

Chapter Three

Housing, Economic and Transport Policies

Housing

3.1 This section of the Local Plan sets out the approach that the Council will expect applicants to adopt in relation to the mix and type of new homes to be provided on development sites within the District. It also sets the site thresholds above which proposals will need to make provision for affordable housing and how the Council will assess proposals for rural affordable housing which would normally be considered as being contrary to policy (known as rural exception sites).

Housing Mix and Accommodation Types

3.2 It is important to consider, as set out in national planning guidance, the housing needs of different sectors within the community. This is to ensure that the right size and type of new homes is provided across the District to meet the needs of existing and future residents and to ensure the creation of mixed and balanced communities. This includes those with specialist housing requirements or who have a desire to build their own homes.

Key Evidence

- Housing Implementation Strategy (Epping Forest District Council, 2017);
- Strategic Housing Market Assessment (Opinion Research Services, 2015);
- Strategic Housing Market Assessment Establishing the OAN (ORS, 2017); and
- Strategic Housing Market Assessment Affordable Housing Update (ORS, 2017);

Approach

3.3 The Strategic Housing Market Assessment (SHMA) 2015 and updates are the latest published housing needs evidence which set out the quantum, type, and size and tenure of new market housing homes needed both across the SHMA area and within the District over the Plan period. However, there is also a need to consider the most appropriate location for new market housing, and the type and size of properties to be provided in different areas. This

must take into account the desire for some to build their own homes and to address specialist housing needs where the evidence exists to support this. The Council will seek to make the best use of land, and take account of the existing stock of homes within the locality to achieve the objective of mixed and balanced communities.

3.4 It is important that a proportion of new homes can provide for the needs of those with, or who may develop, accessibility needs through the design of those homes. This reflects the evidence as set out in the SHMA and the 2017 update that there is an existing need for accessible housing in the District that will continue taking into account the ageing profile of the District's population over the period of the Local Plan. Improving housing standards to strengthen local communities and reduce the need for residential care by enabling vulnerable people to remain in their homes, or be able to have the choice to be able to move into a new home, is important as part of improving the overall housing mix within the District.

Consequently, the Council's approach is that all new homes should be built to Category 2: Accessible and Adaptable Homes standards, in order to maximise choice in the type, size and location of new homes available.

3.5 The needs of those with accessibility needs, including older people can be supported by bungalow accommodation. Recent information contained in the Council's Authority Monitoring Report shows that there has been a gradual erosion of the District's existing stock of bungalows. The Council considers that bungalows can play an important role because of their potential ease of adaptation such that they can provide choice for people with accessibility needs, including the current and future needs of older people.

3.6 Specialist accommodation for those with support needs, including for older people, will continue to play an important role in providing for those residents who currently, or will, need assistance. Consequently, the loss of existing specialist accommodation will be resisted and new provision will normally be supported where appropriately located and designed.

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- 3.7 The Self Build and Custom Housebuilding Act 2015 placed an obligation on local authorities to maintain a register of people and groups interested in building their own homes. A detailed definition of self-build and custom housebuilding is set out in the Housing and Planning Act 2016. The Council will work with landowners and developers to deliver its obligations with respect to self-build and custom housebuilding.
- 3.8 The Council is also supportive of community-led housing. Community-led schemes are those that are driven by local communities, rather than local authorities or developers.

Policy H 1 Housing Mix and Accommodation Types

- A. Development will be permitted where the mix of new homes:
- (i) includes a range of house types and sizes to address local need including for 'down-sizing';
 - (ii) is appropriate to the size, location and characteristics of the site and its surroundings;
 - (iii) takes into account the existing housing stock in the settlement or neighbourhood in order to avoid any over-concentration of a single type or size of homes, or specialist accommodation, where this would undermine the achievement of mixed and balanced communities; and
 - (iv) allows for community-led approaches such as co-housing and co-operatives where appropriate;
 - (v) provides for all new homes to be accessible and adaptable as defined by the Building Regulations in effect at the time of the application.
- B. Planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new homes to be provided. Such evidence will also need to reflect latest housing needs evidence published by the Council.
- C. Proposals for housing, requiring specialist accommodation, self-build/custom build housing, sites upon which caravans can be stationed, or locations for mooring houseboats, will be

supported where:

- (i) they meet a proven identified need;
 - (ii) the location is appropriate in terms of access to facilities, services and public transport and;
 - (iii) It can be demonstrated that the development is designed and managed to provide the most appropriate types and levels of support to the proposed occupier and adequately caters for the needs of support staff.
- D. The Council will require all New Housing Development to include affordable housing in accordance with Policy H 2 (Affordable Housing).
- E. Where there is evidence of an identified unmet need in the local area and the location is appropriate in terms of access to existing or proposed facilities, services and public transport, larger scale new residential developments should incorporate specially designed housing/specialist accommodation for people with support needs (including for older people and housing with care).
- F. The loss of bungalows and specialist accommodation will be resisted.
- G. The Council will support the development of self-build homes on appropriately sized, serviced sites in the first instance or on appropriately sized sites that are capable of being serviced. The provision of such will be encouraged as part of larger development schemes.

Affordable Housing

- 3.9 The evidence presented in the SHMA and updates demonstrates that the provision of affordable homes is a key issue for the District. The 2017 Affordable Housing update sets out that, having taken into account the number of affordable homes provided in the first five years of the plan period, the number of new affordable homes required for the period 2016-2033 in Epping Forest District was 2,851 homes. This equates to some 178 homes per annum.
- 3.10 The primary opportunity to address this issue is through on-site provision as part of market sector housing developments, taking into account the limited supply of land and to ensure the creation of mixed and balanced communities. In doing so there needs to be a balance between securing the maximum level of affordable housing on those sites whilst

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ensuring that this does not impact on their viability and prevent the overall delivery of homes and infrastructure.

3.11 In order to understand what would be considered a proportionate and reasonable level of affordable housing to be sought, without impacting on the overall delivery of housing, the Council has undertaken an assessment of viability to inform this plan.

3.12 The Housing and Planning Act 2016 introduced a general duty on local authorities to promote the provision of Starter Homes and set out how these should be defined. A large proportion of the operational detail still needs to be specified through the introduction of Regulations. Subsequent to the Act gaining Royal Assent the Government published its Housing White Paper (2017). This set out that the Government would commence the general duty on local authorities to promote the supply of Starter Homes but that it would not implement a statutory Starter Home requirement at this point in time. The Housing White Paper indicated that revisions to national planning guidance would be made instead setting out a policy expectation that housing sites of 10 or more dwellings would deliver a minimum of 10% affordable home ownership products.

3.13 Policy H 2 provides sufficient flexibility to accommodate any future changes in policy. In addition the current evidence shows that there is a significant need for homes for affordable rent and such provision will be the Council's priority. This would not preclude the opportunity to provide the indicative levels of affordable home ownership products set out in the Housing White Paper.

Key Evidence

- Local Plan Viability Study (Dixon Searle, 2017);
- Housing Implementation Strategy (Epping Forest District Council, 2017);
- Strategic Housing Market Assessment (Opinion Research Services, 2015);
- Strategic Housing Market Assessment Establishing the OAN (ORS, 2017); and

- Strategic Housing Market Assessment Affordable Housing Update (ORS, 2017).

Approach

3.14 The evidence suggests that the provision of 40% of affordable homes on sites of 11 or more homes (including self-contained units in specialist accommodation) would provide the most appropriate balance between achieving a meaningful proportion of affordable homes, as well as accommodating any CIL contributions, to support both the delivery of affordable homes and the necessary strategic infrastructure subject to individual site viability. The Council recognises that the provision of affordable housing in accordance with Local Plan Policy H 2 may render some development proposals unviable at the time of the application. Where the Council is satisfied that the independently verified viability and financial appraisal submitted to justify the provision of affordable housing below the level required by Policy H 2, where appropriate, the Council will expect additional affordable housing provision to be made if viability improves before full completion of the development permitted. Larger-scale development proposals for new housing development to be delivered on a phased basis, the Council will require section 106 agreements to include mechanism for viability reviews and 'clawback' clauses (or similar) to ensure the fullest possible compliance with Local Plan policy is achieved where the viability of the scheme improves before completion.

3.15 In developing its approach to the delivery of affordable homes the Council needs to take into account the fact that not all development sites will contribute to the provision of affordable housing. This could be due to a number of factors including:

- that the site is too small;
- that there are site-specific factors which mean that the provision of on-site affordable housing may not be desirable in terms of the form and location of development;
- that site-specific complexities and costs would not generate sufficient 'value' to be

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viable if the proportion of affordable housing sought were to be provided; or

- some developments, such as those brought forward through the 'Office to Residential' prior approval process, are exempted by national legislation to make a contribution towards the provision of affordable housing.

In addition there will continue to be a loss of existing affordable housing stock through 'Right to Buy'.

- 3.16 The 2015 SHMA and updates provide information about the potential type and tenure of affordable homes to be provided across the District. This evidence indicates the need for the provision of 81% of new affordable homes to be for affordable rent and 19% to be for intermediate housing products. This provides a useful starting point but, as with the delivery of market housing, there is a need to consider the most appropriate location, type, size and tenure of properties to be provided in different areas. Different locations will have different characteristics, and different sizes of site will provide varying opportunities for achieving a mix. There is also a need to make best use of land, and to take account of the existing stock of affordable housing within the locality in respect of the objective of achieving mixed and balanced communities. In relation to this latter point, it is important to ensure that affordable homes are designed to ensure that they are visually integrated as part of any wider development i.e. that schemes are designed in such a way as to be 'tenure blind'. Similarly, it is important that new homes provide for the needs of those with, or who may develop, accessibility needs through their design.

Policy H 2 Affordable Housing

- A. On development sites which provide for 11 or more homes, or residential floorspace of more than 1,000 sq m (combined gross internal area), the Council will require 40% of those homes to be for affordable housing provided on site. The mix of affordable homes will be required to reflect the latest available housing need. All new homes will be required to meet accessible and adaptable homes standards as defined by the Building Regulations applicable at the time of the application.
- B. The management of the affordable housing provided will be undertaken by a Registered Provider which is a Preferred Partner of the Council unless otherwise agreed by the Council. Any relevant scheme will need to demonstrate that the design, siting and phasing of affordable homes provides for its proper integration and timely provision as part of the wider development.
- C. The mix of units in respect of size will be determined on a site by site basis dependent on the overall needs for the local area and on the specific characteristics of the individual site. However, the Council will generally expect the mix of the affordable homes to reflect the mix of the market housing, in terms of the ratios of types, sizes and the overall number of habitable rooms.
- D. Proposals that do not accord with the requirements of paragraph A (above) must be accompanied by a financial and viability appraisal (with supporting evidence), which is transparent and complies with relevant national or local guidance applicable at the time.
- E. Where it has been demonstrated to the Council's satisfaction that the provision of affordable housing in accordance with the above levels and tenure mix would render the scheme unviable, the Council will determine the approach to be taken to achieving viability, where appropriate, having regard to the following available options:
 - (i) reviewing the tenure mix;
 - (ii) reviewing the extent of other site specific planning obligations; and
 - (iii) reviewing the proportion of affordable housing.
- F. In exceptional circumstances, where the Council agrees that it would be inappropriate for the required affordable housing to be provided on-

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site as part of the development, the Council will accept a financial contribution to fund the provision of affordable housing on another site in the District, provided that the Council is satisfied that:

- (i) The financial contribution is at least equivalent to the increased development value if affordable housing was not provided on-site, subject to such a contribution being viable; and
 - (ii) A financial and viability appraisal has been provided (with supporting evidence) in accordance with paragraph D (above) which is transparent and complies with relevant national and local guidance applicable at the time, properly assessing the level of financial contribution to be provided.
- G. Where a viability and financial appraisal has been submitted in accordance with paragraph D (above) the Council will undertake an independent review of that appraisal for which the applicant will bear the cost.

Rural Exception Sites

3.17 A significant part of the District is rural in nature with a large number of smaller settlements and communities which, in accordance with the proposed spatial strategy, would not be appropriate for the allocation of larger scale developments, which would normally be expected to deliver a proportion of affordable homes. Nevertheless it is highly likely that there will continue to be a need for affordable homes in those communities.

Key Evidence

- Local Plan Viability Study (Dixon Searle, 2017); and
- Strategic Housing Market Assessment (Opinion Research Services, 2015).

Approach

3.18 There is a need to provide the opportunity for those communities to be able to benefit from the provision of affordable homes on suitable small scale sites if a local need is clearly identified and evidenced. In accordance with national guidance, there is also a need to provide some flexibility to enable the

opportunity for some cross-subsidy through the provision of a small proportion of market housing should viability evidence clearly demonstrate that such cross-subsidy is justified.

Policy H 3 Rural Exceptions

- A. Planning permission may be granted for small-scale affordable-housing schemes which are related to smaller settlements, where planning permission for housing development will not normally be granted, where the Council is satisfied that:
- (i) there is a demonstrable social or economic need for affordable housing for local residents which cannot be met in any other way and which can reasonably be expected to persist in the long term. Planning applications will be expected to be supported by a local housing needs assessment;
 - (ii) the development is well-related to the existing settlement and there is no significant detrimental impact to the character of the nearby settlement and the surrounding countryside, or would cause significant harm to Green Belt objectives. Proposals involving extensions into the open countryside or the creation of ribbons or isolated pockets of development are unlikely to be considered acceptable and should be avoided. There should be no significant material grounds for objection including on highways, infrastructure, environmental or amenity matters; and
 - (iii) suitable arrangements have been secured to ensure that all of the affordable homes built are available only for initial and subsequent qualifying occupiers whose total income is insufficient to enable them to afford to rent or buy a dwelling of a sufficient size on the open market in the specified parish.
- B. The management of the affordable housing provided will be undertaken by a Registered Provider which is a Preferred Partner of the Council unless otherwise agreed by the Council.
- C. For the purpose of this Policy 'local resident' is defined as:
- (i) Persons who have been permanently resident in the specified parish for at least two years; or
 - (ii) Persons who are no longer resident in the

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specified parish but who have been resident there for at least three years during the last five years; or

- (iii) Persons who are in permanent employment in the specified parish and have been for a minimum of two years and are working at least an average of 24 hours per week; or
- (iv) Persons who have close relatives (i.e. parents, grandparents, children, brother or sister) living in the specified parish who have lived there for at least five years.

- D. Should there be insufficient applicants from the specified parish when the homes become available for occupation, then applicants from neighbouring parishes who comply with the eligibility criteria set out above will be considered.
- E. The Council will consider the provision of a small proportion of market housing within the proposal site if it can be demonstrated through a financial and viability appraisal (with supporting evidence), which is transparent and complies with relevant national or local guidance applicable at the time, that such housing is financially necessary to ensure the delivery of the affordable homes.
- F. Where a viability appraisal has been submitted in accordance with paragraph D (above) the Council will undertake an independent review of that appraisal for which the applicant will bear the cost.

Traveller Site Development

- 3.19 As set out in national planning guidance “Travellers” means “Gypsies and Travellers” and “Travelling Showpeople”. Therefore, when referring to Travellers in this Plan, the term incorporates Gypsies and Travellers, and Travelling Showpeople.
- 3.20 There are distinct differences in the culture and way of life of Gypsies and Travellers, and Travelling Showpeople. For this reason, Planning Policy for Traveller Sites 2015 provides two separate definitions.
- 3.21 “Gypsies and Travellers” are defined as: persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of

travelling showpeople or circus people travelling together as such.

- 3.22 “Travelling Showpeople” are defined as: members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.
- 3.23 The Council is required to plan for the future needs of Travellers in the District up to 2033. Chapter 2 and Policy SP 2 set out the context in relation to the future needs of Travellers in the District over the Plan period and the sequential approach to meeting those needs over this period. The proposed allocation of sites to meet the identified need for Travellers and Travelling Showpeople are set out in Policy SP 2, SP 4 and Chapter 5
- 3.24 National planning guidance sets out a range of issues for local planning authorities to consider when assessing applications for Traveller site development. It makes clear that local planning authorities should consider matters including: the effective use of brownfield or derelict land; landscaping and the positive enhancement of the environment; promoting opportunities for healthy lifestyles; and avoiding isolation from the rest of the community. The Council should also consider any locally specific criteria to assess applications that may come forward on unallocated sites.
- 3.25 Locally, the Traveller communities live mostly on privately owned sites containing a small number of pitches. There are some larger sites in the District but consultation with both travelling and settled communities has indicated a strong preference for smaller sites for Travellers in locations with a degree of separation from settled communities.
- 3.26 Travelling Show people occupy a single site in the District allocated for intensification in this plan at Policy P 12.

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Key Evidence

- Essex, Southend on Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (ORS, 2017); and
- Epping Forest District Council: Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Summary Report (ORS, 2017).

Approach

- 3.27 The Council will ensure that any proposals for Traveller sites located outside of the allocated sites are assessed in accordance with national guidance to ensure that they are located in suitable locations and meet the future needs of the Traveller community.
- 3.28 The criteria in the Policy responds to the need to ensure that sites for Travellers are accessible and that there is convenient access to local services and facilities, specifically educational, medical and welfare services. The available provision of local services, especially schools, to meet the needs of the occupiers must also be reviewed and appropriately addressed.
- 3.29 When considering applications for sites, the Council will take into account the suitability of the site and the sustainability of the location, having regard to national guidance.
- 3.30 Proposals for Traveller site development is inappropriate development in the Green Belt and will only be approved when very special circumstances have been demonstrated in line with national guidance.
- 3.31 The Council will resist the loss of existing Traveller sites, and particularly the conversion to permanent dwellings unless it can be clearly demonstrated that there is no genuine need or likely future need for Traveller sites in the locality and other planning policy requirements are met including those identified in national planning guidance.

Policy H 4 Traveller Site Development

- A. The Council will meet the identified need for Travellers through the provision of plots and/or pitches as part of allocations as set out in Policies SP 2, SP 4 and Chapter 5.
- B. If applications for Traveller site development are received for sites other than those allocated in this Plan they will be determined taking into account the following considerations:
- (i) The impact on local amenity and the natural and historic environment;
 - (ii) The relationship to local services with capacity, including education establishments, health and welfare services, shops and community facilities;
 - (iii) Access to the highway, public transport services and sustainable transport options;
 - (iv) The provision of on-site facilities for parking, storage, play and residential amenity and appropriate essential services;
 - (v) Whether the site is located outside areas of high flooding risk;
 - (vi) The compatibility of the proposed use with surrounding land uses including potential disturbance from vehicular movements, and on-site business activities;
 - (vii) The impact on the physical and visual character of the area;
 - (viii) The potential for successful integration between travelling and settled communities; and
 - (ix) Any impact on the Green Belt.
- C. In accordance with Policy SP 4, proposals for new sites under part B of this policy should not exceed five pitches or 0.5 hectares, unless a specific justification is provided for a greater number of pitches up to a maximum of 10 pitches.
- D. Planning permission will not be granted for the replacement of lawful Traveller sites by permanent dwellings or other uses unless it can be clearly demonstrated to the satisfaction of the local planning authority that there is no genuine need or likely future need for Traveller sites in the locality and other planning policy requirements are met.

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The Economy and Town Centres

- 3.32 This section of the Local Plan sets out the future plan for the economy and town centres within Epping Forest District up until 2033.
- 3.33 National policy requires the planning system to place a considerable emphasis on supporting economic growth. Local Plan policies for the economy and town centres should be based on adequate, up-to-date and relevant evidence and integrated with other policy elements, particularly housing. It further reinforces the requirement for cooperation with partners and across boundaries in maintaining a robust evidence base to understand current needs and likely changes. National policy also sets the requirement for Local Plans to address barriers to investment, holistically assess needs for land or floorspace as well as the sufficiency and suitability of existing and future land supply. Local Planning Authorities should also have specific regard to the role and function of their town centres, assess locations of deprivation and assess the needs of the food production and tourism industries.
- 3.34 In terms of town centres, Local Plans should define a resilient network and hierarchy and the extent of shopping areas. Plans should promote competitive town centres that provide choice, a diverse offer and reflect individuality; they should support existing, and create new, markets and allocate sites to meet a range of uses/needs, including edge of centre sites.
- 3.35 National planning guidance promotes the sustainable growth of all types of businesses in rural areas, including conversion of, and new, buildings. It also promotes the development and diversification of agricultural and other land-based businesses and the supporting of sustainable rural tourism activities as well as encouraging the retention and development of local services.
- 3.36 The strategy for the economy and town centres is closely linked to the strategic policies of the Plan, particularly in relation to the quantum and location of future planned development. The Plan incorporates policies to plan for future jobs growth, and the identification of sites and areas to meet future land requirements and

employment needs. In addition, policies establish the future town centre hierarchy and plan for the retail needs of the District, both in terms of the type of additional retail floorspace that will be required, and where this should be located. Further policies relate to the food production industry and glasshouses, and the visitor economy.

Employment Sites

- 3.37 Epping Forest District is an area of contrasts. More urban in the south abutting London but in stepping beyond the M25 the District becomes more rural in nature. The area has a number of smaller town and population centres with no single higher order conurbation. Unsurprisingly given its position, the District has very high levels of out-commuting with around half of working residents commuting into London. Consequently, the District is not a self-contained economy, but an integral part of a functional economic geography that extends well beyond its boundaries.
- 3.38 The District has key strengths in the construction, professional services, business services, health and care sectors and job growth is forecast in these sectors over the Local Plan period. Important also to the District's economy is the long established horticultural and glasshouse industry in the Lea Valley, as well as seeking to capitalise on opportunities for growth in the visitor economy. The District is highly entrepreneurial with strong levels of self-employment and business start-ups and the economy is dominated by small and medium enterprises (SMEs).
- 3.39 Drawing on the District's excellent strategic transport links, key employment locations include Loughton and Waltham Abbey with significant, albeit smaller, concentrations of employment space in North Weald Bassett and Nazeing.
- 3.40 London is a clear economic driver with influence on the District but Harlow is also a major location for economic growth, particularly with its Enterprise Zone status. The Harlow Enterprise Zone (serving all of West Essex) is seeking to create high quality, high technology

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employment close to the District. Development and employment at North Weald Airfield features in the County Council and LEP's plans for growth. Epping Forest District sits within the London Stansted Cambridge Corridor's plans which include promoting growth in sectors such as food and life sciences.

- 3.41 The Council, along with the local authorities in the functional economic market area (East Herts, Harlow and Uttlesford), commissioned work in 2017 to assess the employment needs of West Essex and East Hertfordshire. Two District level studies have also been produced which have identified and analysed the supply of employment sites, opportunities for growth, and future needs for employment space.
- 3.42 The majority of existing employment sites within the District are in good or fair condition and are well occupied. There is a strong market demand for employment space throughout the District whether it is clustered near to London Underground linkages, within close proximity to the M25/M11 or within more rural locations within the District. There is a need for further start-up space as well 'grow-on' provision to enable existing businesses to grow and stay within the District. Economic growth locally is however challenged by the availability of suitable sites for employment, high land values and vulnerability to the loss of sites through Permitted Development.
- 3.43 Evidence suggests the need for over 10,000 jobs to be generated over the course of the Plan period. To achieve this, it will be necessary to protect and enhance existing employment sites where appropriate, in addition to identifying at least 16-19 hectares of land for B class uses.

Key Evidence

- West Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates, 2017);
- Employment Review (Hardisty Jones Associates, October 2017); and
- Employment Land Supply Assessment (Arup, 2017); and
- Site Selection Report 2016 and 2017 (Arup).

Approach

- 3.44 The Council's approach is to protect and enhance existing employment sites (including through intensification), together with the allocation of new sites. Such an approach will provide for the employment development needed to support sustainable long-term economic growth within the District and the wider area whilst limiting the extent of land that will need to be released from the Green Belt. The Council supports the development of the rural economy in the District.
- 3.45 Given the limited supply of readily available employment sites within current policy constraints, there is scope to consider the renewal or intensification of some existing employment sites, including those within the Council's ownership, in order to maximise their potential.
- 3.46 In order to retain sites in employment use and meet the identified need for employment, the Council will require robust evidence from applicants seeking to demonstrate that there is no longer a reasonable prospect of the site's continued use for employment purposes before considering its release to other uses. Differing requirements will need to be met depending upon the size, nature and location of the site or property. In general, it should be marketed effectively for a minimum of 12 months at a rate which is comparable to local market value for its existing use and it must be demonstrated that the continuous use of the site for such uses is no longer viable, taking into account the site's existing and potential long-term market demand for such uses.
- 3.47 The Council's Economic Development Team should also be engaged early in the process in order to maximise exposure of the employment/business opportunity that the site affords, to as wide a potential business audience as possible. Any such planning application must include details of valuations undertaken prior to placing the site on the market and a statement detailing why the site has not been taken up.
- 3.48 Policy E 1 sets out the Council's approach in relation to meeting future employment needs.

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3.49 The Local Plan designates 53 existing employment sites, equating to approximately 109 hectares of land for future employment use. In addition, the following new employment allocations are made in order to provide sufficient land to meet future needs and ensure sufficient flexibility. Further details are provided in Policies SP 2, SP 5, Chapter 5 and in Appendix 6. In addition, other small-scale employment uses are expected to be provided as part of the development mix within the new Garden Communities, and other appropriate locations, including Debden London Underground Station Car Park.

Table 3.1 New employment site allocations

Allocation reference	Site Name	Allocated use	Indicative Development Area
LOU.E2	Langston Road Industrial Estate	B2	1 ha
NWB.E4	North Weald Airfield	B1/B2/B8	10 ha
RUR.E19	Dorrington Farm	B1a/B1b	1 ha
WAL.E6	Galley Hill Road Industrial Estate	B2/B8	1 ha
WAL.E8	Land North of A121	B1c/B2/B8	10 ha
Total			23ha

Policy E 1 Employment Sites

- A. Existing Employment Sites**
- (i) The Council will seek to retain and enhance existing employment sites and premises. Proposals for the redevelopment, renewal, intensification, or extension of existing employment sites and premises for their existing use will be encouraged.
 - (ii) The change of use of existing employment sites or premises (whether designated or undesignated) to other uses will not normally be permitted unless the applicant can demonstrate through evidence, including marketing of the site, that there is no longer a reasonable prospect of the site being used for the existing employment use.
 - (iii) Proposals which will result in loss of employment space will be expected to provide mitigation measures in the form of contributions to local employment training and small business growth programmes supported by the Council.
- B. New Employment Sites**
- (i) The Council will meet the identified need for employment sites through new allocations as set out in Policies SP 2, SP 5 and Chapter 5.
- C. The Council will support and encourage the development of flexible local employment space to meet the employment and economic needs of the District.**

Centre Hierarchy/Retail Policy

- 3.50 The town centres of the District experience a significant leakage of comparison retail spend, as many of the District's residents choose to shop outside of the District for items like clothing, furniture and major home appliances. This is not surprising given the relatively small nature of the District's town centres compared to surrounding areas within easy reach, such as Harlow, Romford, Enfield, and Brentwood.
- 3.51 The evidence base has considered the relative roles of settlements and town centres across the District, taking into account a range of factors including: sustainability; accessibility; town centre health check analysis; retail provision; employment provision; the historic environment; availability of services and

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facilities; and population. This has enabled recommendations to be made in relation to the future town centre hierarchy and requirements.

- 3.52 In preparing the Local Plan the Council has to take into consideration the changing nature of town centres recognising the influence of the internet on trading, an increasing demand for services and the level of forecast growth across the District. While population growth is forecast, this does not necessarily translate into a need for more shop and service floorspace, particularly given the competition from nearby centres and the impact of internet trading. Indeed an over provision of floorspace could be detrimental to the health of centres, which in a number of cases have seen some decline in the level of retail provision. Equally under-provision will generate more journeys and potentially diminish the attractiveness of existing centres.
- 3.53 Increasing the market share of retail expenditure is considered to be an unrealistic prospect for the District, given established and more significant nearby retail offer, including Harlow, Romford and Westfield Stratford City that the District cannot and does not wish to compete with, together with greater use of the internet for making purchases. The evidence suggests that retaining a constant market share is more realistic, and this identifies a need for up to 59,700sq.m. of retail floorspace. When 'pipeline' development is removed there is a net need of 39,700sq.m retail floorspace. From this it has been assumed that approximately 40% will be provided in Harlow, recognising the contribution this town makes to service the needs of the District.

Key Evidence

- Town Centres Review (Arup, 2016);
- Epping Forest District Council Town Centres Study (Roger Tym and Partners, 2010); and
- Settlement Hierarchy Technical Paper (Epping Forest District Council, 2015).

Approach

- 3.54 In light of the evidence, the Council's approach is to introduce a simplified town centre hierarchy which accords with the latest evidence. Growth in town centre uses will be

focussed on the largest town centres at Epping and Loughton High Road, and the Council will seek to promote growth in centres across the District in order to maintain their vitality and viability over the Plan period.

- 3.55 Additionally, in accordance with the requirement of national policy, primary shopping areas, Primary Retail Frontages and Secondary Retail Frontages have been identified within each Town and District Centre.
- 3.56 The Council will keep under review how to meet future floorspace requirements over the Plan period, including the needs for out of centre sites, taking account of nearby retail offer including Broxbourne retail trends.

Policy E 2 Centre Hierarchy/Retail Policy

- A. The following Town and District Centre hierarchy applies in the District:
- (i) Town Centre:
- Epping
 - Loughton High Road
- (ii) Small District Centre:
- Waltham Abbey
 - Loughton Broadway
 - Ongar
 - Buckhurst Hill
- B. Proposals within defined Town and Small District Centres for retail, leisure, entertainment, offices, arts and culture, tourism and other main town centre uses, as defined by national planning guidance, will be supported where they will maintain and enhance the vitality and viability of the centres.
- C. Within defined Primary Retail Frontage ground floor units will be maintained in A1 Class Uses in accordance with Policies P 1 to P 5. Proposals that would not result in a reduction in the specified percentage of A1 Class Uses will be permitted for other main town centre uses where this would support the function, vitality or viability of the Town or District Centre and maintain an active daytime frontage.
- D. Within defined Secondary Retail Frontage ground floor units will be maintained in A1 Class Uses in accordance with Policies P 1 to P 5, but a wider range of main town centre uses may be supported

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

where they would maintain the diversity, viability and vitality of the Town or Small District Centre. Proposals for non-A1 Class Uses within Secondary Retail Frontages must encourage active shop fronts, attract a high footfall consistent with other main town centre uses and positively contribute to the function of the Town or Small District Centre.

- E. The scale and type of any development proposals should be proportionate to the position of the relevant centre in the hierarchy.
- F. In Town and Small District Centres, the Council may permit residential development in appropriate locations and within Primary or Secondary Retail Frontages where it is above the ground floor and would not lead to a loss of main town centre uses, floorspace or frontage.
- G. The Council will not permit the change of use to any non- retail use of corner shops, shops in small local parades or village shops, unless it can be demonstrated that:
 - (i) there is no demand for a retail use; or
 - (ii) the service provided is to be continued in another location in the village or locality; or
 - (iii) the new use would meet an identified need for community facilities or services.
- H. Out of Centre development
 - (i) All proposals for main town centre uses outside of defined Town and Small District Centres, including edge of centre/out of centre development, will be subject to sequential testing as required by national planning guidance and will only be permitted where:
 - There is demonstrable need for the development;
 - The proposal satisfies the sequential approach to site selection;
 - The proposal would not put at risk or harm proposals to safeguard the vitality and viability of any nearby town centre;
 - The proposal would not cause material harm to the vitality and viability of any nearby town centre; and
 - The development would be readily accessible, or will be made so, by a range of transport options, including public transport, cycle and foot
- I. Relevant applications for main town centre use

outside of defined Town and Small District Centres will be required to undertake and provide an impact assessment in accordance with national planning guidance.

Food Production and Glasshouses

- 3.57 The District has long been home to a major part of the Lea Valley glasshouse industry, now mainly focused in Roydon, Nazeing and Waltham Abbey. The District has historically provided a favourable location for the industry, with largely flat land, rich soil, ample water supply, and good proximity to London through road, rail and canal links. The industry experienced post-war growth, but has subsequently experienced rapid decline due in part to growing competition with other land uses, increased competition from other areas and technological improvements which means that the industry no longer requires high quality arable land.
- 3.58 However, it continues to remain one of the main centres of the UK Glasshouse industry and whilst the land take has declined significantly, the production from the remaining sites has increased. The industry continues to rely significantly on migrant/seasonal labour for most of the glasshouse and packhouse jobs. However, the cost of local accommodation is too great for many employees, so some growers have made provision on site – a mix of permanent, temporary (caravan/mobile home), or building conversions, a number without permission.
- 3.59 Glasshouse horticulture is an appropriate use in the Green Belt, but technological changes and competition pressures mean new glasshouses have to be much larger in area and taller, increasing their impact on the locality. Some growers are looking to expand significantly, others are stable with some relying on niche markets, and the rest are in long-term decline or are already derelict. Packhouses are vital to the industry to enable the producers to provide supermarkets with graded and packaged products. They handle produce from the Lea Valley, UK and abroad and allow growers to enter into long-term contracts with the

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supermarkets on the basis of guaranteed volume throughout the year.

- 3.60 The Glasshouse sector makes a significant contribution to the local economy and employment. Looking to the future, and given operational matters of profit margins, costs and access to workers, growers are increasingly looking at investment in increased mechanisation/robotics, although the likely impact of this over the Plan period is unclear. Modern operations often include energy efficient plant to assist in controlling costs as well as reducing greenhouse gas emissions.
- 3.61 The glasshouse industry provides two areas of opportunity for future employment and economic growth. The first is the employment of local workers in the existing sector and the second is in the growth of the industry and new jobs that will be created. Following a period of difficult trading conditions the market opportunities for home grown products, together with concern about food security and the widening gap between what the nation produces and requires is leading to renewed aspiration and real opportunities for growth in the sector. The industry appears to have good growth prospects, and food has been agreed as one of the sector priorities for the London Stansted Cambridge Corridor.
- 3.62 The Lea Valley Food Task Force seeks to create a production base by 2035 that exceeds 2014 levels of production by a minimum of 20%. The Task Force recommends that there is a need to develop robust employment and training provision and pathways to ensure that the industry has a skilled local workforce if possible.

Accommodation for Nursery Workers

- 3.63 Traditionally the glasshouse industry in the District depended on the labour of seasonal workers who could be accommodated on nursery sites within temporary caravans for the duration of the season without the need for planning permission. The modern glasshouse industry however, allows for year round growing, and there is therefore no longer a 'season'.

- 3.64 Workers are now needed all year round and as for any other sector of employment, are therefore expected to live in houses or flats in nearby towns and villages rather than at their place of work. The nurseries in the District are not in remote or inaccessible locations.
- 3.65 However, this is traditionally a low wage industry and the gradual change from seasonal work to year round work together with the strict application of Green Belt planning policy to prevent new residential development, has resulted in many workers living in inappropriate unsuitable and unauthorised temporary accommodation within nurseries, much of which is now immune from enforcement action. The resulting poor living conditions of workers and reduction in the quality of the environment within nursery sites makes this a significant local problem, albeit one that is largely hidden from view.
- 3.66 The provision of new long term residential accommodation for workers, whether built or in mobile homes is inappropriate development in the Green Belt. However house prices and rents within the traditional growing areas in the Green Belt so close to London, make permanent off site accommodation unattainable for many individual workers. The conversion of existing buildings within the nursery site to provide accommodation is one potential answer but such buildings may not be available or suitable.

Key Evidence

- The Lea Valley Glasshouse Industry: Planning for the Future (Laurence Gould Partnership Ltd., 2012); and
- Viability of the Horticultural Glasshouse Industry (Reading Agricultural Consultants, in association with Gerry Hayman and Hennock Industries 2003).

Approach

- 3.67 An objective of this Local Plan is to support the diversification of the agricultural economy including the expansion of the glasshouse horticulture industry, subject to appropriate environmental considerations. The Council recognises the benefits to food security that the industry brings and seeks to be flexible to the

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modern needs of the industry whilst addressing environmental impacts of the associated development. The Council takes a criteria based approach to the location and form of glasshouse development, including associated low carbon energy generation and packhouse facilities. This provides the industry with much needed flexibility in the face of increased competition from other locations and increased demands from supermarkets. A criteria based approach will enable proposals to be considered to ensure that proposals are suitable and appropriate. It addresses the matter that some undeveloped land that was designated for glasshouses in previous local plans no longer necessarily meets the needs of the modern grower.

3.68 The matter of water usage in this area of water stress is important and growers are expected to take water efficient measures in their operations, using water harvesting wherever possible as well as sourcing water supply from appropriate sources such as above ground reservoirs. This is now common practice in modern operations.

Policy E 3 Food Production and Glasshouses

A. New or replacement glasshouses, any ancillary packhouse development, any ancillary low carbon energy generation facilities and Combined Heat and Power (CHP) facilities will be permitted subject to the following criteria:

- (i) The scheme does not have a significant visual impact upon the character of the landscape particularly with regard to long-distance views;
- (ii) the planning application includes full details of landscaping, including trees and other vegetation which will be retained or removed;
- (iii) the land is capable of being developed without major changes to existing contouring;
- (iv) vehicular access from the site to the road network is adequate and uses roads capable of accommodating the vehicle movements likely to be generated by the development without detriment to highway safety, the rural character of the roads, and residential amenity;

- (v) adequate surface water and foul drainage capacity exists or can be provided as part of the development. The Council may require inclusion of suitable and adequately maintained sustainable drainage systems to control the quality or attenuate the rate of surface water run-off;
- (vi) adequate quality and quantity of provision of water is available or can be provided on-site, for all domestic and non-domestic purposes;

B. Within existing horticultural nurseries sites, residential accommodation for nursery workers will only be permitted where it can be demonstrated, to the Council's satisfaction, that:

- (i) There is clear and robust evidence which shows that the lack of on-site accommodation is rendering existing use unviable. This include the possibility for converting/extending existing onsite structure to provide for such accommodation;
- (ii) There is no other alternative suitable accommodation within a reasonable distance including purchasing/renting of existing residential property for use as a House in Multiple Occupation or hostel;
- (iii) The quality, size and nature of the proposed structure is commensurate with the needs of the enterprise concerned;
- (iv) Any permission for such accommodation will be strictly tied by either a planning condition and/or other forms of legal agreements e.g. an occupancy agreement to ensure that the accommodation will only be occupied by horticultural workers employed by the relevant enterprise;
- (v) any relevant structure will be removed or demolished once the need for such accommodation ceased to continue and the site reinstated to agricultural use; and
- (vi) Where applicable, any permission will lead to the removal of long established, but inappropriate caravan accommodation within the site, where applicable.

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

The Visitor Economy

- 3.69 Tourism provides an important source of revenue and employment for the District. Evidence suggests that in 2015 tourism provided for over 2,600 full time equivalent jobs in the District, which equated to approximately 8% of overall employment in the District. The total value of the tourism industry for the District equated to more than £200 million in 2015.
- 3.70 Both Epping Forest (4.3 million visits each year) and the Lee Valley Regional Park (LVRP) provide green links into the area from London and offer a wealth of leisure and recreation activities. The District also boasts an enviable built heritage with for instance, Waltham Abbey Church and Gardens, North Weald Airfield, Epping Ongar Railway, Greensted Church, the Royal Gunpowder Mills and the market towns of Ongar, Epping and Waltham Abbey. The Lee Valley White Water Centre, constructed for the 2012 Olympics, and just over the district border in Broxbourne near Waltham Abbey, could also be a catalyst in the medium to long-term to encourage sport and other tourism-related activities in the locality. There is a comparatively low supply of visitor accommodation in relation to potential demand.

Key Evidence

- Epping Forest District Visitor Accommodation Needs Assessment (Hotel Solutions, 2017);
- Economic Impact of Tourism (Destination Research, 2015); and
- Lee Valley Park Development Framework (Lee Valley Regional Park Authority, 2011).

Approach

- 3.71 The Council considers that there is potential to develop the tourism sector locally, drawing on the 'green and unique' character of the District whilst continuing to protect and enhance the quality of the District's environment. There is commitment to support the sector through improving access to a wide range of existing attractions in the District.
- 3.72 The local tourism market is currently dominated by day visitors, with 3.4 million day visitors

compared to 172,500 staying visitors, only around half of whom used paid accommodation (2015). The lack of visitor accommodation is a factor here, and increased provision an opportunity to grow these higher value staying visitor markets. The District currently has a limited stock of hotel and visitor accommodation, and a number of low quality hotels that have seen little recent investment. Key markets for accommodation in the District are business visitors and contract workers for hotels during the week; people attending weddings and family events; people visiting friends and family; leisure tourists using the District as a base for visiting London; people taking part in outdoor sports and recreation, particularly in the Lee Valley Regional Park; and those escaping from London for a rural break. The Visitor Accommodation Needs Assessment notes that these are all markets that are set to grow over the Plan period.

- 3.73 The types of visitor accommodation that would be suitable in the District encompass a wide range including, but not exclusively hotels and inns, camping, caravan, activity holiday centres, holiday lodges, camping pod sites, wedding venues with accommodation and youth hostels.
- 3.74 Lee Valley Regional Park's proposals for Area 5 (King George V reservoir and surrounding areas) within its Park Development Framework seek to provide a range of short stay accommodation within the Park including hotel, hostel, holiday village, touring caravan, camping and short term mooring. The Council is working with Lee Valley Regional Park Authority and other key partners as part of the One Epping Forest Local Strategic Partnership on a tourism strategy.
- 3.75 In order to retain visitor accommodation and to seek to meet the identified market need for various forms of accommodation, the Council will require applicants seeking to discontinue a visitor accommodation use to provide robust evidence that there is no market interest in acquisition and investment to allow continued profitable operation of the business. Differing requirements will need to be met depending upon the size, nature and location of the site or property. In general, evidence will be required that an accommodation business has been

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effectively marketed through a reputable specialist agent, for a reasonable period of time (at least a year), and at a realistic price, compared to the prices that have been achieved for other similar accommodation businesses.

- 3.76 The Council's Economic Development Team should also be engaged early in the process in order to maximise exposure of the business opportunity that the site affords, to as wide a potential business audience as possible. Any such planning application must include details of valuations undertaken prior to placing the site on the market and a statement detailing why the site has not been taken up.
- 3.77 The need to continue to protect and enhance the quality of the District's environment, whilst also taking the opportunity to make the most of the District's assets is recognised. The visitor economy is central to achieving the objective to support tourism in the District through the promotion of, and improving access to, a wide range of existing attractions in the District including Epping Forest, the Lee Valley Regional Park, the Royal Gunpowder Mills site, the historic towns, village centres and countryside.
- 3.78 Whilst tourism is a key sector of the local economy, its growth may also raise challenges for the environment and for local communities. High numbers of visitors can put pressure on some locations in terms of their tranquillity, appearance and by physical erosion.
- 3.79 Increased visitor traffic could result in increased congestion on certain routes, and car parking difficulties can affect the environment, as well as local peoples' and visitors' experiences of the area. It is therefore essential that growth in the tourism sector is based upon sustainable visitor attractions. Such attractions retain the economic and social advantages of tourism development while having minimal impact on the environment and the local community through reducing, or mitigating any undesirable impacts on the natural, historic, cultural or social environment to balance the needs of the visitors with those of the destination.

Policy E 4 The Visitor Economy

- A. Opportunities for the sustainable development of the visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality and provide local economic benefits, through the following measures:
- (i) support for the development of high quality visitor accommodation, in particular accommodation linked to outdoor sport and activity hubs in the Lee Valley Regional Park, and visitor accommodation of an appropriate scale and type that makes use of existing buildings and strengthens existing rural leisure businesses;
 - (ii) support for the upgrading of existing visitor attractions, visitor centres and development of appropriate new ones;
 - (iii) the retention and improvement of existing visitor accommodation and venues unless there is proof that there is no market interest in acquisition and investment to allow continued profitable operation;
 - (iv) encouraging sustainable tourism in rural areas. This will include better linkages between the towns and rural surroundings; and opportunities for the enjoyment of the Lee Valley Regional Park and Epping Forest while recognising the importance of conserving and enhancing the cultural heritage of the area, as assets that form the basis of the tourist industry here;
 - (v) support a year-round visitor economy while ensuring the facility remains for visitor use;
 - (vi) supporting the improvement of sustainable transport opportunities for visitors and encourage the use of sustainable transport modes to reduce the impact of visitors on the highway network; and
 - (vii) encouraging local food/produce and appropriate tourism development that supports rural business and farm diversification.

Transport

- 3.80 This section of the Local Plan sets out the Council's approach to managing growth in car travel and its linked impacts including on the local economy and on the environment and communities. The policies seek to widen the

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choice of travel opportunities using public transport, walking and cycling. The Council is also considering the development of residential car parking standards which are specific to Epping Forest District to reflect local information on car ownership and the need to make best use of land. It also sets out how land will be safeguarded for future transport schemes and seeks to protect petrol filling stations and car repairs/servicing sites, which are an important, but diminishing, local facility.

Sustainable Transport Corridors

3.81 The District has a very varied character ranging from urban areas located on the edge of London through to rural areas. As a consequence there is very variable access to public transport, walking and cycling opportunities even in some more urban areas.

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

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

3.83 The District's economy is such that there are high levels of both in and out commuting which put pressure on the District's road network (at all levels) at peak periods, and also impact on rail capacity (both national rail and London Underground networks). The London Underground Central Line terminates at Epping, and there are a number of other Central Line stations within the District. This is both a benefit to District residents and businesses but also has a downside. Because there are price differentials between the cost of travel on rail

services and London Underground (the latter being cheaper), the London Underground stations are an attractor at peak hours for longer distance car trips by commuters. Not only does this impact on the Central Line's capacity but also adds to peak hour traffic congestion, and places pressure for on-street parking on local roads.

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

3.85 In 2008 road transport related CO² emissions produced per person per annum in Epping Forest was 1.66 tonnes. Whilst this is similar to the UK average, that average exceeds recognised UK air quality targets. Whilst traffic is not the only source of pollution it plays a major role, and has local impacts on key road routes through the District.

3.86 The District, as in many other places, has an ageing population where the car will, over time, become less feasible as a method of travel. Whilst car ownership increased by 4.6% between 2001 and 2011 (as would to some extent be expected when taking into account an increase in the District's households and population over the same period and an increase in the number of younger people staying in the family home than previously), there were also some 15% of households that do not have access to a car.

3.87 Epping Forest District faces a number of challenges including:

- that for some communities public transport, walking and cycling are not realistic options. Rural bus services are becoming less commercially viable and therefore cannot

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operate without receiving subsidy from Essex County Council, which is itself operating within an environment of significant financial challenges;

- that levels of traffic using roads through the Epping Forest SAC and associated junction capacity issues within and adjacent to the Forest have a negative impact on its health as a result of, in part, air borne pollutants arising from vehicle emissions.
- the recognition that the majority of new developments will still need to accommodate the car. Research undertaken nationally has been inconclusive as to whether reducing car parking in new developments has any effect on car ownership and this appears to be backed up by, albeit somewhat dated, post-occupancy research undertaken in relation to new residential developments that many households will still want to have access to a car. Environmental, road safety and community impacts occur if an appropriate balance is not adopted;
- the size of modern cars has increased and this has led to a need to increase the size of parking spaces in new development. This means that more land is needed to accommodate the same number of cars thus placing additional pressure on land when planning for the development needs of the District; and
- the level of car ownership across the District is varied ranging from 66.7% of homes in the Loughton Town Council area having no or 1 car through to 17.8% of homes in Theydon Garnon parish having no or 1 car.

Key Evidence

- Essex Highways Technical Notes (various);
- The Essex Transport Strategy: the Local Transport Plan for Essex 2011-2026 (Essex County Council, 2011); and
- Infrastructure Delivery Plan (Arup, 2017).

Approach

- 3.88 Recognising that there is a need to manage any future growth in car travel the Local Plan has

taken into account the need to maximise the potential to widen sustainable transport choices and encourage reductions in car use wherever possible by:

- considering existing and future sustainable transport opportunities as part of the criteria when identifying sites for housing and employment;
- ensuring the provision of facilities and services in new strategic developments to provide high levels of 'self- containment'; and
- securing the provision of, or financial support for, bus services, and walking and cycling facilities.

3.89 Taking such an approach has a wider benefit in that it can also provide access to new transport opportunities for existing residents, thus reducing increases in background traffic growth, make a contribution to reducing car-related pollution levels and improve access to services for those who do not have a car or who are unable to drive.

3.90 The provision of sustainable transport choices and securing modal shift away from reliance on the car is a key component in mitigating the future impacts of air-borne pollutants on the health of the Epping Forest SAC. In addition, in order to follow the commitment by government and car manufacturers to cease sales of petrol and diesel cars by 2040 to support improvements in air quality, the Council will require the provision of electric vehicle charging points in all new development which include vehicle parking spaces.

3.91 The delivery of development around Harlow is a key part of the Council's strategy for the future delivery of new homes within the District, and to support the opportunities that Harlow's Enterprise Zone offers to create new jobs, as part of its partnership approach with Harlow, Uttlesford, and East Hertfordshire Councils. A key part of the infrastructure needs to support this strategy is the provision of a new junction (J7a) on the M11 motorway, for which planning permission has recently been granted. The approach to delivering sustainable transport choices helps to support the business case

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needed to support its funding by, amongst others, Highways England.

3.92 As set out above there are issues around the provision of car parking in new development. The Council believes that there are opportunities to take a more locally focused approach to car parking standards across the District. It is therefore proposing to develop specific residential car parking standards for Epping Forest District. These parking standards will be developed based on:

- an understanding of differing levels of car ownership across the District;
- the different levels of current and future access to services and facilities across the District; and
- making better use of land through widening the use of 'unallocated' car parking within larger developments and looking at the need for providing on-site garage provision.

Until such time as those standards are adopted, planning applications will use Essex County Council's adopted Parking Standards as the starting point. Where practicable and within 400m of a railway station, the Council will seek reduced car parking, including car free, development.

3.93 Some of the issues raised through consultation are not within the remit of the Local Plan to address. These include matters such as:

- the differential pricing between rail and London Underground services;
- the issues arising from the down time of barriers at rail crossings; and
- the impact of existing HGVs on the local road network.

3.94 The Council recognises that these are important issues that need to be addressed wherever possible and will continue to pursue these matters with partners including Essex County Council, Network Rail and the Train Operating Companies and Transport for London.

Policy T 1 Sustainable Transport Choices

- A. The Council will work in partnership with relevant stakeholders to promote a safe, efficient and convenient transport system which will:
- (i) build on the District's strategic location, through improvements to strategic road and rail connections and other public transport networks to the wider area;
 - (ii) promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent and direct cycling and walking networks to provide a genuine alternative to the car and facilitate a modal shift;
 - (iii) provide opportunities to improve access to the two Town and four Small District Centres and rail stations by all modes of transport and ensure good integration between transport modes;
 - (iv) manage congestion, seek to reduce journey time and maintain consistency in journey times;
 - (v) promote and improve safety, security and healthy lifestyles; and
 - (vi) improve the efficiency of the local highway network.
- B. Development should minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future.
- C. Development proposals will be permitted where they:
- (i) integrate into existing transport networks;
 - (ii) provide safe, suitable and convenient access for all potential users;
 - (iii) provide on-site layouts that are compatible for all potential users with appropriate parking and servicing provision; and
 - (iv) do not result in unacceptable increases in traffic generation or compromise highway safety.
- D. Development proposals that generate significant amounts of movement must be supported by a Transport Statement or Transport Assessment and will normally be required to provide a Travel Plan. Development proposals which generate a significant number of heavy goods vehicle movements will be required to demonstrate by way of a Routing Management Plan that no

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severe impacts are caused to the efficient and safe operation of the road network and no material harm caused to the living conditions of residents.

- E. Development will, where appropriate, ensure that transport infrastructure will be of a high quality, sustainable in design, construction and layout, and offer maximum flexibility in the choice of travel modes, including walking and cycling, and with accessibility for all potential users.
- F. Development will be permitted where it:
- (i) does not result in cumulative severe impact on the operation and safety of, or accessibility to, the local or strategic highway networks;
 - (ii) mitigates impacts on the local or strategic highway networks and London Underground station infrastructure within the District, arising from the development itself or the cumulative effects of development, through the provision of, or contributions towards, necessary transport improvements, including those secured by legal agreement, subject to viability considerations;
 - (iii) protects and, where appropriate, enhances access to Public Rights of Way;
 - (iv) provides appropriate parking provision, in terms of amount, design and layout and cycle storage arrangements, in accordance with adopted Parking Standards and which mitigates any impact on on-street parking provision within the locality. Reduced car parking, including car free, development in sustainable locations will be supported; and
 - (v) ensures that, where appropriate, development proposals provide a co-ordinated and comprehensive scheme that does not prejudice the future provision of transport infrastructure on and through adjoining sites.
- G. In order to accommodate the use of low emission vehicles to support improvements in air quality within the District the provision of electric vehicle charging points will be required within all new developments which make provision for car parking for vehicles.

Safeguarding of Routes and Facilities

- 3.95 The Council's approach is to support using sustainable transport choices to manage the impacts of traffic growth. However, there will still be a need to make some improvements to the local and strategic highway network, including the provision of a new Junction 7a to the M11 motorway, for which planning permission has now been granted. In addition, land may also be needed for improvements to train, bus, cycling and walking networks, to improve connectivity and/or capacity. It is important the Council ensures that such schemes are not prevented from being provided as a result of permitting development on land required for their implementation.
- 3.96 Monitoring undertaken by the Petrol Retailers Association (PRA) identified that 886 forecourts closed between 2008 and 2013, about 10 per cent of all those in the UK, with the loss of almost 6,000 jobs. The PRA has advised that more than a third of these were in rural areas, and it was of the view that this creates the risk of "fuel deserts" in isolated areas where people depend on their vehicles to get around. Concerns regarding closures have also been raised by Government following the commissioning of a report into the matter in 2013.

Key Evidence

- Essex Highways Technical Notes (various);
- The Essex Transport Strategy: the Local Transport Plan for Essex 2011-2026 (Essex County Council, 2011); and
- Infrastructure Delivery Plan (Arup, 2017).

Approach

- 3.97 A number of transport investment opportunities have already been identified within the District. The Council recognises that there is a need to ensure that the implementation of identified schemes and those identified over the course of the Local Plan period, which are needed to support the delivery of future development, the success of the local and wider economy and on the well-being of residents should not be

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fettered. Consequently, there is a need to ensure that land is protected from development which would hinder the successful delivery of such schemes.

- 3.98 The Council will work with the relevant transport bodies, operators and landowners to secure the identification and delivery of transport infrastructure schemes.
- 3.99 In order to protect petrol filling forecourts from change of use, the Council will require robust evidence from applicants seeking to demonstrate that there is no longer a reasonable prospect of the site's continued use as a petrol filling forecourt. In general, it should be marketed effectively for a minimum of 12 months at a rate which is comparable to local market value for its existing use as a forecourt and it must be demonstrated that continuous use of the site for such uses is no longer viable.

Policy T 2 Safeguarding of Routes and Facilities

- A. Land required for proposed transport schemes as identified in Plans and Programmes including Essex County Council's Highways and Transport Investment Programmes, the Highways England Route Investment Strategies, Network Rail Investment Strategies and Transport for London Investment Strategies will be protected from other developments which would prevent their proper implementation.
- B. Local filling stations and car repairs facilities will be protected from redevelopment for alternative uses unless it can be demonstrated through evidence, that the current use on site is no longer viable or necessary, and that the site has been effectively marketed at a rate which is comparable to local market value of its existing use.

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