers of existing pitches as the concentration of provision within existing areas would enable them to live in close proximity to family members. This would positively affect individual members of the community, however could lead to the isolation of the traveller community, having an overall adverse effect on the wider community, and wellbeing and equalities, diversity and inclusion SA topics.</p> <p>This option is likely to limit accessibility to the countryside and green spaces, focusing development in two built up locations. This could have a negative effect on physical and mental health and wellbeing.</p> <p>In terms of employment, the GTAA (2014) found there to be no reported issues amongst the traveller community in accessing employment with a number of travellers being self-employed or engaged in casual labour such as groundwork and tree surgery.</p> <p>The delivery of larger scale sites is likely to have a greater negative effect locally. This will be dependent on the sensitivity of the receiving environment and mitigation measures delivered. This option would however, have less impacts spread across the District compared to the previous option.</p>	Less suitable spatial option	The majority of newly arising housing need will be from the expansion of existing households. Whilst this option is understood to be favoured by the travelling community it was felt that it would place undue pressure on local infrastructure and services and therefore did not represent the most sustainable option for accommodating traveller needs.
Focus pitches in parts of the District traditionally not favoured by the travelling	Whilst the GTAA (2014) found no reported specific community cohesion difficulties in relation to existing sites, it was acknowledged that proposals or planning applications for sites often meet with significant opposition from the settled community. Taking this into consideration, the delivery of traveller pitches in parts of the District traditionally not favoured by the travelling community has the potential to result in isolation of the Traveller community. This could have adverse effects on the health and wellbeing of residents, adversely impacting quality of life. This could have negative effect on SA	Less suitable spatial option	This option was not considered to be deliverable since it would not be realistic to expect all additional households to form within the parts of the

⁷⁷ Based on responses to Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District and 2012

Spatial option	SA commentary	Suitability	Council justification
community	<p>topics relating to health and wellbeing; and equality, diversity and inclusion.</p> <p>Focusing growth in specific parts of the District would lead to increased demand on local services and facilities in these locations, having a negative effect on community and wellbeing.</p> <p>This option is likely to limit accessibility to the countryside and green spaces, focusing development in two built up locations. This would have a negative effect on physical and mental Health and Wellbeing, reducing opportunities for physical activity.</p> <p>The delivery of larger scale sites is likely to have a greater negative effect locally. This will be dependent on the sensitivity of the receiving environment and mitigation measures delivered. This option would however, have less impacts spread across the District compared to the previous option.</p>		<p>District not currently favoured by the travelling community.</p>

Site sizes

The local traveller community views expressed during previous consultations on site size preference indicate that there is no one ideal size of site or number of pitches. The views expressed by site managers, Council officers and residents alike suggest that a maximum of 5 pitches in capacity is conducive to providing a comfortable environment which is easier to manage than larger sites. The experience of Council officers (Development Management, Planning Enforcement and Environmental Health) suggests that large traveller sites or intensification on already comparatively large existing sites, should be avoided. This may be a characteristic of the local stock of sites, and communities of travellers given that almost all travellers live on privately owned sites in the District with their own family group and a more harmonious community appears to result from this pattern of occupation.

A number of respondents to both the 2008 consultation on traveller sites and 2012 community choices consultation expressed a clear preference for the provision of a larger number of smaller sites rather than expanding provision on existing sites that already have over five pitches.

As a result of the above, the Council gave consideration to the site sizes for traveller accommodation. Paragraph 12 of the TSSM states that: “the maximum size of any site should be around 15 pitches with the size of a single pitch site 0.1ha – hence the initial search for sites across the District will range in size between 0.1ha and 1.5ha.” However, it was identified that within this range there were further sub-options which needed to be explored. Two options in relation to site sizes for new sites were identified:

- Traveller needs accommodated in new sites with a proposed capacity of no more than five pitches.
- Traveller needs accommodated in new sites with a proposed capacity of five or more pitches.

The table below sets out the options identified and provides a high level SA commentary that sets out the key issues for each option in relation to the SA Framework. The final columns in the table set out if the options were identified by the Council as being ‘more’ or ‘less’ suitable option and provides justification for this planning judgement.

Table 2: Size options for new traveller sites

Spatial option	SA commentary	Suitability	Council justification
Traveller needs accommodated in new sites with a proposed capacity of no more than five pitches	<p>At this stage it is difficult to identify any significant differences between the options against the SA topics. A site of 6 pitches is unlikely to have a significant difference compared to one of 4 pitches. The differences would become more noticeable the larger the site being delivered under the second option, which proposes a capacity of over 5 pitches.</p> <p>Smaller sites are likely to have less of an impact on SA Topics relating to the environment, including the landscape and historic environment, and are also more likely to integrate effectively with existing communities with positive effects on SA topics relating to community and wellbeing and equalities, diversity and inclusion. However, they will also provide less opportunity for larger traveller families to live together and may reduce the potential for the development of a larger traveller community.</p>	More suitable strategic option	Feedback from the local traveller community indicates that whilst there is no one ideal site size (in terms of number of pitches) generally smaller sites are preferred. This reflects the experience of the Council which considers that smaller sites (five pitches or below) tend to be more successful.
Traveller needs accommodated in new sites with a proposed capacity of over five pitches	<p>Feedback from the local traveller community and other key stakeholders indicate that smaller sites are more likely to be successful. Smaller sites also offer benefits in terms of privacy and safety, particularly considering the likelihood of families and children on sites.</p> <p>Smaller sites would have a reduced adverse effect on infrastructure, as it is likely that services and facilities would be able to cope with lower levels of growth. This is likely to extend to the local transport network, where limited additional vehicles along key routes would minimise levels of congestion. This would limit adverse effects on transport, and any associated indirect effects on air quality and climate change.</p> <p>As set out above, there are benefits in terms of both options. Ultimately, the nature and significance of effects will be dependent on the precise scale and location of the site.</p>	Less suitable strategic option	Feedback from the local traveller community indicates that whilst there is no one ideal site size (in terms of number of pitches) generally smaller sites are preferred. Historically larger sites for traveller accommodation within the District have not tended to integrate as effectively with the settled community, have generated more site management issues and have had a significant adverse impact on the character of an area.

Consideration was also given to the approach to existing traveller sites which had scope for intensification and/or extension. Existing traveller sites include those which have either permanent or temporary planning permission.

Table C: Size options for existing traveller sites

Spatial option	SA commentary	Suitability	Council justification
<p>Traveller needs accommodated in existing sites with a combined capacity of:</p> <ul style="list-style-type: none"> No more than five pitches (for sites with temporary planning permission); and/or No more than 10 pitches (for sites with permanent planning permission) 	<p>At this stage it is difficult to highlight any significant differences between the options in terms of the SA topics.</p> <p>While both options would expand existing traveller sites further, the second option would expand existing sites to a greater extent. This could exacerbate issues in terms of the capacity of local services/facilities and the highway network as well as increase tensions between different communities.</p> <p>Smaller sites are likely to contribute positively to an overall sense of community, and are likely to be able to integrate more effectively with the existing wider community.</p>	<p>More suitable strategic option</p>	<p>Feedback from the local traveller community indicates that whilst there is no one ideal site size (in terms of number of pitches) generally smaller sites are preferred. This reflects the experience of the Council which considers that smaller sites (five pitches or below) tend to be more successful.</p> <p>On this basis, the intensification or extension of existing sites with temporary planning permission should not exceed five pitches. This also reflects the fact that sites with temporary planning permission tend to have time-limiting conditions and/or personal planning permission due to site specific constraints and therefore are considered less suitable for large-scale development.</p> <p>However, existing sites with permanent planning permission may be able to accommodate up to 10 pitches through intensification or extension, subject to detailed consideration of the suitability of each site and the justification for exceeding the preferred maximum of five pitches. This site size threshold reflects the views and preferences expressed in the consultation feedback summarised at Section 3.2.4.</p>
<p>Traveller needs accommodated in existing sites with a combined capacity of:</p> <ul style="list-style-type: none"> Between 6 and 15 pitches (for sites with permanent planning permission); and/or Between 11 and 15 pitches (for sites with permanent planning permission) 	<p>Smaller sites are likely to contribute positively to an overall sense of community, and are likely to be able to integrate more effectively with the existing wider community.</p>	<p>Less suitable strategic option</p>	<p>Feedback from the local traveller community indicates that whilst there is no one ideal site size (in terms of number of pitches) generally smaller sites are preferred. Historically larger sites from traveller accommodation within the District have not tended to integrate as effectively with the settled community, have generated more site management issues and have had a significant adverse impact on the character of an area.</p> <p>Therefore, the intensification or extension of existing sites with temporary planning permission should not exceed five pitches and the intensification or extension of existing sites with permanent planning permission should not exceed 10 pitches.</p> <p>This site size threshold reflects the views and preferences expressed in the consultation feedback summarised at Section 3.2.4.</p>

Appendix IV: Site Selection Method Criteria

Stages 2 and 6.2 in the Council's Site Selection Method

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.1	Impact on Internationally Protected Sites SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)		Site is necessary for the management of internationally protected sites	Effects of allocating the site for the proposed use do not undermine conservation objectives (alone or in combination with other sites)	Effects of allocating the site for the proposed use are not likely to be significant alone but should be checked for in-combination effects	Effects of allocating the site for the proposed use is likely to have a significant effect
1.2	Impact on Nationally Protected sites SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)			Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSIs.	Site falls within an Impact Risk Zone and due to the nature and scale of the development proposed it is likely to be possible to mitigate the effects of the proposed development.	Site falls within an Impact Risk Zone and due to the nature and scale of development proposed it is unlikely to be possible to mitigate the effects of the proposed development.

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.3a	Impact on Ancient Woodland SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)			Site is not located within or adjacent to Ancient Woodland.	Site is adjacent to or contains Ancient Woodland but possible effects can be mitigated.	Site is adjacent to or contains Ancient Woodland. The proposals would likely result in direct loss or harm to Ancient Woodland or cannot be mitigated.
1.3b	Impact on Ancient and Veteran Trees outside of Ancient Woodland SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)			No Ancient or Veteran trees are located within the site.	Site contains Ancient and/or Veteran trees but at a sufficiently low density across the site that removal could be largely avoided or possible impacts could be mitigated.	Site contains a higher density of Ancient and/or Veteran trees, or are configured in such a way that direct loss or harm is likely.
1.4	Impact on Epping Forest Buffer Land SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)		Site may assist in extending the Epping Forest Buffer Lands	Site is unlikely to impact on Epping Forest Buffer Lands	The effects of the site on Epping Forest Buffer Lands can be mitigated.	Site is likely to result in harm to Epping Forest Buffer Lands which cannot be mitigated.
1.5	Impact on BAP priority species or Habitats SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)		Features and species in the site are retained and there are opportunities to enhance existing features.	Site has no effect as features and species could be retained or due to distance of BAP priority habitats from site.	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Features and species in the site unlikely to be retained and effects cannot be mitigated.

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.6	Impact on Local Wildlife Sites SA Topic: • Biodiversity and GI	Housing and Employment (B class uses)		Features and species in the site are retained and there are opportunities to enhance existing features.	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Features and species in the site unlikely to be retained and effects cannot be mitigated.
1.7a	Flood Risk SA Topic: • Climate change	Housing	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required		Site within Flood Zone 3a where exception test required	Site within Flood Zone 3b and not likely to be suitable for development
1.7b	Flood Risk SA Topic: • Climate change	Employment (B class uses)	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required	Site within Flood Zone 3a and exception test not likely to be required		Site within Flood Zone 3b and not likely to be suitable for development
1.8a	Impact on Scheduled Ancient Monument / Listed Building / Conservation Area/ Historic Park or Garden SA Topic: • Historic environment	Housing and Employment (B class uses)	Opportunity for the site to enhance the significance of the heritage asset / further reveal its significance / enhance the setting.	Site is not likely to affect heritage assets due to their distance from the site.	Site is located within the setting of an heritage asset and effects can be mitigated.	Site is located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated.	Site would likely result in the loss of a heritage asset or result in a significant impact that cannot be mitigated.

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.8b	Impact on Archaeology SA Topic: • Historic environment	Housing and Employment (B class uses)		There is a low likelihood that further archaeological assets would be discovered on the site	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site	
1.9	Impact of Air Quality SA Topic: • Air quality	Housing and Employment (B class uses)			Site lies outside of areas identified as being at risk of poor air quality.	Site lies within an area which has been identified as being at risk of poor air quality, but it is likely that the risk could be mitigated or reduced.	Site lies within an area which has been identified as being at risk of poor air quality, and it is unlikely that the risk could be mitigated.
2.1	Level of harm to Green Belt SA Topic: • Community and wellbeing	Housing and Employment (B class uses)	Site provides opportunities to assist in the active use of Green Belt without any loss.	Site is not located in the Green Belt.	Site is within Green Belt, but the level of harm caused by release of the land for development would be none ⁷⁸ .	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	Site is within Green Belt, where the level of harm caused by release of the land for development would be high or very high.

⁷⁸ It is noted that all releases of designated Green Belt land will result, at least to some extent, in harm due to the loss of land from the Green Belt. This phrasing reflects that based on the draft Stage 2 Green Belt Assessment that some parcels of the District's existing Green Belt do not meet the purposes as set out in paragraph 80 of the NPPF.

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.1	Distance to the nearest rail/tube station SA Topics: <ul style="list-style-type: none"> • Transport • Community and wellbeing • Equality, diversity and inclusion 	Housing and Employment (B class uses)		Site is less than 1000m from the nearest rail or tube station	Site is between 1000m and 4000m from the nearest rail or tube station	Site is more than 4000m from the nearest rail or tube station	
3.2	Walking distance to nearest bus stop (with at least peak hourly day service) SA Topics: <ul style="list-style-type: none"> • Transport • Community and wellbeing • Equality, diversity and inclusion 	Housing and Employment (B class uses)		Site is within 400m of a bus stop.	Site between 400m and 1000m of a bus stop.	Site more than a 1000m from a bus stop.	
3.3	Access to employment SA Topics: <ul style="list-style-type: none"> • Community and wellbeing • Economy and employment • Transport • Equality, diversity and inclusion 	Housing		Site is within 1600m of an employment site/location.	Site is more than 1600m and less than 2400m of an employment site/location.	Site is more than 2400m from an employment site/location.	

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.4	Distance to local amenities SA Topics: <ul style="list-style-type: none"> • Transport • Community and wellbeing • Equality, diversity and inclusion 	Housing and Employment (B class uses)		Site is less than 1000m from nearest town, large village or small village.	Site is between 1000m and 4000m from nearest town, large village or small village.	Site is more than 4000m from the nearest town, large village or small village.	
3.5	Distance to nearest infant/primary school SA Topics: <ul style="list-style-type: none"> • Transport • Community and wellbeing • Equality, diversity and inclusion 	Housing		Site is less than 1000m from the nearest infant/primary school	Site is between 1000m and 4000m from the nearest infant/primary school	Site is more than 4000m from the nearest infant/primary school	
3.6	Distance to nearest secondary school SA Topics: <ul style="list-style-type: none"> • Transport • Community and wellbeing • Equality, diversity and inclusion 	Housing		Site is less than 1000m from the nearest secondary school	Site is between 1000m and 4000m from the nearest secondary school	Site is more than 4000m from the nearest secondary school	

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.7	Distance to nearest GP surgery SA Topics: <ul style="list-style-type: none"> • Transport • Community and wellbeing • Equality, diversity and inclusion 	Housing		Site is less than 1000m from the nearest GP surgery	Site is between 1000m and 4000m from the nearest GP surgery	Site is more than 4000m from the nearest GP surgery	
3.8	Access to Strategic Road Network SA Topic: <ul style="list-style-type: none"> • Transport • Equality, diversity and inclusion 	Employment (B class uses)	The site is immediately adjacent to the Strategic Road Network	The site is within 1km of the Strategic Road Network	The site is 1-3km from the Strategic Road Network	The site is 3-10km from the Strategic Road Network	The site is more than 10km from the Strategic Road Network
4.1	Brownfield and Greenfield Land SA Topic: <ul style="list-style-type: none"> • Land and waste 	Housing and Employment (B class uses)	Majority of the site is previously developed land within or adjacent to a settlement	Majority of the site is greenfield land within a settlement	Majority of the site is previously developed land that is neither within nor adjacent to a settlement	Majority of the site is greenfield land adjacent to a settlement	Majority of the site is greenfield land that is neither within nor adjacent to a settlement
4.2	Impact on agricultural land SA Topic: <ul style="list-style-type: none"> • Land and waste 	Housing and Employment (B class uses)			Development of the site would not result in the loss of agricultural land	Development of the site would result in the loss of poorer quality agricultural land (grade 4-5)	Development of the site would involve loss of the best and most versatile agricultural land (grades 1-3)

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
4.3	Capacity to improve access to open space SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equality, diversity and inclusion 	Housing and Employment (B class uses)		Development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private.	Development unlikely to involve the loss of public open space.	Development may involve the loss of public open space but there are opportunities for on-site off-setting or mitigation.	Development may involve the loss of public open space with no opportunities for on-site off-setting or mitigation.
5.1	Landscape sensitivity SA Topic: <ul style="list-style-type: none"> Landscape 	Housing and Employment (B class uses)			Site falls within an area of low landscape sensitivity - characteristics of the landscape are able to accommodate development without significant character change.	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	Site falls within an area of high landscape sensitivity - characteristics of the landscape are vulnerable to change and unable to absorb development without significant character change.
5.2	Settlement character sensitivity SA Topic: <ul style="list-style-type: none"> Landscape 	Housing and Employment (B class uses)		Development may improve settlement character through redevelopment of a run-down site or improvement in townscape.	Development is unlikely to have an effect on settlement character.	Development could detract from the existing settlement character.	Development is likely to substantially harm the existing settlement character.
6.1	Topography constraints SA Topic: <ul style="list-style-type: none"> Housing Equality, diversity and inclusion 	Housing and Employment (B class uses)			No topography constraints are identified in the site.	Topographical constraints exist in the site but there is potential for mitigation.	Topographical constraints in the site may preclude development.

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.2a	Distance to gas and oil pipelines SA Topic: • Housing	Housing and Employment (B class uses)			Gas or oil pipelines do not pose a constraint to the site.	Gas or oil pipelines may constrain part of the site but there is potential for mitigation.	Gas or oil pipelines pose a major constraint to development. They will be difficult to overcome and affect a large part of the site
6.2b	Distance to constraining power lines SA Topic: • Housing	Housing and Employment (B class uses)			Power lines do not pose a constraint to the site.	Power lines may constrain part of the site but there is potential for mitigation.	Power lines pose a major constraint to development. They will be difficult to overcome and affect a large part of the site
6.3	Impact on Tree Preservation Order (TPO) trees SA Topic: • Landscape	Housing and Employment (B class uses)			The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site	The intensity of site development would be constrained by the presence of protected trees either on or adjacent to the site	The site has severely limited feasibility for development as a result of the extensive presence of protected trees, either on or adjacent to the site
6.4	Access to site SA Topic: • Transport • Equality, diversity and inclusion	Housing and Employment (B class uses)		Suitable access to the site already exists.	Access to the site can be created within landholding to adjacent to the highway.	Potential for access to the site to be created through third party land and agreement in place, or existing access would require upgrade.	There is no means of access to the site and no likely prospect of achieving access.

Ref.	Criteria and relevant SA Topic[s]	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.5	Contamination constraints SA Topic: <ul style="list-style-type: none"> Land and waste 	Housing and Employment (B class uses)			No contamination issues identified on site to date.	Potential contamination on site, which could be mitigated.	Potential contamination on site, which is not likely to be able to be mitigated. Note this criteria was amended in 2017 to the following⁷⁹: Potential severe contamination on site, where assurances would have to be sought from the developer that remediation would not harm site viability.
6.6	Traffic impact SA Topics: <ul style="list-style-type: none"> Transport Community and wellbeing 	Housing			Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to significantly affect congestion.	Low level congestion expected at peak times within the vicinity of the site.	Moderate peak time congestion expected within the vicinity of the site.

⁷⁹ Any Tranche 1 sites identified as having a (- -) against criterion 6.5 in 2016 were reconsidered in 2017 to make sure that the score didn't need to be revised following the amendments to the criteria.

Stage 4 and 6.4 Criteria of the Site Selection Method

Ref	Criteria and relevant SA Topic[s]	Land use applicable	Score		
			(+)	0	(-)
1	Availability				
1.1	Site ownership SA Topic: • Housing	Housing and Employment (B class uses)	Site is in single ownership	Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties	Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme
1.2	Existing uses SA Topic: • Housing	Housing and Employment (B class uses)	There are no existing uses on-site or existing uses could cease in less than two years	Existing uses on-site which could cease between two and 10 years	Existing uses on-site where the use could cease in more than 10 years or the timescale for on-site uses ceasing is unknown
1.3	On-site restrictions SA Topic: • Housing	Housing and Employment (B class uses)	Site is not subject to any known restrictions	Site is subject to restrictions but agreement in place or being negotiated to overcome them, or not judged to be a constraint	Site subject to restrictions and there is limited prospect of the restriction being overcome
1.4	Availability SA Topic: • Housing	Housing and Employment (B class uses)	Site expected to be available between 2016 and 2020	Site expected to be available between 2021 and 2025	Site not expected to be available until at least 2026 or site availability is unknown
2	Achievability				
2.1	Marketability	Housing and	Site is under option to a developer	Site is being actively marketed for	Site is not being actively marketed

Ref	Criteria and relevant SA Topic[s]	Land use applicable	Score		
			(+)	0	(-)
	SA Topic: <ul style="list-style-type: none"> Housing 	Employment (B class uses)		development or enquiries have been received from a developer	
2.2	Site viability SA Topic: <ul style="list-style-type: none"> Housing 	Housing and Employment (B class uses)	No viability issues identified	Site viability is marginal or weaker demand for development	Viability and the market for development is poor
2.3	On-site physical and infrastructure constraints SA Topic: <ul style="list-style-type: none"> Housing 	Housing and Employment (B class uses)	There are no known on-site constraints which would impact upon deliverability	On-site constraints have been identified but mitigation or design solutions mean that there would be no impact upon deliverability	Identified on-site constraints may impact upon deliverability
2.3a	Primary Schools (Planning Area) SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equalities, diversity and inclusion 	Housing	Site is located within a Primary Forecast Planning Group that has existing and future capacity	Site is located within a Primary Forecast Planning Group that does not have capacity, however has the potential to expand in the future	Site is located within a Primary Forecast Planning Group with no capacity, and limited scope to expand in the future
2.4b	Primary Schools (Individual)	Housing	Site is located within 1km of a primary school with existing and future capacity	Site is located within 1km of a primary school with either a current or forecast capacity deficit	Site is not located within 1km of a primary school

Ref	Criteria and relevant SA Topic[s]	Land use applicable	Score		
			(+)	0	(-)
	SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equalities, diversity and inclusion 				
2.5a	Secondary Schools (Planning Area) SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equalities, diversity and inclusion 	Housing	Site is located within a Secondary Forecast Planning Group that has existing and future capacity	Site is located within a Secondary Forecast Planning Group that does not have capacity, however has the potential to expand in the future, either through the expansion of existing schools or the provision of a new school site	Site is located within a Secondary Forecast Planning Group with no capacity, and limited scope to expand in the future
2.5b	Secondary Schools (Individual) SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equalities, diversity and inclusion 	Housing	The site is located within 1km of a secondary school with current capacity and no forecast deficit	Site is located within 1km of a secondary school with either a current or forecast capacity deficit	Site is not located within 1km of a secondary school
2.6	Access to open space SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equalities, diversity and inclusion 	Housing	Site is located within 400m of existing publicly accessible open space, or there are proposals for new on-site open space provision as part of the development	Site is located 400-600m from existing publicly accessible open space	Site is more than 600m from existing publicly accessible open space

Ref	Criteria and relevant SA Topic[s]	Land use applicable	Score		
			(+)	0	(-)
2.7	Health SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equalities, diversity and inclusion 	Housing	Site is located within 1km of a GP surgery with capacity	Site is located within 1km of a doctors surgery with no capacity	Site is not located within 1km of doctors surgery
2.8	Impact on Minerals Deposits SA Topic: <ul style="list-style-type: none"> Land and waste 	Housing, Employment (B class uses)	None of the site is located within a minerals safeguarding area	Part of the site is located within a minerals safeguarding area, but possible impacts could be mitigated	Part of the site is located within a minerals safeguarding area and impacts could not be mitigated, or the whole of the site is within a minerals safeguarding area
3	Cumulative achievability				
3.1	Impact on open space SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equality, diversity and inclusion 	Housing	There are no identified current deficiencies in the quantum of open space within the settlement. No open space is lost as a result of the proposed allocations in the settlement.	There are no identified current deficiencies in the quantum of open space within the settlement, however the cumulative impact of the proposed allocations would result in a reduction in land for open space.	There is a current deficiency in the quantum of open space within this settlement. The cumulative impact of the proposed allocations would result in a reduction in land for open space.
3.2	Impact on primary schools SA Topic: <ul style="list-style-type: none"> Community and wellbeing 	Housing	The proposed allocations in the settlement can be accommodated within the current primary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site	The proposed allocations in the settlement would lead to a shortage of current primary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site	The proposed allocations in the settlement would lead to a shortage of current primary school places in the Schools Planning Area. There is limited scope to further expand school provision due to site constraints

Ref	Criteria and relevant SA Topic[s]	Land use applicable	Score		
			(+)	0	(-)
	<ul style="list-style-type: none"> Equality, diversity and inclusion 				
3.3	Impact on secondary schools SA Topic: <ul style="list-style-type: none"> Community and wellbeing Equality, diversity and inclusion 	Housing	The proposed allocations in the settlement can be accommodated within the current secondary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site	The proposed allocations in the settlement would lead to a shortage of current secondary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site	The proposed allocations in the settlement would lead to a shortage of current secondary school places in the Schools Planning Area. There is limited scope to further expand school provision due to site constraints
3.4	Impact on Green Infrastructure (GI) SA Topic: <ul style="list-style-type: none"> Biodiversity and GI Community and wellbeing 	Housing	The proposed site allocations provide opportunities to enhance Green Infrastructure	The proposed site allocations generally provide opportunities to enhance GI; on some sites there is likely to be some loss of GI	The proposed site allocations do not provide opportunities to enhance Green Infrastructure
3.5	Impact on Sewage Treatment SA Topic: <ul style="list-style-type: none"> Water 	Housing	Settlement is served by a Sewage Treatment Works which has known spare capacity or planned additional capacity	No known capacity issues, with further engagement with Thames Water to take place as part of the Infrastructure Delivery Plan	Settlement is served by a Sewage Treatment Works with known limited capacity
3.6	Impact on Central Line Capacity SA Topic:	Housing	The proposed allocations in this settlement do not have a material impact on the current or expected	The proposed allocations in this settlement are expected to result in a minor increase in the expected	The proposed allocations in this settlement are expected to result in a moderate or major increase in the

Ref	Criteria and relevant SA Topic[s]	Land use applicable	Score		
			(+)	0	(-)
	<ul style="list-style-type: none"> Transport 		forecast peak use of the Central Line stations within Epping Forest District	forecast peak use of the Central Line stations within Epping Forest District, which will not affect the capacity of these stations	expected forecast peak use of the Central Line stations within Epping Forest District, which will affect the capacity of these stations
3.7	Impact on Water Networks SA Topic: <ul style="list-style-type: none"> Water 	Housing	Settlement is served by water and network with no known capacity issues	-	Settlement is served by water network which is unlikely to be able to meet additional demand - upgrades to the existing infrastructure expected to be required
3.8	Impact on Wastewater Networks SA Topic: <ul style="list-style-type: none"> Water 	Housing	Settlement is served by wastewater network with capacity to meet additional demand	Settlement is served by wastewater network which may be unable to meet additional demand – local upgrades to the existing infrastructure expected to be required	Settlement is served by wastewater network which is unlikely to be able to meet additional demand – strategic infrastructure expected to be required

Appendix V: SA of strategic options for settlements

Introduction

Responses received from the Community Choices consultation in 2012 led to the view that growth should be distributed across the District and prioritised within or adjacent to settlements to support sustainability (please refer to Chapter 5).

In order to reflect the consultation responses and inform the selection of sites, the Council explored strategic options to accommodate growth at settlements within the District. The strategic options were essentially directions for growth at each settlement (e.g. North, South West) and were developed based on the sites identified through the site assessment process and considered through Stage 2. It should be noted that a strategic option for intensification of the existing urban area was also explored for settlements.

No strategic options were identified for the following settlements given their small scale and the dispersed nature of the residential sites coming forward through the call for sites and SLAA:

- Epping Green
- Fyfield
- High Beach
- Lower Sheering
- Moreton
- Nazeing
- Roydon Hamlet
- Stapleford Abbotts
- Thornwood
- Tylers Cross
- Willingale

The table below sets out the strategic options identified for each settlement. It also provides a high level SA commentary that sets out the key constraints for each strategic option and the SA topics/objectives where impacts may arise. The final column in the table sets out if the strategic options were identified by the Council as being 'more' or 'less' suitable and provides justification for this planning judgement.

Strategic option SA commentary

Suitability and Council's justification

Abridge		
Western expansion	<p>Constraints:</p> <ul style="list-style-type: none"> This area (parcel 034.1) scores strongly against purpose 3, resulting in an overall very high <i>'summary of harm'</i> upon the Green Belt. However, as all parcels in the District score strongly against purpose 3, and this area (parcel 034.1) scores relatively weakly against all other purposes, the loss of this area would result in low impact on the Green Belt (Green Belt Review: Stage 2 2016). The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Report 2015). There is a small cluster of Grade II listed buildings located to the southwest of the site at Great Downs Farm. The strategic option is located within a landscape that is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). The landscape is generally open in nature, affording wide views from the surrounding landscape. This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste Landscape 	<p>More suitable strategic option</p> <p>Justification:</p> <p>Although this strategic option is less preferable at the settlement level than expansion of Abridge to the east/south east, it would still be suitable, promoting small-scale settlement rounding. This strategic option, together with other options for growth around Abridge, would result in limited harm to the Green Belt. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a low impact upon the Green Belt. Additionally, the strategic option lies entirely within Flood Zone 1.</p> <p>This strategic option is sensitive to change in landscape terms, as are other strategic options around Abridge. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all growth options around Abridge are highly sensitive to change. However, in contrast to the eastern/south eastern expansion strategic option, mitigation of harm to landscape character may not be possible for the majority of this strategic option. The sensitivity of the lower, valley floor landscape, the generally open nature of the landscape, affording wide views from the surrounding landscape, and the topography (which rises significantly at the southern end of the strategic option) mean it is unlikely that mitigation or reduction of harm could be achieved for the majority of this strategic option. Mitigation may be possible for part of the strategic option around London Road, where screening may enable limited development, subject to sensitive design which is low rise and incorporates a new soft green edge.</p> <p>Furthermore, any development around the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>
Eastern/South-eastern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> This area (parcel 034.1) scores strongly against purpose 3, resulting in an overall very high <i>'summary of harm'</i> upon the Green Belt. However, as all parcels in the District score strongly against purpose 3, and this area (parcel 034.1) scores relatively weakly against all other purposes, the loss of this area would result in low impact on the Green Belt (Green Belt Review: Stage 2 2016). The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Report 2015). There are Grade II listed buildings located on the boundary of the strategic option, along London Road, and also along New Farm Drive. The strategic option is located within a landscape that is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). It is noted that this strategic option benefits from natural screening; by the extensive woodland, on the higher slopes to the east and south east, which 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option would provide a logical eastern/south eastern expansion of the settlement, promoting settlement rounding. This strategic option, together with other options for growth around Abridge, would result in limited harm to the Green Belt. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a low impact upon the Green Belt. Additionally, the strategic option lies entirely within Flood Zone 1.</p> <p>This strategic option is sensitive to change in landscape terms, as are other strategic options around Abridge. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all strategic options around Abridge are highly sensitive to change. For this strategic option it is judged that it would be possible to limit the potential harm to landscape character by design and by limiting the extent of development. This strategic option benefits from natural screening; by the extensive woodland, on the higher slopes to the east and south east, which would help to limit the harm from wider views from the upper valley slopes in that direction, and in part from local screening by strong hedgerows. Wider harm, in particular in respect of an adverse impact</p>

would help to limit the harm from wider views from the upper valley slopes in that direction, and in part from local screening by strong hedgerows.

- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- There are two Local Wildlife Sites (LWS)/areas of Ancient Woodland located within the boundary of the strategic option.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

on the valley landscape could be reduced by ensuring that all development is limited in height and benefits from local screening. Within this strategic option, in order to minimise harm to the landscape, development should be located adjacent to the developed extent of the existing village and appear a natural extension of it, in particular not extending into the wider and more open and elevated fields east of New Farm Drive. Development should incorporate sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape. Furthermore, any development located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

Northern expansion

Constraints:

- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Report 2015).
- The Study further specifies that the Abridge stretch of the Roding River character area is of high sensitivity, which extends to the strategic option.
- The strategic option includes part of the Abridge Conservation Area
- There is a number of Grade II listed buildings located along London Road and Abridge Road.
- The strategic option is located within a landscape that is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). The growth option is located within visually significant slopes that encompass the sides of the Roding River Valley.
- The majority of the strategic option lies within Flood Zones 2 and 3 which are of medium-high risk of flooding.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Climate Change
- Historic Environment
- Landscape

Less suitable strategic option

Justification:

Aside from small areas in the very south of this strategic option, which are located within Flood Zone 1, for the most part the strategic option lies within Flood Zones 2 and 3. It would therefore be less suitable for development taking account of the sequential flood risk test compared with other strategic options around Abridge.

This strategic option is also more sensitive to change in heritage terms, relative to other strategic options around Abridge. The Historic Environment Characterisation Study (2015) concluded that the Abridge stretch of the Roding River character area is of high sensitivity. Furthermore, this strategic option is sensitive to change in landscape terms, as are other strategic options around Abridge. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all growth options around Abridge are highly sensitive to change.

Southern expansion

Constraints:

- This area (parcel 034.1) scores strongly against purpose 3, resulting in an overall very high 'summary of harm' upon the Green Belt. However, as all parcels in the District score strongly against purpose 3, and this area (parcel 034.1) scores relatively weakly against all other purposes, the loss of this area would result in low impact on the Green Belt (Green Belt Review: Stage 2 2016).

Less suitable strategic option

Justification:

This strategic option is sensitive to change in landscape terms, as are other growth options around Abridge. However, while the Settlement Edge Landscape Sensitivity Study (2010) concluded that all strategic options around the settlement are highly sensitive to change, this strategic option in particular would result in an outward expansion of built form into open, elevated fields to the south of the settlement, which would not be well related to the existing settlement in terms of its pattern or morphology. Furthermore, it is judged that this strategic

- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Report 2015). The landscape of this parcel remains predominately rural and retains many elements of its historic landscapes including the farms, hedgerows and woodland.
- The strategic option is located within a landscape that is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010).
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- A LWS/ area of Ancient Woodland is located to the northeast of the option.
- Knolls Wood is located along the east of the option, slightly within the eastern boundary.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Heritage
- Land and Waste
- Landscape

option would promote an unsustainable southern expansion of Abridge that would be distant from existing village centre services and community facilities.

While the strategic option is less harmful to the Green Belt, as evidenced by the Green Belt Review: Stage 2 (2016), and falls entirely within Flood Zone 1, it is judged that the harm identified to surrounding landscape as well as the overall settlement pattern would, at the settlement level, outweigh any positive factors associated with this strategic option.

Buckhurst Hill

Intensification

This strategic option lies predominantly within the existing settlement boundary, maximising opportunities to focus development in the most sustainable locations within the settlement.

Constraints:

- The loss of this area (parcels 054.1 and 054.2) would have very high and moderate 'summary of harm' upon the Green Belt respectively (Green Belt Review: Stage 2 2016).
- Small areas in the south-east of this strategic option lie within Flood Zones 2 and 3 which are of medium-high risk of flooding.
- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Report 2015).
- Epping Forest SSSI/ Lords Buses Woodland located central to the option, and patch of Epping Forest SSSI immediately to the western boundary of the option.
- There is a Grade II listed building located within the option.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Heritage
- Land and Waste

More suitable strategic option.

Justification:

This strategic option lies predominantly within the existing settlement boundary and also encompasses a small number of lower performing areas of Green Belt - parcels 054.1 and 054.2 located to the north of the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016), which concluded that the loss of these areas would have a low and moderate impact upon the Green Belt (respectively). As a whole, the strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). Aside from small areas in the south-east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. This strategic option would also minimise any harm to the wider landscape around the settlement. Any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

Chigwell		
Intensification	<p>This strategic option lies predominantly within the existing settlement boundary and encompasses a number of small-scale, previously developed Green Belt sites at the edge of the settlement.</p> <p>Constraints:</p> <ul style="list-style-type: none"> • Small areas of the option lie within Flood Zones 2 and 3 which are of medium-high risk of flooding. • The option is located in an area of high overall sensitivity to change (Historic Environment Characterisation Study 2015). • The option contains a number of Grade II listed buildings, and three Grade II* listed buildings. These are focused along High Road. • There is a LWS within the option boundary, to the north. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Biodiversity • Historic Environment 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies predominantly within the existing settlement boundary and encompasses a number of small-scale, previously developed Green Belt sites at the edge of the settlement. The strategic option would therefore maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). The strategic option is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. Additionally, any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>
Eastern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • This strategic option straddles parcels 035.5 and 035.6, the loss of which would have a very high 'summary of harm' upon the Green Belt (Green Belt Review: Stage 2 2016). • The landscape on the eastern side of Chigwell is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). • Small areas of the option lie within Flood Zones 2 and 3 which are of medium-high risk of flooding. • This option contains Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). • There is a LWS located within the option, to the southeast. • The strategic option falls within a character area that is of high sensitivity to change (Historic Environment Characterisation Study 2015). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Biodiversity • Historic Environment • Land and Waste • Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option is harmful in Green Belt terms. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. This strategic option straddles parcels 035.5 and 035.6 which scored strongly against Purpose 1, preventing the outward sprawl of London, and Purpose 2, preventing the erosion of the narrow gap between Chigwell and Hainault and the coalescence of these settlements. Furthermore, the strategic option is sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010) which concluded that the landscape on the eastern side of Chigwell is highly sensitive to change. In particular, the open nature of the land in this area (where development would fall outside existing soft urban green edges), combined with the topography (the elevation rising by up to 40m across the option to the south-east), mean it is unlikely that mitigation or reduction of harm could be achieved for this strategic option.</p> <p>Aside from small areas in the north of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. It is in a sustainable location, close to Chigwell Underground station. However, it is judged that the harm identified to the Green Belt and landscape character would, at the settlement level, outweigh the positive factors associated with this strategic option.</p>
North-eastern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • The loss of this area (parcel 035.8) would have a moderate 'summary of harm' 	<p>More suitable strategic option</p> <p>Justification:</p>

upon the Green Belt (Green Belt Review: Stage 2 2016).

- Small areas in the south-east of this option are located within Flood Zones 2 and 3, which is of medium-high risk of flooding.
- This strategic option is sensitive to change in landscape terms, being located on the eastern side of Chigwell (Settlement Edge Landscape Sensitivity Study 2010).
- This option contains Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- The strategic option falls within a character area that is of high sensitivity to change (Historic Environment Characterisation Study 2015).
- The option includes a number of Grade II listed buildings, which are focused around High Street.
- The option partially overlaps with a Conservation Area, to the south of the option.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

This strategic option provides a natural extension to the settlement, promoting settlement rounding, and is the least harmful to the Green Belt relative to the other strategic options located within the Green Belt adjacent to the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area (parcel 035.8) would have a moderate impact upon the Green Belt. Aside from small areas in the south-east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. This strategic option is sensitive to change in landscape terms, as are other strategic options on the eastern side of Chigwell, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010). However, for this strategic option it is judged that this harm could be mitigated or avoided through the careful siting of development, and by design, including screening by hedges or small woods and limiting the scale of development. Existing boundary features, including the hedgerows, trees banks and ditches would need to be retained, both as elements of the historic landscape and for their screening potential.

Northern expansion

Constraints:

- The loss of this area (parcel 035.7) would have a very high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- The landscape to the north and west of Chigwell has a moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010).
- Small areas in the centre of this strategic option are located within Flood Zones 2 and 3, which is of medium-high risk of flooding.
- This option is located within Grade 2 and 3 agricultural land. Grade 2 (and possibly Grade 3 if determined to be 3a) is described as best and most versatile land.
- There are two patches of Ancient Woodland located within the boundary of the option.
- The strategic option falls within a character area that is of high sensitivity to change (Historic Environment Characterisation Study 2015).
- There are three Grade II listed, and one Grade II* listed buildings located within the option boundary, along High Road and Pudding Lane.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste

Less suitable strategic option

Justification:

This strategic option is harmful in Green Belt terms. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. This strategic option incorporates parcel 035.7 which scored strongly against Purpose 2, preventing the erosion of the narrow gap between Chigwell and Loughton/Debden and the coalescence of these settlements. This strategic option would also promote an unsustainable pattern of development, remote from existing village centre amenities and public transport services.

At the settlement level, the strategic option is less sensitive to change in landscape terms compared to other strategic options, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010) which concluded that the landscape to the north and west of Chigwell has a moderate sensitivity to change. Additionally, aside from small areas in the centre of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the particularly high level of harm identified to the Green Belt would, at the settlement level, outweigh any positive factors associated with this strategic option.

- Landscape

<p>Western expansion</p>	<p>Constraints:</p> <ul style="list-style-type: none"> • The loss of this area (parcels 035.7, 038.1 and 039.1) would have a very high “<i>summary of harm</i>” upon the Green Belt (Green Belt Review: Stage 2 2016). • The landscape to the north-west and west of Chigwell has a moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). • Small areas in the centre of the option are located within Flood Zones 2 and 3, which is of medium-high risk of flooding. • This option is located within Grade 2 and 3 agricultural land. Grade 2 (and possibly Grade 3 if determined to be 3a) is described as best and most versatile land. • The option is located in an area of moderate sensitivity to change (Historic Environment Characterisation Study 2015). • There are two Grade II Listed Buildings located in the northeast corner of the option. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Historic Environment • Land and Waste • Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option is harmful in Green Belt terms. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. This strategic option straddles parcels 035.7, 038.1 and 039.1 which scored strongly against Purpose 2, preventing the erosion of the narrow gap between Chigwell and Woodford, Chigwell and Loughton/Debden, and the coalescence of these settlements.</p> <p>At the settlement level, the strategic option is less sensitive to change in landscape terms compared to other strategic options, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010) which concluded that the landscape to the north-west and west of Chigwell has a moderate sensitivity to change. Aside from small areas in the centre of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Additionally, much of the strategic option is in a sustainable location, located in close proximity to Chigwell Underground station. However, it is judged that the particularly high level of harm identified to the Green Belt would, at the settlement level, outweigh these positive factors associated with this strategic option.</p>
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Chigwell Row

<p>Southern expansion</p>	<p>Constraints:</p> <ul style="list-style-type: none"> • The loss of this area (parcel 035.1) would have a very high ‘<i>summary of harm</i>’ upon the Green Belt (Green Belt Review: Stage 2 2016). • The landscape to the south of Chigwell Row is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). • The option is located in an area of high sensitivity. In particular, Hainault Forest and its immediate context are particularly sensitive to harm (Historic Environment Characterisation Study 2015). • This option contains Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Historic Environment • Land and Waste • Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option is more harmful to the Green Belt relative to the other strategic options identified adjacent to Chigwell Row. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option encompasses parcel 035.1 which scored strongly against Purpose 2, preventing the erosion of the gap between Chigwell Row and Hainault. This strategic option is also sensitive to change in landscape and heritage terms; this is evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the south of Chigwell Row is highly sensitive to change, and the Historic Environment Characterisation Study (2015), which states that much of the strategic option is highly sensitive to change in heritage terms. In particular, Hainault Forest and its immediate context are particularly sensitive to harm. The entirety of the strategic option is within Flood Zone 1. It is recognised that the western part of the strategic option is located close to existing public transport services (including Grange Hill station). However, it is judged that the harm identified to the Green Belt, landscape character and the historic environment would, at the settlement level, outweigh these positive factors associated with this strategic option.</p>
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Intensification and northern expansion	<p>This strategic option lies predominantly within the existing settlement boundary and encompasses limited areas of Green Belt to the north of Chigwell Row.</p> <p>Constraints:</p> <ul style="list-style-type: none"> The strategic option lies predominantly within the existing settlement boundary. The landscape to the north-east of the settlement has a moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). This option contains Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). The option is located in an area of moderate sensitivity (Historic Environment Characterisation Study 2015). There are four Grade II Listed buildings located within the option boundary. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste Landscape 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies entirely within the existing settlement boundary and is not in the Green Belt. The strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing town centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would also minimise any harm to the wider landscape around the settlement. The area is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. Additionally, any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>
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Coopersale

Intensification	<p>This strategic option lies predominantly within the existing settlement boundary and would maximise opportunities to focus development in the most sustainable locations within the settlement.</p> <p>Constraints:</p> <ul style="list-style-type: none"> The option is located in an area of moderate sensitivity (Historic Environment Characterisation Study 2015). Epping Forest SSSI surrounds the option (particularly to the north and east). This option contains Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Biodiversity Historic Environment Land and Waste 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies predominantly within the existing settlement boundary and encompasses an area of Green Belt to the south-east of Coopersale. The Green Belt Review: Stage 2 (2016) concluded that the loss of this area would have limited impact upon the Green Belt. Overall, this strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement), in line with the land preference hierarchy set out in the Site Selection Methodology. This strategic option would also minimise any harm to the wider landscape around the settlement, and lies entirely within Flood Zone 1.</p>
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Epping

Intensification	<p>This strategic option lies predominantly within the existing settlement boundary, which is not in the Green Belt.</p> <p>Constraints:</p> <ul style="list-style-type: none"> This strategic option would minimise any harm to the wider landscape, 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies predominantly within the existing settlement boundary, which is not in the Green Belt. It also encompasses small areas of Green Belt to the north, east and south of</p>
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focussing growth within the existing urban settlement.

- The option is located within four historic character areas which are of low, low, medium and high sensitivity to change (Historic Environment Characterisation Study 2015).
- There is a Conservation Area in the centre of the option, and another to the south, overlapping with the option's southern boundary.
- There is also a large number of Grade II listed buildings located within the option, predominately located along High Road.
- The strategic option is adjacent to Epping Forest SAC.
- This option is predominately urban, with some areas lying within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste

Southern expansion

Constraints:

- There are small areas in the east of this strategic option located within Flood Zones 2 and 3, which is of medium-high risk of flooding.
- The strategic option encompasses parcel 045.1 (immediately to the south of Epping, east of the Central Line), which would have a very high "*summary of harm*" upon the Green Belt if released. However, as all parcels in the District score strongly against purpose 3, and this area (parcel 045.1) scores relatively weakly against all other purposes, the loss of this area would result in low impact on the Green Belt (Green Belt Review: Stage 2 2016).
- The strategic option also straddles parcels 044.2 and 045.2 (south-east and south-west of the strategic option), both of which would have a very high "*summary of harm*" upon the Green Belt if released (Green Belt Review: Stage 2 2016).
- The option is within an area of medium sensitivity to change, with particularly high sensitivity in the area around Hill Hall (distant from the strategic option) (Historic Environment Characterisation Study 2015).
- The strategic option is approximately 500m distance from Epping Forest SAC.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity

Epping, which comprise settlement rounding and small infill sites. Focussing development within the existing settlement boundary combined with the limited loss of such areas would be less harmful to the Green Belt relative to the other strategic options in the settlement. This strategic option would also maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing town centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would also minimise any harm to the wider landscape around the settlement, and additionally it is completely within Flood Zone 1. Any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of medium and high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

More suitable strategic option

Justification:

When compared with other strategic options at the settlement level, this strategic option is the least sensitive to change in landscape terms. This is evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the south of Epping has a lower sensitivity to change. Additionally, it would maximise opportunities to focus development in close proximity to Epping Underground Station, and aside from small areas in the east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. The sensitivity of this strategic option in Green Belt terms varies, as evidenced by the Green Belt Review: Stage 2 (2016). The strategic option encompasses parcel 045.1 (immediately to the south of Epping, east of the Central Line), which it was judged would have a 'low' impact upon the Green Belt if released. The strategic option also straddles parcels 044.2 and 045.2 (south-east and south-west of the strategic option). While the Green Belt Review: Stage 2 (2016) concluded that both of these score relatively strongly against Purpose 4, preserving the setting and special character of the historic town of Epping, further analysis by the Council indicates that the Purpose 4 assessment has been applied inconsistently when considered at the settlement level. It is judged these parcels make only a limited contribution to the overall setting of the town and furthermore, there is no visual relationship between these parcels and the most historic parts of Epping. Therefore, on balance, it is judged that the loss of these areas would be less harmful to the overall historic setting of Epping than other strategic options. Furthermore, any potential harm to the Green Belt could be mitigated through incorporation of sensitive design, which should also reflect the areas of medium overall sensitivity to change set out in the Historic Environment Characterisation Study

- Historic Environment
- Land and Waste
- Landscape

(2015).

Eastern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • The loss of this area, comprising multiple parcels, would have a very low to moderate “<i>summary of harm</i>” upon the Green Belt (Green Belt Review: Stage 2 2016) • Very small areas in the south of this strategic option are located within Flood Zones 2 and 3, which are of medium-high risk of flooding. • The strategic option falls within two historic character areas that are of high sensitivity to change, in part due to the valuable woodlands and parkland landscapes (Historic Environment Characterisation Study 2015). • The area to the east of Epping is highly sensitive to change as a result of the open nature of the land, the potential for development to fall outside existing soft urban green edges, the presence of a pre-1700 field pattern and the rising topography to the east (Settlement Edge Landscape Sensitivity Study 2010). • This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Historic Environment • Land and Waste • Landscape 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option is less harmful to the Green Belt relative to other strategic options identified adjacent to Epping. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area, comprising multiple parcels, would have a very low to moderate impact upon the Green Belt. As a result of its location to the east of Epping, when compared with other strategic options at the settlement level it would be less harmful to the Epping Forest Special Area of Conservation, and would maximise opportunities to focus development sustainably; the southern part of the strategic option is in close proximity to public transport services (Epping Underground Station), whilst existing town centre services and community facilities are in close proximity to the northern part of the strategic option. Additionally, aside from very small areas in the south of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Any development located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p> <p>This strategic option is sensitive to change in landscape terms. The Settlement Edge Landscape Sensitivity Study (2010) concluded that the area to the east of Epping is highly sensitive to change as a result of the open nature of the land, the potential for development to fall outside existing soft urban green edges, the presence of a pre-1700 field pattern and the rising topography to the east. These characteristics are particularly applicable to the easternmost part of the strategic option, which is more sensitive in visual terms as a result of rising topography and more dispersed boundary features; here, mitigation of harm to the wider landscape is likely to be particularly challenging. However, it is judged that mitigation may be possible for other parts of the strategic option. Development should incorporate sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape.</p> <p>Overall, while it is noted that the strategic option is sensitive in landscape and heritage terms, given there is potential for this harm to be mitigated through design, and as the strategic option is less harmful in Green Belt terms and located sustainably on the eastern side of Epping, when compared with other strategic options at the settlement level, it is judged to be a more suitable strategic option.</p>
South-western expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • The loss of this area (parcel 044.1) would have a very high “<i>summary of harm</i>” upon the Green Belt (Green Belt Review: Stage 2 2016). • The area directly south of the strategic option is highly sensitive to development. 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>Although the strategic option is located entirely within Flood Zone 1, it is judged that, at the settlement level, this strategic option would have the most impact upon the Epping Forest</p>

As such, the option is likely to be of moderate sensitivity, contributing to the character of the area (Settlement Edge Landscape Sensitivity Study 2010)

- The option lies within two historic character areas which are of high and low overall sensitivity to change. The Bell Common area, to the south-west of Epping, is of high sensitivity (Historic Environment Characterisation Study 2015).
- The option contains three Grade II listed buildings
- The option overlaps with a Conservation Area, to the southwest of the option.
- The option is located partially within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- The option is expected to adversely impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

Northern expansion

Constraints:

- The loss of this area would have a high “*summary of harm*” upon the Green Belt. The strategic option straddles parcels 070.3, 070.4 and 070.6, all of which would have a high-very high “*summary of harm*” on the Green Belt if released (Green Belt Review: Stage 2 2016)
- The landscape to the north of Epping is of moderate sensitivity (Settlement Edge Landscape Sensitivity Study 2010). The option is not expected to be able to mitigate adverse effects on the landscape as a result of the topography, the land falling away relatively sharply to Cobbins Brook, and the open nature of the land north/west of Bolt Cellar Lane.
- The option is located within an area of medium sensitivity to change, due to the rural character which extends across (Historic Environment Characterisation Study 2015)
- Small areas in the north-east of this strategic option are located within Flood Zones 2 and 3 which are of medium-high risk of flooding.
- The eastern part of this strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area.
- Swaines Green LWS is located immediately to the south of the option.
- Thornwood Common Flood Meadow Local Nature Reserve (LNR) is located along the northern boundary of the option.

Special Area of Conservation by expanding the urban area closer to the designated area, which may have adverse effects on Epping Forest (including potentially from air quality, urbanisation and increased recreation activity). Furthermore, this strategic option is most harmful to the Green Belt relative to the other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option encompasses parcel 044.1 which scored strongly against Purpose 4, preserving the setting and special character of the historic town of Epping. This strategic option is also sensitive to change in heritage terms. The Historic Environment Characterisation Study (2015) concluded that the Bell Common area, to the south-west of Epping, is of high sensitivity.

Less suitable strategic option

Justification:

This strategic option is more harmful to the Green Belt relative to other strategic options identified adjacent to Epping. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a high impact upon the Green Belt. The strategic option straddles parcels 070.3, 070.4 and 070.6, all of which scored strongly against Purpose 4, preserving the setting and special character of the historic town of Epping. Further analysis by the Council confirms that, as a result of the strong visual connection between these parcels and the most historic parts of Epping, this strategic option plays a particularly important role in maintaining the rural setting of Epping. In addition, while the Settlement Edge Landscape Sensitivity Study (2010) concluded that the landscape to the north of Epping is of moderate sensitivity, it is judged that this it would be particularly difficult to avoid or mitigate visual harm from development. This is as a result of topography, the land falling away relatively sharply to Cobbins Brook, and the open nature of the land north/west of Bolt Cellar Lane which provides no natural screening from longer views. There is also the potential for harm to notable landscape features, including pre-Tudor hedgerows and a Saxon-period field pattern at Swaines Green. It is also judged that the eastern part of this strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area, which may have adverse effects on Epping Forest (including potentially from air quality, urbanisation and increased recreation activity). Furthermore, the strategic option would isolate the Swaines Green Local Wildlife Site immediately to the south from the wider

- The option is located within Grade 2 and 3 agricultural land. Grade 2 (and possibly Grade 3 if determined to be 3a) is described as best and most versatile land.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Land and Waste
- Landscape

countryside, severing ecological connections and risking harm to the Local Wildlife Site.

The strategic option is of low-medium sensitivity to change in heritage terms, as evidenced by the Historic Environment Characterisation Study (2015). Aside from small areas in the north-east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to landscape, Green Belt and ecological designations would, at the settlement level, outweigh any positive factors associated with this strategic option.

North-eastern expansion

Constraints:

- The loss of this area would be of very low “*summary of harm*” on the Green Belt (Green Belt Review: Stage 2 2016).
- The landscape to the north-east of Epping is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010).
- The Gaynes Park area, between Epping and Coopersale, is of high sensitivity to change (Historic Environment Characterisation Study 2015).
- There is a cluster of Grade II listed buildings along the northern and southern boundaries of the option. There is also a single Grade II listed building in the centre of the option along Houblons Hill.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- The option is located adjacent to the Epping Forest Special Area of Conservation, to the north east of the option.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape.

Less suitable strategic option

Justification:

This strategic option is located entirely within Flood Zone 1, and less harmful in Green Belt terms, as evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would be of very low harm to the Green Belt. However, it is judged that it is sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north-east of Epping is highly sensitive to change. Additionally, it is judged that this strategic option would harm the historic settlement pattern by eroding the gap between Epping and Coopersale, and additionally promote unsustainable patterns of development distant from existing town centre amenities and public transport services. Furthermore, the Historic Environment Characterisation Study (2015) concluded that the Gaynes Park area, between Epping and Coopersale, is of high sensitivity to change.

Harlow

Harlow Strategic Sites

Constraints:

- The loss of some of the parcels within this area would have a very high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- The option is located partially within areas of high sensitivity to change (including the small area to the south of Harlow comprising Latton Priory) (Historic Environment Characterisation Study 2015).
- The option includes a number of heritage assets, including:
 - A number of Grade II listed buildings
 - Moated site 350m south of Dorrington Farm Scheduled Monument

More suitable strategic option

Justification:

The Council with its Housing Market Area (HMA) partners identified that areas in and around Harlow should be a focus of residential development. The HMA partners are in agreement that c. 51,100 homes will be delivered up to 2033. Although this is below the 51,700 Full Objectively Assessed Housing Need produced by ORS in July 2017, it is noted that the HMA is highly constrained by Green Belt. This covers the southern part of the HMA, home to the vast majority of the HMA’s larger settlements, and it is judged that a spatial strategy predicated on focusing development in smaller, less constrained towns in the northern part of the HMA (Buntingford

- Part of a Conservation Area - this overlaps with the option to the west of Harlow
- The landscape to the west of Harlow is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010).
- This option is located within Grade 2 and 3 agricultural land. Grade 2 (and possibly Grade 3 if determined to be 3a) is described as best and most versatile land.
- Latton Park and Mark Bushes areas of Ancient Woodland are located adjacent to the option, south of Harlow.
- Parndon Woods and Common LNR is located 300m east of the option, south of Harlow.
- There are areas of Flood Zone 2 and 3 located to the east of Harlow, dissecting the option, which are of medium-high risk of flooding.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Climate Change
- Historic Environment
- Land and Waste
- Landscape

(East Herts), Great Dunmow and Saffron Walden (both Uttlesford)) would not be sustainable. Harlow represents the most sustainable location within the HMA at which to concentrate development given: its role as a sub-regional centre for employment; its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections; its important location on the London–Stansted–Cambridge corridor; and the wider economic growth aspirations for the town. While Harlow is therefore the most logical location in the HMA to focus growth, this is predicated on the delivery of a package of transport infrastructure enhancements agreed through the Memorandum of Understanding on Highways and Transportation Infrastructure. Modelling undertaken by Essex County Council demonstrates that, subject to the delivery of these enhancements, growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated to 2033.

To determine which locations in and around Harlow should be the focus for growth, the HMA partners commissioned AECOM to undertake a review of strategic sites in and around Harlow. The extent of this strategic option incorporates the majority of the strategic sites which were assessed by AECOM as well as any other sites promoted in the vicinity of Harlow within Epping Forest District. It excludes strategic Sites P, Q and S, which have a strong physical and functional relationship with other sites promoted in the vicinity of Roydon. Additionally, these sites were judged by AECOM to be less suitable for accommodating strategic growth around Harlow. Sites P, Q and S are therefore assessed as part of the Roydon Eastern Expansion option.

High Ongar

Infill with limited expansion

This strategic lies predominantly within the existing settlement boundary.
Constraints:

- This strategic option lies predominantly within the existing settlement boundary. A large proportion of development will be on previously developed land. For much of the strategic option, the loss would have no impact upon the Green Belt. The northern part of the strategic option falls within parcel 023.3; the loss of which would have a high “*summary of harm*” on the Green Belt. Further analysis undertaken by the Council has confirmed that, the eastern part of this parcel (which includes the strategic option) makes a limited contribution to the setting and special character of Ongar as a result of its physical and visual severance from the wider parcel to the west.
- The landscape to the east and north of High Ongar has a lower sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010).
- There are some areas of the option located within Flood Zones 2 and 3 which are of medium-high risk of flooding.
- The option is of high sensitivity to change (Historic Environment Characterisation Study 2015).
- A Conservation Area is located in the northwest corner of the option.

More suitable strategic option

Justification:

This strategic option provides opportunities to promote infill and settlement rounding. It lies predominantly within the existing settlement boundary and encompasses small areas of Green Belt predominantly to the north and north-east of High Ongar. The loss of such areas would be less harmful to the Green Belt relative to the other strategic option in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that, for much of the strategic option, the loss would have no impact upon the Green Belt. While the northern part of the strategic option falls within a parcel which scores relatively strongly against Purpose 4 (023.3), as identified in the Green Belt Review: Stage 2 (2016), further analysis undertaken by the Council has confirmed that, when looking at a more granular scale, the eastern part of this parcel makes a limited contribution to the setting and special character of Chipping Ongar as a result of its physical and visual severance from the wider parcel to the west. The strategic option would also maximise (albeit limited) opportunities within High Ongar to use previously developed land in line with the land preference hierarchy set out in the Site Selection Methodology. The strategic option is also less sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the east and north of High Ongar has a lower sensitivity to change.

- There are a number of Grade II listed buildings located throughout the option, with a cluster located within the Conservation Area present.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste

The area is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. Additionally, any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

Western expansion

Constraints:

- The loss of this area (parcel 023.3) would have a high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- The landscape to the west of High Ongar is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010).
- The whole area around High Ongar is of high sensitivity to change (Historic Environment Characterisation Study 2015).
- Much of the southern part of the strategic option lies within Flood Zones 2 and 3, which is of medium-high risk of flooding.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Climate Change
- Historic Environment
- Land and Waste
- Landscape.

Less suitable strategic option

Justification:

This strategic option is more harmful to the Green Belt relative to the other strategic options identified adjacent to High Ongar. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a high impact upon the Green Belt. The strategic option encompasses parcel 023.3, which scored relatively strongly against Purpose 4, preserving the setting and special character of the historic town of Chipping Ongar. This strategic option is also sensitive to change with respect to landscape and heritage. The Settlement Edge Landscape Sensitivity Study (2010) concluded that the landscape to the west of High Ongar is highly sensitive to change, while the Historic Environment Characterisation Study (2015) concluded that the whole area around High Ongar is of high sensitivity to change in heritage terms.

In addition, much of the southern part of the strategic option lies within Flood Zones 2 and 3. This area would therefore be less suitable for development taking account of the sequential flood risk test compared with the other strategic option around High Ongar.

Loughton/Debden

Intensification

This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt to the north of Debden.

Constraints:

- This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt to the north of Debden.
- The loss of the area (parcel 054.5) would have a high “*summary of harm*” upon the Green Belt. This area scores strongly against purpose 3, resulting in an overall high ‘*summary of harm*’ upon the Green Belt. However, as all parcels in the District score strongly against purpose 3, and this area (parcel 054.5) scores moderately-weakly against all other purposes, the loss of this area would result in moderate impact on the Green Belt (Green Belt Review: Stage 2

More suitable strategic option

Justification:

This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt to the north of Debden. The loss of this area would be less harmful to the Green Belt relative to the other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of the area (parcel 054.5) would have a moderate impact upon the Green Belt. This strategic option would also maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing town centre amenities, public transport services and community facilities, and to use previously developed land, and managed open space within the settlement (where this would maintain access to adequate open space provision within or adjacent to the settlement), in line with the land preference hierarchy set out

- 2016).
- Some small areas of the option are located within Flood Zones 2 and 3, which are of medium-high risk of flooding.
- The option falls within two historic character area, which are of medium and high overall sensitivity to change (Historic Environment Characterisation Study 2015).
- There is a conservation area on the eastern edge of the option.
- There is a Scheduled Monument (Roman Villa 300m south of Long Shaw) located along the eastern boundary of the option
- There is a large number of Grade II listed buildings scattered throughout the option. The option is located on urban land.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment

in the Site Selection Methodology. This strategic option would also minimise any harm to the wider landscape around the settlement, as well as the Epping Forest Special Area of Conservation by directing growth towards the existing built-up area.

The area is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. Any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of medium and high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

South-eastern expansion

Constraints:

- The majority of the strategic option lies within Flood Zones 2 and 3, which is of medium-high risk of flooding.
- Parcel DSR-039 (which includes the option) was one of the strongest performing Green Belt parcels across the District as a whole, in particular by preventing the merging of Chigwell and Buckhurst Hill, and Chigwell and Loughton / Debden (Green Belt Review: Stage 1 2015).
- The option falls within two historic character areas, which are of low and high sensitivity to change. The high sensitivity is in relation to the surviving elements of the historic landscape, which should be maintained and enhanced (Historic Environment Characterisation Study 2015).
- The option is located within an area of medium sensitivity (Settlement Edge Landscape Sensitivity Study 2010).
- Roding Valley Meadows LNR is located within the option boundary.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics and objectives:

- Biodiversity
- Climate Change
- Landscape

Less suitable strategic option

Justification:

Aside from small areas in the east of this strategic option, which are located within Flood Zone 1, the remainder of the strategic option lies within Flood Zones 2 and 3. It would therefore be less suitable for development taking account of the sequential flood risk test compared with other strategic options around Loughton/Debden. This strategic option is also judged to be more harmful to the Green Belt. This is evidenced by the Green Belt Review: Stage 1 (2015) which concluded that parcel DSR-039 was one of the strongest performing Green Belt parcels across the District as a whole, in particular by preventing the merging of Chigwell and Buckhurst Hill, and Chigwell and Loughton / Debden.

While the strategic option is located in close proximity to Loughton, Debden and Buckhurst Hill stations, and is no more sensitive to change in landscape terms than other strategic options around Loughton/Debden (as evidenced by the Settlement Edge Landscape Sensitivity Study (2010)), it is judged that the flood risk constraint would, at the settlement level, outweigh any positive factors associated with this strategic option.

Northern expansion

Constraints:

- The loss of this area (encompassing a number of Green Belt parcels) would have a high-very high "summary of harm" upon the Green Belt (Green Belt Review: Stage 2 2016).
- The area south of Theydon Bois is of high sensitivity (Historic Environment

Less suitable strategic option

Justification:

This strategic option is the most harmful to the Green Belt relative to the other strategic options at the edge of Loughton/Debden. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a high-very high impact upon the Green Belt. The strategic option straddles a series of Green Belt parcels that meet Purpose 2 relatively

Characterisation Study 2015)

- There are three Grade II listed buildings located along the southwest boundary of the option.
- The option would likely impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area.
- There is a parcel of Ancient Woodland located within the strategic option.
- The majority of the option is of medium sensitivity (Settlement Edge Landscape Sensitivity Study 2010).
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- There are small areas in the centre and south-east of this strategic option located within Flood Zones 2 and 3, which are of medium-high risk of flooding.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

strongly or strongly, preventing the coalescence of Loughton/Debden with Theydon Bois. The strategic option is also sensitive to change in heritage terms. The Historic Environment Characterisation Study (2015) concluded that the area south of Theydon Bois is of high sensitivity. It is also judged that, at the settlement level, this strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area, which may have adverse effects on Epping Forest (including potentially from air quality, urbanisation and increased recreation activity).

Aside from small areas in the centre and south-east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to the Green Belt and to Epping Forest Special Area of Conservation would, at the settlement level, outweigh any positive factors associated with this strategic option.

Lower Nazeing

Western intensification and infill

This strategic option lies predominantly within the existing settlement boundary and would maximise opportunities to focus development in the most sustainable locations within the settlement

Constraints:

- The strategic option lies predominately within Flood Zone 1, which is of low risk of flooding. Small areas in the south-west are located within Flood Zones 2 and 3 which are of medium-high risk of flooding.
- There is a Grade II listed building located within the option boundary, north of Nazeing Road.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics and objectives:

- Land and Waste

More suitable strategic option

Justification:

This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt immediately to the west of Lower Nazeing. The loss of this small area would be less harmful to the Green Belt relative to other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a low impact upon the Green Belt. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing and planned community facilities, including the school and new community centre, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would also minimise any harm to the wider landscape around the settlement.

Aside from small areas in the south-west of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Additionally, the strategic option is less sensitive to change in heritage terms than other strategic options around Lower Nazeing. The Historic Environment Characterisation Study (2015) concluded that the area aligned with this strategic option is of low overall sensitivity to change.

Eastern/north-eastern infill and

Constraints:

More suitable strategic option

Justification:

expansion	<ul style="list-style-type: none"> All outward strategic options around Lower Nazeing are moderately sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). The area is within a historic character area of moderately sensitivity to change (Historic Environment Characterisation Study 2015). There is a Conservation Area partially within the option boundary, to the south west. There are a number of Grade II listed buildings located within the option boundary, predominately focused around Hoe Lane. This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste Landscape 	<p>This strategic option is less harmful to the Green Belt relative to the other strategic options identified adjacent to Lower Nazeing. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area, comprising Green Belt parcels 066.4 and 067.3 would have low or no impact upon the Green Belt. This strategic option is moderately sensitive to change in landscape terms, as are other strategic options to the south, east and north of Lower Nazeing. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all outward strategic options around Lower Nazeing are moderately sensitive to change. Furthermore, the strategic option is moderately sensitive to change in heritage terms, equally or less sensitive than other strategic options around Lower Nazeing.</p> <p>On balance, while this strategic option is overall considered to be suitable, it is less preferential at the settlement level compared to the western intensification and infill and southern expansion strategic options, primarily a result of its location relative to existing community facilities and village centre amenities.</p>
Eastern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> The loss of this area (parcel 066.6) would have a very high “<i>summary of harm</i>” upon the Green Belt (The Green Belt Review: Stage 2 2016). The strategic option is located within a landscape of moderately sensitive to change (Settlement Edge Landscape Sensitivity Study 2010). The option is distant from the existing settlement and would not be keeping with the character of the landscape. The strategic option lies predominately within Flood Zone 1, which is of low risk of flooding. Small areas in the south are located within Flood Zones 2 and 3 which are of medium-high risk of flooding. The option is within a historic character area of moderate sensitivity (Historic Environment Characterisation Study 2015). A Conservation Area partially lies within the option boundary, to the south and east. There are a number of Grade II listed buildings located within the option boundary, predominately focused around Back Lane. This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics and objectives:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option is more harmful to the Green Belt relative to the other strategic options identified adjacent to Lower Nazeing. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option encompasses parcel 066.6 which meets Purpose 2 strongly, preventing coalescence between Harlow, Lower Nazeing and Roydon. In addition, as a result of its location some distance to the east of the settlement, it is the furthest from existing and planned community facilities compared with other strategic options around Lower Nazeing. This strategic option is moderately sensitive to change in landscape terms, as are other strategic options around Lower Nazeing. The Settlement Edge Landscape Sensitivity Study (2010) concluded that outward strategic options to the south, east and north-east of Lower Nazeing are moderately sensitive to change.</p> <p>Aside from small areas in the south of this strategic option which are located within Flood Zone 2, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to the Green Belt and the distance from existing and planned community facilities would, at the settlement level, outweigh any positive factors associated with this strategic option.</p>

Northern expansion

Constraints:

- Loss of this area (parcel 066.6) would have a very high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- The option is located within a historic character area of moderate sensitivity (Historic Environment Characterisation Report 2015). This strategic option would encourage ribbon development to the north of Lower Nazeing, resulting in a further elongation of the settlement.
- The strategic option lies predominately within Flood Zone 1, which is of low risk of flooding. Small areas in the west are located within Flood Zones 2 and 3 which are of medium-high risk of flooding.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste

Less suitable strategic option

Justification:

This strategic option would result in unsustainable development patterns, encouraging ribbon development to the north of Lower Nazeing and a further elongation of the settlement. Furthermore, this strategic option is more harmful to the Green Belt relative to other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option incorporates parcel 066.6 which strongly meets Purpose 2, preventing coalescence between Harlow, Lower Nazeing and Roydon. In addition, as a result of its location some distance to the north of the settlement, it is the furthest from existing and planned community facilities compared with other strategic options around Lower Nazeing.

This strategic option is less sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north of Lower Nazeing has a lower sensitivity to change. Additionally, aside from small areas in the west of this strategic option which are located within Flood Zone 2, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to the Green Belt, impact upon the settlement pattern and the distance from existing and planned community facilities would, at the settlement level, outweigh any positive factors associated with this strategic option.

Southern expansion

Constraints:

- The strategic option lies predominately within Flood Zone 1, which is of low risk of flooding. Small areas in the centre are located within Flood Zones 2 and 3 which are of medium-high risk of flooding.
- The strategic option is located within a landscape of moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010).
- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015).
- A Conservation Area partially lies within the strategic option boundary, to the east of the option.
- There are a number of Grade II listed buildings located within the option boundary, predominately focused around Middle Street.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

More suitable strategic option

Justification:

This is the preferred strategic option for more substantive outward growth of Lower Nazeing. This is because of its location to the south of the settlement, which when compared with other strategic options at the settlement level would cause less harm to the Green Belt than other strategic options as evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area (parcels 67.4 and 67.5) would have no impact upon the Green Belt. It is also located close to existing community facilities and village centre amenities. Aside from small areas in the centre of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1.

This strategic option is moderately sensitive to change in landscape terms, as are the eastern and north-eastern expansion options for Lower Nazeing as evidenced by the Settlement Edge Landscape Sensitivity Study (2010). Any development in the south of the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

North Weald Bassett

Northern expansion

This option is supported by the North Weald Bassett Masterplanning Study. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement.

Constraints:

- The strategic option is located within a landscape of moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). It is noted that this strategic option is less sensitive to change in landscape terms relative to other strategic options around North Weald Bassett.
- Loss of this area (parcels 010.2 and 010.3) would have a moderate and high “*summary of harm*” upon the Green Belt respectively. Parcel 010.3 scores strongly against purpose 3, however, as all parcels in the District score strongly against purpose 3, and this area (parcel 010.3) scores moderately-weakly against all other purposes, the loss of this area would result in moderate impact on the Green Belt (Green Belt Review: Stage 2 2016).
- The option is located within historic character areas of high and low sensitivity. Areas of high sensitivity are around the Church and military defences (Historic Environment Characterisation Report 2015).
- There are a number of Grade II listed buildings, and one Grade II* listed building dispersed within the strategic option. The Grade II* listed building and two Grade II listed buildings are located along Vicarage Lane.
- Church Lane Flood Meadow LNR is located within the option boundary.
- This option is partially located within Grade 2 agricultural land; which is best and most versatile.
- A considerable proportion of the strategic option is located within Flood Zone 1, which is of low risk of flooding. There are sections of the option which are located within Flood Zones 2 and 3, predominately across the centre and to the north. These areas are of medium-high risk of flooding

Given existing constraints there is the potential for issues to arise in relation to the following SA topics and objectives:

- Biodiversity
- Climate Change
- SA Objective 6 (Heritage)
- Land and Waste
- Landscape

More suitable strategic option

Justification:

The strategic options for North Weald Bassett draw on the findings of the North Weald Bassett (NWB) Masterplanning Study (2014). Focused expansion of North Weald Bassett to the north-west was considered in Scenario B of this Study. The NWB Masterplanning Study judged Scenario B to be a more suitable strategic option. A summary of the reasons for this judgement is set out below and was re-confirmed as part of this stage of the site selection process.

This strategic option is less sensitive to change in landscape terms relative to other strategic options around North Weald Bassett. This is evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north of North Weald Bassett is moderately sensitivity to change. This is supported by the NWB Masterplanning Study, which found that, as a result of topography around the settlement, new development to the west of the High Road would have a lesser impact on the skyline and key views to landscape from the wider settlement. There is also the potential to align development with existing physical boundaries (Church Lane, Vicarage Lane and Merlin Way), promoting settlement rounding and limited, small-scale infill along the northern frontage of Vicarage Lane and ensuring the settlement has a logical, clearly defined edge which limits potential visual impacts on the surrounding landscape. The Green Belt Review: Part 2 (2016) concluded that parcels 010.2 and 010.3, which form a substantive part of the strategic option, score moderately against Purpose 2, preventing the merging of North Weald Bassett with other surrounding towns. However, it is judged that the presence of these existing established boundary features and the M11 to the west would, in combination, assist in preventing the coalescence of North Weald Bassett with Epping or Harlow. This strategic option is also less sensitive to change in heritage terms relative to other strategic options around North Weald Bassett. The Historic Environment Characterisation Study (2015) concluded that North Weald Rural area, which is aligned with the strategic option, is of low sensitivity to change.

Additionally, this strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village centre amenities, public transport services and community facilities. The NWB Masterplanning Study found that there is greater scope for connections between the strategic option and: the existing centre of North Weald Bassett; existing and proposed employment uses close to and within the airfield; and St Andrews Church. This would result in a more compact, sustainable settlement pattern. In addition, this strategic option can more easily accommodate a relocated and enlarged or additional primary school, which is likely to be required as a result of new residential development, along with other community uses.

Community engagement conducted as part of the NWB Masterplanning Study indicated greater levels of public approval for residential development to the west of the High Road when compared with other strategic options around North Weald Bassett.

Southern Expansion	<p>Constraints:</p> <ul style="list-style-type: none"> The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). Development is expected to have an adverse impact on the landscape character due to the rising topography of the area. It would also be challenging to mitigate visual harm to the surrounding landscape. The option is located within a historic character area of high sensitivity, particularly around Gaynes Park (Historic Environment Characterisation Study 2015) Ongar Redoubt Scheduled Monument is located in the centre of the option. This heritage asset is on the Heritage at Risk register. The option is a valued green space for informal recreation (NWB Masterplanning Study) Weald Common Flood Meadow LNR located within the option, along the western boundary. This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). The strategic option lies predominately within Flood Zone 1, which is of low risk of flooding. Small areas in the north are located within Flood Zones 2 and 3 which are of medium-high risk of flooding. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Climate Change Community and Wellbeing Historic Environment Land and Waste Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>The strategic options for North Weald Bassett draw on the findings of the North Weald Bassett (NWB) Masterplanning Study (2014). Expansion to the south of North Weald Bassett (along with more limited expansion to the north-west of the settlement) was considered as part of Scenario A. The NWB Masterplanning Study judged Scenario A to be a less suitable strategic option. A summary of the reasons for this judgement being made is set out below and was re-confirmed as part of this stage of the site selection process.</p> <p>This strategic option is more sensitive to change in landscape terms than the strategic option to the north, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010) which concluded that the landscape to the south of North Weald Bassett is highly sensitive to change. It was judged through the NWB Masterplanning Study that, as a result of the rising topography of the area, development to the south-east of the settlement would have a greater impact on the landscape setting of North Weald Bassett than development to the north-west. This rising topography would also restrict the scope for access and connections from the existing settlement, in particular to the south-east of Emberson Way. Furthermore, aside from the railway line, no established natural or man-made features exist to the south of the strategic option; the level of development required to align with this potential edge would be disproportionately high compared with the scale of the existing settlement, and would not integrate well with the settlement. It would also be challenging to mitigate visual harm to the surrounding landscape.</p> <p>This strategic option is also more sensitive to change in heritage terms relative to other strategic options around North Weald Bassett. The Historic Environment Characterisation Study (2015) concluded that the area to the south of North Weald Bassett, Gaynes Park, is of high sensitivity to change. This is supported by the NWB Masterplanning Study, which highlighted the sensitivity of the Ongar Redoubt. This is a Scheduled Monument on the Heritage at Risk register and feedback from English Heritage through the Study indicated that residential development close to the Redoubt would not be supported.</p>
South-western Expansion	<p>Constraints:</p> <ul style="list-style-type: none"> The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). This strategic option would represent an unsustainable pattern of settlement growth, creating ribbon development distant from existing village centre amenities and community facilities, and further elongating the settlement. The option is located within a historic character area of high sensitivity (Historic 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option would represent an unsustainable pattern of settlement growth, creating ribbon development distant from existing village centre amenities and community facilities, and further elongating the settlement. This would result in development in an unsustainable location, distant from existing and planned village centre amenities and community facilities. In addition, this strategic option is particularly sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the</p>

- Environment Characterisation Report 2015).
- Roughtalleys Wood LWS, LNR and Ancient Woodland is located within the eastern part of the strategic option.
- The strategic option lies predominately within Flood Zone 1, which is of low risk of flooding. Small areas in the east are located within Flood Zones 2 and 3 which are of medium-high risk of flooding

Given existing constraints there is the potential for issues to arise in relation to the following SA topics :

- Biodiversity
- Historic Environment
- Landscape

south-west of North Weald Bassett is highly sensitive to change.

This strategic option would result in very low harm to the Green Belt. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area (parcel 010.5) would have a low impact. However, it is judged that this would be outweighed by the harm identified to the landscape and the settlement pattern. Additionally, this strategic option would not support the development of the preferred scenario arising from the North Weald Bassett (NWB) Masterplanning Study (2014).

Ongar

Intensification	<p>The strategic option is located within the urban settlement boundary and as such is not expected to lead to adverse effects on the wider landscape, promoting the use of previously developed land.</p> <p>Constraints:</p> <ul style="list-style-type: none"> The area is predominantly located within Flood Zone 1, with some areas of Flood Zones 2 and 3 in the centre of the option. Development within Flood Zones 2 and 3 is of medium- high risk of flooding. The strategic option is located within three different historic character areas; two are of high sensitivity to change, one is of low sensitivity. High sensitivity relates to the sensitive historic buildings and archaeology (Historic Environment Characterisation Study 2015). A Conservation Area is located in the centre of the option. There is an abundance of Grade II listed buildings located within the site boundary, predominately along the High Street, and one Grade I listed building, the Church of St Martin. This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies entirely within the existing settlement boundary and is not in the Green Belt. The strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing town centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would also minimise any harm to the wider landscape around the settlement. The area is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. Additionally, any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>
Northern expansion	<p>This strategic option provides opportunities to promote development in sustainable locations within the settlement.</p> <p>Constraints:</p> <ul style="list-style-type: none"> The area is predominantly located within Flood Zone 1, with some areas of 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option provides opportunities to promote development in sustainable locations within the settlement, in close proximity to the new secondary academy and the existing primary school and health facility. The area is predominantly located within Flood Zone 1 and therefore</p>

Flood Zones 2 and 3 around the eastern and western boundaries and also in the centre of the strategic option. Development within Flood Zones 2 and 3 is of medium- high risk of flooding.

- The loss of parcel 016.1 (forming the eastern part of the strategic option) would have a high 'summary of harm' upon the Green Belt.
- The 'summary of harm' of releasing parcels 015.1 and 016.2 (covering much of the wider strategic option) would be very high. However, as these two parcels score highly for purpose 3 only, the overall impact of the loss of the parcels is low.
- The strategic option is located within a landscape that is highly sensitive to change (Settlement Edge Landscape Sensitivity Study 2010).
- The strategic location is within three historic character areas, each holding a different sensitivity value (high, medium and low). High sensitivity relates to the characteristic town and rural settlement pattern of the area (Historic Environment Characterisation Study 2015).
- There is one Grade II listed building located along Epping Road adjacent to the southern boundary.
- This option is located within Grade 2 and 3 agricultural land. Grade 2 (and possibly Grade 3 if determined to be 3a) is described as best and most versatile land.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. While part of the strategic option is sensitive in Green Belt terms, the option as a whole is less harmful to the Green Belt relative to the other strategic options identified for this settlement. This is evidenced by the Green Belt Review: Stage 2 (2016), which concluded that, while the loss of parcel 016.1 (forming the eastern part of the strategic option) would have a high impact upon the Green Belt, the impact of releasing parcels 015.1 and 016.2 (covering much of the wider strategic option) would be very low.

This strategic option, together with other strategic options around Chipping Ongar, is sensitive to change in landscape terms. The Settlement Edge Landscape Sensitivity Study (2010) concluded that strategic options to the north, east and west of the settlement are all highly sensitive to change. However, within this strategic option, in order to minimise harm to the landscape, development could be located to the south of the Ongar Leisure Centre, where harm could be more effectively limited or mitigated, and around Fyfield Road where there is a degree of existing screening from local hedgerows. Development should incorporate sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape. Furthermore, any development located within areas of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

It is judged that the particular opportunities for sustainably locating development presented by this strategic option would outweigh potential Green Belt and landscape harm (the latter of which could also be limited through incorporation of suitable mitigation).

Western expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • The strategic option is predominantly located within Flood Zone 1, with some areas of Flood Zone 2 and 3 located through the centre of the option, to the south. Development within Flood Zones 2 and 3 is of medium- high risk of flooding. • The loss of parcels 024.3 and 024.4 (the northern part of the strategic option) would have a very high and high 'summary of harm' upon the Green Belt (respectively) (Green Belt Review: Stage 2 2016). • The 'summary of harm' of releasing parcel 024.2 (the southern part of the strategic option) is very high. However considering this parcel scores highly for purpose 3 only, the overall impact of the loss of the parcel is low. • The northern part of the option is within an area of high overall sensitivity to change. The southern part of the strategic option falls into a different landscape area characterised as low sensitivity (Settlement Edge Landscape Sensitivity Study 2010). 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option provides opportunities for expansion of the settlement in close proximity to existing town centre amenities, public transport services and community facilities, including the new secondary academy to the north of the town and the primary schools to the south and north, whilst minimising harm to the Green Belt and the surrounding landscape. The strategic option is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. While part of the strategic option is sensitive in Green Belt terms, the option as a whole is less harmful to the Green Belt relative to the other strategic options in the settlement. While the Green Belt Review: Stage 2 (2016) concluded that the loss of parcels 024.3 and 024.4 (the northern part of the strategic option) would have a very high and high impact upon the Green Belt (respectively), the impact of releasing parcel 024.2 (the southern part of the strategic option) would be very low.</p>
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- The settlement and landscape of the area, in addition to the potential survival of below ground deposits, are of medium sensitivity to change (Historic Environment Characterisation Study 2015).
- The option contains one Grade II listed building.
- The option is located within Grade 2 and 3 agricultural land. Grade 2 (and possibly Grade 3 if determined to be 3a) is described as best and most versatile land.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

This strategic option, together with other strategic options around Chipping Ongar, is sensitive to change in landscape terms. The Settlement Edge Landscape Sensitivity Study (2010) concluded that strategic options to the north, east and west of the settlement are all highly sensitive to change; in particular, the northern part of this strategic option is within an area identified as high overall sensitivity to change. However, the southern part of the strategic option falls into a different landscape sensitivity area characterised as low sensitivity where harm could be effectively limited or mitigated. This area benefits from a degree of screening from local hedgerows. Within this strategic option development should incorporate sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape.

It is judged that the particular opportunities for sustainably located development presented by this strategic option would outweigh potential Green Belt and landscape harm, which could also be limited through incorporation of suitable mitigation.

Southern expansion

Constraints:

- The option is within two landscape sensitivity areas. The area to the east of Brentwood Road is a highly sensitive area (more associated with the wider River Roding valley). The landscape to the south of Ongar has a lower sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010).
- The loss of this area of land would have a moderate “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016)
- The option falls within two historic character areas, which are of medium and high sensitivity to change.
- The option contains one Grade II listed building.
- The strategic option lies predominately within Flood Zone 1, with small areas of Flood Zones 2 and 3 in the south which are of medium-high risk of flooding.
- The option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment,
- Land and Waste
- Landscape

More suitable strategic option

Justification:

Although less favoured than other more suitable strategic options around Chipping Ongar as a result of its distance from existing town centre amenities, public transport and community facilities, this strategic option provides opportunities for settlement expansion which would minimise harm to the Green Belt and largely avoid harm to the wider landscape around the settlement. The majority of the strategic option is less sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010). This concluded that the landscape to the south of Chipping Ongar has a lower sensitivity to change where harm could be effectively limited or mitigated, though it should be noted that the area to the east of Brentwood Road is in a highly sensitive area in landscape terms (more associated with the wider River Roding valley). The strategic option is also less harmful to the Green Belt relative to the other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a moderate impact upon the Green Belt. Aside from small areas in the south of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1.

This strategic option is noted as being similarly sensitive to change in heritage terms as other strategic options around Chipping Ongar. The Historic Environment Characterisation Study (2015) concluded that the whole area is of high overall sensitivity to change; however, it is judged that this could be mitigated through incorporation of sensitive design.

Eastern expansion

Constraints:

- The loss of this area of land (parcel 023.2) would have a very high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- The option is located within a historic character area of overall moderate sensitivity. High sensitive areas include Historic Ongar, particularly areas in the

Less suitable strategic option

Justification:

This strategic option is the most harmful to the Green Belt relative to the other strategic options identified adjacent to Chipping Ongar. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option encompasses parcel 023.2, which scored strongly against Purpose 4,

immediate vicinity of the Castle. Overall the area is of medium sensitivity to change (Historic Environment Characterisation Report 2015).

- The strategic option includes a Conservation Area, in the northwest corner of the option. Part of another Conservation Area is located to the centre west of the option, overlapping slightly with the western boundary.
- Ongar Castle Scheduled Monument is located inside the western boundary of the option.
- There are a number of Grade II listed buildings within the option.
- The option is located within an area of a high overall visual sensitivity, with strong intervisibility and visual prominence (Settlement Edge Landscape Sensitivity Study 2010).
- Much of the southern area of the option, as well as the eastern fringes, lie within Flood Zones 2 and 3, which is of medium-high risk of flooding
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Climate Change
- SA Objective (Historic Environment)
- Land and Waste
- Landscape

preserving the setting and special character of the historic town of Chipping Ongar.

The strategic option is also judged to be particularly sensitive in heritage terms. In particular, the Historic Characterisation Study (2015) concluded that Historic Chipping Ongar, including areas in the immediate vicinity of the Castle, are of a high sensitivity to change. Furthermore, while the strategic option is similarly sensitive to change in landscape terms as the majority of other strategic options around Chipping Ongar, it is judged that (in contrast to these) there is very limited potential for mitigation of harm to landscape character. The Settlement Edge Landscape Sensitivity Study (2010) concluded that the entirety of the area to the east of the settlement, which aligns with the strategic option, is of a high overall visual sensitivity, with strong intervisibility and visual prominence. While much of the northern part of this strategic option is located within Flood Zone 1, much of the southern area, as well as the eastern fringes, lie within Flood Zones 2 and 3. These areas would be less preferential for development sequentially compared with other strategic options around Chipping Ongar.

While parts of the strategic option are located sustainably, in close proximity to existing town centre services and, in the case of the northern area, the new secondary school, it is judged that the harm identified to the Green Belt, landscape and to historic character would, at the settlement level, outweigh any positive factors associated with this strategic option.

Roydon

Intensification

This option would maximise opportunities to focus development in the most sustainable locations within the settlement, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement).

Constraints:

- Loss of this area (parcels 064.1, 064.2) would have a moderate to very low “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- Loss of this area (parcels 064.4 and 064.8) would have a high “*summary of harm*” upon the Green Belt. However, as these parcels only score highly against purpose 3, the loss of the parcels would have a low impact on the Green Belt. (Green Belt Review: Stage 2 2016).
- Small areas along the eastern edge of this strategic option are located within Flood Zones 2 and 3, which is of medium-high risk of flooding. The majority of the strategic option lies within Flood Zone 1 which is of low risk of flooding.
- The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). This strategic option minimises harm by limiting the scale of outward growth into the wider landscape.

More suitable strategic option

Justification:

This strategic option lies predominantly within the existing settlement boundary and encompasses small areas of Green Belt to the south, east and west of Roydon. The loss of these areas would be less harmful to the Green Belt relative to the other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of these areas, (parcels 064.1, 064.2, 064.4 and 064.8), would have a moderate to very low impact upon the Green Belt. In the case of parcel 064.6 to the south-west of Roydon, it was assessed that the loss of this area would not cause any significant harm to the Green Belt. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village centre amenities, public transport services (including Roydon railway station) and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). Furthermore, aside from small areas along the eastern edge of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1.

While the strategic option encompasses some areas that are sensitive to change in landscape

- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015).
- There are two Conservation Areas located within the option boundary, to the north, and central/south, covering a large proportion of the option.
- There is a LWS partially located within the option, to the south.
- This option is located within Grade 2 and Grade 3 agricultural land. Grade 2 agricultural land (and Grade 3 if found to be 3a) is best and most versatile.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

terms, other strategic options around Roydon are judged to be equally sensitive. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all strategic options around Roydon are highly sensitive to change. This strategic option minimises harm by limiting the scale of outward growth into the wider landscape, and it would be possible to further limit harm to the landscape by incorporating sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape. It should also be noted that any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

Eastern expansion

Constraints:

- The option is located within a historic character area of moderate sensitivity (Historic Environment Characterisation Study 2015).
- The option includes a large number of Grade II listed buildings, which are predominately focused along the High Street and Harlow Road.
- The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010).
- Loss of this area (parcels 064.3 and 064.5) would have a very high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- There is a LWS partially located within the option, to the south, and another outside of the option, to the north.
- Small areas to the north of this strategic option are located within Flood Zones 2 and 3, which is of medium-high risk of flooding. The majority of the strategic option lies within Flood Zone 1 which is of low risk of flooding.
- This option is located within Grade 2 and Grade 3 agricultural land. Grade 2 agricultural land (and Grade 3 if found to be 3a) is best and most versatile.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

Less suitable strategic option

Justification:

This strategic option is sensitive to change in both landscape and heritage terms, as are the other strategic options around Roydon. The Historic Environment Characterisation Study (2015) concluded that the whole area around Roydon is of moderate sensitivity, whilst the Settlement Edge Landscape Sensitivity Study (2010) concluded that all areas around Roydon are highly sensitive to change. However, this strategic option is the most harmful to the Green Belt, relative to the other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this strategic option would have a very high impact upon the Green Belt. This strategic option straddles parcels 064.3 and 064.5 which scored strongly and relatively strongly (respectively) against Purpose 2, preventing the erosion of the narrow gap between Roydon and Harlow and the coalescence of these settlements. This is also supported by the Harlow Strategic Site Assessment (2016), which concluded that the development of this strategic option (which contains Sites P, Q and S) would result in the coalescence of Harlow and Roydon / Halls Green and reduce the openness of the Green Belt. The Harlow Strategic Site Assessment (2016) also noted the prevalence of environmental constraints throughout much of the strategic option, including woodland priority habitats, in particular to the south of the strategic option, as well as a local wildlife site to the north.

Aside from small areas in the north of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. As a result of its location to the east of the settlement, when compared with other strategic options at the settlement level, it would be less harmful to the Lee Valley Regional Park, and the northern part of the strategic option is located close to Roydon railway station. However, it is judged that the harm identified to the Green Belt, as well as its location away from village centre amenities would, at the settlement level, outweigh any positive factors associated with this strategic option.

Western expansion

Constraints:

- Loss of this area (parcels 064.7 and 064.8) would have a high and very high “*summary of harm*” upon the Green Belt respectively (Green Belt Review: Stage 2 2016). However, as the parcels only scores highly against purpose 3, loss of the parcels will have a moderate and low impact on the green belt respectively (Green Belt Review: Stage 2 2016).
- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015).
- The option contains one Grade II listed building.
- As a result of its location to the west of Roydon, this strategic option would be the most harmful to the Lee Valley Regional Park relative to the other strategic options in the settlement. The strategic option would conflict with the statutorily defined purpose of the Park - "a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind" (Section 12(1), Lee Valley Regional Park Act 1966) - risking the incursion of inappropriate development into the Park.
- There is a LWS partially located within the option, to the southwest.
- The northern part of the strategic option is located within Flood Zones 2 and 3 which is of medium-high risk of flooding. For the most part the strategic option lies within Flood Zone 1 which is of low risk of flooding.
- This option is located within Grade 2 and Grade 3 agricultural land. Grade 2 agricultural land (and Grade 3 if found to be 3a) is best and most versatile.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Climate Change
- Historic Environment
- Land and Waste
- Landscape

Less suitable strategic option

Justification:

This strategic option is sensitive to change in both landscape and heritage terms, as are the other strategic options identified around Roydon. The Historic Environment Characterisation Study (2015) concluded that the whole area around Roydon is of moderate sensitivity, whilst the Settlement Edge Landscape Sensitivity Study (2010) concluded that all areas around Roydon are highly sensitive to change. However, as a result of its location to the west of Roydon, this strategic option would be the most harmful to the Lee Valley Regional Park relative to the other strategic options in the settlement. The strategic option would conflict with the statutorily defined purpose of the Park - "a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind" (Section 12(1), Lee Valley Regional Park Act 1966) - risking the incursion of inappropriate development into the Park.

This strategic option is less harmful to the Green Belt. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of parcels 064.7 and 064.8 would have a moderate and low impact upon the Green Belt respectively. The northern part of the strategic option is located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Additionally the northern part of the strategic option is located close to Roydon railway station. However, it is judged that the harm identified to the Lee Valley Regional Park, as well as its location away from village centre amenities would, at the settlement level, outweigh any positive factors associated with this strategic option.

Sewardstone

Intensification

Constraints:

- The option straddles Green Belt parcels 059.1 and 059.2. The loss of this area would have a very high “*summary of harm*” upon the Green Belt (Green Belt Review: Stage 2 2016).
- This strategic option has variable sensitivity to change in landscape terms. The landscape to the north of Sewardstone has low sensitivity to change, whilst land to the south is highly sensitive (Settlement Edge Landscape Sensitivity Study 2010).

Less suitable strategic option

Justification:

This strategic option would lead to the promotion of further unsustainable patterns of growth, which would increase the current pattern of ribbon development and focus development where there are limited public transport services and away from existing community facilities and local amenities and shops. The strategic option would also be harmful to the Green Belt; this is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option straddles parcels 059.1

- The option is located predominately within a historic character area of low sensitivity, however the east of the option overlaps with an area of high sensitivity (Historic Environment Characterisation Study 2015).
- There is a Grade II and Grade II* listed building (Luthers) located along Sewardstone Road.
- Small areas in the west of the strategic option are located within Flood Zones 2 and 3 which is of medium-high risk of flooding.
- The option is located to a LWS to the east.
- Chingford Reservoirs SSSI is located adjacent to the option to the east.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

and 059.2 which both perform strongly against Purpose 1, preventing the outward sprawl of London.

This strategic option has variable sensitivity to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north of Sewardstone has low sensitivity to change, whilst land to the south is highly sensitive. Aside from small areas in the west of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to Green Belt, as well as the limited access to public transport, existing community facilities and local amenities would, at the settlement level, outweigh any positive factors associated with this strategic option.

Sheering

Intensification This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement).

Constraints:

- The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015).
- The option includes a large number of Grade II listed buildings, which are predominately focused along The Street.
- This option is located within Grade 2 agricultural land, which is best and most versatile.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Climate Change
- Historic Environment
- Land and Waste

More suitable strategic option
Justification:
This strategic option lies predominantly within the existing settlement boundary and encompasses small areas of Green Belt to the south and west of Sheering. The loss of such areas would be the least harmful to the Green Belt relative to the other strategic options in the settlement. This is also evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of these areas would have no impact upon the Green Belt. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village centre amenities, public transport services and community facilities, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). In addition, this strategic option is entirely within Flood Zone 1 and would also minimise any harm to the wider landscape around the settlement.

While this strategic option is highly sensitive to change in heritage terms, as evidenced by the Historic Environment Characterisation Study (2015), all other strategic options around Sheering are judged to be equally sensitive. Any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).

Southern Constraints:

Less suitable strategic option

expansion	<ul style="list-style-type: none"> The strategic option is located within a landscape of high sensitivity to change, a result of its elevated position above the Pincey Brook (Settlement Edge Landscape Sensitivity Study 2010). The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015). The Grade II listed Parish Church of St Mary the Virgin is located within the strategic option, along with a Grade II listed building, both located along Church Lane. This option is located within Grade 2 agricultural land, which is best and most versatile. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste Landscape 	<p>Justification:</p> <p>This strategic option is more harmful in both landscape and heritage terms compared with other strategic options around Sheering. The strategic option is sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the south of Sheering is highly sensitive to change as a result of its elevated position above the Pincey Brook. Additionally, although applicable to all strategic options around Sheering, this option is highly sensitive to change in heritage terms, as evidenced by the Historic Environment Characterisation Study (2015).</p> <p>While the strategic option is less harmful to the Green Belt, as evidenced by the Green Belt Review: Stage 2 (2016), and the strategic option lies entirely within Flood Zone 1, it is judged that, on balance, this strategic option is less suitable compared with the northern expansion strategic option as a result of the high sensitivity in both landscape and heritage terms.</p>
Northern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> The strategic option is located within a landscape of moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015). This option is located within Grade 2 agricultural land, which is best and most versatile. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> Historic Environment Land and Waste Landscape 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option is less harmful to the Green Belt as evidenced by the Green Belt Review: Stage 2 (2016), which concluded that the loss of this area would have a very low impact upon the Green Belt. It is less sensitive to change in landscape terms relative to other options around Sheering, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north of the settlement has a moderate sensitivity to change. The strategic option is also entirely within Flood Zone 1.</p> <p>While this strategic option is highly sensitive to change in heritage terms, as evidenced by the Historic Environment Characterisation Study (2015), all other strategic options around Sheering are judged to be equally sensitive. Any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>

Theydon Bois

Intensification	<p>This strategic option lies predominantly within the existing settlement boundary and would minimise any harm to the wider landscape.</p> <p>Constraints:</p> <ul style="list-style-type: none"> Loss of this area (parcel 043.2) would have a high “<i>summary of harm</i>” upon the Green Belt. However, as the parcel only scores highly against purpose 3, loss of the parcel will have a moderate impact on the green belt (Green Belt Review: Stage 2 2016). The option is located within a historic character area of moderate sensitivity 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt to the north of Theydon Bois. The loss of this small area would be less harmful to the Green Belt relative to the other strategic options in identified for the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016), which concluded that the loss of this area, parcel 043.2, would have a moderate impact upon the Green Belt. This strategic option would also maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing village</p>
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(Historic Environment Characterisation Study 2015).

- There are a small number Grade II listed buildings located within the option, predominately focused along Theydon Park Road. This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

centre amenities and public transport services, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would minimise any harm to the wider landscape around the settlement and lies entirely within Flood Zone 1. The strategic option is also less sensitive to change in heritage terms than other strategic options around Theydon Bois. The Historic Environment Characterisation Study (2015) concluded the urban area of Theydon Bois is of moderate sensitivity to change.

North-eastern expansion

- Loss of this area (parcel 043.2) would have a high "summary of harm" upon the Green Belt. However, as the parcel only scores highly against purpose 3, loss of the parcel will have a moderate impact on the green belt (Green Belt Review: Stage 2 2016).
- The option is located within a historic character area of moderate sensitivity (Historic Environment Characterisation Study 2015).
- Small areas in the east of the strategic option are located within Flood Zones 2 and 3 which is of medium-high risk of flooding. For the most part the strategic option lies within Flood Zone 1 which is of low risk of flooding.
- The strategic option is located within a landscape of moderate sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). It is noted the option has a high visual sensitivity, considering the visually significant slopes, which also function as a visual "wrapper" to the village.
- This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

More suitable strategic option

Justification:

As a result of its location to the north-east of the settlement, when compared with other strategic options, this strategic option at the settlement level would be less harmful to the Green Belt and surrounding environmental designations (e.g. Epping Forest Special Area of Conservation) relative to other strategic options identified adjacent to Theydon Bois. It is located close to Theydon Bois Underground station and existing local amenities and shops, thus ensuring development is focused in the most sustainable location relative to the overall settlement. In Green Belt terms, the Green Belt Review: Stage 2 (2016) concluded that the loss of this area would have a moderate impact upon the Green Belt. Aside from small areas in the east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Additionally, the strategic option is less sensitive to change in heritage terms than other strategic options around Theydon Bois. The Historic Environment Characterisation Study (2015) concluded that the Theydons and Stapleford Tawney character zone is of medium sensitivity to change.

This strategic option is sensitive to change in landscape terms, as are other strategic options identified around Theydon Bois. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all strategic options around the village are moderately or highly sensitive to change. In the case of this strategic option, the Settlement Edge Landscape Sensitivity Study indicates a moderate sensitivity to change but with a high visual sensitivity, noting the visually significant slopes, which also function as a visual "wrapper" to the village. Within this strategic option, it would be possible to limit harm to the landscape by incorporating sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape.

Northern expansion

Constraints:

- The option is located within two historic character areas of high to moderate sensitivity (Historic Environment Characterisation Study 2015).
- The strategic option is located within a landscape of high sensitivity to change

Less suitable strategic option

Justification:

This strategic option is sensitive to change in landscape terms, as are other strategic options identified around Theydon Bois. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all strategic options around the village are moderately or highly sensitive to

(Settlement Edge Landscape Sensitivity Study 2010). It is noted that the option has a high landscape sensitivity in respect of sensitive natural, cultural and historic features.

- The option is immediately adjacent to Epping Forest, including an area of Epping Forest Buffer Land with distinctive landmark trees, and in part - where the slopes rise sharply above the eastern village envelope - forming an important visual "wrapper" to the village. It is therefore judged that this strategic option would, relative to the other strategic options identified around Theydon Bois, have the most harm to the setting of the Epping Forest Buffer Land.
- This strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area. Adverse effects on Epping Forest include potentially from air quality, urbanisation and increased recreation activity.
- This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

change. In the case of this strategic option, the Settlement Edge Landscape Sensitivity Study indicates a moderate sensitivity to change with a high landscape sensitivity in respect of sensitive natural, cultural and historic features. This area is distinguished as being immediately adjacent to Epping Forest, including an area of Epping Forest Buffer Land with distinctive landmark trees, and in part - where the slopes rise sharply above the eastern village envelope - forming an important visual "wrapper" to the village. It is therefore judged that this strategic option would, relative to the other strategic options identified around Theydon Bois, have the most harm to the setting of the Epping Forest Buffer Land. Furthermore, it is judged that this strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area, which may have adverse effects on Epping Forest (including potentially from air quality, urbanisation and increased recreation activity).

While the strategic option falls entirely within Flood Zone 1, it is judged that the harm identified to the Epping Forest Special Area of Conservation and Epping Forest Buffer Land would, at the settlement level, outweigh any positive factors associated with this strategic option.

Western expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • This strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area. Adverse effects on Epping Forest include potentially from air quality, urbanisation and increased recreation activity. • The option also contains a LWS, in the eastern extent of the option. • The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). • The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015). • There is one Grade II listed building located within the strategic option. • This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Biodiversity • Historic Environment • Land and Waste 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>It is judged that, at the settlement level, this strategic option would have the most significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area, which may have adverse effects on Epping Forest (including potentially from air quality, urbanisation and increased recreation activity). Furthermore, the strategic option is the most sensitive to change in landscape terms relative to other strategic options around Theydon Bois, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the west of the settlement is highly sensitive to change.</p> <p>While the strategic option falls entirely within Flood Zone 1, and is in close proximity to existing community facilities and village centre amenities, it is judged that the harm identified to the Epping Forest Special Area of Conservation and the landscape would, at the settlement level, outweigh any positive factors associated with this strategic option.</p>
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- Landscape

<p>Southern expansion</p>	<p>Constraints:</p> <ul style="list-style-type: none"> • This strategic option straddles a series of Green Belt parcels, the loss of which would have a high-very high “<i>summary of harm</i>” upon the Green Belt (Green Belt Review: Stage 2 2016). • The option is located within a historic character area of high sensitivity (Historic Environment Characterisation Study 2015). • This strategic option would have a significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area. Adverse effects on Epping Forest include potentially from air quality, urbanisation and increased recreation activity. • The option also contains a LWS, in the centre of the option. • This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). • Small areas in the centre and south-east of the strategic option are located within Flood Zones 2 and 3 which is of medium-high risk of flooding. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Biodiversity • Historic Environment • Land and Waste • Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option is the most harmful to the Green Belt relative to the other strategic options identified adjacent to Theydon Bois. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a high-very high impact upon the Green Belt. The strategic option straddles a series of Green Belt parcels that meet Purpose 2 relatively strongly or strongly, preventing the coalescence of Loughton/Debden with Theydon Bois. The strategic option is also sensitive to change in heritage terms. The Historic Environment Characterisation Study (2015) concluded that the area south of Theydon Bois is of high sensitivity. It is also judged that, at the settlement level, this strategic option would have the most significant impact upon the Epping Forest Special Area of Conservation by expanding the urban area closer to the designated area, which may have adverse effects on Epping Forest (including potentially from air quality, urbanisation and increased recreation activity).</p> <p>Aside from small areas in the centre and south-east of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. However, it is judged that the harm identified to the Green Belt and to Epping Forest Special Area of Conservation would, at the settlement level, outweigh any positive factors associated with this strategic option.</p>
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Waltham Abbey

<p>Intensification</p>	<p>This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, and to use previously developed land and managed open space within the settlement.</p> <p>Constraints:</p> <ul style="list-style-type: none"> • This strategic option lies entirely within the existing settlement boundary and is not in the Green Belt. • For the most part the strategic option lies within Flood Zone 1 which is of low risk of flooding. There are small areas within the strategic option located within Flood Zones 2 and 3, which is of medium-high risk of flooding. • The option is located within historic character areas of medium and high sensitivity (Historic Environment Characterisation Study 2015). • This option is partially located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). • Scheduled Monument Waltham Abbey including gatehouse and Stoney Bridge is located partially within the option. 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option lies entirely within the existing settlement boundary and is not in the Green Belt. The area is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing town centre amenities, public transport services and community facilities, and to use previously developed land and managed open space within the settlement (where this would maintain adequate open space provision within the settlement), in line with the land preference hierarchy set out in the Site Selection Methodology. This strategic option would also minimise any harm to the wider landscape around the settlement. Any infill development in the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of medium and high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>
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- There are a number of listed buildings within the option, many focused around Church Street and Derby Drive. This includes the Grade I listed Church of the Holy Cross and St Lawrence Ruins and 4 Grade II* listed buildings.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste

Southern expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • For the most part the strategic option lies within Flood Zone 1 which is of low risk of flooding. There are small areas in the south of the strategic option located within Flood Zones 2 and 3, which is of medium-high risk of flooding. • The strategic option is located within two landscape character areas, which are of low sensitivity (to the south of the main settlement) and high sensitivity (to the east of the settlement) (Settlement Edge Landscape Sensitivity Study 2010). • There is a sensitive historic parkland landscape pattern to the north of the M25, as well as sharply rising topography to an isolated hillock to the south-west of the strategic option; these features increase the potential for visual harm to the wider landscape (Landscape Character Assessment 2010). • The option is located within historic character area of high sensitivity (Historic Environment Characterisation Study 2015). • This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a). • The option is located in close proximity to Epping Forest SAC, to the southeast. <p>Given existing constraints there is the potential for issues to arise in relation to the following SA topics:</p> <ul style="list-style-type: none"> • Historic Environment • Land and Waste • Landscape 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>While this strategic option has limited constraints to restrict development, it is judged to be a less suitable location for residential growth at the settlement level including parts of the strategic option being separated from the town centre by the M25. The loss of this strategic option from the Green Belt would have a low impact upon the Green Belt, as evidenced by the Green Belt Review: Stage 2 (2016). Furthermore, aside from small areas in the south of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1.</p> <p>However, while the Settlement Edge Landscape Sensitivity Study (2010) judges that the strategic option is less sensitive to change in landscape terms, the Landscape Character Assessment (2010) notes the presence of a sensitive historic parkland landscape pattern to the north of the M25, as well as sharply rising topography to an isolated hillock to the south-west of the strategic option; these features increase the potential for visual harm to the wider landscape. Furthermore, the Historic Environment Characterisation Study (2015) concluded that the whole area is of high overall sensitivity to change. Additionally, it is distant from public transport services, community facilities and existing town centre amenities, and is poorly related to the wider settlement as a result of the M25, which in particular severs the southern part of the strategic option from the town to the north. It is also judged that surrounding highways, including the M25 and A121, as well as surrounding employment uses, create an undesirable environment for residential development (for example, as a result of noise and air pollution).</p>
North-western expansion	<p>Constraints:</p> <ul style="list-style-type: none"> • Loss of this area (parcel 061.3) would have a very high “<i>summary of harm</i>” upon the Green Belt (Green Belt Review: Stage 2 2016). • The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010). • Aside from a very small area in the south-east of the strategic option, the whole area is highly sensitive to change in heritage terms (Historic Environment Characterisation Study 2015). • A conservation area covers a large proportion of the option. • Waltham Abbey Royal Gunpowder Factory Scheduled Monument covers a large 	<p>Less suitable strategic option</p> <p>Justification:</p> <p>This strategic option is the most harmful to the Green Belt relative to the other strategic options identified adjacent to Waltham Abbey. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option incorporates parcel 061.3 which scored strongly against Purpose 4, preserving the setting and special character of the historic town of Waltham Abbey. In addition, the strategic option is sensitive to change in both landscape and heritage terms; this is evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north-west of Waltham Abbey is highly sensitive to change, while the Historic Environment Characterisation Study (2015) concluded that, aside from a very small area</p>

proportion of the option. Watham Abbey, including gatehouse and Stoney Bridge, Scheduled Monument also falls partially within the option boundary, to the south.

- The Grade I listed Ministry of Defence Building L157 and 6 Grade II* listed buildings are within the site boundary, focused around Middle Road. There is also a number of Grade II listed buildings located within the option.
- The majority of the strategic option falls within the boundary of the Lee Valley Regional Park and would conflict with its statutorily defined purpose - "a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind" (Section 12(1), Lee Valley Regional Park Act 1966) - risking the incursion of inappropriate development into the Park.
- Small areas in the east of this strategic option are located within Flood Zone 1, which is of low risk of flooding. For the most part, the strategic option lies within Flood Zones 2 and 3, which is of medium-high risk of flooding.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Historic Environment
- Land and Waste
- Landscape

in the south-east of the strategic option, the whole area is highly sensitive to change in heritage terms.

As a result of its location to the north-west of Waltham Abbey, this strategic option would be the most harmful to the Lee Valley Regional Park relative to the other strategic options in the settlement. The majority of the strategic option falls within the boundary of the Park and would conflict with its statutorily defined purpose - "a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind" (Section 12(1), Lee Valley Regional Park Act 1966) - risking the incursion of inappropriate development into the Park. Additionally, aside from small areas in the east of this strategic option, which are located within Flood Zone 1, for the most part the strategic option lies within Flood Zones 2 and 3. It would therefore be less preferential for development sequentially compared with other strategic options around Waltham Abbey. While it acknowledged that the strategic option is located in close proximity to existing public transport, town centre services and community facilities, is judged that the harm identified to the landscape, Green Belt and the Lee Valley Regional Park would, at the settlement level, outweigh any positive factors associated with this strategic option.

<p>Northern expansion</p>	<p>Constraints:</p> <p>This strategic option provides opportunities to support development within close proximity to existing town centre services whilst minimising harm to the Green Belt.</p> <ul style="list-style-type: none"> • While the wider character area, Copped Hall ridge north, is identified as being sensitive to change in heritage terms, it is noted that the south-west corner (which aligns with the strategic option) would be less sensitive to change (Historic Environment Characterisation Study 2015). • This option is partially located within a Conservation Area, to the east of the option. • Part of the option (the landscape to the north-east of Waltham Abbey) is highly sensitive to change, while the remainder of the option (the landscape to the north-west) is of moderate sensitivity (Settlement Edge Landscape Sensitivity Study (2010). • The area is predominantly located within Flood Zone 1, which is of low risk of flooding. Small areas of the option are located within Flood Zone 2 and 3 which 	<p>More suitable strategic option</p> <p>Justification:</p> <p>This strategic option provides opportunities to support development within close proximity to existing town centre services whilst minimising harm to the Green Belt. The loss of this strategic option from the Green Belt would have a low impact upon the Green Belt, as evidenced by the Green Belt Review: Stage 2 (2016). It would maximise opportunities to focus development sustainably, in close proximity to existing town centre amenities, public transport services and community facilities. While the wider character area, Copped Hall ridge north, is identified as being sensitive to change in heritage terms, it is noted in the Historic Environment Characterisation Study (2015) that the south-west corner (which aligns with the strategic option) would be less sensitive to change.</p> <p>Part of this strategic option is sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north-east of Waltham Abbey is highly sensitive to change, with the landscape to the north-west of moderate sensitivity. Overall, it is judged that there is more potential to mitigate harm to the</p>
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is of medium-high risk of flooding.

- There is a LWS located along the southern boundary of the option.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Historic Environment
- Land and Waste
- Landscape

Eastern expansion

- The strategic option is located within a landscape of high sensitivity to change (Settlement Edge Landscape Sensitivity Study 2010).
- The northern part of this strategic option is located within Flood Zone 1, which is of low risk of flooding. The area at the edge of Waltham Abbey is within Flood Zones 2 and 3 which is of medium-high risk of flooding.
- There are four Grade II listed buildings located within the option.
- This option is partially located within a Conservation Area, to the north of the option.
- This option is located within Grade 3 agricultural land; however it is unknown if this is best and most versatile land (Grade 3a).
- The option is located in close proximity to Epping Forest SAC, to the southeast.

Given existing constraints there is the potential for issues to arise in relation to the following SA topics:

- Biodiversity
- Climate Change
- Historic Environment
- Land and Waste
- Landscape

landscape in the western portion of the strategic option, in closer proximity to Waltham Abbey town centre. Development should incorporate sensitive design which responds to the characteristics of the landscape, including retention, where possible, of existing historic landscape features and incorporation of screening to minimise visual harm to the wider landscape. The area is predominantly located within Flood Zone 1 and therefore where sites within this strategic option are located within higher flood risk zones, further consideration will need to be given as to whether specific sites meet the sequential and exceptions test in accordance with the National Planning Policy Framework.

Less suitable strategic option

Justification:

As a result of its location to the east of the settlement, when compared with other strategic options at the settlement level, it would be more harmful to the surrounding landscape than other strategic options. This is evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the east of Waltham Abbey is highly sensitive to change. It is also located furthest from public transport services, community facilities and existing town centre amenities. While the northern part of this strategic option is located within Flood Zone 1, much of the area at the edge of Waltham Abbey is within Flood Zones 2 and 3. This area would therefore be less suitable for development taking account of the sequential flood risk test compared with other strategic options around Waltham Abbey, particularly given this would tend to direct growth further away from the existing town centre. While the strategic option would result in very low harm to the Green Belt, as evidenced by the Green Belt Review: Stage 2 (2016), this is judged to be outweighed by its unsustainable location, distant from the existing town centre, and its potential harm to the wider landscape.

Appendix VI: SA of District-wide reasonable alternatives in 2017

Introduction

As explained within 'Part 1' above, a focus of work has been on the development and appraisal of District-wide spatial strategy alternatives, with a view to informing determination of the preferred strategy.

The alternatives in 2017 were defined in order to test the parameters of the potential changes under consideration by the Council, following consideration of the latest evidence and responses to the Draft Local Plan consultation. The alternatives were developed to enable further consideration of the following in relation to the Draft Local Plan:

- Whether transport impacts on Epping could be minimised;
- Whether air quality impacts on Epping Forest could be minimised;
- Whether transport impacts and congestion generally across the District could be minimised;
- The Potential impacts from decisions on key infrastructure - particularly Princess Alexandra Hospital and the location of two new secondary school(s);
- Contribution to five year land supply within the Local Plan; and
- Potential alignment with emerging Neighbourhood Plans.

This would help to inform the Council's decision-making on proposed site allocations in the Submission Local Plan. Based on the above, three reasonable District-wide alternatives were identified and these are set out in the Table below.

Table A: The District-wide Reasonable Alternatives in 2017

	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patters	Alternative C School variation across the District
Description	This distribution took the sites from the Draft Local Plan together with the new and amended sites from Tranche 2 as part of the site selection process and assessed whether they would be suitable based on the notion of minimising the level of change to the Draft Local Plan.	This distribution set out to assess the impacts of changing the distribution of sites on the travel patterns across the District, using both the allocated and new and amended sites from tranche 2 of this round of the site selection process.	This distribution set out to assess the impacts of the location of schools in the District, using both allocated and new/amended sites from Tranche 2 of the site selection process.
Residential	<ul style="list-style-type: none"> • More growth at Epping and Theydon Bois. • More growth on suitable brownfield sites in Loughton (emerging through Tranche 2) and less on the managed open space sites. 	<ul style="list-style-type: none"> • Less growth at Epping and Theydon Bois. • More growth at Ongar and north of Waltham Abbey. 	<ul style="list-style-type: none"> • More growth at Epping (same level as Alternative A). • Less growth at Theydon Bois (same level as Alternative B). • More growth at Ongar (same level as Alternative B). • More growth on brownfield sites in Loughton (emerging through Tranche 2) and less on the managed open space sites.

	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patters	Alternative C School variation across the District
Employment	<ul style="list-style-type: none"> • Lower growth at North Weald Basset. • Higher growth at Waltham Abbey, primarily to the south. • Lower growth at Harlow Strategic Sites. 	<ul style="list-style-type: none"> • Higher growth at North Weald Basset. • No growth at Waltham Abbey. • Higher growth at Harlow Strategic Sites. 	<ul style="list-style-type: none"> • Higher growth at North Weald Basset. • Growth at Waltham Abbey. • Higher growth at Harlow Strategic Sites.
Infrastructure	<ul style="list-style-type: none"> • Two new secondary schools at Harlow Strategic Sites - Latton Priory and East of Harlow • Expansion of Waltham Abbey and Loughton secondary schools. 	<ul style="list-style-type: none"> • New secondary school at East of Harlow. • New secondary school at Waltham Abbey to the north. • Expansion of Loughton secondary schools. 	<ul style="list-style-type: none"> • New secondary school at East of Harlow. • New secondary school at Epping. • Expansion of Loughton/Waltham Abbey secondary schools.

It was understood that the sites ultimately identified for allocation in the Submission Version Local Plan would represent a hybrid of the three alternatives above, taking into account the findings of the technical assessment work (transport modelling, education requirements and the SA process).

The varying distribution of housing under the three alternatives is illustrated in **Figures 6 to 8**, which are provided in Chapter 7 in the SA Report. Broad locations for employment and new secondary schools were explored as part of the alternatives rather than specific sites. These broad locations are identified in the Table above. As a result, the broad locations are not included as part of the figures to avoid confusion with the specific residential sites.

Appraisal methodology

For each of the options, the assessment examines **likely significant effects** on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. A star is used to highlight the option or options that are preferred from an SA perspective.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.⁸⁰ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Epping Forest District Local Plan).

⁸⁰ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Appraisal findings

Appraisal findings are presented below within twelve separate tables (each table dealing with a specific sustainability objective) with a final table drawing conclusions.

The appraisal methodology is explained above, but to reiterate: For each sustainability topic the performance of each scenario is categorised in terms of 'significant effects (using red / green) and also ranked in order of preference. Also, '=' is used to denote instances of all alternatives performing on a par.

SA Topic: <u>Air quality</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	?		
Discussion	<p>There is currently one Air Quality Management Area (AQMA), declared for Nitrogen Dioxide on High Road, Epping (Bell Common). Epping High Street had an AQMA that was revoked in 2011, although the Essex Air Quality Consortium suggest that there may be a need to declare further AQMAs in Epping and Loughton, for Nitrogen Dioxide arising from stop-start traffic, depending on whether or not improvements in cleaner vehicle technology deliver the desired results.</p> <p>Traffic modelling and air quality impact assessment was undertaken to support the assessment of the different HMA-wide spatial options. The modelling found that the HMA options are likely to have similar effects on traffic increases within the areas declared as AQMAs, which includes the High Road AQMA within Epping Forest District.</p> <p>The three alternatives were considered through transport modelling which found that the key traffic impacts are likely to arise in Epping and Waltham Abbey and that the Wake Arms Roundabout is a key constraint. Not surprisingly, it demonstrated that there are differences between the alternatives for some settlements depending on if a higher or lower level of growth and infrastructure is being proposed.⁸¹</p> <p>It is important to note that the majority of sites are common to all the options; there are only small differences as to how some of the growth, including residential, employment and secondary schools, will be distributed across the District.</p> <p>Alternative A directs more growth towards the Central Line, in particular Theydon Bois, compared to the other Alternatives. It proposes the same level of growth in the same locations as Alternative C in Loughton and Epping. While it could be predicted that this would result in a higher level of traffic in an area already experiencing congestion, it could also be said that housing will be located in an area with excellent access to the rail network and services/facilities, which would help to reduce the use of the private vehicle and therefore traffic.</p> <p>While Alternative C proposes the same level of growth in the same locations as Alternative A in Loughton and Epping, it proposes less growth at Theydon Bois and more growth at Ongar. This is likely to reduce the impacts on traffic at Theydon Bois and increase them at Ongar compared to Alternative A. Ultimately though, the delivery of around 260 dwellings less at Theydon Bois and around 200 dwellings more at Ongar will not result in any significant differences in terms of traffic impacts and therefore air quality, particularly when looking at the District as a whole.</p> <p>Compared to the other Alternatives, Alternative B directs less growth towards the Central Line (Loughton, Theydon Bois and Epping) focusing growth instead at Waltham Abbey and Ongar. It also proposes a higher overall level of growth delivering around 500 dwellings more compared to</p>		


⁸¹ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

the other Alternatives. This Alternative is more likely to increase traffic and therefore affect air quality in Waltham Abbey than the other Alternatives. The significance of the effect is uncertain at this stage and the level of further improvements to public transport as a result of additional development are not known at this stage. Alternative B proposes the same level of development at the same locations as Alternative C in Ongar. While this Alternative delivers less growth near the existing AQMA and toward the south where there are congestion issues, it is delivering growth in areas that have less access to public transport and services/facilities.


In conclusion: There are existing congestion and air quality issues in the south of the District and alternatives that focus or direct development there, such as Alternative A, could exacerbate this. However, on the other hand, settlements in the south of the District have good access to public transport (in particular the Central Line), employment and services/facilities. Alternative B focuses development away from the south of the District in Waltham Abbey and Ongar. While this directs development away from the AQMA and congestion issues in the south, it also delivers growth in areas that have less access to public transport and services/facilities. Alternative C provides a mix of both Alternatives A and B. It is predicted that all of the alternatives have the potential for a negative effect on air quality as a result of increased traffic; however, the significance of this is uncertain at this stage. At this stage it is difficult to differentiate the alternatives in terms of air quality.

It should be noted that the transport modelling work to date concluded that the delivery of a combination of more ambitious sustainable transport and physical highway improvements could potentially mitigate the most significant impacts of the Local Plan, particularly when considered against the Do Minimum Scenario (2033) where no Local Plan growth is delivered.⁸² However, it is recognised that there is still some uncertainty with regard to how this will affect air quality.

⁸² Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

SA Topic: <u>Biodiversity and green infrastructure</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	2	2	
Significant effects?	No		
Discussion	<p>Important biodiversity designations are predominantly located in the south and south west of the District, which includes the Lee Valley and Epping Forest nature conservation designations (SAC, SPA, Ramsar, SSSI). The north east of the District has little in the way of significant nature conservation designations (European sites and SSSIs).</p> <p>Potential effects on the Lee Valley SPA/Ramsar and Epping Forest SAC were considered through the HRA process undertaken with respect to the HMA strategic spatial options. This considered: disturbance from recreational activities and urbanisation; atmospheric pollution; water abstraction; and water quality. It was concluded that none of the HMA-wide options would result in adverse effects on any European sites.</p> <p>It is important to note that the overall level of growth proposed under each alternative is very similar and that the majority of sites are common to all the alternatives. There are only minor differences as to how some of the growth, including residential, employment and secondary schools, will be distributed across the District.</p> <p>Taking the above into account, all of the alternatives have the potential for a negative effect on biodiversity through the loss and fragmentation of habitats as well as increased atmospheric pollution (resulting from increased traffic linked to new development) and disturbance (recreational).</p> <p>In terms of the differences between them, Alternative A focuses development along the Central Line towards the sensitive receptors in the south and south west of the District. It proposes a similar level of development at Loughton and Epping compared to Alternative C but more growth at Theydon Bois.</p> <p>While Alternative C proposes the same level of growth in the same locations as Alternative A in Loughton and Epping, it proposes less growth at Theydon Bois and more growth at Ongar. This is likely to reduce the impacts on sensitive receptors in the south west compared to Alternative A; however, the delivery of around 260 dwellings less at Theydon Bois is unlikely to result in any significant differences between the alternatives. Furthermore, the growth proposed at Ongar is unlikely to have any significant effects on biodiversity.</p> <p>Compared to the other alternatives, B directs less growth towards the Central Line (Loughton, Theydon Bois and Epping) focusing growth instead at Waltham Abbey and Ongar. It also proposes a slightly higher overall level of growth compared to the other alternatives. While this alternative is likely to reduce impacts on sensitive receptors in the south east it does propose the delivery of an additional 948 dwellings to the north of Waltham Abbey, within 500m of the Lee Valley and the designated sites present there.</p> <p>In conclusion: Sensitive receptors (international and national nature conservation designations) are predominantly located in the south and south west of the District. Alternative A focuses more development in this area. It proposes the highest level of growth at Theydon Bois but similar levels of growth to Loughton and Epping as Alternative C. Alternative B proposes the least growth in the south west but does propose the delivery of 948 dwellings to the north of Waltham Abbey, within 500m of the Lee Valley and the designations present there. While Alternative C does propose some growth in the south west at Loughton and Epping, it proposes less at Theydon Bois compared to Alternative A, redirecting it towards Ongar. Alternative C is therefore less likely to result in a negative effect of significance on biodiversity compared to the other</p>		

Alternatives as it proposes less growth in the south west compared to Alternative A and does not propose growth to the north of Waltham Abbey in proximity to the Lee Valley.

SA Topic: <u>Climate change (mitigation and adaptation)</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank		2	2
Significant effects?	?		
Discussion	<p>With regards to climate change mitigation, key issues relate to A) the need to capitalise upon opportunities to design-in low carbon infrastructure, and therefore reduce per capita related CO₂ emissions; and B) the need to reduce car dependency and distance travelled by private car, and therefore per capita transport related CO₂ emissions. In relation to the latter point, the Council's Carbon Reduction and Renewable Energy Assessment (2013) concluded that renewable and low carbon electricity and heat generation schemes of all kinds could be feasible and viable on larger schemes within the District.</p> <p>With regards to climate change adaptation, a key issue is flood risk. The Strategic Flood Risk Assessment (SFRA) Level 1 Update 2015 identifies that the forms of flooding experienced in the District are: 'fluvial' from rivers and other watercourses; 'pluvial' from rain i.e. surface water flooding resulting from precipitation; and 'groundwater' flooding which is the emergence of water from the ground away from river channels. The corridors of the River Lea and the River Roding, including their main tributaries - Cobbins and Cripsey Brooks - contain the majority of the flood risk zones in the District - i.e. areas at risk from flooding by rivers; and the rapid onset, flash flooding of the smaller watercourse system is identified as an issue.</p> <p>In terms of transport related CO₂, Alternative A stands-out as performing well given a particular focus in the south of the District, where there is good access to public transport and services/facilities; and Alternative B potentially performs less well given a focus on Waltham Abbey and Ongar, which are both less well linked (albeit there is potential for enhancement). Increased traffic is considered in further detail under the Transport topic.</p> <p>In terms of built environment CO₂, it is difficult to differentiate the alternatives. All provide opportunities to deliver strategic or large scale developments that could incorporate low carbon or renewable energy schemes. It could be predicted that Alternative B has a greater likelihood to achieve this as it proposes a development of an additional 948 dwellings to the north of Waltham Abbey but this is uncertain at this stage.</p> <p>In terms of flood risk, there are no significant differences between the alternatives given the location of proposed development and the mitigation available.</p> <p>In conclusion: Alternative A performs well in terms of minimising transport related CO₂ emissions given the focus of growth around the Central Line. Alternative B may provide an opportunity to design-in low carbon infrastructure as part of the extension of Waltham Abbey but this is uncertain at this stage. In terms of flooding there are no significant differences between the Alternatives.</p>		

Sustainability Topic: <u>Community and wellbeing</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	Yes		
Discussion	<p>All of the Alternatives are likely to have a significant long term positive effects on this topic through the delivery of housing and associated improvements to infrastructure, including community facilities/services and public transport.</p> <p>It is important to note that the overall level of growth proposed under each alternative is very similar and that the majority of sites are common to all the alternatives. There are only minor differences as to how some of the growth, including residential, employment and secondary schools, will be distributed across the District.</p> <p>When compared against each other, the alternatives are likely to have both enhanced and reduced positive effects for certain communities depending on where growth is being directed. Alternative A is likely to have an enhanced positive effect for communities in Theydon Bois as it directs a higher level of growth there compared to other Alternatives. Although, it could be argued that the delivery of an additional 264 dwellings would not result in any significant differences. All of the Alternatives propose some growth towards Ongar with Alternatives B and C proposing a higher level of growth.</p> <p>In terms of infrastructure, Alternative A is likely to positively affect the communities around Harlow through the delivery of two new secondary schools. This is likely to contribute positively to the self-sufficiency of the strategic sites, and overall community cohesion. These are to be delivered at Latton Priory and East of Harlow (SR-0146-N/SR-0046A-N).</p> <p>Alternative B will deliver higher growth (an additional 984 dwellings) to the north of Waltham Abbey which is to include a new secondary school, benefitting the local community through providing improved access to educational facilities with capacity. As discussed above, Waltham Abbey is not well linked to the transport network, and as such new educational facilities in the town will likely reduce any prior reliance on the car to access secondary schools elsewhere. The higher growth proposed at Waltham Abbey under Alternative B may possibly result in other improvements to community infrastructure, although there is uncertainty as to the level of improvements that might be achieved. It would also help to balance the growth of Waltham Abbey, as it is recognised that the settlement has been spreading eastwards away from the historic centre where the majority of services/facilities are located.</p> <p>Alternative C includes a new secondary school at Epping to accommodate for the high level of growth proposed for the town, in comparison to that of Alternative B. It is noted that Alternative A also proposes high growth at Epping, but does not include the same infrastructure provision as is proposed through Alternative C.</p> <p>Alternative C is most likely to take advantage of the existing capacity of educational facilities in Ongar. All Alternatives seek to expand the existing educational facilities in Loughton, extending capacity to meet residents' needs.</p> <p>In conclusion: All of the alternatives have the potential for a significant long-term positive effect for the District as a whole, through the provision of housing and associated improvements to infrastructure, including community facilities/services and public transport. When compared against each other the alternatives are likely to have both enhanced and reduced positive effects for certain communities depending on where growth is being directed; however, it is difficult to identify any significant differences between the Alternatives when looking at the District as a whole.</p>		



SA Topic: <u>Economy and employment</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	Yes		
Discussion	<p>The District's six main retail/service centres are at Loughton High Road, Loughton Broadway, Epping, Ongar, Buckhurst Hill and Waltham Abbey. These main centres are all fairly small compared with much larger centres nearby - notably Brookfield Shopping Park (in Broxbourne Borough), Chelmsford, Harlow town, Romford and Westfield Stratford City; this causes significant and growing competition. In addition to the main retail/service centres, the main employment sites within the District are Epping, Nazeing, North Weald Bassett (including the Airfield) and Waltham Abbey, where the larger industrial estates are located. Around half of the District's working residents commute out of the District for work, with the largest proportion travelling to London.</p> <p>Development can open up new employment opportunities through stimulating the creation of new employment and through boosting local labour markets. All of the Alternatives are likely to support existing as well as new employment opportunities across the District with the potential for positive effects against this topic. The significance of the effects for each Alternative will differ at a local or settlement level depending on where the growth is directed.</p> <p>Alternatives B and C will deliver a higher amount of employment growth at the North Weald Airfield site. High levels of growth at this main employment location will have a significant positive effect on job availability, supporting a range of businesses and growing the wider economy. Alternative B in particular supports high levels of self-sufficiency, proposing three large allocations of employment floorspace around Harlow and high growth at North Weald Airfield. Significant employment growth at these locations will provide high skilled jobs in key employment locations (along the M11 transport corridor). Aviation related uses, complemented by a mix of employment and leisure uses will be sought to boost the commercial offer and sustainability of the North Weald Airfield. In this context, it is also likely that levels of in-commuting to the District may increase, contributing positively to the area's economic prosperity.</p> <p>In contrast, Alternative A will deliver lower levels of growth at the North Weald Airfield and in the Garden Communities around Harlow, focusing a larger proportion of growth at Waltham Abbey. This will have a positive effect on the economy and employment opportunities at Waltham Abbey, developing the town as revitalised District Centre, with a thriving daytime and night-time economy.</p> <p>Alternative C also moves employment focus away from the Garden Communities around Harlow to Waltham Abbey. While the level of growth proposed at Waltham Abbey is less than that of Alternative A, it is still expected that development will positively affect the area's local economy; utilising the retail and tourism based opportunities of the town.</p> <p>All Alternatives seek to support the growth of Loughton through SME provision.</p> <p>In conclusion: It is difficult to differentiate between the alternatives in terms of the significance of effects for economy and employment at the District level. All are likely to support existing as well as new employment opportunities across the District with the potential for positive effects at the District scale. The significance of the effects for each alternative will differ at a local or settlement scale.</p>		

Sustainability Topic: <u>Equality, diversity and inclusion</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	No		
Discussion	<p>As a public sector organisation, the Council has a duty under the Equality Act 2010 and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy Alternatives within the Local Plan eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with a protected characteristics and all others. Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.</p> <p>It is difficult to highlight significant differences between the alternatives in terms of protected characteristics. While they vary the distribution of a small proportion of the overall growth across the District, none of them is considered likely to result in a situation whereby there are significant differences in terms of needs being met. Other matters that will have a greater significance for protected characteristics groups relate to issues such as the mix of housing, provision of affordable homes and other policy matters relating to the design of development.</p> <p>The English indices of deprivation measure relative deprivation in small areas in England called lower-layer super output areas. Data published in 2015 shows that the west and south of the District are relatively deprived compared to other areas in the District. In particular, Waltham Abbey in the west and Loughton in the south include areas that are within the 20% most deprived neighbourhoods in the country.</p> <p>The provision of housing and associated infrastructure improvements in and around areas that are relatively deprived can help to regenerate them to a certain extent by improving access to services/facilities as well as employment. Alternative B proposes additional growth to the north of Waltham Abbey, Alternatives A and C propose a different distribution of growth in Loughton. However, at this stage, it is not clear to what extent this growth, if any, could help to reduce deprivation within these areas.</p> <p>In conclusion: It is difficult to differentiate the alternatives in terms of their effect on protected characteristics groups. While the Alternatives vary the distribution of a small proportion of the overall growth across the District, none of them is considered likely to result in a situation whereby there are significant differences in terms of needs being met. It is possible that the delivery of housing and associated infrastructure improvements in and around areas that are relatively deprived can help to regenerate them to a certain extent by improving access to services/facilities as well as employment. However, this is uncertain at this stage.</p>		

Sustainability Topic: <u>Historic environment</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	No		
Discussion	<p>Built and natural heritage features are an important part of the character of the District. There are a large number of designated heritage assets (Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks & Gardens) spread across the District. While all of the alternatives propose similar overall levels of housing and employment growth, there are variations in how a small proportion of this growth, including infrastructure, is distributed across the District.</p> <p>Overall designated heritage assets appear to be fairly evenly spread across the District. It is important to note that the majority of residential sites are common to all the alternatives. Some of these sites contain designated heritage assets or fall within or in close proximity to Conservation Areas. The nature and significance of the effect on the historic environment will depend on implementation and the precise design and layout of development. The regeneration of brownfield land at some of these sites could provide an opportunity to enhance the historic environment by removing buildings that are currently detracting from the townscape or by improving accessibility and signage.</p> <p>With regard to the differences between them, Alternative A focuses development along the Central Line. It proposes a similar level of development at Loughton and Epping compared to Alternative C but more growth at Theydon Bois. The development proposed at Theydon Bois may impact the setting of some listed buildings; however, once mitigation is taken into account the overall negative effect on the historic environment is likely to be minor. Similarly the different distribution of growth at Epping or Loughton is unlikely to have a significant effect on the historic environment once mitigation is taken into account.</p> <p>While Alternative C proposes the same level of growth in the same locations for Loughton and Epping as Alternative A, it redirects the growth focused at Theydon Bois under Alternative C and proposes a higher level of development at Ongar. Proposed development to the south of Ongar is likely to have impacts on the setting of around four listed buildings but unlikely to affect the setting of the Conservation Area given the presence of existing development. Once mitigation is taken into account it is predicted that there will be a minor negative effect on the historic environment to the south of Ongar. A smaller level of growth is proposed in the north of Ongar and once mitigation is taken into account, the negative effect on the historic environment is also likely to be minor.</p> <p>Compared to the others, Alternative B directs less growth towards the Central Line (Loughton, Theydon Bois and Epping) focusing it at Waltham Abbey and Ongar. Proposed additional development to the north of Waltham Abbey will change the landscape character further and there are number of designated heritage assets in the surrounding areas, including Scheduled Monuments and listed buildings, but not within or directly adjacent to the proposed sites. Once mitigation is taken into account it is predicted that there will be a minor negative effect on the historic environment to the north of Waltham Abbey. Alternative B proposes the same level of growth and in the same locations at Ongar as Alternative C.</p> <p>There are no significant differences between the Alternatives in terms of likely effects on the historic environment.</p> <p>In conclusion: Alternative A is more likely to have a negative effect on the historic environment in and around settlements along the Central Line. Alternative C is likely to have a reduced negative effect on the historic environment at Theydon Bois compared to Alternative A but is likely to have a negative effect of greater significance at Ongar. Alternative B is likely to have a reduced negative effect on the historic environment in and around settlements along the Central Line but a</p>		

negative effect of greater significance to the north of Waltham Abbey and at Ongar compared to Alternative A. Given the slight variations in terms of the distribution of growth, each of the alternatives will have a different effect on the historic environment in terms of localised impacts. Taking the historic environment of the District as a whole, it is not considered that there are any significant differences between the alternatives. There is suitable mitigation that can be provided through DM policies and available at the project level to ensure that residual long term negative effects are minor.

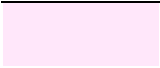
Sustainability Topic: <u>Housing</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	2	★ 1	2
Significant effects?	Yes		
Discussion	<p>All of the Alternatives will have a significant long-term positive effect by meeting housing need established through sub-regional joint working (which included a Strategic Housing Market Assessment, SHMA and updates to this). While the alternatives above vary the distribution of a small proportion of the overall growth across the District, none of them are considered likely to result in a situation whereby there are significant differences in terms of housings needs being met. Alternative B could result in less housing at some of the settlements away from the Central Line; however, it is likely to have a positive effect of greater significance compared to the other alternatives as it proposes the delivery of slightly higher level of growth over the life of the Plan.</p> <p>In conclusion: Despite none of the Alternatives meeting the full OAN identified in the SHMA update (July 2017), they still have the potential for a significant long term positive effect on this SA Topic by meeting housing need established through sub-regional joint working. Alternative B is likely to have a positive effect of greater significance compared to the other alternatives as it proposes slightly higher level of growth over the life of the Plan.</p>		

Sustainability Topic: <u>Land and waste</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank		3	
Significant effects?	Yes		
Discussion	<p>Key issues include the efficient use of land⁸³, whether there are potential contamination issues, the agricultural quality of land⁸⁴, and how waste issues will be managed.</p> <p>All of the alternatives have the potential for a significant negative effect on this topic through the loss of greenfield and agricultural land; however, it should be noted that the site selection process has been designed to minimise the loss of both where possible.</p> <p>There are no significant differences between the alternatives in terms of the loss of best and most versatile agricultural land, although it is recognised that there are currently data gaps in terms of differentiating between Grade 3a and 3b land. Alternatives A and C direct more growth towards existing settlements in the south of the District, in particular brownfield sites in Loughton. This is positive in terms of the efficient use of land but does not account for a significant level of growth.</p> <p>The Essex and Southend-on-Sea Waste Local Plan was adopted in July 2017 and does not identify any strategic waste site allocations within the District. However, it does identify an area of search around Langston Road/Oakwood Hill, Loughton as an area for potential waste management development. None of the Alternatives propose any sites for development within this area of search.</p> <p>In conclusion: All of the alternatives have the potential for a significant negative effect through the loss of agricultural and greenfield land. All of the alternatives would result in the loss of some best and most versatile land and there are no significant differences between them in terms of this loss. Alternatives A and C direct more growth towards existing settlements in the south of the District, in particular brownfield sites in Loughton. This is positive in terms of the efficient use of land but does not account for a significant level of growth.</p>		


⁸³ However, all developments, regardless of location or option would need to be designed to make the most effective use of land, whilst also providing appropriate community and green infrastructure.

⁸⁴ Grade 2 Agricultural Land is the highest level of classification in the District according to available evidence. It should be noted, that the Agricultural Land Classification system is limited and does not provide a detailed assessment of smaller parcels of land. Within higher grades, there will be areas of land of a poor quality and vice versa. With all development options it will therefore be necessary to undertake more detailed assessments and plan for appropriate mitigation and compensatory improvements where possible.

Sustainability Topic: <u>Landscape</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	?		
Discussion	<p>A Landscape Character Assessment (LCA) for the District was published in 2010. The aim of the study was to provide a comprehensive District-wide assessment of landscape character and provide contextual characterisation mapping. Informed by the LCA, a Settlement-edge Landscape Sensitivity Assessment was carried out to provide a more detailed understanding of sensitive landscape and environmental features around the edges of the twenty-two principal settlements within the District. The findings of these studies have informed the appraisal below.</p> <p>All of the alternatives propose some development in areas of medium sensitivity to the south of Lower Nazeing, north of North Weald Bassett and north of Waltham Abbey. Development common to all the alternatives at Ongar is within an area identified as having high landscape sensitivity.</p> <p>Ultimately, the development of greenfield land on the edge of settlements, even in areas of low sensitivity, will change the landscape character of the local area. The significance of this effect will not only be dependent on the sensitivity of the landscape but the implementation of development, including precise layout and design.</p> <p>With regard to the differences between them, Alternative A focuses development along the Central Line. It proposes a similar level of development at Loughton and Epping compared to Alternative C but more growth at Theydon Bois. The development proposed at Theydon Bois under Alternative A is in an area of moderate landscape sensitivity. Development proposed under Alternatives A and C to the west of Epping falls within an area of moderate landscape sensitivity and development proposed to the south east within an area of high landscape sensitivity. Alternatives A and C propose development on brownfield sites in Loughton, which could have a positive effect on the townscape; however, this does not account for a significant level of the overall growth.</p> <p>While Alternative C proposes the same level of growth in the same locations for Loughton and Epping as Alternative A, it redirects the growth focused at Theydon Bois and proposes a higher level of growth at Ongar. Development to the south of Ongar is in an area of low landscape sensitivity. A smaller level of growth is proposed in the north of Ongar and the majority of this falls within an area identified as having high landscape sensitivity. Alternative A proposes a larger site to the south west of Ongar compared to the other Alternatives. However, Alternatives B and C propose an overall higher level of growth for Ongar.</p> <p>Compared to the others, Alternative B directs less growth towards the Central Line (Loughton, Theydon Bois and Epping) focusing it at Waltham Abbey and Ongar. Alternative B proposes the same level of growth and in the same locations at Ongar as Alternative C. Proposed additional development to the north of Waltham Abbey is within an area of moderate landscape sensitivity.</p> <p>In conclusion: All of the alternatives are likely to have a negative effect on the landscape through the development of greenfield land on the edge of settlements. The significance of the effects for each alternative will differ at a local or settlement level depending on where the growth is directed. Alternative A is more likely to have a negative effect in the south of the District, particularly to the north east of Theydon Bois compared to the other Alternatives. Alternative B is more likely have a negative effect of greater significance on the local landscape character to the north of Waltham Abbey. Alternative C is likely to have a reduced negative effect on the landscape character to the north east of Theydon Bois compared to Alternative A. Alternatives B and C are likely to have a greater negative effect on the landscape character surrounding Ongar. While each of the Alternatives will have different effects at a local scale, it is difficult to differentiate</p>		



between them at a District level.

Sustainability Topic: <u>Transport</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank		3	2
Significant effects?	?		
Discussion	<p>An initial analysis of traffic growth across the District has shown that, even without development in the future, parts of the highway network will be operating over-capacity, in some cases by 2026 and in other cases by 2036. Whilst some junctions could be improved, most physically cannot be improved or would have environmental consequences if they were. For example, traffic congestion and delays that occur on the routes south of Epping could only be resolved by using land which forms part of Epping Forest.</p> <p>Transport modelling for the alternatives was carried out and found that key traffic impacts are likely to arise in Epping and Waltham Abbey and that the Wake Arms Roundabout is a key constraint.⁸⁵ The modelling found the following in terms of differences between the alternatives:</p> <ul style="list-style-type: none"> • Wake Arms roundabout - Alternative C performs slightly worse in the AM and there are no significant differences between Alternatives A and B in the AM. There are no significant differences between the alternatives in the PM. The modelling found that all the alternatives are likely to have reduced traffic impacts compared to the Draft Local Plan (2016). • Epping - Alternative B performs best in the AM and PM as it proposes the lowest level of growth. Alternative C performs worse in the AM as a result of the delivery of a new secondary school. Alternative A falls between B and C in the AM and performs similarly to Alternative C in the PM. The modelling found that all the alternatives are likely to have increased traffic impacts compared to the Draft Local Plan (2016), apart from Alternative B in the PM. • Loughton - All the alternatives perform similarly in the AM and PM. The modelling found that all the alternatives are likely to significantly reduce traffic impacts, particularly in the AM, compared to the Draft Local Plan (2016). • Waltham Abbey - Alternative B performs significantly worse in the AM and PM. There are no significant differences between Alternatives A and C. The modelling found that all the alternatives are likely to have and increased traffic impact compared to the Draft Local Plan (2016). • Harlow - Alternative B performs worse in the AM and PM followed by Alternative C. Alternative A performs better in both the AM and PM. This is likely due to the higher level of employment growth proposed at the Harlow Strategic Sites under Alternatives B and C. The modelling found that all the alternatives are likely to have increased traffic impacts compared to the Draft Local Plan (2016), apart from Alternative A in the PM. <p>The traffic modelling demonstrates that all of the alternatives have the potential for a negative effect on this topic as a result of increased traffic. The significance of the effects varies locally depending on where growth and infrastructure is distributed.</p> <p>It is important to note that all of the alternatives propose the same level of development on the fringes of Harlow, which provides a good opportunity to focus development in a sustainable location and use the critical mass of new development to deliver significant improvements to the transport network. The Council has been working with neighbouring planning authorities, Essex and Hertfordshire County Councils and Highways England to identify the necessary infrastructure</p>		

⁸⁵ Epping Forest District Council (2017) Highway Assessment Report. Prepared by Essex Highways on behalf of Epping Forest District Council and Essex County Council.

to support new growth in this location. A Memorandum of Understanding has been prepared, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).

Alternative A proposes the most growth around the Central Line taking advantage of the public transport on offer. The Council's own analysis for the Draft IDP and advice from Transport for London (TfL) suggest that there is sufficient capacity on the Central Line within the District. Epping Forest District Council are working with TfL as well as Redbridge Borough and Waltham Forest Borough Councils to consider and understand the effects of growth further down the Central Line.

Alternative C also proposes additional growth at Loughton and Epping but proposes less development at Theydon Bois. It redirects this growth to Ongar where there is a poorer public transport, less services/facilities and employment; however, this helps to reduce traffic and therefore airquality impacts on Epping Forrest.

Alternative B proposes the least amount of growth along the Central Line instead proposing additional growth to the north of Waltham Abbey and further growth at Ongar. At this stage there is no evidence to suggest that an increased level of growth to the north of Waltham Abbey could enable the delivery of any additional significant transport infrastructure or services/ facilities. This is also the case with additional growth at Ongar. It should be noted that Alternative B could help to balance the growth of Waltham Abbey, directing new development towards existing services/facilities present in the historic centre. In the past, the settlement has been spreading eastwards away from the historic centre where the majority of services/facilities are located.

In conclusion: While all of the alternatives propose a similar overall level of housing and employment growth, there are variations as to how this growth is distributed across the District. It is predicted that all of the alternatives have the potential for a negative effect on this topic as a result of increased traffic; however, the significance of this effect varies locally depending on the distribution of growth and infrastructure. There are existing congestion issues in the south of the District and focusing development there could exacerbate this. However, the settlements in the south of the District have good access to the Underground network and services/facilities. Housing within and around these settlements accompanied with associated improvements to public transport infrastructure could potentially help to reduce use of the private vehicle and therefore traffic by encouraging the use of other, more sustainable modes of transport. As Alternative A proposes the greatest level of growth along the Central Line it is therefore considered to perform better against this topic. It is followed by Alternative C which proposes the next highest level of growth in the south. Alternative B proposes the highest overall level of growth and directs more development away from the Central Line so is therefore less likely to reduce the use of the private vehicle.

Sustainability Topic: <u>Water</u>			
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Rank	=	=	=
Significant effects?	No		
Discussion	<p>Water is a key issue given water scarcity in the wider area, and an issue that will be exacerbated through the effects of climate change and increasing demand. Consideration has been given to ensuring water demand and waste water infrastructure capacity can be managed throughout the Plan period. It is the statutory duty of water providers to ensure that adequate water supply and waste water infrastructure are provided for development.</p> <p>All of the Alternatives propose similar levels of growth and there is no evidence to indicate that there would be any significant differences between the alternatives in terms of water resources or waste water treatment capacity given the variations in relation to distribution.</p> <p>In conclusion: There are no significant differences between the Alternatives in terms of water resources or water quality.</p>		

Summary findings and conclusions			
Topic	Categorisation and rank		
	Alternative A Minimising change to the Draft Local Plan	Alternative B Exploring alternative travel patterns	Alternative C School variation across the District
Air quality	=	=	=
Biodiversity and green infrastructure	2	2	★1
Climate change (mitigation and adaptation)	★1	2	2
Community and wellbeing	=	=	=
Economy and employment	=	=	=
Equality, diversity and inclusion	=	=	=
Historic environment	=	=	=
Housing	2	★1	2
Land and waste	★1	3	★1
Landscape	=	=	=
Transport	★1	3	2
Water	=	=	=

Summary findings and conclusions

Alternative A	Alternative B	Alternative C
Minimising change to the Draft Local Plan	Exploring alternative travel patterns	School variation across the District

In terms of significant effects the appraisal found the following:

- There is the potential for all the alternatives to have a **significant long term positive effect** on SA topics relating to community and wellbeing, economy and employment and housing. The delivery of housing and employment as well as associated improvements to infrastructure, including community facilities/services and public transport, will help to meet the needs of communities and have a positive effect for the District. Alternative B performed slightly better against the housing topic compared to the others as it would deliver a slightly higher level of overall housing growth.
- There is the potential for all the alternatives to have a **significant negative effect** on the land and waste SA topic through the loss of greenfield and agricultural land. While the Local Plan Strategy and therefore all of the alternatives seek to minimise the loss of both where possible, there will still be a loss that is of significance in order to ensure that housing requirements are being met. Alternative B performs worse against this topic as it proposes less brownfield development in Loughton compared to the others.

While the appraisal did not identify any further significant effects, it did highlight some differences between the alternatives for the following topics:

- **Biodiversity** - Alternative C performs slightly better than the others as it directs more growth away from the sensitive receptors, such as Epping Forest and the Lea Valley, situated in the South West and West of the District.
- **Transport** - There are existing congestion issues in the south of the District and focusing development there could exacerbate this. However, the settlements in the south of the District have good access to the Underground network and services/facilities. Housing within and around these settlements accompanied with associated improvements to public transport infrastructure could potentially help to reduce use of the private vehicle and therefore traffic by encouraging the use of other, more sustainable modes of transport. Alternative A proposes the greatest level of growth along the Central Line, so it performs better against the transport topic compared to the other alternatives. It is followed by Alternative C with Alternative B performing less well as it proposes directs growth away from the Central Line.
- **Climate Change** - Linked to the findings of the appraisal for transport, the appraisal found that Alternative A performs slightly better against the climate change topic as it is more likely to reduce the need to travel/ use of the private vehicle so is therefore more likely to minimise transport related CO₂ emissions.

