

Epping Forest District Council
Epping Forest District Local Plan
Report on Site Selection

Issue v3 | March 2018

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

1.1 Purpose of the Report

- 1.1 The adopted Local Plan for the Epping Forest District is the Local Plan (1998) with Alterations (2006). The Council is currently preparing a new Local Plan for the District, which will cover the period up to 2033. The new Local Plan must allocate sufficient land in appropriate locations to meet housing, traveller and employment requirements over the Plan period. As part of the evidence base for the emerging Local Plan, residential (including traveller) and employment sites have been assessed based on detailed methodologies that provide a framework for the identification of appropriate sites for allocation. This Report provides further details of both of the methodologies developed and the resulting assessment.
- 1.2 Arup, on behalf of and in collaboration with, Epping Forest District Council ('the Council') produced an interim version of this Report on Site Selection in September 2016 to support the consultation on the Draft Local Plan, which ran between October and December 2016. The Report on Site Selection has subsequently been updated to address representations received to the Draft Local Plan consultation and the assessment of new or amended sites received by the Council between 18 May 2016 and 31 March 2017¹. In accordance with the detailed methodologies, the most appropriate residential (including traveller) and employment sites have been selected and included as proposed site allocations in the Epping Forest District Local Plan Submission Version. The detailed write-up of the site selection work undertaken in 2016 and 2017 is documented in the appendices to this Report.

1.2 Structure of this Report

- 1.3 This Report is structured as follows:
- Chapter 2: provides a summary of the site selection process followed to identify residential sites for allocation in the Council's Local Plan Submission Version. This chapter is supplemented by Appendices A, B and C which present the Site Selection Methodology (SSM), the detailed findings of the site assessment and the settlement overviews which describe the characteristics and identify the aspirations for places within the District.
 - Chapter 3: contains a summary of the site selection process followed to identify traveller sites for allocation in the Council's Local Plan Submission Version. This chapter is supplemented by Appendices D

¹ Refer to Appendix B1.2.3 which sets out how representations to the Draft Local Plan consultation in 2016 received from site promoters regarding the site selection process have been considered through Stage 6 of the site selection process in 2017.

and E which present the Traveller Site Selection Methodology (TSSM) and the detailed findings of the site assessment.

- Chapter 4: presents a summary of the site selection process followed to identify employment sites for allocation in the Council's Local Plan Submission Version. This chapter is supplemented by Appendix F which presents the detailed findings of the site assessment.

2 Sites for Residential Development

- 2.1 This chapter contains an introduction to the District's housing requirement, provides an overview of the methodology developed to guide the selection of residential sites in Epping Forest District Council's Local Plan Submission Version and presents the findings of the site selection process for residential sites.

2.1 Epping Forest District's Housing Requirement

- 2.2 The Council has worked closely with partners in the Strategic Housing Market Area (East Hertfordshire, Harlow and Uttlesford District Councils) to understand the level of housing need across the local authority areas. This has enabled agreement to be reached on how this need would be best distributed across the authority areas in order to support strategic objectives whilst recognising the differing environmental, policy and infrastructure constraints.
- 2.3 The Councils jointly prepared a Strategic Housing Market Assessment (SHMA) (2015). This provides an up-to-date and policy compliant assessment of housing need over the West Essex/East Hertfordshire Housing Market Area (HMA) for the period 2011-2033. Further partial updates were undertaken in 2016 and 2017 to consider the most recent population and household projections. The latest updates to the SHMA published in July 2017 assessed the 2016 national population and household projections data together with further sensitivity testing specific to local circumstances, including for migration. This update has indicated that the full objectively assessed need for housing across the HMA amounts to some 51,700 new homes over the period 2011-2033. It then identified that for Epping Forest District some 12,573 new homes were needed within that period. This figure represents a 'starting point' and does not take into account environmental, policy and infrastructure constraints. In accordance with national policy it is for Local Plans to consider the most appropriate spatial distribution for achieving the full objectively assessed need across the HMA.
- 2.4 The four authorities, supported by Essex County Council, Hertfordshire County Council and Highways England, agreed a Memorandum of Understanding (MoU) in March 2017 - Distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Areas. This agreement predates the 2017 update of the SHMA and provides for a total of 51,100 homes across the four authorities with a housing requirement for Epping Forest District of approximately 11,400 homes over the Plan period.
- 2.5 The MoU distribution recognises that Harlow represents the most sustainable location within the HMA to focus residential development given:

- its role as a sub-regional centre for employment (especially in technology);
- its Enterprise Zone status;
- the need to rejuvenate the town centre;
- the opportunity to capitalise on its transport connections (for example, good rail links to London, London Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors across the town;
- its important location on the London Stansted Cambridge corridor; and
- the wider economic growth aspirations for the town.

2.6 In order to understand the most appropriate sites in and around Harlow a strategic sites assessment was undertaken, which indicates that sufficient suitable strategic sites are available in and around Harlow to deliver circa 16,100 homes (together with sites either already completed or granted planning permission as well as urban brownfield sites). To meet the figure of circa 16,100 homes, some 3,900 homes would be provided within Epping Forest District, which would be delivered through sites to the west, south and east of Harlow². Further details on this site selection process and how it relates to the District level site selection is presented in Section 2.3.

2.7 The Council is fully committed to meeting its contribution to the HMA's objectively assessed housing need over the Plan period. Table 2.1 summarises the components of the land supply, which will be delivered to meet the Council's housing requirement. Once completions, commitments, windfall development and the contribution from the garden communities around Harlow are accounted for, there is a residual requirement of circa 4,146 homes for which land in the rest of the District needs to be found.

Table 2.1: Housing land supply

The components of housing land supply over the period 2011-2033 are as follows:	
Number of homes required to be built 2011-2033	~11,400
Homes built (completions) 2011 up to 31 March 2017	1,330
Future supply:	
Sites with planning permission up to 31 March 2017 (+10% non-delivery rate)	1,621
Windfall (35 dwellings per annum for 11 years)	385
Total supply (completions plus future supply)	3,336
Homes met through garden communities around Harlow	3,900
Remaining number of homes to be provided elsewhere in the District	4,146

² Through the plan-making process, the name of the strategic sites around Harlow has evolved. They are referred to as garden communities in the Local Plan Submission Version. Where relevant and to ensure consistency with the site allocations proposed in the Local Plan Submission Version references to the allocation of the strategic sites have been updated in the remainder of this report to refer to garden communities.

2.2 Overview of Site Selection Methodology

- 2.8 The Local Plan must allocate sufficient land in appropriate locations to ensure land supply for the 15-year Plan period. This is reflected in paragraph 157 of the NPPF, which states: *“Crucially, Local Plans should ... allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”* and *“identify land where development would be inappropriate, for instance because of its environmental or historic significance”*.
- 2.9 The portfolio of site allocations and/or broad locations to be included in the Local Plan for residential development must meet the policy requirement within paragraph 47 of the NPPF, by which local planning authorities should: *“identify... a supply of specific deliverable ... sites sufficient to provide five years [sic] worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land...”* and *“identify a supply of specific, developable ... sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”*.
- 2.10 The NPPF also specifically addresses *“using a proportionate evidence base”* advising local planning authorities (paragraph 158) to ensure *“... that their assessment of and strategies for housing, employment and other land uses are integrated, and they take full account of market and other economic signals”* and that the Local Plan must be justified as *“... the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”* (see paragraph 182). This is a key test of soundness and is fundamental to the site selection process.
- 2.11 Finally, paragraph 152 of the NPPF includes the following overarching policy advice: *“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate”*. Accordingly, the process of site selection must adhere to these principles and avoid significant social, environmental, or economic harm, within the context of other policies within the NPPF.
- 2.12 In response to the requirements of government policy and practice guidance contained within the NPPF and Planning Practice Guidance (PPG) respectively, the Council worked collaboratively with Arup to develop a SSM to identify appropriate sites for residential and employment development to meet identified requirements for inclusion in the Draft Local Plan. The SSM was drafted in April 2016 and finalised in August 2016 following Counsel’s advice. A related but separate methodology was developed for identifying and selecting proposed site allocations for

traveller accommodation (TSSM), which is discussed further in Chapter 3 of this Report.

- 2.13 The purpose of the SSM is to provide a robust framework that guides the preparation of an adequate evidence base to support the proposed site allocations. It explains the proposed methodology for identifying appropriate sites to meet identified housing and employment requirements. In order for the site selection process to be adequate, the evidence base must be robust, assessments should be founded upon a cogent methodology, undertaken in a transparent manner and fully documented at key stages. Professional judgements require justification and site selection decisions must be clearly explained.
- 2.14 The SSM identifies five stages through which sites are sieved and subject to more detailed assessment in order to identify the proposed site allocations for residential and employment development for inclusion in the Draft Local Plan.
- 2.15 The five stages can be summarised as follows:
- Stage 1 Major Policy Constraints – identified sites which were subject to one or more of these constraints and therefore were not considered to be suitable for development.
 - Stage 2 Quantitative and Qualitative Assessment – undertook more detailed assessment of sites to understand their relative suitability for development.
 - Stage 3 Identify Candidate Preferred Sites – identified those sites which were considered suitable for development and were subject to further capacity and deliverability assessment. More detailed indicative capacity assessment was also undertaken for each site identified for further testing.
 - Stage 4 Deliverability – assessed the availability and achievability of sites to enable decisions to be made about sites to allocate and to ensure the Council could demonstrate a sufficient housing trajectory over the Plan period.
 - Stage 5 Sustainability Appraisal/Habitats Regulation Assessment of Candidate Preferred Sites – established the impact of the candidate Preferred Sites alone and in combination.
- 2.16 The SSM also contained Stage 6 Review of Candidate Preferred Sites Following Draft Local Plan Consultation, which confirmed that following the Draft Local Plan consultation the Council would review the draft site allocations against any representations received and updated technical information. Where there are clear planning reasons the Council may then alter the assessment or discount draft site allocations and/or identify new sites for allocation in the Local Plan Submission Version.
- 2.17 To provide further clarity on which sites would be assessed and how as part of Stage 6, the SSM was updated in February 2017 and finalised in June 2017 following Counsel advice. The updates addressed, where relevant,

representations received to the Draft Local Plan consultation on the SSM and confirmed the process the Council followed in developing its Local Plan Submission Version. In the updated SSM, Stage 6 was divided into six sub-stages, which can be summarised as follows. Broadly the sub-stages reflect the process followed for Stages 1 to 4 of the SSM.

- Stage 6.0 Identifying Sites for Assessment – identified amended or new sites for assessment through the SSM.
- Stage 6.1A Major Policy Constraints – identified sites which were subject to one or more of these constraints and therefore were not considered to be suitable for development.
- Stage 6.1B Sifting Residential Sites against the Local Plan Strategy – determined whether sites accorded with the Local Plan Strategy and therefore proceeded to Stage 6.2.
- Stage 6.2 Quantitative and Qualitative Assessment – undertook more detailed assessment of sites to understand their relative suitability for development.
- Stage 6.3 Identify Candidate Preferred Sites – identified those sites which were considered suitable for development, best met the Council’s Local Plan Strategy and were subject to further capacity and deliverability assessment. More detailed indicative capacity assessment was also undertaken for each site identified for further testing.
- Stage 6.4 Deliverability – assessed the availability and achievability of sites to enable decisions to be made about sites to allocate and to ensure the Council could demonstrate a sufficient housing trajectory over the Plan period.

2.18 The SSM also identifies that following the conclusion of the site selection process, the Council will undertake further work to inform the Local Plan Submission Version including:

- A review of Green Belt boundaries to identify proposed alterations to the Green Belt boundary to accommodate the proposed site allocations;
- SA and HRA, which will include any new or amended sites in accordance with the relevant regulations;
- Infrastructure Delivery Plan; and
- Transport modelling.

2.19 A full version of the SSM finalised in June 2017 is provided at Appendix A.

2.20 The remainder of this chapter explains how the SSM has been applied in the preparation of the Draft Local Plan published for consultation in Autumn 2016 and the Local Plan Submission Version published in December 2017. It provides a summary of the results, with reference made to appendices which provide further detail of the assessment undertaken and justification for key decisions made. This includes Appendix B1.1

(Overview of Assessment of Residential Sites), which provides an overview of how each site proposed for residential development was assessed at each stage of the SSM. With the exception of Section 2.5, which explains the joint process followed for identifying residential and employment sites for consideration through the SSM, this chapter addresses residential sites only. The application of the SSM for employment sites is documented separately in Chapter 4.

- 2.21 It should also be noted that the results of the SA and HRA are documented under separate cover in the Sustainability and Equalities Impact Appraisal (AECOM, December 2017) and the Habitats Regulations Assessment (AECOM, December 2017).

2.3 Relationship with Housing Market Area Strategic Sites

- 2.22 Paragraph 3.5 of the SSM summarises the relationship between the District level site selection process and strategic site work commissioned by the four local authorities for the HMA. The SSM states: *“the Strategic Housing Market Area authorities have commissioned an assessment of the strategic sites in and around Harlow, including those sites in East Hertfordshire and Epping Forest Districts. The Council has worked with AECOM, the consultants appointed to undertake the strategic sites assessment, to align, where possible, the methodology, criteria and data sources for these two pieces of work. Section 4 (below) identifies the stages at which the Council will either cross-check its assessment with, or rely upon the assessment undertaken by AECOM.”*
- 2.23 Since the SSM was originally drafted in April 2016 the phasing and timing of the assessment of strategic sites around Harlow and the District level site selection process has changed with the processes effectively being undertaken in parallel in advance of the publication of the Draft Local Plan. In practice this has meant that:
- The assessment of strategic sites around Harlow was completed in September 2016 to inform the Draft Local Plan consultation³. The output of the assessment is documented in Harlow Strategic Site Assessment (AECOM, 2016). This coincided with the identification of the Harlow and Gilston Garden Town, which includes the garden communities surrounding Harlow but located within Epping Forest District and East Hertfordshire District⁴.

³ Since the strategic site and District level assessment was undertaken in parallel prior to the Draft Local Plan consultation, sites around Harlow were paused at Stage 2 to ensure that any future stages of the site selection process could take account of the findings of the work by AECOM. The strategic sites were therefore assessed at Stage 6.3 and Stage 6.4 for their suitability and deliverability.

⁴ On 2 January 2017 the Government announced its support for the Expression of Interest submitted to the locally-led Garden Towns prospectus for the Harlow and Gilston Garden Town. This represents a major opportunity at the heart of the London Stansted Cambridge Corridor to accommodate around 16,100 homes together with employment up to 2033 between the global

- All of the strategic sites around Harlow, which are located within Epping Forest District have been considered through the District level site selection process. This includes the six sites (H, N, O, Q, T, V) AECOM recommended in the Harlow Strategic Site Assessment to be considered as part of the District level site selection process. AECOM identified these sites as being unsuitable as strategic expansion sites to Harlow (they were judged not to be contiguous with the Harlow built-up area) but might merit further consideration as freestanding sites or extensions to other settlements in the District. The locations of the strategic sites and the relationship between the strategic site site references and District level site references are presented in Figure 2.1 and Table 2.2 respectively.
- Following the consultation on the Draft Local Plan, the need to re-assess some of the strategic sites around Harlow through the District level site selection process was identified. This was principally to address the following matters:
 - it became apparent that for some of the strategic sites around Harlow, the District level assessment previously undertaken needed to be reviewed to reflect up-to-date information for various sites; and
 - three of the strategic sites (K, N, O) were promoted for employment uses through the Draft Local Plan consultation. These sites were considered as part of the Council's Employment Land Supply Assessment (Arup, December 2017) and identified for (re-)assessment for employment uses.
- The methodology, criteria and data sources for assessing the suitability of sites have been aligned, where possible, across the two studies. This includes the outcomes of the Stage 2 and Stage 6.2 assessments being cross-checked against AECOM's work to maintain consistency.
- At Stage 6.3 of the District level assessment, the judgements made in relation to the suitability of the strategic sites around Harlow were informed by AECOM's assessment and recommendations. Where this is the case the write-up in the relevant appendix to this report indicates this.
- At Stage 6.3 of the District level assessment, the capacity assessment has been informed by the findings from the strategic site assessment along with any updated information provided by site promoters.
- At Stage 6.4 of the District level assessment, the findings from the strategic site assessment along with any updated information provided by site promoters was used to inform the deliverability assessment.

centres of London and Cambridge. The Garden Town enables the three Council's to focus development where it is needed and where it can be sustainably accommodated in order to maximise the longer-term economic potential of the area in a proactive way.

- The Council used the information collated by AECOM along with any updated information provided by site promoters to refine the housing trajectory.

2.24 In the remainder of this chapter, unless explicit reference is made to the strategic site assessment around the Harlow, the write-up relates to the District level site selection process undertaken in accordance with the requirements of the SSM.

Figure 2.1: Map of strategic sites around Harlow



Source: AECOM, 2016

Table 2.2: Site references for strategic sites around Harlow

Strategic Site Reference	District Level Site Reference	Site Name	Land Use Assessed for in SSM
H	SR-0032, SR-0121, SR-0313-B1, SR-0313-C1, SR-0472	East of Lower Sheering	Residential
I	SR-0403-N	Land off Lower Sheering Road & Harlow Road	Residential
J	SR-0146C-N	Harlow East	Residential

Strategic Site Reference	District Level Site Reference	Site Name	Land Use Assessed for in SSM
K	SR-0074, SR-0092	West of A414 to the south of Harlow	Residential (SR-0074) Employment (SR-0092)
L	SR-0139	Riddings Lane Garden Centre	Residential
M	SR-0046A-N	Latton Priory	Residential
N	SR-0066	Land at Harlow Gateway South	Employment
O	SR-0409	Land to North of Junction 7 of M11	Employment
P	SR-0052A-N	Land to West of Harlow/East of Roydon	Residential
Q	SR-0009	Halls Green	Residential
R	SR-0964-Z	Land West of Katherines	Residential
S	SR-0052B-N	Land West of Pinnacles	Residential
T	SR-0197-N, SR-0306, SR-0890	Land to East of Epping Road, Roydon	Residential
U	SR-0068-N	Land West of Sumners	Residential
V	SR-0169, SR-0304	North of Harlow Road and East of High Street, Roydon	Residential

2.4 Identifying Sites for Assessment

2.25 In advance of undertaking the SSM the sites to be subject to it were identified. Two tranches of sites were subject to the SSM: Tranche 1 sites were assessed in 2016, with Tranche 2 sites assessed in 2017. The process followed to identify residential and employment sites for assessment for each Tranche is set out in the following sub-sections.

2.4.1 Tranche 1 Sites

2.26 Prior to undertaking the SSM in 2016, a filtering process was undertaken to sift out sites that had been identified through various sources but were considered unsuitable for assessment.

2.27 The starting point for identifying sites that should be subject to the SSM was the Council's Strategic Land Availability Assessment (SLAA) (Nathaniel Litchfield and Partners, March 2016). In accordance with the requirements of paragraph 4.6 of the SSM, sites identified through the SLAA were reviewed against the following criteria to determine whether they should be subject to the SSM:

- Sites identified in the SLAA were filtered out from the SSM where they were identified in the SLAA as: a duplicate site; subject to extant

planning permission⁵; being promoted for non-housing or employment (B Use Class) uses; subject to an existing continuing use; and/or located outside the boundary of Epping Forest District.

- Sites discounted at Stage A (strategic constraints)⁶ of the SLAA process were identified for re-assessment through the SSM to ensure alignment of approach with the major policy constraints identified at Stage 1 of the SSM.
- Sites greater than 0.2 hectares in area (promoted for residential or employment uses), or capable of delivering six or more dwellings were identified for assessment through the SSM. Sites proposed for residential use only needed to meet one of these criteria in order to be assessed through the SSM. Sites below these thresholds were considered to constitute windfall development and therefore were not assessed.
- The SLAA identified primary and secondary uses for sites. Sites with a primary use which was non-residential or non-B Use Class uses were removed from consideration through the SSM unless the secondary use identified in the SLAA was either for residential or employment (B Use Class) uses.

2.28 Additional sites were also identified for assessment through the SSM, which were not assessed through the SLAA. The Council holds a rolling 'Call for Sites'. All Call for Sites submissions received by the Council up to and including 31 March 2016 were assessed through the SLAA. Additional Call for Sites submissions were received by the Council after this date. Submissions for sites for residential and employment B Use Class uses received by the Council by 17 May 2016 were assessed through the SSM. Any submissions received by the Council after this date and up to 31 March 2017 were assessed as part of the second Tranche of sites.

2.29 Some 785 Tranche 1 sites were identified from the SLAA or subsequent Call for Sites submissions for potential consideration through the SSM. Each Tranche 1 site has a unique site reference (usually in the format SR-XXXX). Following the review of this 'long list' of sites, 224 sites were identified as not being suitable for consideration through the site selection process and therefore did not proceed any further. A summary of the reasons for discounting these sites at this stage is presented in Table 2.3. Appendix B1.2.1 (Residential and Employment Sites Discounted from the Assessment) identifies for each site removed from the site selection process at this point, the reason(s) why the site was discounted.

⁵ In 2016, the Council continued to monitor the status of sites with regard to planning permission. Any sites identified in the SLAA/SSM and for which planning permission was granted up to and including 31 July 2016 were removed from consideration through the SSM and are reflected in the existing supply figures presented in Table 2.1.

⁶ Further details of the strategic constraints are provided in the SLAA (2016).

Table 2.3: Summary of reasons for Tranche 1 sites not being considered through the site selection process

Reasons for not assessing a site through the site selection process	Number of sites discounted
Site falls below the minimum residential site threshold for both site size (0.2 hectares) and amount of development (6 dwellings).	109
Site is subject to extant planning permission dated prior to 31 July 2016.	55
Site identified in the SLAA as being a duplicate site.	35
Site is being promoted for non-housing or employment (B Use Class) uses.	9
Site falls below the minimum residential site threshold for both site size (0.2 hectares) and amount of development (6 dwellings), and the site is subject to extant planning permission.	4
Site is located outside of the Epping Forest District Boundary.	4
Site is subject to an existing continuing use, and is unavailable for development within the Plan period.	6
Site falls below the minimum employment site size threshold of 0.2 hectares.	1
Site is being promoted for non-housing or employment (B Use Class) uses and subject to extant planning permission	1
Total	224

2.30 Some 524 sites were identified for assessment for residential uses and 37 sites were identified for assessment for employment (B Use Class) uses.

2.31 In addition, when reviewing the Tranche 1 sites which had been identified for assessment it became apparent that there were:

- A number of very large sites for which there were no detailed proposals and which could not be meaningfully assessed as defined. Such sites were identified and were sub-divided using existing natural features and boundaries. Where a large site was identified for sub-division but was promoted by a third party, a site was only divided where there was agreement from the site promoter. Appendix B1.2.2 (Justification for 'Split Sites') identifies the sites which were split and the associated justification.
- A number of sites which comprised multiple parcels, which were not adjacent and therefore may potentially score differently if assessed as a single site through the SSM. Where this was the case, the parcels were assessed as individual sites.
- Sites identified through the SLAA, which overlapped with other sites. In such cases the indicative capacity of sites had been reduced to avoid double counting when the total number of suitable, available and achievable homes were summed together. However, for the purposes of site selection the assessment needed to assess each site individually for its full capacity. Therefore, the capacity of each site was reviewed and where a reduction had been applied in the SLAA due to overlapping

sites this capacity was re-instated. If this adjustment was made, it is documented in the output of the site assessment undertaken at Stage 2 of the SSM.

2.4.2 Tranche 2 Sites

2.32 The Council decided not to update the SLAA following the Draft Local Plan consultation, since the site selection process provides a more comprehensive assessment of site suitability, availability and achievability. In accordance with paragraph 4.58 of the SSM, the following sources were therefore used to identify Tranche 2 residential and employment (B Use Class) use sites:

- Employment Land Supply Assessment (2017).
- 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 identified new sites and/or proposals for Tranche 1 sites which are materially different from that previously assessed.
- Updates to the strategic sites around Harlow to align the strategic site and District level site assessment processes to reflect up-to-date information available.

2.33 To maintain consistency with Tranche 1 sites, Tranche 2 sites were reviewed to check they accorded with the relevant criteria identified at paragraph 4.6 of the SSM and were assigned a primary use in accordance with the approach set out in paragraph 4.11 of the SSM.

2.34 Some 136 Tranche 2 sites were identified for assessment for residential uses and 13 Tranche 2 sites were identified for assessment for employment (B Use Class) development.

2.35 In addition, Tranche 1 sites were reviewed to determine whether they remained 'live' proposals, which should continue to be considered through the site selection process. The checks undertaken to determine this comprised:

- Site promoters confirming that the proposals assessed as part of Tranche 1 did not reflect their current proposals and instead a materially different scheme should be considered as part of the second Tranche of sites. There were 36 sites promoted for residential use where this was the case.
- Site promoters confirming that a site was no longer available for the promoted development. There were six sites promoted for residential use where this was the case.

- Draft site allocations being granted planning permission. There were five sites promoted for residential use where this was the case.
- 2.36 Appendix B1.2.1 identifies for each site removed from the site selection process at this point, the reason(s) why the site was discounted.
- 2.37 The Council continued to monitor the status of sites with regard to planning permission. Any sites identified that were subject to the SSM and for which planning permission was granted up to and including 30 September 2017 have been removed from consideration through the SSM. These sites are identified in Appendix B1.2.1 and the residential development approved reflected in the existing supply figures presented in Table 2.1. Sites which benefitted from the grant of planning permission between 1 April 2017 and 30 September 2017 and that met the dwelling threshold of six units or more are also shown as site allocations in the Local Plan Submission Version.
- 2.38 Since the Council did not undertake an update of the SLAA prior to the site selection process continuing, the promoted site capacity for Tranche 2 sites was not checked for constraints at this stage. Where appropriate the site capacity reduced (as was the case for Tranche 1 sites). This check was undertaken as part of Stage 6.1.

2.5 Stage 1 and Stage 6.1A: Major Policy Constraints

- 2.39 Paragraph 4.5 of the SSM states that “the purpose of Stage 1 will be to identify any sites that are 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.” At paragraphs 4.55 and 4.56 of the SSM, it states that the purpose of Stage 6.1A is the same for Tranche 2 sites.
- 2.40 In developing the SSM, six major policy constraints were identified for residential sites. The same constraints were used for Stage 1 and Stage 6.1A.
- 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 a Essex County

Council owned or managed wildlife site or Council owned or managed Local Nature Reserve.

- Epping Forest and its Buffer Lands – sites were removed from consideration where the site was entirely located within Epping Forest or Epping Forest Buffer Land⁷.
- 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.

- 2.41 The justification for the selection of each major policy constraint is set out in the SSM at Appendix A.
- 2.42 Each site was screened against the six major policy constraints using a Geographic Information Systems (GIS) database.
- 2.43 For Stage 1, of the 524 Tranche 1 sites promoted for residential development, which were assessed against the major policy constraints, 98 sites were sifted out due to one or more major policy constraints. This left 426 sites that proceeded to Stage 2. It should be noted that in accordance with the checks undertaken on Tranche 1 sites in 2017 (see Section 2.4.2 above), some 45 sites were discounted for further consideration through the site selection process. This means that the number of ‘live’ sites from Tranche 1 sites is 482 sites of which 386 sites were assessed at Stage 2.
- 2.44 For Stage 6.1A, of the 136 Tranche 2 sites promoted for residential development, which were assessed against the major policy constraints, 20 sites were sifted out due to one or more major policy constraints. Some 116 sites proceeded to Stage 6.1B.
- 2.45 An overview of the reasons for sifting out sites proposed for residential development at Stage 1 and Stage 6.1A is presented in Table 2.4. For Tranche 1 sites, the numbers in this table relate to those proposals which were ‘live’ in 2017 following the checks undertaken. Further detail on how each of these sites scored against the six major policy constraints for Stage 1 and 6.1A is provided in Appendix B1.3 (Results of Stage 1 and Stage 6.1 A/B Assessment).

Table 2.4: Summary of reasons for sites proposed for residential uses being sifted out at Stages 1 and 6.1A of the site selection process

Major Policy Constraint	Number of sites subject to Major Policy Constraint	
	Stage 1	Stage 6.1A
Site is located outside Settlement Buffer Zones.	83	19
Site is constrained by Epping Forest or its Buffer Land.	4	N/A
Site is located outside Settlement Buffer Zones and is constrained by Epping Forest or its Buffer Land.	3	N/A

⁷ Based on the Buffer Land in the City of London Corporation’s ownership on 15 June 2016.

Major Policy Constraint	Number of sites subject to Major Policy Constraint	
	Stage 1	Stage 6.1A
Site is located outside Settlement Buffer Zones and is constrained by Flood Risk Zone 3B.	2	1
Site is constrained by Flood Risk Zone 3B.	1	N/A
Site is entirely constrained; either outside Settlement Buffer Zone or is constrained by Flood Risk Zone 3B.	2	N/A
Site is entirely constrained; either outside Settlement Buffer Zones or is constrained by LNR or Flood Risk Zone 3B.	1	N/A

2.46 Paragraph 4.11 of the SSM confirms that: *“the assessment will first assess the suitability of the site for the primary use identified; it is this use which will be considered at Stages 2 and 3. Where a site is not selected as a preferred site for the primary use and insufficient sites have been identified for the secondary use, the site will be re-assessed to consider its suitability for the secondary use. Sites will not be re-assessed in other circumstances.”* Based on the assessment work completed to-date, there has not been a need to re-assess sites for their secondary use. Therefore, all results reported for the Stage 1 and Stage 6.1A assessments relate to the primary use for each site. The exception to this is where site promoters re-submitted the same site for a different use during the Draft Local Plan consultation. In such cases, the site has been assessed for the re-submitted use.

2.6 Stage 6.1B Sifting Residential Sites against the Local Plan Strategy

2.47 This stage was only applied to Tranche 2 sites which proceeded from Stage 6.1A and sought to filter out Tranche 2 sites which did not accord with the Local Plan Strategy. As paragraphs 4.60 and 4.61 of the SSM explain: *The Council set out its Local Plan Strategy for residential sites in the Draft Local Plan. This was informed by the site selection work undertaken for Tranche 1 sites and reflects the hierarchy set out in paragraph 4.26 (above). The Local Plan Strategy is also supported by the strategic options⁸ 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 continues to believe that the Local Plan Strategy it consulted upon remains 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 has changed, and that the NPPF indicates that local planning authorities should take a proportionate*

⁸ The spatial extent and suitability of strategic options was informed by material planning considerations, the main source of which was the Council’s evidence base, including for example, the Epping Forest District Green Belt Assessment Stage 2: (LUC, August 2016) and Settlement Edge Landscape Sensitivity Study (CBA, January 2010).

approach to evidence collection, the Council considers that sites which do not accord with the Local Plan Strategy should not be assessed at Stage 6.2. This is because the Stage 6.2 assessment is only used at Stage 6.3 if a site is located within a more suitable strategic option.

2.48 *In order to determine whether a site proposed for residential development accords with the Local Plan Strategy and therefore should progress to Stage 6.2, the following decision rules will be 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.*

2.49 Footnote 7 of paragraph 4.50 stated that: *“It should be noted that in response to representations received to the Draft Local Plan consultation, the Council has reviewed the strategic options identified at Stage 3 of the site selection process. Where necessary, the strategic options have been amended to more closely align with the evidence base for the Local Plan and any new information received. Further justification has also been developed to set out why a strategic option is considered to be more or less suitable. In a limited number of instances this work has resulted in strategic options changing from more suitable to less suitable or vice versa.”*

2.50 In response to this review, the spatial extent and suitability of strategic options identified at Stage 3 remain unchanged for this stage, except in the following instances:

- **Chigwell - Eastern Expansion:** This strategic option was divided into two strategic options through the creation of a new North-eastern Expansion option (see below). This reflected the distinct characteristics of these two areas, as demonstrated by the Council’s evidence base. The spatial extent of the Eastern Expansion option was revised to exclude the area to the north-east of Vicarage Lane and include a broader area to the west and north of Chigwell Row. The suitability of the Eastern Expansion option was amended to ‘less suitable’, reflecting the potential for very high impact upon the Green Belt and the area’s high landscape sensitivity.
- **Chigwell - North-eastern Expansion:** A new strategic option was created, comprising an area to the north-east of Vicarage Lane (formerly part of the Eastern Expansion option). Development in this

area would be least harmful to the Green Belt relative to other Green Belt strategic options adjacent to Chigwell (as set out in the Green Belt Review: Stage 2 (2016)), thus the strategic option was judged to be more suitable.

- **Chigwell Row - Southern Expansion/Intensification:** This strategic option was divided into two strategic options through the creation of separate Intensification and Southern Expansion options (see below). This reflected the distinct characteristics of these two areas, as demonstrated by the Council's evidence base.
- **Chigwell Row – Intensification:** A new strategic option was created, comprising the existing non-Green Belt settlement of Chigwell Row and areas of expansion to the north-east of the settlement. The suitability of this option was judged to be 'more suitable' as it is less harmful in Green Belt terms relative to other strategic options around the settlement, and also less sensitive in landscape sensitivity terms.
- **Chigwell Row – Southern Expansion:** A new strategic option was created, comprising an area to the south of Chigwell Row (formerly part of the Southern Expansion/Intensification option). The suitability of this option was judged to be 'less suitable', reflecting the potential for very high impact upon the Green Belt and the area's high landscape sensitivity.
- **High Ongar - Infill with Limited Expansion:** The spatial extent of the strategic option was revised to exclude the area to the west of the settlement, which would be harmful in Green Belt and landscape sensitivity terms. This area was included in the Chipping Ongar eastern expansion option to better align with the Council's evidence base.
- **Ongar - Southern Expansion:** The suitability of this strategic option was amended to more suitable to better reflect the Council's evidence base. Although the strategic option is less preferential in terms of its location, it is less harmful in Green Belt terms relative to other strategic options around the settlement, and most of the strategic option is also less sensitive in landscape sensitivity terms (in particular, the western area to the west of Brentwood Road).
- **Sheering - Southern Expansion:** The suitability of this strategic option was amended to 'less suitable' to reflect that, at the settlement level, this area is more harmful in both landscape and heritage terms compared with the other strategic options.
- **Waltham Abbey - Southern Expansion:** The suitability of this strategic option was amended to less suitable. This reflected evidence of the potential for visual harm to the wider landscape (demonstrated through the Landscape Character Assessment 2010) and the area being poorly related to the wider settlement as a result of the severance created by the M25.
- **Waltham Abbey - Northern Expansion:** This strategic option was divided into two strategic options through the creation of a new North-

western Expansion option (see below). This reflected the distinct characteristics of these two areas, as demonstrated by the Council's evidence base. The spatial extent of this strategic option was amended to exclude the area to the west of the Crooked Mile.

- **Waltham Abbey - North-western Expansion:** A new strategic option was created, comprising land between the Crooked Mile and the River Lee (formerly part of the Northern Expansion option). This strategic option is: most harmful to the Green Belt relative to other options around Waltham Abbey (as set out in the Green Belt Review: Stage 2 (2016)); harmful in landscape sensitivity and heritage terms; most harmful to the setting of the Lee Valley Regional Park; and predominantly lies within Flood Zones 2 and 3. It was therefore judged to be less suitable.

- 2.51 In addition to the amendments outlined above, the North Weald Bassett Southern Expansion strategic option was subject to a minor alterations to its boundaries to remove the area to the south of the Epping and Ongar Railway. The Masterplan Scenario B was also renamed to Northern Expansion to better reflect its distinction from the North Weald Bassett Masterplanning Study (2014).
- 2.52 Of the 116 sites promoted for residential development which proceeded from Stage 6.1A, 33 sites were sifted out at Stage 6.1B. Some 83 Tranche 2 sites proceeded to Stage 6.2.
- 2.53 An overview of the reasons for discounting sites proposed for residential uses at Stage 6.1B is presented in Table 2.5. Further detail on how each site scored against the strategic options for Stage 6.1B is provided in Appendix B1.3, with a map by parish summarising whether sites proceeded or not to Stage 6.2 of the site selection process.

Table 2.5: Summary of reasons for sites proposed for residential uses being sifted out at Stage 6.1B of the site selection process

Justification	Number of Sites Contrary to the Local Plan Strategy
Site is located within two less suitable strategic options and the constraints identified for these strategic options are considered to apply to the site.	1
Site is located entirely within a less suitable strategic option.	27
Site is located outside but near to a less suitable strategic option and the constraints identified for this strategic option are considered to apply to the site.	4
Site is located partially within a less suitable strategic option and the constraints identified for this strategic option are considered to apply to the site.	1
Total	33

- 2.54 As identified above, since the Council did not undertake an update of the SLAA prior to the site selection process continuing, the promoted site

capacity for Tranche 2 sites was not checked for constraints at this stage. For any sites which were identified to proceed to Stage 6.2 following Stages 6.1A and 6.1B, a check was undertaken to see whether any part(s) of the site were subject to the major policy constraints (excluding settlement buffers). Where this was the case the site capacity was discounted accordingly. Where this occurred it is documented in the output of the site assessment undertaken at Stage 6.2 of the SSM.

2.7 Stage 2 and Stage 6.2: Quantitative and Qualitative Assessment

- 2.55 Paragraph 4.15 of the SSM states that *“the purpose of Stage 2 will be to undertake more detailed quantitative and qualitative assessment of sites to identify the relative suitability of sites for housing or employment development.”* At paragraph 4.63 of the SSM, it states that the purpose of Stage 6.2 is the same for Tranche 2 sites.
- 2.56 In order to do this 33 assessment criteria were identified, which were 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.
- 2.57 Details of each criteria are provided in Appendix A of the SSM. For each criteria a 'Red-Amber-Green' (RAG) rating system was utilised using a scale of between three and five scores.
- 2.58 Each of 386 sites subject to Stage 2 and 83 sites subject to Stage 6.2 were assessed against the aforementioned criteria.
- 2.59 This assessment was completed using a combination of GIS analysis and planning judgement. Where a planning judgement was made an explanation was provided to justify the decision made. Further details of how the assessment was undertaken for each criteria is set out in Appendix B1.4.1 (Detailed Methodology for Stage 2 and Stage 6.2 Assessment). The methodology followed for Tranche 2 sites was in general conformity with that followed for Tranche 1 sites; the differences were minor and related to new/updated information being available. Where there were any differences in methodology followed between Tranche 1 and Tranche 2 sites this is identified in Appendix B1.4.1.
- 2.60 A review of representations received on Tranche 1 sites was also undertaken. The Council has produced a summary of the representations received which is set out in Appendix B1.2.3 (Representations received to

Draft Local Plan consultation). Where appropriate, updates or amendments were made to the Stage 2 assessments.

- 2.61 Part way through the assessment process for Tranche 1 sites a moderation workshop was held. The workshop was held on 7 June 2016 (as required by paragraph 4.21 of the SSM) to moderate the results, check that there is a level of agreement on judgements and regularise any apparently significant inconsistencies. Generally there was agreement on the way the SSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment. For Tranche 2 sites this moderation was undertaken as part of the Stage 6.3 workshop on 17 August 2017 (as required by paragraph 4.66 of the SSM). Generally there was agreement on the way the SSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment.
- 2.62 The output of Stage 2 and Stage 6.2 is an assessment proforma for each site, which provides details of the site proposals and the assessment results for each criteria. The assessments are presented at Appendix B1.4.2 (Results of Stage 2 and Stage 6.2 Assessment) by parish. For each parish there is an overview map which identifies the sites within the parish that were assessed, followed by proformas for each site which are presented in ascending order by site reference number. Table 2.6 provides an overview of the number of sites assessed in each parish.

Table 2.6: Number of sites assessed at Stage 2 and Stage 6.2 by parish

Parish	Number of sites subject to quantitative and qualitative assessment	
	Stage 2	Stage 6.2
Buckhurst Hill	14	2
Chigwell	41	11
Epping	42	8
Epping Upland	4	N/A
Fyfield	8	1
High Ongar	6	N/A
Lambourne	7	N/A
Loughton	35	15
Matching	1	N/A
Moreton, Bobbingworth and the Lavers	2	N/A
Nazeing	36	4
North Weald Bassett	37	8
Ongar	30	9
Roydon	24	10
Sheering	10	5
Stapleford Abbotts	13	1
Theydon Bois	21	2
Waltham Abbey	51	7
Willingale	4	N/A

2.8 Stage 3 and Stage 6.3: Identify Candidate Preferred Sites

2.8.1 Stage 3: Identifying Sites for Further Testing

2.63 Paragraph 4.23 of the SSM states that “*the purpose of Stage 3 is to identify the candidate Preferred Sites, which best meet the Council's preferred growth strategy. This will be undertaken in parallel for employment, residential and traveller sites and will bring together the assessment under this SSM and the Traveller Site Selection Methodology (TSSM).*” At the time that the SSM was drafted it was envisaged that it would be possible for Stage 3 to be undertaken for residential, employment and traveller sites in parallel. However, there were delays in the collection of evidence on the existing supply of employment sites and identification of traveller sites for assessment which meant that this was not possible. Therefore, Stage 3 solely focussed on the identification of residential sites for further assessment through the SSM. This stage (which is Stage 5 in the TSSM) was undertaken later in 2016 for traveller sites, the findings of which are reported in Chapter 3.

2.64 In order to identify those Tranche 1 sites proposed for residential use, which should be subject to further testing a four step process was followed, in accordance with the requirements of paragraphs 4.24 to 4.26 of the SSM. The approach was premised around identifying the ‘best’ fit sites for a particular settlement rather than those sites which may be ‘best’ for the District overall. Therefore sites were considered on a settlement by settlement basis.

2.65 The four steps can be summarised as:

- **Step 1:** Identifying suitable strategic options to accommodate growth.
- **Step 2:** Assessing site suitability.
- **Step 3:** Assigning sites against the land preference hierarchy.
- **Step 4:** Identifying sites for further testing.

2.66 The first two steps were undertaken through a meeting of the Local Plan Officer Working Group on 13 and 14 June 2016.

Step 1: Identifying Suitable Strategic Options to Accommodate Growth

2.67 Based on the locations of the candidate sites within each settlement strategic options to accommodate growth were identified. For each strategic option identified a planning judgement was made about whether the option represented a more suitable or less suitable location for growth. This decision was informed by all relevant material considerations, the main source of which was the Council’s evidence base. Other factors which informed the planning judgements made included sustainable development principles set out in the NPPF, environmental constraints, local knowledge/initial officer evaluation of the area, feedback from the

Community Choices consultation held in 2012 which sought views on the suitability of broad locations for growth in and around settlements and previous feedback from Members.

- 2.68 In some settlements only a single option for accommodating growth was identified, while in other settlements the location of some sites was not considered to be a reasonable alternative and therefore sites were not identified within a strategic option. Where this is the case, this is justified in the strategic options write-up (refer to Appendix B1.5.2 Results of Identifying Sites for Further Testing).

Step 2: Assessing Site Suitability

- 2.69 The Tranche 1 sites located within each strategic option judged to be more suitable or where sites were not located within a strategic option were subject to more detailed consideration. If sites were located in strategic options judged to be a less suitable location for growth they were not considered further through the site selection process.
- 2.70 When undertaking the more detailed consideration of sites regard was had to paragraph 4.25 of the SSM, which states that: *“in general...those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable [sites] for allocation”*. Paragraph 4.25 then goes on to say: *“however, in common with all site selection/allocation processes, the identification of candidate Preferred Site[s] will involve an element of planning judgement, the effect of which on outcomes cannot be prejudged. It should also be noted that in exercising planning judgement different weight may be given to each of the criteria reflecting the characteristics of the sites being assessed under the SSM. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.”*
- 2.71 Therefore, for each Tranche 1 site located within a more suitable strategic option/not located within a strategic option a judgement was made based upon all relevant material considerations as to whether a site was considered suitable or not suitable for residential development. In reaching this judgement, material considerations included the findings of the Stage 2 assessment, local knowledge/initial officer evaluation of sites, feedback from the Community Choices consultation and previous Member feedback. A justification for judgements made was documented; the justification identifies the particular material considerations considered relevant to the site. Where sites were judged to be suitable they continued to be considered in the Council’s site selection process.
- 2.72 In accordance with paragraph 4.30 of the SSM a ‘check and challenge’ workshop was held with Members on 18 June 2016. In the SSM it was envisaged that this workshop would be held once the candidate Preferred Sites had been identified. When carrying out this Stage of the SSM it was considered more appropriate to seek feedback at this point in the process (feedback was sought on the strategic options identified and the judgements made on the suitability of sites) to ensure that Member knowledge and feedback was taken into account before a final judgement was made as to

which sites should progress for further assessment. Where appropriate, Member feedback is reflected in the judgements made. Feedback was also sought from Members as part of Step 4; see below for further details.

Step 3: Assigning Sites to the Land Preference Hierarchy

- 2.73 All Tranche 1 sites which were judged to be suitable for residential development were categorised against the hierarchy presented at paragraph 4.26 of the SSM. The principle of the hierarchy is that a sequential approach is applied to identifying those sites which should be further considered. The hierarchy is applied independently to each settlement and only to those sites identified as being suitable.
- 2.74 For ease of reference the hierarchy set out in paragraph 4.26 of the SSM has been repeated below:
- The sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
 - Sites located on previously developed land within settlements (the Green Belt boundaries were used as a proxy since more detailed settlement boundaries are not designated);
 - Sites located on open space within settlements where such selection would not adversely affect open space provision within the settlement.
 - 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).
 - 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.
 - Agricultural land:
 - Of Grade 4-5 if the land meets other suitable criteria for development.
 - Of Grade 1-3 if the land meets other suitable criteria for development.
- 2.75 Therefore, for each site the Flood Risk Zone it is located in as well as the type of land the site is located on has been identified. This ranking reflects the Stage 2 assessment findings for criteria 1.7 (flood risk), 2.1 (level of harm to the Green Belt), 4.1 (brownfield and greenfield land) and 4.2 (agricultural land). Further details on how the hierarchy was applied is described in Appendix B1.5.1 (Categorising Sites for Further Assessment).

Step 4: Identifying Sites for Further Testing

- 2.76 The total number of Tranche 1 sites and associated capacity identified as potentially suitable for residential development far exceeded the residual housing requirement figure to be met through site allocations away from sites around Harlow⁹. Therefore, in order to adopt a proportionate approach, a decision was made about how many residential units should be taken forward for further testing and the distribution of those residential units across the District.
- 2.77 Paragraph 4.29 of the SSM requires that consideration be given to whether broad locations (rather than site allocations) should be identified to deliver planned development in the latter stages of the Plan period. Given the large number of sites identified as potentially suitable for residential development it was agreed that site allocations should be identified to meet the District's housing requirement for the whole Plan period. The need to identify broad locations was not considered further.
- 2.78 To assist in identifying which sites should be subject to further testing, sites were grouped into seven categories (based on the rankings applied at Step 3):
- 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 greenfield (including both designated and non-designated open spaces).
 - 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 greenfield land of least value to the Green Belt adjacent to the settlement.
 - Category 5 - sites located within Flood Zone 1 and on greenfield land of greater value to the Green Belt adjacent to the settlement.
 - Category 6 - sites located within Flood Zone 1 and on greenfield 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 greenfield, Green Belt and not adjacent to the settlement; and
 - all other sites located in other flood zones (regardless of the type of land the site is located on).
- 2.79 Since more detailed indicative capacity (see Section 2.8.3) and deliverability (see Section 2.9.2) assessments were to be undertaken on the candidate Preferred Sites, it was considered necessary to identify more sites to be taken forward for assessment than would be needed to meet the

⁹ In 2016 the residual housing requirement comprised approximately 4,550 homes.

District's residual housing requirement. This was to provide a buffer for any changes in capacity resulting from the more detailed assessment and any constraints which may make deliverability of sites not possible within the Plan period.

2.80 In terms of the distribution of residential development across the District, feedback from the Community Choices consultation and other stakeholders indicated that:

- growth should be spread across the District rather than focussed in specific settlements;
- development potential within existing settlements should be maximised, focusing on brownfield land with higher densities where possible, before releasing land in the Green Belt;
- opportunities for growth of North Weald Bassett should be maximised and;
- development proposals should support the realisation of the emerging settlement visions.

2.81 It was therefore agreed that all sites judged to be suitable and located within categories 1 to 4 (as set out above) should be taken forward for further testing. This ensured that all potentially suitable sites across the District would be considered further and maximised the ability of the Council to find sites to support a distributed pattern of growth across the District.

2.82 The indicative capacity arising from suitable sites within categories 1 to 4 were not considered to provide sufficient flexibility. It was anticipated that the number of sites deemed to be suitable, available and achievable and their associated development capacity would reduce following the further capacity and deliverability assessment. Also, some settlements had none or very little land located within the first four categories and it was felt that more sites should be put forward for testing in these locations in order to support a distributed pattern of growth across the District and assist in the realisation of the emerging settlement visions. Therefore, all suitable sites located in Green Belt adjacent to the settlement (whether that be land of greater value or most value to the Green Belt) within the following settlements were identified for further testing:

- 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.
- Lower Sheering – to enable sufficient sites to be put forward to meet local needs.
- North Weald Bassett – to enable sites identified to the north of the settlement (identified as the preferred direction of growth in the North Weald Bassett Masterplan) to be subject to more detailed testing.
- 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.

- Roydon – to enable sufficient sites to be put forward to meet local needs.
- Sheering - to enable sufficient sites to be put forward to meet local needs.
- Theydon Bois – to enable sufficient sites to be considered to maximise existing sustainable transport links within the settlement.
- Thornwood – to enable sufficient sites to be put forward to meet local needs.
- Waltham Abbey – to ensure sufficient sites to be considered to provide a sustainable level of housing which supports regeneration of the settlement and retention of town centre services.

2.83 During this step meetings were held with Members to brief them on the sites that were proposed for further testing.

2.84 Paragraph 4.29 of the SSM requires that consideration be given to exceptional circumstances for sites located in the Green Belt. Given the sequential approach followed to identify sites for further testing, and that sites in the Green Belt were only identified for testing in order to meet the District's housing requirement, at this point in the process it was considered that the approach adopted would support the case for exceptional circumstances should the remaining assessment work conclude release of the Green Belt was required.

2.8.2 Stage 6.3: Identifying Sites for Further Testing

2.85 The purpose of Stage 6.3 is consistent with that set out in paragraph 4.23; to identify the candidate Preferred Sites, which best meet the Council's preferred growth strategy. Paragraph 4.68 of the SSM goes on to confirm that: *“this stage will consider Tranche 1 and Tranche 2 sites assessed at Stages 2 and 6.2, respectively, and will be undertaken in parallel for employment and residential sites. Traveller sites assessed under the TSSM will also be considered in parallel.”* Sites for all three uses were considered at the same time.

2.86 As confirmed by footnote 8 of the SSM, 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). Some four sites were re-assessed for this reason;

- 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. Some five sites were re-assessed for this reason; 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 supply¹⁰. Some eight sites were re-assessed for this reason.

2.87 As indicated in paragraph 4.70 of the SSM, the process followed for Stage 6.3 was consistent with that followed for Stage 3 except for the following amendments:

- in accordance with paragraph 4.71 of the SSM some additional factors were taken into account when determining which sites should be taken forward for further testing¹¹. These reflected the additional information available to the Council to inform the judgements made; and
- Step 3 (assigning and filtering sites against the land preference hierarchy) was undertaken before Step 2 (assessing site suitability). The reasons for this change in the sequencing of activities is explained below.

2.88 For Stage 6.3, the four steps were undertaken through a meeting of the Local Plan Officer Working Group on 17 August 2017.

Step 1: Identifying Suitable Strategic Options to Accommodate Growth

2.89 The amended strategic options used for Stage 6.1B provided the starting point for this step of the assessment. 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 matters:

- 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.

¹⁰ Further analysis undertaken by the Council following the Draft Local Plan consultation identified the need to identify as many appropriate sites as possible that could contribute to its five year housing land supply whilst ensuring the proper and appropriate planning of the District.

¹¹ Paragraph 4.71 of the SSM identified that refined settlement visions and work on placemaking would be available to inform this Stage of the site selection process. The Council deferred this element of work to later in the plan-making process to enable the update to incorporate, where relevant, the recommendations of other evidence base studies. This information instead informed the decisions on which sites to allocate in the Local Plan Submission Version (see Section 2.9.3).

2.90 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 Belt¹² 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.

2.91 Appendix B1.5.2 contains a map for each settlement which presents the strategic options identified and confirms whether each option was considered to be a more or less suitable location for growth. A table accompanies each map which provides the justification for the judgement reached.

Step 3¹³: Assigning Sites to the Land Preference Hierarchy

2.92 Prior to the Local Plan Officer Working Group workshop on 17 August 2017 sites were assigned to the land preference hierarchy in accordance

¹² This is evidenced by the Green Belt Review (2015) and Harlow Strategic Site Assessment (2016).

¹³ As explained above, the process followed for Stage 6.3 was consistent with that followed for Stage 3 with a limited number of amendments. One such amendment was undertaking Step 3 (assigning and filtering sites against the land preference hierarchy) before Step 2 (assessing site suitability). Therefore, this reference to Step 3 is correct.

with the methodology set out in Appendix B1.5.1. To be consistent with the judgements reached in 2016 and the decisions made regarding re-visiting Tranche 1 sites, and to ensure an proportionate approach was adopted, it was determined that Tranche 2 sites located too far down the land preference hierarchy should not be reviewed for their site suitability and should be filtered out at this Step. This is because even if they were considered suitable they would not progress for further testing.

2.93 As in 2016, this filtering process was undertaken on a settlement by settlement basis, with sites lower down the land preference hierarchy only put forward for further testing in selected settlements to support a distributed pattern of growth across the District and realisation of the settlement visions. The ‘cut offs’ developed in 2016 were applied consistently in 2017 with the following exceptions:

- As sites around Harlow were not assessed in 2016 beyond Stage 2, the ‘cut offs’ for this settlement needed to be determined (see Section 2.3 for further details). It was judged appropriate to put forward sites in categories 1 to 6 for further testing in order to support the joint aspirations of Harlow, East Hertfordshire and Epping Forest District Council’s for the Harlow and Gilston Garden Town.
- Where sites were located in the following lower categories the Council reviewed the Tranche 2 sites using information provided to it by site promoters to determine whether any sites could potentially contribute to the Council’s five year housing land supply:
 - Category 5 and 6 – all Tranche 2 sites located in Chigwell, Chigwell Row, Loughton, Lower Nazeing and Stapleford Abbots. Some nine sites were identified for site suitability assessment.
 - Category 7 – all Tranche 2 sites located adjacent to any settlement. Some 13 sites were identified for site suitability assessment.

2.94 Where Tranche 2 sites were identified for site suitability assessment, a judgement was made on whether the potential contribution the site might make to the Council’s five year housing land supply outweighed other site suitability considerations. Where a site was filtered out at this Step, this is reflected in the site suitability justification contained in Appendix B1.5.2.

Step 2¹⁴: Assessing Site Suitability

2.95 For Stage 6.3, an approach consistent with that used for Stage 3 was adopted in accordance with paragraph 4.71 of the SSM. In determining whether a site was considered suitable all relevant material considerations were taken into account which included the following:

- the findings of the Stage 2/6.2 assessment;

¹⁴ As explained above, the process followed for Stage 6.3 was consistent with that followed for Stage 3 with a limited number of amendments. One such amendment was undertaking Step 3 (assigning and filtering sites against the land preference hierarchy) before Step 2 (assessing site suitability). Therefore, this reference to Step 2 is correct.

- feedback received to the Draft Local Plan consultation;
- the Tranche 1 suitability assessment where a similar site was previously assessed;
- the outcomes of the transport, infrastructure and HRA modelling of the Draft Local Plan sites;
- the Council's updated work on its housing trajectory and five year housing land supply;
- emerging Neighbourhood Plans which include proposed site allocations; and
- local knowledge.

2.96 Based on this assessment a judgment was made as to whether a site was considered suitable or not suitable. A justification for this judgement was documented with reference to the particular material considerations relevant to the site. The maps by settlement at Appendix B1.5.2 confirm whether a site was judged to be suitable or unsuitable. The accompanying table provides a justification on a site by site basis for the judgements made.

Step 4: Identifying Sites for Further Testing

2.97 Table 2.7 identifies, by settlement, the number of sites (containing Tranche 1 and Tranche 2) and capacity of those sites located within each of the seven categories, which were judged as suitable for residential development. In total, 202 Tranche 1 and 2 sites with a capacity for 23,648 units were put forward for further testing. This reflects the 'cut-offs' identified for each settlement in Stage 3 (see Table 2.7) plus the following additional sites:

- Some six sites in Chigwell, Lower Nazeing and Stapleford Abbots that were identified at Step 3 of Stage 6.3 as potentially being able to contribute to the Council's five year housing land supply.
- Two Tranche 1 sites to the north of Waltham Abbey, which were assigned to category 7 in the land preference hierarchy. In parallel with the site selection process, the Council undertook some further technical assessment work which was used to refine the Draft Local Plan strategy and inform the decisions made on site allocations included in the Local Plan Submission Version. The sites subject to the further technical assessment were drawn from the draft site allocations and those sites identified for further testing as part of Stage 6.3. One of the scenarios which the Council wished to test was whether increasing the total quantum of residential development at Waltham Abbey would further support regeneration of the town and enable the provision of a new secondary school. There were insufficient suitable sites within categories 1-6 to provide this additional capacity and therefore sites located within category 7 were re-visited. The two Tranche 1 sites to the north of Waltham Abbey were selected since they are located in Flood

Zone 1 and would comprise a logical extension to the draft site allocations proposed in this area in the Draft Local Plan.

- 2.98 In accordance with paragraph 4.71, bullet four, a check was undertaken to make sure that at least 10% of the sites taken forward for further testing were on sites of half a hectare or less in order to accord with the emerging requirement set out in the Housing White Paper. The percentage exceeded 10% and therefore no additional sites were identified for further testing.
- 2.99 At the workshop, there was also consideration of whether sites should comprise mixed use development (in accordance with paragraph 4.72 of the SSM). Where such sites were identified for mixed use development, this is identified in the capacity assessment, the output of which is reported in Appendix B1.6.4 (Results of Stage 3 Capacity and Stage 4 Deliverability Assessments).

Table 2.7: Summary of site ranking by settlement

Settlement		Total	Category						
			1	2	3	4	5	6	7
Abridge	Sites	4					3		1
	Dwellings	573					469		104
Buckhurst Hill	Sites	13	10			1	1		1
	Dwellings	535	270			60	184		21
Chigwell and Chigwell Row	Sites	26	8	8	2		5	3	
	Dwellings	1,931	294	679	107		571	280	
Coopersale	Sites	3	1	2					
	Dwellings	52	20	32					
Epping	Sites	31	16		2		6	7	
	Dwellings	3,222	627		193		1,464	938	
Epping Green	Sites	1					1		
	Dwellings	92					92		
Fyfield	Sites	2				2			
	Dwellings	105				105			
Harlow	Sites	12					1	11	
	Dwellings	5,801					27	5,774	
High Beach	Sites	1							1
	Dwellings	40							40
High Ongar	Sites	4				1	1	1	1
	Dwellings	126				10	7	41	68
Loughton	Sites	34	20	13					1
	Dwellings	2,075	919	962					194
Nazeing	Sites	18	1		1	4	8		4
	Dwellings	2,925	8		43	1,058	1,649		167
	Sites	2						2	

Settlement		Total	Category						
			1	2	3	4	5	6	7
Lower Sheering	Dwellings	33						33	
	Sites	1							1
Moreton	Dwellings	26							26
	Sites	18	1		1	4	8		4
North Weald Bassett	Dwellings	2,132	16		12	533	1,352		219
	Sites	23	3	1	1		6	9	3
Ongar	Dwellings	2,895	52	10	26		1,341	1,212	254
	Sites	7					7		
Roydon	Dwellings	513					513		
	Sites	3					3		
Sheering	Dwellings	774					774		
	Sites	6			1			5	
Stapleford Abbots	Dwellings	128			14			114	
	Sites	12	5				7		
Theydon Bois	Dwellings	1,830	88				1,742		
	Sites	9					3		6
Thornwood	Dwellings	766					386		380
	Sites	24	5	7	1		2		9
Waltham Abbey	Dwellings	2,470	55	171	18		250		1,976
	Sites	254	70	31	9	12	62	38	32
TOTAL*	Dwellings	29,044	2,349	1,854	413	1,766	10,821	8,392	3,449

Key

	Sites ranked above the 'cut off' in the Land Preference Hierarchy for this settlement – all sites proceeded for further testing
	Sites ranked below the 'cut off' in the Land Preference Hierarchy for this settlement – some sites proceeded for further testing (see Step 4 of Stage 6.3)
	Sites ranked below the 'cut off' in the Land Preference Hierarchy – no sites proceeded for further testing

* Figures may not sum due to rounding.

2.8.3 Stage 3 and Stage 6.3: More Detailed Assessment for Residential Sites

2.100 All Tranche 1 and Tranche 2 site identified at Stage 3/Stage 6.3 were subject to more detailed capacity assessment. For Tranche 1 sites, this accorded with paragraphs 4.31 to 4.33 of the SSM which states that: “*the SLAA provides an indicative capacity for each site. This comprises a gross density taking account of any major site constraints... The density assumptions will be reviewed for all [candidate] Preferred Sites and updated as necessary...*”.

2.101 The SSM goes on to identify factors which the capacity assessment should seek to address:

- For larger sites in particular, there was a concern that applying net density to the gross site area may result in the capacity of the site being overstated once the need for internal roads and other infrastructure is taken into account.
- Prior to the Draft Local Plan, the Council was progressing work to consider whether a more balanced view should be taken to the provision of car parking and differential standards being applied across the District rather than the universal application of the car parking standards adopted by Essex County Council. As the detailed work had not been completed to inform the Draft Local Plan the Council will consider amendments to car parking standards through the development of a supplementary planning document. It was therefore determined that no adjustment to density would be made based on car parking standards.
- Densities would benefit from a check in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015 regarding support for higher densities at transport and commuter hubs.
- The appropriateness or ability of sites to accommodate mixed use development.

2.102 In addition, updated information was sought from land promoters/developers on their proposals for sites during June/July 2016 (refer to Section 2.9.1 for further details), which needed to be taken into account.

2.103 For the majority of the sites identified for further testing little masterplanning or site constraints work had been completed by the promoter of the site. Therefore, for each site the following assessment was undertaken in order to better understand the indicative net capacity of the site on a consistent basis:

- **Step 1:** Reviewing site polygons – the site polygon is the boundary of the site. The site polygon was reviewed against any updated information submitted by the land promoter/developer. The site area was amended as necessary to reflect the updated information received.
- **Step 2:** Accounting for policy constraints, which affect the developable site area – sites were checked to identify the extent of land affected by the major policy constraints identified at Stage 1 and other non-major policy constraints. Non-major policy constraints affecting the developable area of a site included areas of flood constraint, public open space, car-parking to be retained/re-provided, and areas of BAP protected habitat or other ecological designations. Full details of these constraints affecting the developable area of the site are provided in Appendix B1.5.3 (Detailed Methodology for More Detailed Assessment for Housing Sites). Where a major or non-major policy constraint

intersected with part of a site, the affected area was removed from further consideration in the capacity assessment.

- **Step 3:** Establishing a baseline density for the site – the purpose of this step was to understand what might be a suitable baseline density for development. All sites started with a baseline density of 30 dwellings per hectare. The density was then increased depending on the location of the settlement within the Council’s settlement hierarchy and the proximity of the site to both town centres and transport and commuter hubs in anticipation of the proposed changes to the NPPF published in December 2015. Further details of the adjustments made are set out in Appendix B1.5.3.
- **Step 4:** Baseline density – this step confirmed the baseline density for the site based on the outcomes of Step 3.
- **Step 5:** Adjusting baseline density – this step either reduced or increased the proposed density of the site using a qualitative approach taking into account non-major policy constraints which affect built form, height, scale, massing and layout (e.g. proximity to a Listed Building etc.) in addition to those considered at Step 2 above. This step also considered the local setting of the site and the likelihood of the site accommodating a mix of uses. Where this assessment concluded that only part of the site was suitable for development a revised extent of the site was identified.
- **Step 6:** Gross to net density conversion – this step converted the gross site density to a net site density to account for on-site ancillary uses. Larger sites were assumed to require more land for ancillary uses, streets and other infrastructure, open space etc., which reduces the developable capacity of the site.
- **Step 7:** Calculate site capacity – this step confirmed the indicative net capacity of the site, which included deducting the contribution of any existing residential dwellings located on-site or any extant planning permissions. For a limited number of sites, the outcome of the capacity assessment, additional information received on the site, and discussions at workshops indicated that only part of a site should proceed to the next stage. In these cases, the boundary was amended to reflect the preferred development area, and the capacity of the remaining part of the site was reduced accordingly.

2.104 Where additional information on site proposals had been submitted by the land promoter/developer (either historically or in response to the further information request) this was taken into account in the assessment. Further details of the methodology and how it was applied is presented in Appendix B1.5.3.

2.105 In accordance with paragraph 4.77 of the SSM, the same process was followed at Stage 6.3 for Tranche 2 sites. This included having regard to additional information submitted by land promoter/developer in response to the survey issued in June 2017.

2.106 The capacity assessments for Tranche 1 sites were revisited in 2017 where one or more the following criteria applied:

- additional information from the land promoter/developer had been received (either in response to the Draft Local Plan consultation or through correspondence received by the Council up to 30 September 2017; and/or
- where representations to the Draft Local Plan provided further information which needed to be taken into account.

2.107 Overall the assessment of indicative net capacity resulted in a reduction in the number of homes which could be delivered through the 202 Tranche 1 and Tranche 2 sites from 23,648 to 17,266. However, there is some variance with the capacity increasing on some sites and decreasing on others. Table 2.8 overleaf provides a summary of the indicative net capacity of the 202 sites broken down by settlement and by the seven categories identified in the previous section.

Table 2.8: Summary of indicative net capacity assessment by settlement and category of land

Settlement	Category 1	Category 2	Category 3	Category 4	Category 5	Category 6	Category 7	Total by settlement
	Dwellings							
Buckhurst Hill	183			31				214
Chigwell and Chigwell Row	163	243	65		124			595
Ongar	49	3	24		846	803		1,725
Coopersale	6	8						14
Epping	489		197		1,211	971		2,868
Fyfield				96				96
Harlow					29	4,591		4,620
High Ongar				10				10
Loughton	914	686						1,600
Lower Nazeing	6		29	231	18		9	293
Lower Sheering						14		14
North Weald Bassett	19		27	333	1,538			1,917
Roydon					159			159
Sheering					84			84
Stapleford Abbotts			8			33		41
Theydon Bois	56				1,275			1,331
Thornwood					311			311

Settlement	Category 1	Category 2	Category 3	Category 4	Category 5	Category 6	Category 7	Total by settlement
	Dwellings							
Waltham Abbey	43	133	27		445		726	1,374
Total by category*	1,928	1,073	377	701	6,040	6,412	735	17,266

* Figures may not sum due to rounding

2.108 Paragraph 4.33 of the SSM acknowledges that should the indicative net capacity assessment substantially reduce the estimated housing capacity, additional appropriate sites should be identified for assessment. Although the indicative net capacity assessment resulted in a reduction in the estimated capacity of the candidate Preferred Sites, it was considered in 2016 and 2017 that the resulting capacity still provided a sufficient buffer to account for the findings of the deliverability assessment. Therefore, additional sites were not identified for further assessment.

2.109 Further details of the indicative net capacity assessment undertaken for each site is presented in a further site proforma (with the deliverability assessment) presented in Appendix B1.6.4. The assessments are presented by settlement. For each settlement there is an overview map which identifies the sites within the settlement that were assessed, followed by proformas for each site which are presented in ascending order by site reference number.

2.110 For some sites, the indicative net capacity assessment resulted in the identified capacity being less than six units. In accordance with the SSM, a site must be capable of accommodating a minimum of six units if it is to be considered for allocation. Therefore, those sites where the capacity was below six units have not been identified for allocation but could come forward as windfall development. This decision is recorded in Appendix B1.6.6 (Results of Identifying Sites for Allocation).

2.111 Paragraph 4.34 of the SSM also stated that “*further consideration will also be given [at this stage] as to the potential mix/types of homes on a site to demonstrate how the needs outlined in the Strategic Housing Market Area plus Starter Homes will be met so that any revised mixes can be subject to further viability assessment.*” The Housing Implementation Strategy (Epping Forest District Council, December 2017) sets out how the housing mix in the District will be considered.

2.9 Stage 4 and Stage 6.4: Deliverability

2.9.1 Land Promoter/Developer Survey

2.112 For Stage 4, paragraph 4.39 of the SSM states: “*Information collected as part of the SLAA will be supplemented by updated information from*

promoters/developers/landowners, findings from the strategic sites assessment and further technical studies. As a minimum, a proforma will be sent to all sites promoters/developers/landowners (as appropriate), which proceed to Stage 2 to validate the information contained in the SLAA and to seek further, more detailed information on proposals.” This requirement is reflected in Stage 6.4, where at paragraph 4.81 the SSM confirms that: “Information collected from promoters Call for Sites forms will be supplemented by updated information from promoters/developers/landowners and further technical studies. As a minimum, a proforma will be sent to all Tranche 2 site promoters/developers/landowners (as appropriate), which proceed to Stage 6.2 to validate the information provided in the Call for Sites form and to seek further, more detailed information on proposals.”

- 2.113 To ensure that data held on Tranche 1 sites were accurate, in a consistent format and up-to-date, a survey was developed in 2016. This was distributed to promoters, developers and/or landowners in the form of an online survey. The survey also contained existing information held on the Council’s SLAA database and requested updates to this information where necessary, as well as responses to additional questions. The questions were developed in coordination with the Council, drawing on best practice from elsewhere and responding to the Council’s information requirements including those topics identified for assessment at Stage 4 of the SSM.
- 2.114 A series of questions were posed through the survey, a copy of which is provided at Appendix B1.6.1 (Land promoter/developer survey), which can be broadly grouped as follows:
- Contact information;
 - Ownership and availability;
 - Achievability;
 - Land use, masterplanning and infrastructure;
 - Site management;
 - On-going engagement.
- 2.115 Respondents were also provided with the opportunity to submit additional information to support their responses, including drawings, plans and any other relevant technical work undertaken to date.
- 2.116 Invitations to complete the survey were issued electronically in a series of tranches to promoters, developers and/or landowners for all sites that proceeded to Stage 2, where contact information was available. In total, 311 proformas were issued at this stage (June 2016). Where up-to-date landownership information was not held by the Council or a ‘bounce back’ was received to the email address held by the Council and sites had proceeded to Stages 3 and 4, landownership searches were undertaken through HM Land Registry. Following this, an additional 21 proformas were distributed (July 2016). Respondents were provided a minimum of

two weeks to respond to the survey. In total, 175 survey responses were received.

2.117 The same survey was used in 2017 to check the information received by the Council when the Tranche 2 site was promoted remained correct, as well as seeking responses to additional questions. Invitations to complete the survey were issued electronically to promoters, developers and/or landowners for all sites that proceeded to Stage 6.2, where contact information was available. In total, 90 proformas were issued at this stage (June 2017). Where up-to-date landownership information was not held by the Council or a ‘bounce back’ was received to the email address held by the Council landownership searches were undertaken through HM Land Registry. Following this, an additional four proformas were distributed (July 2017). Respondents were provided a minimum of three weeks to respond to the survey and, in total, 43 survey responses were received.

2.9.2 Availability and Achievability Assessment

2.118 Paragraph 4.38 of the SSM states that: *“the purpose of Stage 4 is to consider the deliverability of the candidate Preferred Sites to inform the housing trajectory for the Plan. Stage 1, 2 and 3 considered the suitability of the site and, therefore, this stage focuses on whether a site is deliverable, specifically:*

- *Whether the site is available now, or is it likely to become available during the Local Plan period?*
- *Whether there is a reasonable prospect that development will be achievable within the appropriate timescales?”*

2.119 At paragraph 4.80 of the SSM, it states that the purpose of Stage 6.4 is the same.

2.120 The SSM provides an indication of the matters which will be subject to the availability and achievability assessment. In applying the SSM, the methodology for this assessment was further refined to include assessment against the following criteria:

- **Availability:** site ownership, existing uses, on-site restrictions and site availability. Information was also collected on proposed development phasing, which was not taken into account as part of the availability assessment but instead informed the housing trajectory.
- **Achievability:** site marketability, site viability, on-site physical and infrastructure constraints, impact on capacity of primary and secondary schools in the Schools Planning Area and at individual primary and secondary schools, access to open space, access to health facilities and impact on mineral deposits.
- **Cumulative achievability (in combination with proposed traveller site allocations):** 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. Following representations received to the Draft Local Plan consultation, two additional cumulative achievability criteria were added (impact on water networks and impact on wastewater networks).

- **Overview assessment of constraints:** insurmountable constraints.
- 2.121 For each criteria a RAG rating system was utilised using a scale of three scores. Further details on each criteria including how the assessment was undertaken are provided at Appendix B1.6.2 (Detailed Methodology for Deliverability Assessment). The methodology followed for Tranche 2 sites was in general conformity with that followed for Tranche 1 sites; the differences were minor and related to new/updated information being available. Where there were any differences in methodology followed between Tranche 1 and Tranche 2 sites this is identified in Appendix B1.6.2.
- 2.122 In 2016, each of the sites subject to Stage 4 were assessed against the availability and achievability criteria. This assessment was completed using a combination of GIS analysis, information from the land promoter/developer survey or other information held by the Council and planning judgement. Where a planning judgement was made an explanation for this judgement is provided in the deliverability proforma presented in Appendix B1.6.4.
- 2.123 In 2017, in accordance with paragraphs 4.83 and 4.84 of the SSM, all Tranche 2 sites and Tranche 1 sites not previously subject to Stage 4 were assessed at Stage 6.4. 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.
- 2.124 Moderation of the deliverability assessment was undertaken as part of the allocation workshops on 28 July 2016 and 18/19 October 2017. Generally there was agreement on the way the SSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment.
- 2.125 The availability and achievability assessment provided a more nuanced picture of the appropriateness of sites for allocation. Table 2.9 provides an overview of the availability of the 202 Tranche 1 and Tranche 2 sites subject to the deliverability assessment. It shows that some 14,790 homes

can be delivered on sites where the availability has been confirmed with approximately 2,476 homes located on sites falling below the six unit allocation threshold, sites where the landowner is known but timescale for bringing forward development is not, or where the landowner has confirmed the site is not available for development within the Plan period.

- 2.126 Further details of the deliverability assessment undertaken for each site is presented in a further site proforma (with the indicative net capacity assessment) presented in Appendix B1.6.4. The assessments are presented by settlement. For each settlement there is an overview map which identifies the sites within the settlement that were assessed, followed by proformas for each site which are presented in ascending order by site reference number.

Table 2.9: Summary of availability assessment by settlement; *figures may not sum due to rounding

Settlement	Below unit threshold	Below unit threshold	Available	Available	Availability Unknown	Availability Unknown	Not Available	Not Available	Total Number of Sites	Total Site Capacity
	Number of Sites	Site Capacity	Number of Sites	Site Capacity	Number of Sites	Site Capacity	Number of Sites	Site Capacity		
Buckhurst Hill	2	8	5	151	1	7	3	48	11	214
Chigwell and Chigwell Row	7	10	9	350	4	47	1	188	21	595
Coopersale	2	8	1	6					3	14
Epping	2	7	20	2,044	7	806	2	11	31	2,868
Fyfield			2	96					2	96
Harlow			11	4,502	1	118			12	4,620
High Ongar			1	10					1	10
Loughton	6	20	18	1,163	4	99	5	318	33	1,600
Nazeing			7	287	1	6			8	293
Lower Sheering	1	0	1	14					2	14
North Weald Bassett			11	1,659	2	7	1	251	14	1,197
Ongar	2	3	14	1,523	2	151	2	48	20	1,725
Roydon			6	134	1	25			7	159
Sheering			3	84					3	84
Stapleford Abbots			2	41					2	41
Theydon Bois	1	2	8	1118	3	211			12	1,331
Thornwood			3	311					3	311
Waltham Abbey	2	6	8	1,297	4	20	3	51	17	1,374
Grand Total*	25	64	130	14,790	30	1,497	17	915	202	17,266

2.9.3 Identify Sites for Allocation

2.127 In 2016, following completion of the indicative net capacity assessment and the availability and achievability assessment a Local Plan Officer Working Group meeting was held on 28 July 2016 to identify which sites should be allocated in the Draft Local Plan. At the meeting a decision was made for each site as to whether it should be allocated or not in the Draft Local Plan. This decision was informed by all relevant material considerations, which included the findings of the availability and achievability assessment and the emerging settlement visions, which helped to identify the quantum of development which should be allocated in each settlement. A justification for the judgements made was documented. In accordance with paragraph 4.43 of the SSM a second Member workshop was held on 6 August 2016 to ‘check and challenge’ the sites identified for allocation. Where appropriate, Member feedback was incorporated in the decisions made. This process informed the draft site allocations presented in the Draft Local Plan.

2.128 In 2017, the Council needed to re-visit the conclusions reached in 2016 to determine whether any draft site allocations should be removed from the Local Plan Submission Version and/or whether any sites not previously identified for allocation should be.

2.129 In accordance with paragraph 4.86 of the SSM, the following process was followed. All residential Tranche 1 and Tranche 2, which reached Stage 4/Stage 6.4 sites were considered along with employment and traveller sites. Prior to a workshop on 18/19 October it was agreed with the Council that the judgements reached on Tranche 1 sites assessed in 2016 where it did not result in a site being proposed for allocation would not be re-visited except where they met one or more of the following criteria:

- There was a material change in the availability and achievability assessment. One site was identified which met this criteria.
- The decision made in 2016 on whether or not to allocate the site was finely balanced. For example, the decision not to allocate a site was based on it being sequentially less preferential as opposed to unavailable/unachievable. Some three sites were identified which met this criteria.
- The site could potentially contribute to the Council’s five year land supply (based on the assessment undertaken by the Council for Stage 6.3). Some two sites were identified which met this criteria.
- There was a change to the site capacity, which meant that it could now accommodate a minimum of six units. No sites were identified which met this criteria.

2.130 Therefore, at the workshop on 18/19 October the Council considered, for each settlement sites from the following sources: draft site allocations; Tranche 1 sites not allocated in 2016 but identified for re-assessment; Tranche 1 sites not subject to further assessment in 2016; and Tranche 2 sites subject to further assessment.

2.131 All relevant material considerations were taken into account when determining which sites to allocate in the Local Plan Submission Version. In accordance with paragraph 4.86 of the SSM, this included:

- the findings of the availability and achievability assessment;
- the findings of the transport, education and HRA technical assessments¹⁵;
- accordance with the updated settlement visions¹⁶;
- the potential of the site to contribute to the Council's five year land supply; and
- providing a mix of size of sites including at least 10% of the sites allocated for residential development being of half a hectare or less.

2.132 The following additional material considerations were also taken into account:

- accordance with the Local Plan Strategy and associated hierarchy (which is in general conformity with the site selection hierarchy set out at paragraph 4.26 of the SSM) in terms of the distribution of growth across the District and maximising the sites allocated in each category before moving onto the next;
- addressing infrastructure constraints identified through the emerging Infrastructure Delivery Plan and surface water flooding assessment undertaken by the Council;
- feedback from the Draft Local Plan consultation;
- emerging Neighbourhood Plans which include proposed site allocations; and
- local knowledge.

2.133 A justification for the decisions made at the workshop on 18/19 October was documented; this write-up is presented in Appendix B1.6.6.

2.134 Where sites were proposed for allocation they were assessed along with other residential and traveller sites identified in that settlement for the cumulative achievability of the proposals. Following this additional assessment a review of insurmountable constraints was undertaken. Each site was assessed 'in the round' to identify whether any restrictions or constraints, either individually or collectively, could be deemed insurmountable. The assessment took into account all achievability criteria in the Stage 4/Stage 6.4 assessment. The assessment was undertaken qualitatively and utilised professional judgement to determine whether restrictions or constraints would be likely to be insurmountable. The assessment of insurmountable constraints is documented in Appendix

¹⁵ Details of the technical assessments and results are presented in Appendix B1.6.5 (Scenario Testing) produced by the Council.

¹⁶ These are presented in the Local Plan Submission Version.

B1.6.6. On the basis of this further assessment no amendments were made to the proposed site allocations.

2.135 Further details on whether specific sites have been identified for allocation along with the associated justification is presented at Appendix B1.6.6. Maps are presented by settlement, which confirm whether a site has been identified for allocation or not. The accompanying table provides a justification on a site by site basis for the judgement made. The Council also checked that the proposed site allocations provided a five year supply of housing land. Details of the Council's housing trajectory is presented in the Housing Implementation Strategy and Local Plan Submission Version.

2.136 In summary, the Council has selected a portfolio of sites which will achieve the Local Plan Strategy; providing residential development across the settlements in the District, which supports settlement visions and, where relevant, the aspirations of Neighbourhood Plans. The sites proposed for allocation comprise:

- three garden communities around Harlow¹⁷;
- 80 sites across the rest of the District¹⁸; and
- eight sites that will be shown as allocations since they have benefitted from the grant of planning permission between 1 April and 30 September 2017 and are above the six unit threshold.

2.137 The site allocations proposed for inclusion in the Local Plan Submission Version are broadly consistent with those contained in the Draft Local Plan. Amendments to the Draft Local Plan site allocations were made in the following settlements for the reasons set out below. If a settlement is not listed below the site allocations remain as proposed in the Draft Local Plan.

- **Chigwell:** site allocations amended to reflect the emerging Neighbourhood Plan and additional urban brownfield sites promoted in 2017.
- **Coopersale:** site allocations amended to reflect planning permissions secured since 2016, updated availability information and additional urban brownfield sites promoted in 2017.
- **Epping:** site allocations amended to reduce the overall quantum of growth proposed in the settlement and associated impacts on Epping Forest in terms of air quality and traffic congestion. Focus of non-urban brownfield sites to the south of the settlement ensured greater alignment with the emerging Neighbourhood Plan and provided greater critical mass and potential for new and improved infrastructure.

¹⁷ 11 residential sites around Harlow recommended for allocation were merged to form the three garden communities allocated in the Local Plan Submission Version. Further details can be found in Appendix B1.6.6.

¹⁸ Three residential sites in Ongar and seven residential sites in Epping recommended for allocation were merged to form three site allocations in the Local Plan Submission Version. Further details are recorded in Appendix B1.6.6.

- **Fyfield:** site allocation amended to incorporate a site promoted in 2017, the scale and location of which is more appropriate for the scale of the settlement.
- **Loughton:** site allocations amended and overall quantum of development reduced on managed open spaces in response to representations to the Draft Local Plan and additional urban brownfield sites promoted in 2017.
- **Nazeing:** site allocations amended to reduce the overall quantum of growth proposed in the settlement, and to address representations received to the Draft Local Plan regarding impact of draft site allocations on heritage assets.
- **North Weald Bassett:** site allocations amended to reflect a reduced level of growth in response to traffic impacts and representations to the Draft Local Plan.
- **Ongar:** site allocations reduced to reflect updated availability information; limited development proposed to the south east of the settlement to support its sustainable growth.
- **Roydon:** site allocations amended to reflect updated proposals for sites and incorporate additional greenfield site adjacent to the settlement promoted in 2017 which benefits from the settlement's transport links.
- **Stapleford Abbots:** site allocations amended to reflect planning permissions secured since 2016 and additional greenfield site adjacent to the settlement promoted in 2017.
- **Theydon Bois:** site allocations amended and overall quantum of development reduced to address concerns regarding potential impacts on Epping Forest arising from increased recreational pressure.
- **Thornwood:** site allocations amended to incorporate additional greenfield site adjacent to the settlement.
- **Waltham Abbey:** site allocations amended to reflect updated information and additional sites included to support the Council's aspiration to encourage the re-location of King Harold Secondary School to the north of the settlement.

2.138 In total, these 91 sites will support delivery of approximately 9,816 homes across the District. This is in excess of the 8,046 homes needed to meet the housing requirement in the District and ensures sufficient flexibility to respond to changes in the status of the proposed site allocations and the requirements of the market.

2.139 Table 2.10 identifies the estimated likely number of homes in each settlement that the Council will make provision for through the Local Plan Submission Version and confirms the number of sites identified for allocation in each settlement.

Table 2.10: Estimated like number of homes by settlement

Settlement	Estimated likely number of homes	Number of sites identified for allocation
Buckhurst Hill	87	3
Chigwell	376	11
Ongar	590	8
Coopersale	6	1
Epping	1,305	11
Fyfield	14	1
Harlow and Gilston Garden Town Communities	3,911	4 ¹⁹
High Ongar	40	2
Loughton	1021	18
Lower Sheering	14	1
Nazeing	122	4
North Weald Bassett	1,050	5
Roydon	62	4
Sheering	84	3
Stapleford Abbots	47	3
Theydon Bois	57	3
Thornwood	172	2
Waltham Abbey	858	7

2.9.4 Exceptional Circumstances

2.140 In order to support the proposed site allocations alterations will be required to the District's Green Belt boundary. The NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary, whether this is to remove or create areas of Green Belt. There is no clear definition of what amounts to exceptional circumstances, but case law is clear that any justification must be responsive to local conditions and take into account a range of factors.

2.141 As set out in Section 2.1, the Council has worked in partnership with the other local authorities within the HMA to identify the objectively assessed housing need for the Plan period. Table 2.1 identifies the housing requirement for the District, which represents a considerable increase over previous development rates. However, case law indicates that the need to make provision for development requirements is not, in itself, sufficient to

¹⁹ The four sites referred to comprise the three garden communities at East of Harlow, Latton Priory and Water Lane Area plus SR-0937, which is proposed for allocation for approximately 11 homes.

justify the exceptional circumstances necessary to make alterations to the Green Belt boundary. It is, however, part of the overall set of local conditions which together can demonstrate exceptional circumstances.

- 2.142 As indicated in the Distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Areas MoU given local circumstances including constraints and lack of available land it would not be possible for other authorities within the HMA to assist in meeting the housing requirement of Epping Forest District.
- 2.143 Successive studies (including the Strategic OAHN Spatial Options Study for the West Essex and East Hertfordshire authorities (AECOM, 2016) and the Harlow Strategic Sites Assessment (AECOM, 2016)) have demonstrated that Harlow is the most sustainable location to focus growth across the HMA. In order to achieve this aspiration some growth would need to be outside of the administrative boundaries of Harlow within Epping Forest and East Hertfordshire Districts. This is reflected in the designation of the Harlow and Gilston Garden Town in January 2017.
- 2.144 In the rest of the District, the SSM sets out a clear strategy to minimise the use of Green Belt land for development. Paragraph 4.26 of the SSM sets out a sequential approach in which non-Green Belt land is prioritised for development over land within the Green Belt; within the Green Belt sites on land of least value are preferred over sites on land of most value to the Green Belt. This approach was informed by feedback from the Community Choices consultation in 2012, which identified that the Council needed to be certain that all opportunities for the re-use of brownfield land were identified before land is released from the Green Belt.
- 2.145 In addition the feedback from the community influenced the Council commissioning the Settlement Capacity Study (2016), which sought to ensure that potential opportunities to redevelop existing brownfield sites within settlements and outside of the Green Belt were identified. Sites identified through this study were included in the SLAA and subject to the caveats identified in Section 2.4 of this report assessed through the site selection process. Table 2.7 also shows that there is insufficient suitable land within non-Green Belt area to meet the housing requirement of the District within the Plan period. In order to meet the development requirement identified, and achieve sustainable forms of development in and around existing settlements, alterations to the Green Belt boundaries are necessary.
- 2.146 The site allocations proposed in the Local Plan Submission Version will require alterations to the Green Belt boundary in the following settlements: Buckhurst Hill; Chigwell; Epping; Fyfield; High Ongar; Lower Sheering; Nazeing; North Weald Bassett; Ongar; Roydon; Sheering; Stapleford Abbots; Theydon Bois; Thornwood; Waltham Abbey; and around Harlow.
- 2.147 For each settlement consideration has been given to the aspirations for each settlement, the most suitable broad locations for growth, the suitability of individual sites to accommodate development and their deliverability over the Plan period. The sites proposed for allocation therefore represent the

minimum land take required from the Green Belt to enable the Council to meet the District's housing requirement through a strategy that is both sustainable and deliverable. Such an approach accords with the requirements of national policy.

3 Identifying Sites for Traveller Accommodation

3.1 This chapter contains an introduction to the District's traveller accommodation requirement, provides an overview of the methodology developed to guide the selection of traveller sites in the Epping Forest District Council's Local Plan Submission Version and presents the findings of the site selection process.

3.1 Existing Traveller Provision in the District

3.2 As at 30 September 2017 within Epping Forest District there were:

- some 139 authorised permanent pitches²⁰ in the District (comprising 228 caravans);
- some nine authorised temporary personal permissions²¹ for pitches with a total of 19 caravans; and
- some 16 unauthorised²² caravans on sites that have never been granted planning permission and 38 unauthorised caravans which are the subject of planning applications or appeals and are awaiting decisions.

3.3 In relation to the provision for Travelling Showpeople in the District there were nine yards in one location accommodating in total up to 39 caravans.

3.4 These pitches, yards and caravans are on sites within the Green Belt and, with the exception of one site, are all in private ownership. Since 2004 there has been a steady decline in number of unauthorised caravans and a commensurate rise in the number of authorised sites as temporary and unauthorised sites have become regularised through planning applications and appeals.

3.5 A key finding of the consultation²³ undertaken in 2008 on traveller accommodation in the District was that the local traveller community in Epping Forest District is unusually settled, with a significant number living in chalets rather than caravans. However, under the Government's revised

²⁰ A pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans. Fire safety concerns and functional requirements (amenity unit, large trailer, touring caravan, drying area, lockable sheds, parking space) effectively set a minimum pitch size. An average pitch size of 0.1 hectares is used across the East of England and was therefore used as the basis for site search in this report.

²¹ In cases where a temporary pitch is permitted the planning permission is always personal to the applicant and granted for a stipulated period, consistent with Section 70(1)(a) of the Town and Country Planning Act 1990.

²² An unauthorised development refers to the occupation of land which is owned by travellers but for which they do not have planning permission to use the land for residential purposes. An unauthorised encampment refers to unauthorised occupation of land which is not owned by travellers.

²³ 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.

definition for ‘travellers’ it is likely that many of these ethnic travellers will no longer be considered as ‘travellers’ as defined in the DCLG’s Planning Policy for Traveller Sites (August 2015) (the PPTS). Those interviewed in 2008 found it difficult to consider living in other parts of the District – the concept of choice being unfamiliar with general restrictions on site availability and opposition from the settled community. Others wished to be allowed to stay where they were, particularly if they had children in school.

- 3.6 Larger existing sites tend to be overcrowded with small pitches on sites that are difficult to expand. Smaller existing sites cater for individuals, often elderly people, as well as extended families and hence generate more pressure to grow.
- 3.7 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.

3.2 Traveller Housing Requirement

3.2.1 Gypsy and Traveller Accommodation Assessment

- 3.8 To identify the requirement for traveller accommodation the PPTS requires an assessment of current and future pitch requirements. In undertaking the Gypsy and Traveller Accommodation Assessment (GTAA), the PPTS requires the Council to determine whether households living on sites, yards, encampments and in bricks and mortar fall within the planning definition of a traveller.
- 3.9 The PPTS introduced a definitional change which removed the term “*persons... who have ceased to travel permanently*” from the definition of a traveller; the implication of this change being the fact that an individual is an ethnic Gypsy or Traveller is not directly relevant to their land-use planning needs – rather a nomadic habit of life is relevant and that individuals have not ceased travelling permanently. As such, a local planning authority must make appropriate provision to meet the accommodation needs of “*persons of nomadic habit of life*”. The PPTS does not therefore recognise those persons who have ceased permanently “*to be of nomadic habit of life*” to have land-use planning needs that fall within the provision of the PPTS, rather their housing needs are assessed with the rest of the settled community through the SHMA.
- 3.10 Opinion Research Services (ORS) was commissioned by the Essex Planning Officers Association (EPOA) to undertake a GTAA in 2014. An update to the GTAA was commissioned by EPOA in 2016 to bring the evidence in line with the PPTS and the amended definition for travellers. ORS produced an Interim Briefing Note on the emerging updated GTAA

for Epping Forest District in September 2016 to support the Draft Local Plan consultation; this was in advance of the publication of the full updated GTAA for all Essex authorities. The full update to the GTAA was completed in October 2017 and the final version was published in February 2018. The GTAA uses September 2016 as the base date reflecting when the surveys with the traveller community were undertaken.

- 3.11 In undertaking the update to the GTAA ORS attempted to: complete interviews with residents found on all occupied pitches and yards, including any currently unauthorised, within Epping Forest District; and undertake a household survey to collect information necessary to assess each household against the new definition in the PPTS. Repeat visits were made to households where it was not possible to conduct an interview because they were not in or not available.
- 3.12 In completing the household survey the outcomes from the questions on travelling activities determined the status of each household against the new definition in PPTS. Only those households that meet, or may meet, the new definition form the components of need to be included in the updated GTAA. However, it should be noted that the updated GTAA also provides information that assists in understanding needs of traveller households that do not meet the planning definition.
- 3.13 The Interim Briefing Note (2016)²⁴ indicated the requirement to provide 38 pitches and 1 additional yard over the Plan period 2011- 2033 for traveller households that meet the PPTS definition. The Draft Local Plan, consulted upon in Autumn 2016, was based upon this data.
- 3.14 The updated GTAA, completed in October 2017 and published in February 2018, covered the period 2016 to 2033. It identified a requirement for 28 pitches and 1 yard. Since the base date for this study is September 2016 the Council wanted to ensure the need position reflected the full Plan period (i.e. started in 2011) and was up-to-date as of 30 September 2017. It therefore used its own records to update completions for the period 2011 to 2016 and the need for the Plan period arising over the period September 2016 to September 2017. This means that as of 30 September 2017 there is an identified requirement for 64 pitches and 1 additional yard over the Plan period 2011-2033.
- 3.15 Table 3.1 summarises the components of the land supply, which will be delivered to meet the Council's traveller accommodation requirement. Once completions between April 2011 and September 2017 are accounted for, there is a residual requirement of 32 pitches and 1 yard for which land in the District needs to be found. It should be noted that it was not possible to deduct from the overall need figure the nine temporary pitches authorised between April 2011 and September 2017. This is because these planning permissions have all been granted on a personal permission basis pertaining

²⁴ Epping Forest District Council Gypsy and Traveller Accommodation Assessment Interim Briefing Note (ORS, September 2016)

to the applicant and all are permitted for a stipulated period. Instead, this study has considered the scope for permanently regularising these sites.

Table 3.1: Traveller pitch supply

Category	Pitches/yards
Number of pitches required 2011-2033	64 pitches and 1 yard
No of pitches permitted and implemented to 30 September 2017	32 pitches
Remaining requirement to be provided	32 pitches and 1 yard

3.2.2 Qualitative Need Considerations

- 3.16 In terms of site location previous responses²⁵ 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.
- 3.17 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.
- 3.18 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 respondents²⁶ 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.
- 3.19 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.

²⁵ 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.

²⁶ 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.

3.2.3 Traveller Site Size Preferences

- 3.20 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 15 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.
- 3.21 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 more than five pitches.

3.3 Overview of Traveller Site Selection Methodology

- 3.22 The TSSM seeks to take careful account of national policy and guidance and, in particular the considerations outlined in the PPTS. Where possible the Council has sought to align the TSSM with the SSM.
- 3.23 In response to the requirements of government policy and practice guidance contained within the NPPF, PPG and the PPTS the Council worked collaboratively with Arup to develop a TSSM to identify appropriate sites for traveller accommodation to meet the identified requirement for inclusion in the Draft Local Plan. The TSSM was drafted in April 2016 and finalised in August 2016 following Counsel's advice.
- 3.24 The purpose of the TSSM is to provide a robust framework that guides the preparation of an adequate evidence base to support the proposed site allocations. It explains the proposed methodology for identifying appropriate sites for traveller accommodation to meet the identified requirement. In order for the site selection process to be adequate, the evidence base must be robust, assessments should be founded upon a cogent methodology, undertaken in a transparent manner and fully documented at key stages. Professional judgements require justification and site-selection decisions must be clearly explained.
- 3.25 The TSSM identifies seven stages through which sites are sieved and subject to more detailed assessment in order to identify the proposed site allocations for traveller accommodation for inclusion in the Draft Local Plan. The seven stages can be summarised as follows:
- Stage 1 Identifying Sites for Consideration – identify sites which should be subject to the TSSM. The TSSM sets the criteria for narrowing broad

locations to sites and the approach to defining opportunities for intensification or extension of existing traveller sites.

- Stage 2 Site Availability – understand whether sites may be available for traveller accommodation to enable a decision to be made about which sites should proceed for further testing.
- Stage 3 Major Policy Constraints – identified sites which were subject to one or more of these constraints and therefore were not considered to be suitable for development
- Stage 4 Quantitative and Qualitative Assessment – undertook more detailed assessment of sites to understand their relative suitability for development.
- Stage 5 Identify Candidate Preferred Sites – identified those sites which were considered suitable for development and were subject to further capacity and deliverability assessment.
- Stage 6 Deliverability – assessed the availability and achievability of sites to enable decisions to be made about which sites to allocate and to ensure that land can be provided throughout the Plan period.
- Stage 7 Sustainability Appraisal/Habitats Regulation Assessment of Candidate Preferred Sites – established the impact of the candidate Preferred Sites alone and in combination.

3.26 The TSSM also contained Stage 8 Review of Candidate Preferred Traveller Sites Following Draft Local Plan Consultation, which confirmed that following the Draft Local Plan consultation the Council would review the draft site allocations against any representations received and updated technical information. Where there are clear planning reasons the Council may then alter the assessment or discount draft site allocations and/or identify new sites for allocation in the Local Plan Submission Version.

3.27 To provide further clarity on which sites would be assessed and how as part of Stage 8, the TSSM was updated in February 2017 and finalised in June 2017 following Counsel advice. The updates addressed, where relevant, representations received to the Draft Local Plan consultation on the TSSM and confirmed the process the Council followed in developing its Local Plan Submission Version. In the updated TSSM, Stage 8 was divided into five sub-stages, which can be summarised as follows. Broadly the sub-stages reflect the process followed for Stages 1 to 6 of the TSSM.

- Stage 8.1 Identifying Sites for Consideration – identified amended or new sites for assessment through the TSSM.
- Stage 8.3 Major Policy Constraints – identified sites which were subject to one or more of these constraints and therefore were not considered to be suitable for development.
- Stage 8.4 Quantitative and Qualitative Assessment – undertook more detailed assessment of sites to understand their relative suitability for development.

- Stage 8.5 Identify Candidate Preferred Sites – identified those sites which were considered suitable for development, best met the Council’s Local Plan Strategy and were subject to further capacity and deliverability assessment.
 - Stage 8.6 Deliverability – assessed the availability and achievability of sites to enable decisions to be made about which sites to allocate and to ensure that land can be provided throughout the Plan period.
- 3.28 The TSSM also identifies that following the conclusion of the site selection process, the Council will undertake further work to inform the Local Plan Submission Version including:
- SA and HRA, which will include new or amended sites in accordance with the relevant regulations;
 - Infrastructure Delivery Plan; and
 - Transport modelling.
- 3.29 A full version of the TSSM finalised in June 2017 is provided at Appendix D.
- 3.30 The remainder of this chapter explains how the TSSM has been applied in the preparation of the Draft Local Plan published for consultation in Autumn 2016 and the Local Plan Submission Version published in December 2017. It provides a summary of the results, with reference made to detailed appendices which provide further detail of the assessment undertaken and justification for key decisions made. This includes Appendix E1.1 (Overview of Assessment of Traveller Sites), which provides an overview of how each site proposed for traveller accommodation was assessed at each stage of the TSSM.
- 3.31 The Council was responsible for preparation of the methodology and conducting Stage 1, Stage 2 and Stage 8.1 of the TSSM; the write-up presented in Sections 3.4 and 3.5 and associated appendices was produced by the Council with Stages 3 to 6 and 8.3 to 8.6 led by Arup.
- 3.32 It should also be noted that the results of the SA and HRA are documented under separate cover in the Sustainability and Equalities Impact Appraisal (AECOM, December 2017) and the Habitats Regulations Assessment (AECOM, December 2017).

3.4 Stage 1 and Stage 8.1: Identifying Sites for Consideration

- 3.33 In advance of undertaking the TSSM the sites to be subject to it were identified. Three tranches of sites were subject to the TSSM: Tranche 1 & 2 sites were assessed in 2016, with Tranche 3 sites assessed in 2017. The process followed to identify sites for assessment for each Tranche is set out in the following sub-sections.

3.4.1 Tranche 1 & 2 Sites

3.34 Paragraph 16 of the TSSM identifies the potential sources of sites which will be subject to the TSSM. As explained in paragraphs 35 and 36 of the TSSM, the identification of sites through these sources was undertaken in two tranches. These comprised:

- Tranche 1 sites, which were sourced from:
 - the Council's Call for Sites (paragraph 16(e)); and
 - other appropriate locations (paragraph 16(h)). Details of the methodology followed to identify sites in appropriate locations and the results of the search are reported in Appendix E1.3 (Results of Stage 1 Assessment).
- Tranche 2 sites, which were from the sources identified at sub-paragraphs 16(b) to 16(d), 16(f), 16(g) and 16(i).

3.35 The total numbers of sites and pitches that could theoretically be derived from sources (d)-(i) is shown in summary form in Table 3.2. Pitch numbers are shown where pitch estimate was possible at this stage. Full details are provided in Appendix E1.3. It should be noted that sites identified through paragraph 16(a) (extant planning permissions or pitches/yards under construction) are reflected in the supply position shown in Table 3.1.

Table 3.2: Potential pitches/yards from identified site sources at end Stage 1²⁷

Site Source	Potential additional Traveller pitch accommodation source	Total no. of sites into sieve	Total no. of sites proceeding to Stage 2	Potential no. of additional pitches/yards
(d)	Sites identified for extension or intensification	41 sites	23 sites	98 pitches 1 yard
(e)	Privately owned sites being promoted for traveller sites identified through the Council's Call for Sites.	5 sites	5 sites	40 pitches
(f)	Council and other publicly owned land within the District.	0 new sites	No potential sites on publicly owned land have been identified	0
(g)	Identified in draft development plan in 2008/09	15 sites	15 sites	164 pitches

²⁷ This table represents the status of sites as documented in the Report on Site Selection published in September 2016. The figures have not been amended to reflect requests for sites to be withdrawn from consideration from the site selection process and/or any sites which may be superseded due to amended site boundaries being identified/promoted.

Site Source	Potential additional Traveller pitch accommodation source	Total no. of sites into sieve	Total no. of sites proceeding to Stage 2	Potential no. of additional pitches/yards
(h)	Sites identified from desk based study	871 locations	60 sites	442 pitches
(i)	Working with Registered Providers of social housing to develop and manage a site or sites for the travelling community	Unknown	Potential interest shown from one RSL to develop / run 1 traveller site	Unknown at this stage

3.4.2 Tranche 3 Sites

3.36 In accordance with paragraph 71 of the TSSM, the following sources were used to identify Tranche 3 sites for traveller accommodation:

- Refused and withdrawn planning applications, live planning applications and pre-application enquiries received between 1 April 2016 and 31 March 2017.
- Call for Sites submissions received between 18 May 2016 and 31 March 2017.
- Additional sites identified with temporary permissions or unauthorised sites that may potentially be suitable for regularisation.
- Intensification and/or extension of the additional sites identified with temporary permissions or unauthorised sites that may potentially be suitable for regularisation and also have the potential for intensification and/or expansion in accordance with the requirements set out in Stage 1b.
- Representations from site promoters received in response to the Draft Local Plan consultation which identified new sites and/or proposals for Tranche 1 and Tranche 2 sites which are materially different from that previously assessed. There were no new or amended sites identified through representations that are being promoted for traveller accommodation.

3.37 To maintain consistency with Tranche 1 & 2 sites, Tranche 3 sites were reviewed to check they accorded with paragraph 12 of the TSSM.

3.38 Some 11 Tranche 3 sites were identified for assessment for traveller accommodation.

3.39 In addition, Tranche 1 & 2 sites were reviewed to determine whether they remained 'live' proposals, which should continue to be considered through the site selection process. The checks undertaken to determine this comprised:

- Site promoters confirming that the proposals assessed as part of Tranche 1 & 2 did not reflect their current proposals and instead a

materially different scheme should be considered as part of the third Tranche of sites. No sites were identified which met this criteria.

- Site promoters confirming that a site was no longer available for the promoted development. There were two sites where this was the case.
- Draft site allocations being granted planning permission. No sites were identified which met this criteria.
- Sites previously sifted out due to being located wholly outside the Settlement Buffer Zones (see Section 3.6 for further details). There were four sites where this was the case.

- 3.40 Appendix E1.2 (Traveller Sites Withdrawn from the Assessment after Stage 1 and Stage 2) identifies for each site removed from the site selection process at this point, the reason(s) why the site was discounted.
- 3.41 The Council continued to monitor the status of sites with regard to planning permission. Any sites identified that were subject to the TSSM and for which planning permission was granted up to and including 30 September 2017 have been removed from consideration through the TSSM. These sites are identified in Appendix E1.2 and the traveller accommodation approved reflected in the existing supply figures presented in Table 3.1.

3.5 Stage 2: Site Availability

- 3.42 Paragraph 36 of the TSSM explains that this stage was introduced for Tranche 1 & 2 sites to collect information on whether a landowner would be willing for a site to be considered for traveller accommodation and reflected that the landowners for sites identified through other appropriate locations (paragraph 16(h) of the TSSM) had not directly promoted their sites for consideration for traveller accommodation. It was therefore necessary to establish the wishes of landowners. Some 64 sites²⁸ remained subject to the site selection process.
- 3.43 Some 53 letters were sent on 3 August 2016 to site owners of 55 of the sites seeking to establish the landowners' interest in either selling or leasing land for the purpose of providing additional traveller site accommodation in the District. Respondents were provided 1.5 weeks to respond. The 55 sites comprised existing sites with potential to expand, sites identified and consulted on by the Council in 2008 and sites identified in other appropriate locations. Letters were not sent to the nine sites which were identified for

²⁸ However, at this point in time the sites in Tranche 1 (i.e. those privately owned sites being promoted for Traveller sites through the Call for Sites (paragraph 16(e) of the TSSM) and other appropriate locations identified from desk based analysis (paragraph 16(h) of the TSSM)) had already been taken through Stage 5 of the TSSM by the Council. As a result 29 sites had been sifted out thus avoiding potentially abortive work or risk of raising false hopes of any potentially interested landowner when there were policy constraints that rendered the site unsuitable. In addition the following sites were discounted: one duplicate site; five small sites with multiple owners; and four sites where no title was returned from the Land Registry.

regularisation or intensification since the Council knew such sites were available for development.

- 3.44 Where a positive response was not received from a landowner in response to this letter the relevant site was removed from further consideration in the site selection process. Responses indicating potential availability were received for 13 sites. Table 3.3 indicates the numbers of sites subject to Stage 2 and those which proceeded to Stage 3. Appendix E1.4 (Results of Stage 2 Assessment) contains parish based maps, which illustrates the locations of the sites along with a table which records whether a positive or negative response (either non-response or confirmation that the site was not available) was received.

Table 3.3: Sources and numbers of sites going forward to Stage 3²⁹

Site Source		Sites subject to Stage 2	Sites Proceeding to Stage 3
16(d)	Intensification of existing sites	9	7
16(d)	Extension of existing sites	14	4
16(e)	Call for Sites	5	1
16(g)	Consultation in 2008	15	4
16(h)	Other appropriate locations	60	4
Total		103	20

- 3.45 Table 3.4 identifies the potential pitches from intensification and expansion of existing travellers sites at this point in the process whilst Table 3.5 outlines the potential pitches arising from the other sites going forward to Stage 3.

Table 3.4: Potential intensification and extension sites results at the end of Stage 2³⁰

Site Source	Site Status	Number of Potential Sites Identified	Number of Pitches/Yards
Intensification of existing sites	6 permanent 1 temporary	7 (including a Travelling Showpeople site)	18 pitches 1 yard
Extension of existing sites	3 permanent 1 unauthorised	4	19 pitches
Total		11 sites	37 pitches and 1 yard

²⁹ This table represents the status of sites as documented in the Report on Site Selection published in September 2016. The figures have not been amended to reflect requests for sites to be withdrawn from consideration from the site selection process and/or any sites which may be superseded due to amended site boundaries being identified/promoted

³⁰ Ibid

Table 3.5: Potential sites from other sources results at the end of Stage 2³¹

Site Source		Number of Potential Sites Identified	Number of Pitches/Yards
16(e)	Call for Sites	1	15
16(g)	Consultation in 2008	4	54
16(h)	Other appropriate locations	4	24
Total		9 sites	93 pitches

3.46 As confirmed at paragraph 73 of the TSSM, the assessment of availability for Tranche 3 sites was undertaken at Stage 8.6.

3.6 Stage 3 and Stage 8.3: Major Policy Constraints

3.47 In accordance with paragraphs 40 and 41 of the TSSM, those Tranche 1 & 2 traveller sites that reached Stage 3 of the TSSM were screened against the following six major policy constraints using a GIS database³²:

- 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 3a and 3b - sites were removed from consideration where the site was entirely located within Flood Risk Zone 3a and 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 a Essex County Council owned or managed wildlife site or Council owned or managed Local Nature Reserve.
- Epping Forest and its Buffer Lands – sites were removed from consideration where the site was entirely located within Epping Forest or Epping Forest Buffer Land³³.
- 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.

³¹ Ibid

³² It should be noted that there is an error in paragraphs 40 and 41 of the TSSM. The references made to Table 1 should refer to Table 1 in the SSM.

³³ Based on the Buffer Land in the City of London Corporation's ownership on 15 June 2016.

- 3.48 Of the 20 Tranche 1 & 2 sites promoted for traveller accommodation, which were assessed against the major policy constraints, three sites were sifted out at Stage 3 due to those sites being located outside the Settlement Buffer Zones. This left 17 Tranche 1 & 2 sites that proceeded to Stage 4. It should be noted that in accordance with the checks undertaken on Tranche 1 & 2 sites in 2017 (see paragraph 3.39 above), some six sites were discounted for further consideration through the site selection process. This means that the number of 'live' sites from Tranche 1 & 2 sites was 15 sites, all of which proceeded to Stage 4.
- 3.49 In 2017, as noted in paragraph 76 of the TSSM, it was considered that sites located outside of the Settlement Buffer Zones should not be excluded at this stage of the TSSM. Therefore, Stage 8.3 assessed all Tranche 3 sites and any Tranche 1 & 2 sites which were filtered out at Stage 3 due to being entirely located outside of the Settlement Buffer Zones. Other Tranche 1 & 2 sites were not re-assessed as the other major policy constraints and the data supporting each constraint remained unchanged from that used in 2016.
- 3.50 Of the 11 sites promoted for traveller accommodation, which were assessed against the major policy constraints at Stage 8.3, no sites were sifted out due to one or more major policy constraints. All 11 sites therefore proceeded to Stage 8.4.
- 3.51 Further detail on how each of these sites scored against the five major policy constraints is provided in Appendix E1.5 (Results of Stage 3 and Stage 8.3 Assessment).

3.7 Stage 4 and Stage 8.4: Quantitative and Qualitative Assessment

- 3.52 In accordance with paragraphs 43 to 45 and 79 of the TSSM, each of the 15 sites subject to Stage 4 (so Tranche 1 & 2 sites) and 11 sites subject to Stage 8.4 (so Tranche 3 sites) were assessed against the criteria identified in Appendix A of the TSSM. This assessment was completed using a combination of GIS analysis and planning judgement. Where a planning judgement was made an explanation was provided to justify the decision made. The assessment was undertaken using the same approach as for residential and employment sites; further details of how the assessment was undertaken for each criteria is set out in Appendix B1.4.1. The methodology followed for Tranche 3 sites was in general conformity with that followed for Tranche 1 & 2 sites; the differences were minor and related to new/updated information being available. Where there were any differences in methodology followed between Tranche 1 & 2 and Tranche 3 sites this is identified in Appendix B1.4.1.
- 3.53 A review was undertaken to see whether representations had been received on Tranche 1 & 2 sites in response to the Draft Local Plan consultation. No representations were received from traveller site promoters.

- 3.54 The quantitative and qualitative assessment was subject to moderation (in accordance with paragraphs 46 and 82 of the TSSM). Tranche 1 sites were reviewed at a moderation workshop held on 7 June 2016. A second workshop to consider traveller sites subject to Stage 4 was held on 7 September 2016. The purpose of the two workshops was to moderate the results, check that there was a level of agreement on judgements and regularise any apparently significant inconsistencies. Generally there was agreement on the way the TSSM had been applied at both workshops and in the resulting assessment. Minor comments were made which were incorporated into the assessment. For Tranche 3 sites the moderation was undertaken as part of the Stage 8.5 workshop on 18 August 2017. Generally there was agreement on the way the TSSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment.
- 3.55 The output of Stage 4 and Stage 8.4 is an assessment proforma for each site, which provides details of the site proposals and the assessment results for each criteria. The assessments are presented at Appendix E1.6 (Stage 4 and Stage 8.4 Assessment) by parish. For each parish there is an overview map which identifies the sites within the parish that were assessed, followed by proformas for each site which are presented in ascending order by site reference number. Table 3.6 provides an overview of the number of sites assessed in each parish.

Table 3.6: Number of sites assessed at Stage 4 and Stage 8.4 by parish

Parish	Number of sites assessed at Stage 4	Number of sites assessed at Stage 8.4*
Epping	1	N/A
Moreton, Bobbingworth and the Lavers	1	N/A
Nazeing	2	2
North Weald Bassett	3	N/A
Roydon	2	5
Stapleford Abbotts	2	1
Stapleford Tawney	N/A	1
Theydon Bois	1	N/A
Waltham Abbey	3	N/A
Willingale	N/A	2

*This column contains sites which were filtered out at Stage 4 in 2016 as they were wholly outside of Settlement Buffer Zones, but were re-introduced as Tranche 2 sites for re-assessment at Stage 8.4. These sites are not counted as sites assessed at Stage 4.

3.8 Stage 5 and Stage 8.5: Identify Candidate Preferred Traveller Sites

3.8.1 Stage 5: Identifying Sites for Further Testing

3.56 Paragraph 48 of the TSSM states that “*the purpose of Stage 5 is to identify the candidate Preferred Traveller Sites, which best meet the Council's preferred approach to meeting traveller accommodation needs. This will be undertaken in parallel for employment, residential and traveller sites and will bring together the assessment under this TSSM and the SSM.*” At the time that the TSSM was drafted it was envisaged that it would be possible for Stage 5 to be undertaken in parallel with Stage 3 of the residential and employment assessment. However, there were delays in the collection of evidence on the existing supply of employment sites and identification of traveller sites for assessment which meant that this was not possible. A later workshop was held where traveller sites were subject to consideration.

3.57 In order to identify those sites proposed for traveller accommodation, which should be subject to testing a five-step process was followed, in accordance with the requirements of paragraphs 49 to 53 of the TSSM. The approach was premised around the consideration of different strategic alternatives to locating traveller sites in the District.

3.58 The five steps can be summarised as:

- **Step 1:** Identifying suitable spatial options to accommodate growth.
- **Step 2:** Defining optimal site sizes.
- **Step 3:** Assessing site suitability.
- **Step 4:** Assigning sites against the land preference hierarchy and identifying sites for further testing.
- **Step 5:** Checking site capacities.

3.59 For Stage 5, the first two steps were undertaken through a meeting of the Local Plan Officer Working Group on 7 September 2016.

Step 1: Identifying Broad Spatial Options to Accommodate Growth

3.60 Three broad spatial options for accommodating the traveller requirement were identified. These were:

- 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.

3.61 Each spatial option was assessed using planning judgement having regard to a range of factors including principles set out in the PPTS, local knowledge/initial officer evaluation of sites, previous feedback from

Members and feedback from the consultations held in 2008 and 2012 (as detailed in Section 3.2.2). The feedback from the consultations included an indication that the settled and travelling communities favour a degree of separation from each other; concerns about an over-concentration of travellers in the parishes of Nazeing and Roydon; and a desire not to see the expansion of existing sites.

- 3.62 For each spatial option a judgement was made about whether the option represented a more suitable or less suitable location for development. Of the three options considered provision of pitches across the District was considered most suitable. Table 3.7 sets out the judgements reached on each of the spatial options.

Table 3.7: Spatial options assessment

Spatial option	Suitability	Justification for suitability
Distribute pitches across the District	More suitable spatial option	This option balances the preferences of the travelling community with not placing undue pressure on services in a single location.
Focus pitches in parts of the District traditionally favoured by the traveling community	Less suitable spatial option	The majority of newly arising housing need is expected to 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 community	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 District not currently favoured by the travelling community.

Step 2: Defining Optimal Site Sizes

- 3.63 Consideration was given 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.

- 3.64 A summary of the suitability of these two options is provided in Table 3.8. Of the two options considered accommodating traveller needs on sites of no more than five pitches was considered the most appropriate approach for new sites.

Table 3.8: Site size options for new traveller sites

Site size option	Suitability	Justification for suitability
Traveller needs accommodated in new sites with a proposed capacity of no more than five pitches	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	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.

3.65 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. A summary of the suitability of the options considered is set out in Table 3.9.

Table 3.9: Site size options for existing traveller sites

Site size option	Suitability	Justification for suitability
Traveller needs accommodated in existing sites with a combined capacity of: <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). 	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. 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. 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 3.2.3.
Traveller needs accommodated in	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

Site size option	Suitability	Justification for suitability
existing sites with a combined capacity of: <ul style="list-style-type: none"> between 6 and 15 pitches (for sites with temporary planning permission); and/or between 11 and 15 pitches (for sites with permanent planning permission). 		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. 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. This site size threshold reflects the views and preferences expressed in the consultation feedback summarised at Section 3.2.3.

3.66 For the purposes of determining which site size option a site falls within, the decision rules set out in Table 3.10 were applied.

Table 3.10: Site size rules applied to different traveller site types

Site status	Definition	Size Site Option Applied
Not currently a traveller site	No existing authorised or unauthorised traveller occupation. These new sites may comprise greenfield or brownfield land.	Sites can accommodate up to five pitches subject to detailed site suitability considerations.
Current location for a traveller site (permanent)	Existing authorised traveller occupation. These sites benefit from permanent planning permission. This does not include sites with temporary planning permission and/or personal planning permission.	Sites can accommodate up to 10 pitches subject to detailed site suitability considerations.
Current location for a traveller site (temporary)	Existing authorised traveller occupation. These sites benefit from temporary planning permission, with time limiting conditions and/or personal planning permission whereby the use of the land for traveller accommodation ceases once the named family departs.	Sites can accommodate up to five pitches subject to detailed site suitability considerations.
Unauthorised occupation of land	Although there is existing traveller accommodation on site, it does not benefit from any form of planning permission (temporary, personal and/or permanent planning permission).	Sites can accommodate up to five pitches subject to detailed site suitability considerations.

3.67 Given the decision to consider a distributed approach to accommodating traveller needs across the District, all sites assessed at Stage 4 were subject to further assessment. Before sites were assessed for their suitability, the following checks were undertaken:

- Existing sites with permanent planning permission identified for intensification and/or extension were checked to see whether with additional pitches they would stay within the 10 pitch limit. Sites which were above this site size were discounted at this point.

- Existing sites with temporary planning permission identified for intensification and/or extension were also checked to see whether with additional pitches they would stay within the five pitch limit. No sites were identified which met this criteria.
- The capacity of sites identified for regularisation of unauthorised pitches or for new sites were reviewed. For sites of five pitches or fewer they proceeded for site specific suitability assessment. Where they exceeded the threshold the site was considered further but only for its suitability to accommodate five pitches.

3.68 Where sites were discounted at this step, this is recorded in Appendix E1.7 (Stage 5 and Stage 8.5 Results of Identifying Sites for Further Testing).

Step 3: Assessing Site Suitability

3.69 When undertaking the site specific suitability assessment regard was had to paragraph 50 of the SSM, which states that: *“in general...those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable [sites] for allocation. However, in common with all site selection/allocation processes, the identification of candidate Preferred Traveller Sites will involve an element of planning judgement, the effect of which on outcomes cannot be prejudged. It should also be noted that in exercising planning judgement different weight may be given to each of the criteria reflecting the specific criteria for identifying traveller sites outlined in PPTS and the characteristics of the sites being assessed under the TSSM. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.”*

3.70 Therefore, for each site considered regard was had to all relevant material considerations, which included the findings of the Stage 4 assessment and local knowledge/initial officer evaluation of sites. Based on this assessment a judgment was made as to whether a site was considered suitable or not suitable for further testing. A justification for this judgement with reference to the particular material considerations considered relevant to the site is set out in Appendix E1.7.

Step 4: Assigning Sites to the Land Preference Hierarchy and Identifying Sites for Further Testing

3.71 The sites which were judged to be suitable for traveller accommodation were then categorised against the hierarchy presented at paragraph 51 of the TSSM. The principle of the hierarchy is that a sequential approach is applied to identifying those sites which should be further considered.

3.72 For ease of reference the hierarchy set out in paragraph 51 of the TSSM has been repeated below:

- The sequential flood risk assessment – proposing land in Flood Zone 2 where need cannot be met in Flood Zone 1.
- Sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation.

- Intensification of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission).
- Extension of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission).
- New traveller sites in non-Green Belt areas.
- New traveller sites in Green Belt areas.
- Where sufficient provision to meet identified need for additional pitches cannot be found from the above sources, to consider provision for allocating traveller pitches within strategic residential site allocations around Harlow.

Step 5: Checking Site Capacities

3.73 Paragraph 52 of the TSSM states that: “*where a site has been proposed which exceeds 1.5ha officers will identify the preferred location of any additional pitches.*” Where sites exceeded the 1.5 hectare threshold the site boundaries were amended to more accurately reflect the extent of the site to be subject to further testing.

3.74 Some further capacity checks were also undertaken:

- where sites were promoted for more than the number of pitches considered suitable based on Step 2 (above), the site boundaries and associated capacity were amended; and
- by the time the Local Plan Officer Working Group meeting was held on 7 September 2016, the selection of residential sites for allocation in the Draft Local Plan was at an advanced stage. Where traveller sites were located within a larger site which was being proposed for residential allocation it was agreed that the pitches would be positioned in the most suitable location within the wider residential site.

3.75 Further details of the capacity checks are contained in the site proformas (with the deliverability assessment) presented in Appendix E1.8.2 (Results of Stage 5/8.5 Capacity and Stage 6/8.6 Deliverability Assessments). The assessments are presented by parish. For each parish there is an overview map which identifies the sites within the parish that were assessed, followed by proformas for each site which are presented in ascending order by site reference number.

3.8.2 Stage 8.5: Identifying Sites for Further Testing

3.76 The purpose of Stage 8.5 is consistent with that set out in paragraph 48 of the TSSM; to identify the candidate Preferred Traveller Sites, which best meet the Council's preferred approach to meeting the traveller accommodation requirement. Paragraph 84 of the TSSM goes on to confirm that: “*this stage will consider Tranche 1 & 2 and Tranche 3 sites assessed at [Stage 4 and] Stage 8.4 and will be undertaken in parallel with employment and residential sites assessed under the SSM.*” Sites for all three uses were considered at the same time.

- 3.77 As confirmed by footnote 10 of the TSSM, Tranche 1 & 2 sites were not assessed at this stage if they had been re-assessed as part of a Tranche 3 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 & 2 sites were not re-visited.
- 3.78 As indicated in paragraph 85 of the TSSM, the process followed for Stage 8.5 was broadly consistent with that followed for Stage 5. The main difference was that in accordance with paragraph 86 of the TSSM some additional factors were taken into account when determining which sites should be taken forward for further testing³⁴. These reflected the additional information available to the Council to inform the judgements made.
- 3.79 For Stage 8.5, the five steps were undertaken through a meeting of the Local Plan Officer Working Group on 18 August 2017.
- 3.80 In summary the outcomes of the five steps are as follows:
- **Step 1:** Identifying suitable spatial options to accommodate growth – the suitability of the spatial options remained unchanged from Stage 5. Therefore all sites proceeded to Step 2.
 - **Step 2:** Defining optimal site sizes – the suitability of the site size options remained unchanged from Stage 5. Sites falling within the more suitable site size options proceeded to Step 3.
 - **Step 3:** Assessing site suitability – with the exception of the additional factors taken into account, the same approach was following for determining site suitability. Sites judged to be suitable for traveller accommodation proceeded to Step 4.
 - **Step 4:** Assigning sites against the land preference hierarchy and identifying sites for further testing – sites judged to be suitable for traveller accommodation were assigned against the land preference hierarchy. To provide flexibility as part of the further testing it was agreed that all sites judged to be suitable should proceed to Stage 8.6.
 - **Step 5:** Checking site capacities – where sites were promoted for more than the number of pitches considered suitable based on Step 2, the site boundaries and associated capacity were amended. There was also consideration of whether sites should comprise mixed use development (in accordance with paragraph 87 of the TSSM). With the exception of the two Tranche 1& 2 traveller sites located within larger residential sites proposed for allocation, no Tranche 3 sites were identified as being suitable for accommodating a mix of uses.

³⁴ Paragraph 86 of the TSSM identified that refined settlement visions and work on placemaking would be available to inform this stage of the site selection process. The Council deferred this element of work to later in the plan-making process to enable the update to incorporate, where relevant, the recommendations of other evidence base studies. This information instead informed the decisions on which sites to allocate in the Local Plan Submission Version (see Section 3.9.3).

3.81 Table 3.11 identifies the number of sites (containing Tranche 1 & 2 and Tranche 3) and capacity of those sites located within each of the land preference hierarchy categories, which were judged to be suitable for traveller accommodation. In total, 15 sites with a capacity for 51 pitches and 1 yard were identified in sites across the District. Given the residual requirement figure of 32 pitches, it was judged that in order to provide sufficient flexibility and account for any constraints which may make deliverability of sites not possible within the Plan period the provision of traveller accommodation on the three Garden Communities around Harlow should also be considered.

Table 3.11: Traveller sites for further testing by site type

Land preference hierarchy	Number of sites ³⁵	Number of pitches ³⁶
The sequential flood risk assessment - proposing land in Flood Zone 2 where need cannot be met in Flood Zone 1.	14 sites are located within Flood Zone 1. 1 site is located within Flood Zone 2.	51 pitches 1 yard
Sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation.	3 sites with temporary permission 1 unauthorised site	5 pitches
Intensification of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission).	4 sites for pitches 1 site for yard	15 pitches 1 yard
Extension of existing Traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission).	1 site	5 pitches
New traveller sites in non-Green Belt areas.	0 sites	0 pitches
New traveller sites in Green Belt areas.	6 sites	26 pitches
Where sufficient provision to meet identified need for additional pitches cannot be found from the above sources, to consider provision for allocating traveller pitches within strategic site allocations (around Harlow).	3 within Garden Communities around Harlow	15 pitches

³⁵ Some sites have been assessed for more than one category of site type within the land preference hierarchy; for example regularisation and intensification. Therefore, the number of sites within this column does not reflect the total number of traveller sites identified for further testing.

³⁶ 51 pitches and 1 yard represents the total capacity of the sites identified for further testing. These pitches/yard are categorised by both Flood Zone and by site type within this column. The 15 pitches within the strategic site allocations around Harlow represent additional provision.

3.9 Stage 6 and Stage 8.6: Deliverability

3.9.1 Land Promoter/Developer Survey

- 3.82 For Stage 6, paragraph 58 of the TSSM makes reference to additional information on availability being sought from landowners where a positive response was received to Stage 2 of the TSSM. For Stage 8.6, the requirement was slightly different since Stage 2 and Stage 6 were combined together for Stage 8.6 (as confirmed in paragraph 73 of the TSSM). Paragraph 90 of the TSSM therefore requires that: *“Information collected from promoters Call for Sites forms will be supplemented by updated information from promoters/developers/landowners and further technical studies. As a minimum, a proforma will be sent to all Tranche 3 site promoters/developers/landowners (as appropriate), which proceed to Stage 8.4 to validate the information provided in the Call for Sites form and to seek further, more detailed information on proposals.”* In accordance with footnote 11, proformas were also be sent to those promoters/developers/landowners of Tranche 1 & 2 sites previously sifted out due to being located outside the Settlement Buffer Zones but which proceeded to Stage 8.4.
- 3.83 To maintain consistency with the SSM, in 2016 a similar online survey to that sent to land promoters/developers of residential sites was sent to landowners of proposed traveller sites (these were sent to the owners of the sites who indicated potential availability at Stage 2 and the owners of existing traveller sites identified for potential intensification/regularisation). Amendments to the survey questions were developed in coordination with the Council and in response to the Council’s information requirements including those topics identified for assessment at Stage 6 of the TSSM.
- 3.84 A series of questions were posed through the survey, a copy of which is provided at Appendix E1.8.1 (Land promoter/developer survey), which can be broadly grouped as follows:
- Contact information;
 - Ownership and availability;
 - Achievability;
 - On-going engagement.
- 3.85 Respondents were also provided with the opportunity to submit additional information to support their responses, including drawings, plans and any other relevant technical work undertaken to date.
- 3.86 Invitations to complete the survey were issued via letter for all Tranche 1 & 2 sites that proceeded to Stage 3 (20 sites in total). Respondents had two weeks to respond to the survey. In total, five survey responses were returned.
- 3.87 The same survey (aside from an amended introductory section) was used in 2017 to check the information received by the Council when the Tranche 3

site was promoted remained correct, as well as seeking responses to additional questions. Invitations to complete the survey were issued electronically in a series of tranches to promoters, developers and/or landowners for all sites that proceeded to Stage 8.4, where contact information was available. The survey was issued via letter; in total, 12 letters were issued at this stage (27 June 2017). Where up-to-date landownership information was not held by the Council landownership searches were undertaken through HM Land Registry. Following this, one additional letter was distributed (27 June 2017). Respondents were given two weeks to respond to the survey. In total, one survey response was received. Two follow up phone calls were received by the Council confirming that sites should be considered available, whilst a third call requested for a site to be removed from further consideration.

3.9.2 Availability and Achievability Assessment

3.88 Paragraph 57 of the TSSM states that: *“the purpose of Stage 6 is to consider the deliverability of the candidate Preferred Traveller Sites to inform the identified need for traveller accommodation. Stages 1 and 3 to 5 will have already considered the suitability of the site. Therefore focus of this stage is whether a site is deliverable and specifically:*

- *To better understand site availability including whether the site is available now, or is it likely to become available during the Local Plan period?*
- *Whether there is a reasonable prospect that development will be achievable within the appropriate timescales?”*

3.89 At paragraph 89 of the TSSM, it states that the purpose of Stage 8.6 is the same.

3.90 The TSSM provides an indication of the matters which will be subject to the availability and achievability assessment. In applying the TSSM, the methodology for this assessment was further refined. The starting point was the criteria developed under the SSM for residential sites. The same criteria were used with the exception of marketability and viability which were considered to be less relevant to traveller sites. Traveller sites were therefore assessed against the following criteria:

- **Availability:** site ownership, existing uses, on-site restrictions and site availability.
- **Achievability:** on-site physical and infrastructure constraints, impact on capacity of primary and secondary schools in the Schools Planning Area and at individual primary and secondary schools, access to open space, access to health facilities and impact on mineral deposits.
- **Cumulative achievability (in combination with proposed residential site allocations):** 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. Following representations received to the Draft Local Plan consultation, two additional cumulative achievability criteria were added (impact on water networks and impact on wastewater networks).

- **Overview assessment of constraints:** insurmountable constraints.
- 3.91 Further details on each criteria including how the assessment was undertaken are provided at Appendix B1.6.2. For each criteria a RAG rating system was utilised using a scale of three scores. The methodology followed for Tranche 3 sites was in general conformity with that followed for Tranche 1 & 2 sites; the differences were minor and related to new/updated information being available. Where there were any differences in methodology followed between Tranche 1 and Tranche 2 sites this is identified in Appendix B1.6.2.
- 3.92 In 2016, each of the sites subject to Stage 6 were assessed against the availability and achievability criteria. This assessment was completed using a combination of GIS analysis, information from the land promoter/developer survey or other information held by the Council and planning judgement. Where a planning judgement was made an explanation was provided to justify the decision made. This is recorded in the deliverability proforma presented in Appendix E1.8.2.
- 3.93 In 2017, in accordance with paragraphs 92 and 93, all Tranche 3 sites and Tranche 1 & 2 sites not previously subject to Stage 6 were assessed at Stage 8.6. Where Tranche 1 & 2 sites, were assessed at Stage 6, the assessment was re-visited at Stage 8.6 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.
- 3.94 Moderation of the deliverability assessment was undertaken as part of the allocation workshops on 15 September 2016 and 18/19 October 2017. Generally there was agreement on the way the TSSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment.
- 3.95 In summary, eight sites scored positively against the Stage 6/Stage 8.6 assessment criteria with seven sites scoring less positively across the assessment criteria as a result of on-site constraints, over-intensification of traveller accommodation in the area, unknown cessation periods for existing on-site uses, unknown or lack of availability, and lack of identified

need on the site over the Plan period. Further details of the deliverability assessment undertaken for each site is presented in a further site proforma presented in Appendix E1.8.2. The assessments are presented by parish. For each parish there is an overview map which identifies the sites within the parish that were assessed, followed by proformas for each site which are presented in ascending order by site reference number.

3.9.3 Identify Sites for Allocation

- 3.96 In 2016, following completion of the availability and achievability assessment a Local Plan Officer Working Group meeting was held on 15 September 2016 to identify which sites should be allocated in the Draft Local Plan. At the meeting a decision was made for each site as to whether it should be allocated or not in the Draft Local Plan. This judgement was informed by all relevant material considerations, which included the findings of the availability and achievability assessment. A justification for the decisions made was documented. This process informed the draft site allocations presented in the Draft Local Plan.
- 3.97 In 2017, the Council needed to re-visit the conclusions reached in 2016 to determine whether any draft site allocations should be removed from the Local Plan Submission Version and/or whether any sites not previously identified for allocation should be.
- 3.98 In accordance with paragraph 95 of the TSSM, the following process was followed. All three tranches of traveller sites were considered along with residential and employment sites. Prior to a workshop held with officers on 18/19 October it was agreed with the Council that the judgements reached on Tranche 1 & 2 sites assessed in 2016 where it did not result in a site being proposed for allocation would not be re-visited as the following criteria did not apply to the sites:
- There was a material change in the availability and achievability assessment.
 - The decision made in 2016 on whether or not to allocate the site was finely balanced. For example, the decision not to allocate a site was based on it being sequentially less preferential as opposed to unavailable/unachievable.
 - The site could potentially contribute to the Council's five year pitch supply.
- 3.99 Therefore, at the officer workshop on 18/19 October the Council considered, for each parish, sites from the following sources: draft site allocations; Tranche 1 & 2 sites not subject to further assessment in 2016; and Tranche 3 sites subject to further assessment.

3.100 All relevant material considerations were taken into account when determining which sites to allocate in the Local Plan Submission Version. In accordance with paragraph 95 of the TSSM this included³⁷:

- the findings of the availability and achievability assessment;
- the potential of the site to contribute to the Council's five year pitch supply;
- accordance with the updated settlement visions³⁸; and
- need arising from specific households and the extent to which such needs can be met on sites currently occupied by the household.

3.101 The following additional considerations were also taken into account:

- accordance with the Local Plan Strategy and associated hierarchy (which reflects the site selection hierarchy set out at paragraph 51 of the TSSM) in terms of maximising the sites allocated in each category before moving onto the next;
- feedback from the Draft Local Plan consultation;
- emerging Neighbourhood Plans which include proposed site allocations; and
- local knowledge.

3.102 A justification for the decisions made at the workshop on 18/19 October was documented; this write-up is presented in Appendix E1.8.3 (Results of Identifying Sites for Allocation).

3.103 Where sites were proposed for allocation they were assessed along with other residential and traveller sites identified in that settlement for the cumulative achievability of the proposals. Following this additional assessment a review of insurmountable constraints was undertaken. Each site was assessed 'in the round' to identify whether any restrictions or constraints, either individually or collectively, could be deemed insurmountable. The assessment was undertaken qualitatively and utilised professional judgement to determine whether restrictions or constraints would be likely to be insurmountable. The assessment of insurmountable constraints is documented in Appendix E1.8.3. On the basis of this further assessment no amendments were made to the proposed site allocations.

3.104 Further details on whether specific sites have been identified for allocation along with the associated justification is presented at Appendix E1.8.3. Maps are presented by parish, which confirm whether a site has been

³⁷ Paragraph 95 of the TSSM identified that the findings of the transport, infrastructure or HRA sensitivity testing would be taken into account. Based on the nature of the technical assessments undertaken (see Appendix B1.6.5) the size and/or location of the traveller sites would not have had a material impact on the outcomes of the assessment and therefore were not included. This consideration therefore did not inform the decision on which traveller sites to allocate.

³⁸ These are presented in the Local Plan Submission Version.

identified for allocation or not. The accompanying table provides a justification on a site by site basis for the judgement made. The Council also checked that the proposed site allocations provided a five year supply of land. Details of the Council's pitch trajectory is presented in the Housing Implementation Strategy and Local Plan Submission Version.

3.105 In summary, the Council has selected a portfolio of sites which will achieve the Local Plan Strategy. The sites proposed for allocation comprise:

- three sites for regularisation (comprising two sites with temporary planning permission and one unauthorised site);
- two sites with scope for intensification;
- one site with scope for expansion;
- two new sites within Green Belt; and
- three new sites within the Garden Communities around Harlow.

3.106 The site allocations proposed for inclusion in the Local Plan Submission Version are broadly consistent with those contained in the Draft Local Plan. Amendments to the Draft Local Plan site allocations were made in the following parishes for the reasons set out below. If a settlement is not listed below the site allocations remain as proposed in the Draft Local Plan. It was judged that traveller allocations continued to be required in the Garden Communities around Harlow in order to meet the increased requirement figure identified in the updated GTAA (2017).

- **Nazeing** – site allocations amended to reflect additional greenfield site identified in 2017.
- **Stapleford Abbots** – site allocations amended to reflect additional greenfield site identified in 2017.

3.107 In total, these 11 sites will make provision for the delivery of approximately 38 pitches and 1 yard across the District. This is in excess of the remaining 32 pitches and 1 yard needed to meet the remaining traveller accommodation requirement in the District over the Plan period and ensures sufficient flexibility to respond to change in the status of the proposed site allocations.

3.108 It is anticipated that those proposed allocations within wider residential allocation sites would come forward as a part of the development proposals for those sites and not independently.

3.109 Table 3.12 identifies the estimated likely number of pitches in each parish and the Garden Communities around Harlow that the Council will make provision for through the Local Plan Submission Version and confirms the number sites identified for allocation in each parish.

Table 3.12: Estimated likely number of pitches by parish

Parish	Estimated likely number of pitches	Number of sites identified for allocation
Nazeing	12	4
Moreton, Bobbingworth and the Lavers	1 yard	1
North Weald Bassett	5	1
Stapleford Abbotts	1	1
Waltham Abbey	5	1
Harlow and Gilston Garden Communities	15	3
Total	38 pitches and 1 yard	11

3.9.4 Exceptional Circumstances

- 3.110 The TSSM sets out a clear strategy to minimise the use of Green Belt land for development. Paragraph 51 of the TSSM sets out a sequential approach in which existing sites are promoted before new sites are identified; within this new sites on non-Green Belt land are preferred to those sites located in the Green Belt. Table 3.11 also shows that there is insufficient suitable land located outside the Green Belt to meet the traveller requirement of the District within the Plan period.
- 3.111 For the proposed traveller site allocations which do not fall within proposed residential sites (including the Garden Communities around Harlow), alterations to the Green Belt boundary are not proposed so sites will remain washed over by Green Belt. Very special circumstances will have to be demonstrated at the development management stage, however, the existence of the Local Plan allocation will provide a compelling case upon which very special circumstances may be demonstrated. That decision can only be made at the time the application is considered and the allocation of land does not predetermine any decision on whether to grant planning permission.
- 3.112 In order to support the proposed site allocations where alterations to existing Green Belt boundaries are proposed, it will be necessary to demonstrate exceptional circumstances. This relates to those proposed site allocations that form a part of a larger proposed residential site allocations (GRT-N_06 which is located in North Weald Basset and GRT_N-07 which is located in Waltham Abbey), and the three Garden Communities proposed for allocation around Harlow. In the event that the residential site allocations are forthcoming then the related proposed traveller site allocations within the same site would benefit from the associated Green Belt releases.
- 3.113 The site allocations proposed in the Local Plan Submission Version therefore represent the minimum land take required from the Green Belt to enable the Council to meet the District's traveller requirement through a

strategy that is both sustainable and deliverable. Such an approach accords with the requirements of national policy.

4 Employment Sites

- 4.1 This chapter contains an introduction to the District's employment requirement, provides an overview of the methodology developed to guide the selection of employment sites in Epping Forest District Council's Local Plan Submission Version and presents the findings of the site selection process.

4.1 Employment Requirement

- 4.2 The Council with its Functional Economic Market Area (FEMA) authority partners East Hertfordshire, Harlow and Uttlesford District Councils, jointly commissioned a study to provide an assessment of employment needs for the FEMA with the intention of the findings of the study informing future planning for strategic employment matters across the Area.
- 4.3 The West Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates, October 2017) ('the study') provides a quantitative assessment of employment needs across the FEMA, and applied relevant 'policy-on' considerations in order to identify an informed basis for future plan making across the Area. Following the identification of a preferred scenario, the study translated the assessment of employment need into the land use requirements for B Use Class uses across the FEMA having regard to current supply position, local economic strategy, historic take-up and market demand. The analysis of future requirements considered the 2016-33 period. Commitments from 2011 to 2016 were factored into the future projections.
- 4.4 Analysis of forecast employment across the FEMA indicated a substantial proportion of forecast job growth would lie outside the B Use Class uses. The largest requirement falls within the 'none and homeworking' category, encompassing both home based working and peripatetic employment. Within the B Use Class uses the greatest growth in jobs falls within the B1a office Use Class. There is also growth in B1b, B1c and B8 requirements. Employment within the B2 Use Class is forecast to decline.
- 4.5 The study identified a total land requirement for between 9-22 hectares for office use, and 65 hectares for industrial use across the FEMA from 2016-2033. For Epping Forest District, the study found that there is a requirement for between 3-7 hectares for office use, and 14 hectares for industrial use. The Council is keen to ensure that through the Local Plan there is sufficient flexibility to respond to unforeseen demands and to provide for a range and choice of sites in terms of typology, location, mix and phasing. This may result in land requirements above that set out in the study being provided for in the Local Plan.
- 4.6 The study also acknowledged that there remains a small shortfall in forecast jobs to balance the labour market and maintain 2011 commuting rates. It is estimated that without any increase in densities that a further 6,400 sqm of

office floorspace and 8,700 sqm industrial floorspace will be required to accommodate the shortfall across the FEMA. This will require a further 2.8-3.8 hectares of land in addition to the requirements set out above. However, given that there are some uncertainties associated with jobs forecasting and the long-term nature of Local Plans, such a scale of additional provision over the FEMA area up to 2033 does not represent any significant short-term difficulties for the emerging Local Plans. In reality the additional provision may be accommodated through increased job densities and/or windfall development.

- 4.7 To supplement the FEMA level analysis, the Council also commissioned further work to consider in more detail the employment needs specifically for Epping Forest District and inform the future Local Plan employment strategy. This is set out in the Employment Review (Hardisty Jones Associates, December 2017). The report provided additional District level market demand side analysis, drawing heavily on evidence gathered from local commercial market stakeholders. It also utilised the outputs from the Employment Land Supply Assessment (Arup, December 2017) in order to provide recommendations on locations for future growth.
- 4.8 Evidence collated suggests potential for jobs growth of circa 10,800 in the District over the Plan period 2011-2033. Discussion with local business and commercial property market stakeholders indicates two sub-markets within the District. The first relates to the area within and around the M25, broadly the southwest of the District which forms part of the outer London fringe and is characterised as more urban. The second relates to the area outside the M25 which is characterised as more rural with smaller towns. Strong demand and a shortage of supply is reported across the District, particularly for locations with strong access to key transport infrastructure routes including the M25 and M11 Motorways and London Underground Central Line.
- 4.9 Key drivers relate to the accessibility of the District, and there are strong anecdotal indications of demand arising from businesses displaced out of London and serving London markets. This makes strong access back to the Capital a key feature of requirements. A strong start-up market is also reported, driving requirements for both start-up and grow-on space. Both general and local trends are pointing towards strong demand for smaller premises, rather than significantly large footplates in either the office or industrial sectors. There is no evidence that the District currently serves a wider Harlow market area or that there is a need to meet Harlow requirements or serve the Harlow market. There is therefore no clear requirement for the spatial strategy to address this.
- 4.10 The greatest barriers to delivering employment floorspace relate to site availability and viability, which are exacerbated by strong residential values. There is a clear sentiment across stakeholders that there is a need for deliverable employment sites to meet demand. There is also a need to drive regeneration and redevelopment of poorer quality industrial areas and some evidence of this having already taken place.

- 4.11 The existing typology of the District commercial employment market is around B1a, B1c and B8 premises. The District is not a strong manufacturing location. Whilst there is a need for flexibility in provision there is also a need to ensure a spread of industrial sites that suit both B8 and B1c/B2 activities. The Employment Land Supply Assessment indicated a strong offer of sites suited to B8 with limited capacity for B1c/B2 which will need to be addressed in the preparation of the Local Plan.

4.2 Overview of Site Selection Methodology

- 4.12 As discussed in Chapter 2, the SSM identifies five stages through which sites are sieved and subject to more detailed assessment in order to identify the proposed site allocations for employment uses. The five stages can be summarised as follows.
- Stage 1 Major Policy Constraints – identified sites which were subject to one or more of these constraints and therefore were not considered to be suitable for development.
 - Stage 2 Quantitative and Qualitative Assessment – undertook more detailed assessment of sites to understand their relative suitability for development.
 - Stage 3 Identify Candidate Preferred Sites – identified those sites which were considered suitable for development and were subject to further capacity and deliverability assessment. More detailed indicative capacity assessment was also undertaken for each site identified for further testing.
 - Stage 4 Deliverability – assessed the availability and achievability of sites to enable decisions to be made about sites to allocate and to ensure that the land can be provided throughout the Plan period.
 - Stage 5 Sustainability Appraisal/Habitats Regulation Assessment of Candidate Preferred Sites – established the impact of the candidate Preferred Sites alone and in combination.
- 4.13 In 2016, the site selection process was paused at the end of Stage 2 awaiting a more up-to-date picture of existing employment land supply to be established. Therefore, Stages 3 and 4 were not completed and the sites included in the Draft Local Plan reflected the existing and potential employment sites identified at that point in time by the Council. The update to the existing employment land supply picture was completed in 2017, therefore enabling the site selection process for employment sites to be re-commence.
- 4.14 To provide further clarity on the process that would be followed for employment sites, Stage 6 of the SSM was updated in February 2017 and finalised in June 2017 following Counsel advice. This Stage of the SSM sets out the process the Council followed in developing its Local Plan Submission Version. In the updated SSM, Stage 6 was divided into six sub-

stages, which can be summarised as follows. Broadly the sub-stages reflect the process followed for Stages 1 to 4 of the SSM.

- Stage 6.0 Identifying Sites for Assessment – identified amended or new sites for assessment through the SSM.
- Stage 6.1 Major Policy Constraints – identified sites which were subject to one or more of these constraints and therefore were not considered to be suitable for development.
- Stage 6.2 Quantitative and Qualitative Assessment – undertook more detailed assessment of sites to understand their relative suitability for development.
- Stage 6.3 Identify Candidate Preferred Sites – identified those sites which were considered suitable for development, best met the Council’s Local Plan Strategy and were subject to further capacity and deliverability assessment. More detailed indicative capacity assessment was also undertaken for each site identified for further testing.
- Stage 6.4 Deliverability – assessed the availability and achievability of sites to enable decisions to be made about sites to allocate and to ensure that land can be provided throughout the Plan period.

4.15 The SSM also identifies that following the conclusion of the site selection process, the Council will undertake further work to inform the Local Plan Submission Version including:

- A review of Green Belt boundaries to identify proposed alterations to the Green Belt boundary to accommodate the proposed site allocations;
- SA and HRA, which will include any employment sites in accordance with the relevant regulations;
- Infrastructure Delivery Plan; and
- Transport modelling.

4.16 A full version of the SSM finalised in June 2017 is provided at Appendix A.

4.17 The remainder of this chapter explains how the SSM has been applied to employment sites and provides a summary of the results, with reference made to detailed appendices which provide further detail of the assessment undertaken and justification for key decisions made. This includes Appendix F1.1 (Overview of Assessment of Employment Sites), which provides an overview of how each site proposed for employment (B Use Class) uses was assessed at each stage of the SSM.

4.18 It should also be noted that the results of the SA and HRA are documented under separate cover in the Sustainability and Equalities Impact Appraisal (AECOM, December 2017) and the Habitats Regulations Assessment (AECOM, December 2017).

4.3 Identifying Sites for Assessment

- 4.19 In advance of undertaking the SSM the sites to be subject to it were identified. Two tranches of sites were subject to the SSM: Tranche 1 sites were assessed in 2016, with Tranche 2 sites assessed in 2017.
- 4.20 Section 2.4.1 identifies the process that was followed for identifying Tranche 1 sites. In total, 37 employment sites were identified for assessment and were subject to Stage 1 and Stage 2 of the SSM.
- 4.21 As indicated in Section 4.2, an update to the existing employment land supply picture was undertaken in 2017, which is presented in the Employment Land Supply Assessment (Arup, December 2017). This study collected up-to-date information on existing and potential employment sites in the District and was informed by the sites identified in the following documents:
- employment site allocations contained in the Council's adopted Local Plan (1998) with Alterations (2006);
 - the Council's existing Employment Land Review (Atkins, 2010);
 - sites promoted through the SLAA (Nathaniel Litchfield and Partners, March 2016);
 - sites received through the Council's Call for Sites process between 31 March 2016 and 31 January 2017;
 - sites identified from refused, live or withdrawn planning applications and pre-application enquiries for employment uses made between 18 May 2016 and 31 January 2017; and
 - the Council's employment land records.
- 4.22 One of the purposes of the Employment Land Supply Update was to identify the potential of sites to accommodate additional employment floorspace and/or employment land. Sites were assessed for opportunities for regeneration, intensification, expansion (of existing sites) and potential for development (new sites). This included assessing whether the additional employment floorspace and/or employment land identified in the documents listed above, and which informed the Tranche 1 employment sites, remained up-to-date.
- 4.23 The Employment Land Supply Update recommends that only those existing employment sites with the potential to expand beyond their site boundaries as well as potential new sites should be subject to the site selection process. Some 29 of 37 Tranche 1 employment sites did not accord with this recommendation and therefore were discounted from the site selection

process³⁹. A summary of the specific reasons each site was discounted is set out in Table 4.1.

Table 4.1: Summary of reasons for Tranche 1 employment sites not continuing to be considered through the site selection process

Reasons	Number of sites discounted from the SSM
Site identified in the Employment Land Supply Assessment as an existing employment site with no potential for expansion.	12
Site area and development quantum identified in the Employment Land Supply Assessment was materially different from that assessed in 2016 through the site selection process.	4
Site is identified as being a duplicate site which has been superseded by a more recent Call for Sites submission (i.e. new development proposal) under a different site reference.	3
Site is subject to an existing non-employment (non-B Class) use, and is therefore unavailable for development within the Plan period	9
The Council subdivided the site into three separate parcels along using road and fence boundaries in order to fairly assess a large area of land. These three separate parcels have been assessed under new site references.	1
Total	29

4.24 For the remaining eight Tranche 1 sites, the site boundary and development quantum identified in the Employment Land Supply Assessment was broadly consistent with the sites assessed in 2016 through the site selection process. Some non-material amendments were made to site boundaries and development quanta to ensure the sites reflected the latest information contained in the Employment Land Supply Assessment.

4.25 The Employment Land Supply Assessment also identified some additional employment sites which were not assessed in 2016. These sites along with any others identified through the sources set out in Section 2.4.2 were assessed as part of the second tranche of sites.

4.4 Stage 1 and Stage 6.1: Major Policy Constraints

4.26 In accordance with paragraph 4.5 of the SSM, each employment site was screened against the five major policy constraints using a Geographic Information Systems (GIS) database.

4.27 Of the 37 Tranche 1 sites promoted for employment uses, which were assessed against the major policy constraints, four sites were sifted out at Stage 1 due to the sites being located wholly outside the Settlement Buffer Zones. This left 32 Tranche 1 sites that proceeded to Stage 2. It should be

³⁹ It should be noted that the Employment Land Supply Assessment did however, recommend that existing employment sites should be designated in the emerging Local Plan except where there is no reasonable prospect of the site being used for employment purposes.

noted that in accordance with the updates undertaken on Tranche 1 sites following the Employment Land Supply Assessment (see Section 4.3 above), some 29 sites were discounted for further consideration through the site selection process. This meant that the number of 'live' sites from Tranche 1 sites was eight of which seven sites proceeded to Stage 2; a single site did not proceed because it was located outside the Settlement Buffer Zones.

- 4.28 For Stage 6.1, of the 13 Tranche 2 sites promoted for employment uses, which were assessed against the major policy constraints, four sites were sifted out due to being located wholly outside the Settlement Buffer Zones. This left nine sites that proceeded to Stage 6.2.
- 4.29 Further detail on how each of these sites scored against the five major policy constraints for Stage 1 and 6.1 is provided in Appendix F1.2 (Results of Stage 1 and Stage 6.1 Assessment).
- 4.30 As identified in the SSM, the Council did not undertake an update of the SLAA prior to the site selection process continuing. This meant that the promoted site capacity for Tranche 2 sites was not checked for constraints at this stage. For any sites which were identified to proceed to Stage 6.2, a check was undertaken to see whether any part(s) of the site were subject to the major policy constraints (excluding settlement buffers). Where this was the case the site capacity was discounted accordingly. Where this occurred it is documented in the output of the site assessment undertaken at Stage 6.2 of the SSM.

4.5 Stage 2 and Stage 6.2: Quantitative and Qualitative Assessment

- 4.31 In accordance with paragraphs 4.15 and 4.63 of the SSM, the seven sites subject to Stage 2 and nine sites subject to Stage 6.2 were assessed against 27 criteria identified in Appendix A of the SSM. This assessment was completed using a combination of GIS analysis and planning judgement. Where a planning judgement was made an explanation was provided to justify the decision made. Further details of how the assessment was undertaken for each criteria is set out in Appendix B1.4.1. The methodology followed for Tranche 2 sites was in general conformity with that followed for Tranche 1 sites; the differences were minor and related to new/updated information being available. Where there were any differences in methodology followed between Tranche 1 and Tranche 2 sites this is identified in Appendix B1.4.1.
- 4.32 A review of representations received on Tranche 1 sites was also undertaken. The Council has produced a summary of the representations received which is set out in Appendix B1.2.3. Where appropriate, updates or amendments were made to the Stage 2 assessments.
- 4.33 Part way through the assessment process for Tranche 1 sites a moderation workshop was held on 7 June 2016 (as required by paragraph 4.21 of the SSM) to moderate the results, check that there was a level of agreement on

judgements and regularise any apparently significant inconsistencies. Generally there was agreement on the way the SSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment. For Tranche 2 sites this moderation was undertaken as part of the Stage 6.3 workshop on 18 August 2017 (as required by paragraph 4.66 of the SSM). Generally there was agreement on the way the SSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment.

- 4.34 The output of Stage 2 and Stage 6.2 is an assessment proforma for each site, which provides details of the site proposals and the assessment results for each criteria. The assessments are presented at Appendix F1.3 (Stage 2 and Stage 6.2 Assessment) by parish. For each parish there is an overview map which identifies the sites within the parish that were assessed, followed by proformas for each site which are presented in ascending order by site reference number. Table 4.2 provides an overview of the number of sites assessed in each parish.

Table 4.2: Number of sites assessed at Stage 2 by parish

Parish	Number of sites assessed at Stage 2	Number of sites assessed at Stage 6.2
Chigwell	2	N/A
High Ongar	N/A	3
Loughton	1	1
Nazeing	1	1
North Weald Bassett	3	2
Waltham Abbey	N/A	2

4.6 Stage 6.3: Identify Candidate Preferred Sites

4.6.1 Identifying Sites for Further Testing

- 4.35 Paragraph 4.68 of the SSM states that: *“the purpose of this stage [Stage 6.3] is to identify the candidate Preferred Sites, which best meet the Council's preferred growth strategy. This stage will consider Tranche 1 and Tranche 2 sites assessed at Stages 2 and 6.2, respectively, and will be undertaken in parallel for employment and residential sites. Traveller sites assessed under the TSSM will also be considered in parallel.”* Sites for all three uses were considered at the same time.
- 4.36 As confirmed by footnote 8 of the SSM, 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.
- 4.37 In order to identify those sites proposed for employment use which should be subject to further testing a four step process was followed, in accordance with the requirements of paragraphs 4.73 to 4.75 of the SSM.

4.38 The four steps can be summarised as follows and were undertaken through a meeting of the Local Plan Officer Working Group on 18 August 2017:

- **Step 1:** Identifying suitable strategic options to accommodate growth.
- **Step 2:** Assessing site suitability.
- **Step 3:** Assigning sites against the land preference hierarchy.
- **Step 4:** Identifying sites for further testing.

Step 1: Identifying Suitable Strategic Options to Accommodate Growth

4.39 Paragraph 4.73 of the SSM states that this stage will firstly look at “*which settlements are the preferred locations for the different B Use Class uses*” drawing on the findings of the Employment Review (Hardisty Jones Associates, December 2017). As identified in Section 4.1, the District has two sub-markets:

- The area within and around the M25, which broadly comprises the southwest of the District. This includes the following settlements: Buckhurst Hill, Chigwell, Loughton, Theydon Bois and Waltham Abbey.
- The area outside the M25 which is characterised as more rural with smaller towns. This includes the following settlements: Epping, Nazeing, North Weald Bassett and Ongar.

4.40 The Employment Review identified strong demand and a shortage of supply across the whole of the District.

4.41 Paragraph 4.74 of the SSM also identified that the FEMA level work may provide guidance on: “*the quantum of employment land required across the FEMA and how such needs should be distributed across the authorities.*” At the time the workshop was undertaken the findings of the Employment Review were emerging and there was a lack of clarity on the role that Harlow might play. Therefore, whilst the Employment Review now confirms that there is no evidence that the District currently serves a wider Harlow market area or that there is a need to meet Harlow requirements or serve the Harlow market, at the time of the workshop it was considered that sites around Harlow should not be discounted at this Step.

4.42 On the basis of this guidance, and reflecting that there is strong demand for employment land across the District, it was judged that all sites in all settlements should progress for site specific assessment.

Step 2: Assessing Site Suitability

4.43 In accordance with paragraph 4.73 of the SSM, this Step considered in more detail the suitability of each of the 16 remaining employment sites. When undertaking the more detailed consideration of sites regard was had to paragraph 4.25 of the SSM, which states that: “*in general...those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable [sites] for allocation*”. Paragraph 4.25 then goes on to say: “*however, in common with all site selection/allocation processes, the*

identification of candidate Preferred Site[s] will involve an element of planning judgement, the effect of which on outcomes cannot be prejudged. It should also be noted that in exercising planning judgement different weight may be given to each of the criteria reflecting the characteristics of the sites being assessed under the SSM. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.”

- 4.44 Therefore, for each site a judgement was made as to whether it was considered suitable or not suitable for employment uses. In reaching this judgement, regard was had to all relevant material considerations including the findings of the Stage 2/6.2 assessment, the outcomes of the transport, infrastructure and HRA modelling of the Draft Local Plan sites, local knowledge and feedback from the Draft Local Plan consultation. A justification for the judgements made was documented with reference to the particular material considerations considered relevant to the site. The table at Appendix F1.4 (Results of Identifying Sites for Further Testing) provides a justification on a site by site basis for the judgement made.

Step 3: Assigning Sites to the Land Preference Hierarchy

- 4.45 Prior to the Local Plan Officer Working Group workshop sites were assigned to the supplemented land preference hierarchy. In accordance with paragraph 4.75 of the SSM, the sites were ranked against the considerations set out in paragraph 4.26 of the SSM⁴⁰ as well as an additional consideration which identified whether a site comprised an extension to an existing employment site or a new employment site.

Step 4: Identifying Sites for Further Testing

- 4.46 Table 4.3 identifies, by settlement, the number of sites (containing Tranche 1 and Tranche 2) and capacity of those sites located within each of the categories, which are judged to be suitable for employment uses. It should be noted that Table 4.3 only displays those six categories into which sites fall. In total, five sites comprising 63.6 ha were judged as being suitable for employment uses. In order to provide flexibility to meet the office and industrial employment requirements and provide a sufficient buffer pending the results of the deliverability assessment at Stage 6.4 it was determined that all sites judged to be suitable should be put forward for further testing.
- 4.47 At the workshop, there was also consideration of whether sites should comprise mixed use development (in accordance with paragraph 4.76 of the SSM). Where such sites were identified for mixed use development, this is identified in the capacity assessment, the output of which is reported in Appendix F1.5.2 (Results of Stage 6.4 Deliverability Assessments). This included identifying the potential for residential-led schemes to accommodate employment provision for small and medium enterprises (SMEs).

⁴⁰ In accordance with the methodology set out in Appendix B1.5.1.

Table 4.3: Summary of site categorisation by settlement

Settlement		Total	Category E5	Category E7	Category N3	Category N5	Category N6	Category N7
Harlow	Sites	1		1				
	Land (ha)	0.9		0.9				
Loughton	Sites	1		1				
	Land (ha)	5.0		5.0				
North Weald Bassett	Sites	1	1					
	Land (ha)	30.8	30.8					
Waltham Abbey	Sites	2		1		1		
	Land (ha)	26.9		1.3		25.6		
TOTAL	Sites	5	1	3		1		
	Land (ha)	63.6	30.8	7.2		25.6		

4.6.2 More Detailed Assessment for Employment Sites

- 4.48 Paragraph 4.78 of the SSM states that: “*for each site taken forward for further testing, more detailed capacity testing may be undertaken in accordance with paragraphs 4.35 and 4.36.*” Paragraph 4.35 of the SSM relates to ensuring employment sites provide flexibility of use (in accordance with national policy) and paragraph 4.36 of the SSM notes that the needs of SMEs should be met through the proposed site allocations.
- 4.49 With regards to the type of B Use Class uses which sites might be allocated for, the Employment Land Supply Assessment provided an indication of the preferred primary and secondary employment uses for sites based on an appraisal of existing/previous site uses and the sensitivity of surrounding land uses. Such uses were therefore identified in a policy neutral context and indicated a strong offer of sites suited to B8 Use Class uses. To ensure that the final portfolio of sites to be included in the Local Plan Submission Version would be capable of meeting the requirements of the District (which comprises limited B1a office floorspace along with B1c and B8 industrial uses) the ability of the sites to accommodate a more flexible mix of employment uses was considered. Table 4.4 summarises the employment uses identified in the Employment Land Supply Assessment and the further assessment undertaken as part of the site selection process. Where appropriate, this review of employment uses also considered opportunities to provide space for SMEs.

Table 4.4: Assessment of employment uses for each site

Site	Employment Land Supply Assessment		Site Selection Assessment
	Primary Use	Secondary Use	
SR-0006-N Dorrington Farm, Rye Hill Road, Harlow, Essex, CM18 7JF	B8	B1c/B2	This site is located within the wider Latton Priory site (SR-0046A-N), which was identified for allocation in the Draft Local Plan. Therefore, any expansion of this site should contribute to achieving the aspirations for this Garden Community and wider Harlow and Gilston Garden Town. Since SR-0046A-N would be a residential-led development, it was judged that B1a/b would be the most suitable type of employment use and would support Garden Town principles by enabling small scale employment provision, which could comprise start-up or grow-on space.
EMP-0002b Land to rear of Langston Road Industrial Estate and West of M25, Loughton, IG10 3DQ	B8	B1a/b	The site comprises an extension to an existing industrial estate with good public transport connectivity. This site therefore represents an appropriate location to meet demand for start-up and grow-on space for high tech and other niche sectors, which generally comprise B2 uses.
SR-0940 North Weald Airfield, North Weald, CM16 6HR	B8	B1a/b	North Weald Airfield represents a strategic employment site within the District. To provide maximum flexibility to enable it to respond to market requirements it was judged that the site would be suitable for B1/B2/B8 uses.
SR-0375-N Galley Hill Road Industrial Estate, Waltham Abbey, EN9 2AG	B8	N/A	The existing industrial estate is in B8 use. In order to provide flexibility for the site in the future it was judged that the site would be suitable for B2/B8 uses.
SR-1034-Z Land adjacent to the north of A121, south of Waltham Abbey, EN9 3AA	SR-0939, which is a smaller land parcel within SR-1034-Z was assessed in the Employment Land Supply Assessment. It was assessed for B8 as the primary use and B1a/b as the secondary use.		A key objective of the Local Plan is to support the regeneration and revitalisation of Waltham Abbey's town centre. It was considered that B1a office uses in this location would detract from achieving this aspiration. Given the sites access to the strategic road network (M25 Motorway) it was judged that the site would be suitable for B1c/B2/B8 uses.

4.50 In addition, some checks were undertaken the site boundary of each of the employment sites. Where a change was made this is recorded in the site proformas (with the deliverability assessment) presented in Appendix F1.5.2. The assessments are presented by settlement. For each settlement there is an overview map which identifies the sites within the settlement

that were assessed, followed by proformas for each site which are presented in ascending order by site reference number.

4.7 Stage 6.4: Deliverability Assessment

4.7.1 Land Promoter/Developer Survey

- 4.51 Paragraph 4.81 of the SSM confirms that: *“Information collected from promoters Call for Sites forms will be supplemented by updated information from promoters/developers/landowners and further technical studies. As a minimum, a proforma will be sent to all Tranche 2 site promoters/developers/landowners (as appropriate), which proceed to Stage 6.2 to validate the information provided in the Call for Sites form and to seek further, more detailed information on proposals.”*
- 4.52 To maintain consistency with the SSM, in 2016 a similar online survey to that sent to land promoters/developers of residential sites was sent to landowners of proposed employment sites. A series of questions were posed through the survey, a copy of which is provided at Appendix F1.5.1 (Land promoter/developer survey), which can be broadly grouped as follows:
- Contact information;
 - Ownership and availability;
 - Achievability;
 - On-going engagement.
- 4.53 Respondents were also provided with the opportunity to submit additional information to support their responses, including drawings, plans and any other relevant technical work undertaken to date.
- 4.54 Invitations to complete the survey were issued electronically in a series of tranches to promoters, developers and/or landowners for all sites that proceeded to Stage 6.2, where contact information was available. In total, 10 proformas were issued at this stage (26 June 2017). Respondents were provided a minimum of two weeks to respond to the survey. In total, seven survey responses were received.

4.7.2 Availability and Achievability Assessment

- 4.55 Paragraph 4.80 of the SSM states that: *“the purpose of this stage [Stage 6.4] is to consider the deliverability of the candidate Preferred Sites to inform.... the Plan. Stage 6.1, 6.2 and 6. 3 considered the suitability of the site and, therefore, this stage focuses on whether a site is deliverable, specifically:*
- *Whether the site is available now, or is it likely to become available during the Local Plan period?*

- *Whether there is a reasonable prospect that development will be achievable within the appropriate timescales?"*
- 4.56 Appendix B to the SSM sets out the matters which will be subject to the availability and achievability assessment. Employment sites were therefore assessed against the following criteria:
- **Availability:** site ownership, existing uses, on-site restrictions and site availability.
 - **Achievability**⁴¹: site marketability, on-site physical and infrastructure constraints and impact on mineral deposits.
 - **Overview assessment of constraints:** insurmountable constraints.
- 4.57 Further details on each criteria including how the assessment was undertaken are provided at Appendix B1.5.3. For each criteria a RAG rating system was utilised using a scale of three scores. The assessment of the five sites was completed using a combination of GIS analysis, information from the land promoter/developer survey or other information held by the Council and planning judgement. Where a planning judgement was made, an explanation for this judgement is provided in the deliverability proforma presented in Appendix F1.5.2.
- 4.58 Moderation of the deliverability assessment was undertaken as part of the allocation workshop on 18/19 October 2017. Generally there was agreement on the way the SSM had been applied and resulting assessment. Minor comments were made which were incorporated into the assessment.
- 4.59 Generally the five sites scored positively against the Stage 6.4 assessment; all sites will be available within the first five years of the Plan period and are subject to none or limited constraints which are not judged to affect the deliverability of the site.

4.7.3 Identifying Sites for Allocation

- 4.60 Following completion of the availability and achievability assessment a Local Plan Officer Working Group meeting was held on 18/19 October 2017 to identify which sites should be allocated in the Local Plan Submission Version. In accordance with paragraph 4.86 of the SSM this meeting was held in parallel for employment, residential and traveller sites. At the meeting a decision was made for each employment site as to whether it should be allocated or not in the Local Plan Submission Version. This decision was informed by all relevant material considerations. In accordance with paragraph 4.86 of the SSM this included:
- the findings of the availability and achievability assessment;

⁴¹ Appendix B to the SSM states that employment sites will be assessed for site viability. At the time the SSM was drafted it was anticipated that information on site viability for employment sites would be forthcoming through other evidence base studies. However, this information was not available at the time the assessment was undertaken.

- the findings of the transport, education and HRA technical assessments⁴²; and
- accordance with the updated settlement visions⁴³.

4.61 The following additional considerations were also taken into account:

- accordance with the Local Plan Strategy and associated hierarchy (which reflects the site selection hierarchy set out at paragraphs 4.26 and 4.75 of the SSM) in terms of expansion of existing sites before identifying new sites and maximising the sites allocated in each category before moving onto the next;
- feedback from the Draft Local Plan consultation;
- emerging Neighbourhood Plans which include proposed site allocations; and
- local knowledge.

4.62 A justification for the decisions made at the workshop on 18/19 October was documented; this write-up is presented in Appendix F1.5.3 (Results of Identifying Sites for Allocation).

4.63 Following completion of the availability and achievability assessment, a review of insurmountable constraints was undertaken. Each site was assessed 'in the round' to identify whether any restrictions or constraints, either individually or collectively, could be deemed insurmountable. The assessment took into account all achievability criteria in the Stage 6.4 assessment. The assessment was undertaken qualitatively and utilised professional judgement to determine whether restrictions or constraints would be likely to be insurmountable. The assessment of insurmountable constraints is documented in Appendix F1.5.3. On the basis of this further assessment no amendments were made to the proposed site allocations.

4.64 Further details on whether specific sites have been identified for allocation along with the associated justification is presented at Appendix F1.5.3. Maps are presented by settlement, which confirm whether a site has been identified for allocation or not. The accompanying table provides a justification on a site by site basis for the judgement made. Details of the Council's employment land trajectory is presented in the Local Plan Submission Version.

4.65 In summary, the Council has selected a portfolio of sites which will achieve the Local Plan Strategy. The sites proposed for allocation comprise five locations distributed across the District which will support delivery of approximately 23 hectares of employment land. This is in excess of the 17-21 hectares needed to meet the employment requirement in the District and ensures sufficient flexibility to respond to unforeseen demands and to

⁴² Details of the technical assessments and results are presented in Appendix B1.6.5 produced by the Council.

⁴³ These are presented in the Local Plan Submission Version.

provide for a range and choice of sites in terms of typology, location, mix and phasing.

- 4.66 Table 4.5 identifies the estimated likely amount of employment land in each settlement that the Council will make provision for through the Local Plan Submission Version and confirms the number of sites identified for allocation in each settlement.

Table 4.5: Estimated likely amount of employment land and floorspace by settlement

Settlement	Estimated likely amount of employment land (ha)	Proposed B Use Class use(s)	Estimated likely amount of employment floorspace (sqm)	Number of sites identified for allocation
Harlow	1	B1a/b	5,640	1
Loughton	10	B1c/B2/B8	4,000	1
North Weald Bassett	0.94	B1a/B1b	40,000	1
Waltham Abbey	11.28	B1c/B2/B8	45,120	2

- 4.67 In addition to identifying sites for allocation which provide new employment land and in accordance with the findings of the Employment Review and the Employment Land Supply Assessment, the Council has concluded that the majority of existing employment sites should be designated for on-going employment use within the Local Plan Submission Version (a total of 57 sites are designated for employment use). These sites are well used and their on-going protection will provide an important contribution to the future supply of employment land in the District. However, taking into account the quality of sites, as well as their planning history, the Council has concluded that the following existing employment sites should not be designated for employment use within the Local Plan Submission Version:

- E-111 - The Chimes Centre, Old Nazeing Road, EN10 6QU
- E-117 - Patches Farm, Galley Hill Road, Waltham Abbey, EN9 2AG
- ELR-0096 - Chase Farm, Off Vicarage Lane, North Weald Bassett, CM16 6AL
- ELR-0100 - Stoneshot Farm, Hoe Lane, Nazeing
- SR-0173 - Fyfield Research and Business Park, Fyfield Road, Chipping Ongar, CM5 0GZ
- SR-0943 - Stationbridge House, Blake Hall Road, Chipping Ongar, Essex, CM5 9LW
- SR-0946 - Broxlea Nursery, Nursery Road, Nazeing, Essex, EN9 2JE
- SR-0951 - Garden Centre, Crown Hill, Waltham Abbey, Essex, EN9 3TF

- 4.68 These sites are not considered to have ‘a reasonable prospect’ of being used for employment purposes over the course of the Plan period, and are therefore not being afforded long-term protection, in accordance with national policy.

4.7.4 Exceptional Circumstances

- 4.69 In order to support the proposed site allocations alterations may be required to the District’s Green Belt boundary. The NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary, whether this is to remove or create areas of Green Belt. There is no clear definition of what amounts to exceptional circumstances, but case law is clear that any justification must be responsive to local conditions and take into account a range of factors.
- 4.70 As indicated in Section 4.1, the FEMA authorities jointly commissioned and are signed-up to the West Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates, October 2017), which provides an informed basis for future plan making across the Area. The study included a proposed distribution of employment land across the FEMA which takes into account local circumstances including constraints and land availability. It is intended that the support for the findings of the study is reflected in a further MoU.
- 4.71 The SSM sets out a clear strategy to minimise the use of Green Belt land for development. Paragraph 4.26 of the SSM sets out a sequential approach in which non-Green Belt land is prioritised for development over land within the Green Belt; within this Green Belt sites on land of least value are preferred over sites on land of most value to the Green Belt.
- 4.72 Table 4.3 shows that there is insufficient suitable land located within settlements and outside the Green Belt to meet the employment requirement of the District within the Plan period. In order to meet the development requirement identified, and achieve sustainable forms of development in and around existing settlements, alterations to the Green Belt boundaries are necessary.
- 4.73 The site allocations proposed in the Local Plan Submission Version will require alterations to the Green Belt boundary in North Weald Bassett and Waltham Abbey. In addition, since SR-0006-N is located within the area identified for release to support the Latton Priory Garden Community, this site will also benefit from removal from the Green Belt.
- 4.74 In arriving at the proposed site allocations consideration has been given to where there is likely to be demand for employment land in the future, the suitability of individual sites to accommodate development and their deliverability over the Plan period. The sites proposed for allocation therefore represent the minimum land take required from the Green Belt to enable the Council to meet the District’s employment requirement through a strategy that is both sustainable and deliverable. Such an approach accords with the requirements of national policy.