

HEARING STATEMENT

In respect of

Epping Forest District Local Plan

Matter 4: Spatial Strategy / Distribution of Development

On behalf of

CK Properties Theydon Bois Ltd

JLN0243
Final
24 January 2019

REPORT

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Contents

1	INTRODUCTION.....	1
2	POLICY BACKGROUND	2
3	SETTLEMENTS.....	4
4	OTHER MATTERS	7
5	SUMMARY AND CONCLUSION	8

Appendices

Appendix 1	Extracts from Draft Local Plan - October 2016
Appendix 2	Extracts from Draft Local Plan - Submission Draft
Appendix 3	Extracts from Settlement Hierarchy Technical Paper, September 2015
Appendix 4	Extracts from Site Selection Report / Appendix B1.6.5

1 INTRODUCTION

- 1.1 This hearing statement has been prepared in relation to Matter 4: “The Spatial Strategy / Distribution of Development”, which forms part of the examination of the Submission Version of the Epping Forest District Local Plan (December 2017) (“SVLP”).
- 1.2 The hearing statement has been prepared on behalf of CK Properties Theydon Bois Limited (“CK”), who are the owners of the Land East of Central Line / North of Abridge Road (including the Old Foresters site), Theydon Bois. CK made representations upon the consultation draft of the Local Plan in December 2016 and upon the SVLP in January 2018 and April 2018. For the avoidance of doubt, this hearing statement is not site specific, but concentrates on Matter 4. CK are due to appear at the examination in relation to other matters and accordingly, further hearing statements will be prepared.
- 1.3 Matter 4 as identified by the examination Inspector is as follows:
“The Spatial Strategy / Distribution of Development”
- 1.4 This hearing statement focuses on Issue 2 which is as follows:
“Beyond the Harlow area, is the distribution area in the Plan justified having regard to the defined settlement hierarchy?”
- 1.5 More specifically, the statement addresses Question 5 under the Issue 2 heading:
“Is the relatively limited growth at Buckhurst Hill and Theydon Bois as Large Villages justified by comparison to that proposed at Nazeing and Thornwood as Small Villages?”
- 1.6 This statement considers the merits of promoting additional housing development at Theydon Bois as to oppose smaller settlements, such as Nazeing and Thornwood to ensure the SVLP is sound. The statement does not deal with the merit of additional growth at Buckhurst Hill. Please note that where “NPPF/XXX” is used, this denotes references to paragraphs in the National Planning Policy Framework of March 2012 (“NPPF”).

2 POLICY BACKGROUND

Government Policy

- 2.1. The SVLP must be assessed against the 2012 NPPF, rather than the current July 2018 version. This is in accordance with NPPF214, as the SVLP was submitted for examination prior to 24 January 2019.
- 2.2. At the heart of the NPPF is a presumption in favour of sustainable development (NPPF14). In addition, paragraph 17 of the NPPF confirms the following core principle:
 - *“Actively manage patterns of growth to make the most possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”*
- 2.3. NPPF152 advises that for plan making, *“significant adverse impacts”* on the dimensions of sustainable development (economic, social and environmental) *“should be avoided, and wherever possible, alternative options which reduce or eliminate such impacts should be pursued”*.
- 2.4. Further, the SVLP must be found *“sound”* (NPPF182). The test for *“soundness”* includes that the SVLP should be *“consistent with national policy”* (i.e. the NPPF) and represents the *“most appropriate strategy”*.

Epping Forest District Local Plan – Consultation Draft (October 2016) (“Consultation Draft”)

- 2.5. The Consultation Draft recognised the need to make provision for housing in accordance with the strategic housing market assessment (**“SHMA”**). Based on the SHMA and housing projections, the Consultation Draft made provision for 11,400 new homes which clearly requires the release of Green Belt land. Nevertheless, the objective of the Consultation Draft was to bring forward new homes in the most sustainable locations (see paragraph 3.26) and to provide for greater intensity development at places with good accessibility (see Policy SP4).
- 2.6. The Spatial Development Strategy is contained in Policy SP2. This policy is contained in full within **Appendix 1** to this statement as are other relevant extracts from the Consultation Draft, but relevant figures for the distribution of new homes are as follows:
 - Nazeing 220
 - Theydon Bois 360
 - Thornwood 130
- 2.7. Section 5 of the Consultation Draft sets out the visions and policies for settlements. This is based on a settlement hierarchy, as set out in Figure 5.1. Theydon Bois is categorised as a Large Village and for example, Nazeing and Thornwood are classified as Small Villages. These settlements in Figure 5.1 are defined as follows by reference to the Settlement Hierarchy Technical Paper of September 2015 (**“SHTP”**):
 - Large Village: *“A settlement that is smaller than a town, containing moderate facilities including reasonable public transport access. Can meet most local demands for “everyday” services”*.

- Small Village: “*Smaller than a larger village, but larger than a hamlet. Few facilities and limited public transport access.*”

2.8. The Consultation Draft subsequently makes specific housing and employment allocations within the identified settlements.

Submission Version of Epping Forest District Local Plan (December 2017) (SVLP)

2.9. In terms of key objectives and the total housing figure, the submission draft is similar to the Consultation Draft. For example, the SVLP continues to state that the provision of new homes should be met in the most sustainable locations (see paragraph 2.27). The SVLP also aims to provide “*a minimum*” of 11,400 new homes, albeit the total number of housing allocations in the SVLP are reduced. Comparison of the two versions of Policy SP2 reveals that the total of housing allocations in the settlements has been reduced by 1,474 homes.

2.10. Most significantly, the distribution of new homes, i.e. the spatial development strategy, has been altered significantly. The SVLP version of Policy SP2 and other relevant extracts of the SVLP are set out in **Appendix 2** to this statement. The relevant figures for the distribution of new homes in Policy SP2 are set out below:

- Nazeing 122
- Theydon Bois 57
- Thornwood 172

2.11. The changes compared to the Consultation Draft are as follows:

- Nazeing -98
- Theydon Bois -303
- Thornwood +42

2.12. Significantly, Theydon Bois experiences by far the largest percentage decrease of any settlement in the district. The new housing figure represents 16% of the previous figure.

2.13. The large reduction in housing provision in Theydon Bois is notwithstanding the fact it maintains its status as a Large Village, as set out in Table 5.1 of the Consultation Draft. Likewise, Nazeing, Roydon and Thornwood remain as Small Villages. By way of comparison, Epping, Loughton and Chigwell have had their total housing allocations reduced, by a proportionately smaller figure. Their new figures are now 79%, 85% and 87% of the housing allocations in the Consultation Draft respectively.

3 SETTLEMENTS

Theydon Bois

- 3.1 As explained previously, the SVLP designates Theydon Bois as a Large Village. The SVLP has prepared “*visions and policies*” for all settlements categorised as a town or a large village, as they represent the largest settlements within the district. In light of the District’s pressing need for more housing, it is sensible to consider the potential of town and large villages to accommodate an increase in housing, instead of small villages acknowledged in the SHTP to have “*Few facilities and limited public transport access*”. Indeed, it would be illogical not to do so.
- 3.2 Theydon Bois is an obvious candidate to accommodate further increase in housing, predominantly because of its sustainability transport links and close proximity to London Underground Central Line. The Theydon Bois Underground station means that the village has direct and quick links into Central London (35 minutes to Liverpool Street). Furthermore, Theydon Bois has a local bus service linking it with Loughton, Epping and Harlow. Accordingly, the village is highly sustainable, with regard to the public transport network. Its sustainable location means that by accommodating an increase in housing, it is able to meet the objectives of both the NPPF and the SVLP.
- 3.3 In addition to the Central Line Underground Station, Theydon Bois also benefits from the following further supporting its preference and suitability for increased housing growth:
- A. Parade of shops and services on Coppice Row / Forest Road – including Tesco Express and 23 unit shops / restaurants.
 - B. Two public houses (The Bull and Queen Victoria).
 - C. Theydon Bois Primary School
 - D. Theydon Bois Village Hall (including nursery)
 - E. St Mary’s Church Hall
 - F. Childrens’ play area
 - G. Dental surgery
- 3.4 As explained in both versions of the Local Plan:
- “The settlement benefits from an attractive parade of shops offering local convenience retail, whilst a station on the London Underground network provides a direct link with London”**
- 3.5 For information, as of 2011, Theydon Bois had a population of 4,062.

Nazeing

- 3.6 Nazeing is described in the Local Plan as a Small Village, but is allocated to provide for 122 new homes - almost double that in Theydon Bois. Within the parish of Nazeing are the separate settlements of Upper Nazeing, Middle Nazeing and Lower Nazeing.

- 3.7 The facilities of Nazeing are limited to a small parade of shops (Nazeingberry Parade), a primary school and a health centre. It is known there were plans for a community hall but was abandoned in 2013 due to escalating costs.
- 3.8 Nazeing is very much rural in character and supports an agricultural and economic base, dominated by the glasshouse industry.
- 3.9 As at 2011, the parish of Nazeing had a population of 3,874.

Thornwood

- 3.10 Thornwood is designated in the Local Plan as a Small Village. However, the Local Plan seeks to make provision for 172 new homes, treble the Theydon Bois allocation.
- 3.11 Thornwood has very little in terms of community facilities. These being restricted to a local shop within two petrol filling stations, a kitchen shop and a village hall. Its population is under 1,000 people. It is clear that Thornwood is reliant on other settlements for its facilities and every day services.

Settlement Hierarchy Technical Paper (SHTP)

- 3.12 As explained in the previous section, the purpose of the SHTP was to inform the preparation of the Local Plan and distribution of growth. Relevant extracts of this document are provided as **Appendix 3**.
- 3.13 The SHTP explains that the settlement hierarchy is determined by identifying the range of services and facilities available within each place (see paragraph 3.21). Accordingly, it adopts a scoring system for each settlement. The relevant tables are contained on pages 20, 21 and 22 of the document. The total scores (see page 23) for the relevant centres are as follows:
- Nazeing – 10
- Theydon Bois – 17
- Thornwood – 8
- 3.14 It is clear from the above and indeed from the document as a whole that the range of services and facilities in Theydon Bois is far superior to those in either Nazeing or Thornwood. Indeed, Theydon Bois scores higher than both North Weald and Roydon, both of whom have higher housing allocations.
- 3.15 Usefully, contained in the document are individual settlement profiles, including those for Nazeing, Theydon Bois and Thornwood, which are also included in **Appendix 3**. These profiles confirm the descriptions in this section of the statement.

Technical Assessment Testing

- 3.16 Following publication of the SVLP, the Council issued Appendix B of the Site Selection Report in March 2018, produced by Arup's. Appendix B has been the subject of separate representations, which are not repeated in this statement.
- 3.17 Appendix B contains 21 individual components. Appendix B1.6.5 contains "Technical Assessment Testing". Relevant extracts of this part of the document are provided as **Appendix 4** to this statement.

- 3.18 Appendix B1.6.5 explains three strategic technical assessments, which were undertaken by the District Council in September 2017, to consider the implications of the District wide distribution of housing, employment and infrastructure needs. The purpose of the assessment was to “test a range of variant options” in order to inform final site selection.
- 3.19 The three assessments were labelled Technical Assessments A, B and C. Each assessment was tested through the Sustainability Appraisal. Technical Assessment A assumed high growth in Theydon Bois, based on 354 additional dwellings (as compared to 360 additional dwellings in the Consultation Draft). Technical Assessments B and C assumed lower levels of growth in Theydon Bois, in both cases adopting 90 additional units.
- 3.20 As is clear from this appendix, the Technical A Assessment (high growth of 354 dwellings in Theydon Bois) had very clear advantages and scored more favourably as opposed to other options (i.e. Technical Assessments B and C which considered significantly lower growth in Theydon Bois), and especially in terms of sustainability, as is clear from the following extracts, all of which are on page 1066 of the document:
- “In respect of Transport there is existing congestion in the south of the District and focusing development there could exacerbate this...Alternative A proposes the greatest level of growth along the London Underground Central Line, so performs better against Transport than the other alternatives.**
- Following on from the findings of the transport assessment, the appraisal found that Alternative A performs slightly better against climate change as it is more likely to reduce the need to travel and the need of the private vehicle so would minimise traffic related emissions to air.**
- Overall, Alternative A was rated against three topics as the most sustainable option – they were Climate Change and Transport with positive effects and Land and Waste with the least negative effects of the three scenarios...”**
- 3.21 Technical Assessment A also scored equal to Technical Assessment B (which assumed the same lower levels of growth in Theydon Bois as Technical Assessment C of 90 units) in terms of Biodiversity and Green Infrastructure, and also in relation to Landscape against both Technical Assessment B and C.
- 3.22 It is clear that based on the independent studies undertaken by Arup and the Council’s own evidence, that this Technical Assessment Testing only supports the position for increased growth in Theydon Bois, consistent with that in the Consultation Draft.

4 OTHER MATTERS

- 4.1 It is argued by the Council that the reduction in the Theydon Bois allocation is principally as a result of the representation made by the Conservators of Epping Forest (“**Conservators**”).
- 4.2 The Conservators raised concerns about the prospect of an increase in housing across Epping Forest district and the release of Green Belt sites, for example at Theydon Bois and Epping. However, the Conservators are not expressly resisting specific new housing allocations. Rather they are suggesting suitable alternative natural green space (SANG) will be required, so as to accommodate an increase in population in the settlement.
- 4.3 Points raised by the Conservators are addressed in previous representations made by CK. As is demonstrated in the other parts of the country, for example in the area of Thames Basin Heath Special Protection Area, the requirement for SANG is not a justifiable reason to prevent the provision of new housing. However, in any event, it will be possible to accommodate SANG on sites on the edge or close to Theydon Bois. Such sites can be contained within housing allocations or in other suitable locations and therefore this should not be a barrier to increased growth in Theydon Bois.

5 SUMMARY AND CONCLUSION

- 5.1 Based on the foregoing analysis, it is clear that the distribution of planned development in the Plan is unsound, especially in so far as housing allocations in Theydon Bois are disproportionality low, especially when compared to smaller settlements.
- 5.2 The provision of only 57 additional dwellings in Theydon Bois during the Local Plan period is not justified; cannot represent the “*most appropriate strategy*” (our emphasis); nor comply with the principles of sustainable development under NPPF14, and NPPF152 for the following reasons:
- Theydon Bois is designated as a Large Village
 - Theydon Bois is in a highly sustainable location, being adjacent to the London Underground Central Line
 - Theydon Bois has a good range of facilities and services. Notably, Theydon Bois scores well (or more favourably) when compared to similar and smaller settlements.
 - The provision of high growth in Theydon Bois is supported by the Council’s own technical assessment
- 5.3 Accordingly, it is considered that the Spatial Development Strategy and apportionment of housing growth within the District should be reassessed, with significantly increased growth attributed to Theydon Bois, in order that the SVLP can be made sound.

Appendix 1

Extracts from Draft Local Plan – October 2016



epping forest district

draft local plan

consultation 2016



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Draft Policy SP 2: Spatial Development Strategy 2011-2033

Within the period 2011-2033 the Council will provide for approximately 11,400 new homes and approximately 10,000 new jobs through the Local Plan.

A The new homes will be delivered by:

- i) permitting development proposals within the defined settlement boundaries where they comply with all other relevant policies of the Local Plan;
- ii) the development of sites around Harlow and at other settlements as allocated through this Local Plan (as identified in Policy SP 3 and Chapter 5) as follows;

Sites around Harlow	~ 3,900
Buckhurst Hill	~ 90
Chigwell	~ 430
Chipping Ongar	~ 600
Coopersale	~ 50
Epping	~ 1,640
Fyfield	~ 90
High Ongar	~ 10
Loughton	~ 1,190
Lower Sheering	~ 30
Nazeing	~ 220
North Weald Bassett	~ 1,580
Roydon	~ 40
Stapleford Abbots	~ 10
Sheering	~ 120
Theydon Bois	~ 360
Thornwood	~ 130
Waltham Abbey	~ 800

- iii) permitting rural exception sites in accordance with Policy H 3 and all other relevant policies of the Local Plan;
- iv) the delivery of sites identified in Neighbourhood Plans;
- v) making the best use of land by ensuring that development densities are appropriate to the location and size of the site in accordance with Policy SP 4; and
- vi) resisting developments which would result in a net loss of homes, unless it can be demonstrated that the benefits of doing so will materially outweigh the harm.

B An additional 18 pitches and 1 yard will be provided through the allocation of sites in the Local Plan to accommodate the needs of Travellers and Travelling Showpeople as identified in Policy SP 3 and Chapter 5.

This provision will be delivered through the following sequential approach:

- i) the regularisation of existing sites with temporary permissions or other unauthorised sites where appropriate;
- ii) making the best use of existing traveller sites through intensification and extension, and the review of personal permissions where appropriate;
- iii) new sites in locations outside the Green Belt which are appropriately located in terms of access to healthcare, education and other services
- iv) new Traveller sites in Green Belt areas which are appropriately located in terms of access to healthcare, education and other services;
- v) The provision of land as part of the development of the strategic housing sites around Harlow and other allocated sites in this Local Plan and;
- vi) Permitting additional Traveller sites in accordance with Policy H 4.

C The new jobs will be delivered by:

- i) retaining, enhancing and extending existing employment sites where appropriate;
- ii) allocating new employment land at appropriate locations across the District to provide a flexible supply of future sites to cater for needs;
- iii) allocating new employment space at the strategic allocations to contribute to meeting the economic needs of the wider sub-region, and complement Harlow Enterprise Zone;

In addition, the Council will:

- iv) promote and support town centre development and regeneration;
- v) encourage town centres to complement other larger sub-regional and regional comparison retail destinations locations outside of the District;
- vi) promote and support growth in the food production and glasshouse industry;
- vii) promote and support growth in the tourism industry and visitor economy;

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

- vii) seek to provide suitable training and skills development for local residents, to provide them with the skills needed to access future employment opportunities both within and outside the District;
- ix) seek to increase workforce participation and encouraging older workers to continue to work; and
- x) attract new businesses, encourage start-ups, and help growing businesses.

D Development proposals will be required to demonstrate that they accord with infrastructure requirements established through the Infrastructure Delivery Plan and all other policies of the Plan.



Development at Langston Road

- 3.62 The identified housing supply to 2033 exceeds the requirement. This serves two functions. Firstly, it provides a contingency to allow for flexibility. Contingency planning is necessary to allow for eventualities beyond the Council's control, including the economic cycle and factors relating to specific sites or developers, which could result in stalled sites. The Plan provides a range of sites in different locations which means that it is not reliant on delivery at a single location. A breakdown of the housing supply is included at Appendix 5.
- 3.63 Secondly, as identified in paragraph 3.48, the Council recognises that recent household projections demonstrate a further upward trend in housing need and the identification of additional sites demonstrates the Council's commitment to positive planning.
- 3.64 The Council's positive approach may also require it to use its compulsory purchase powers under section 226 of the Town and Country Planning Act 1990. That power gives the Council a positive tool to help to assemble land where this is necessary to implement proposals in the District Plan or where strong planning justifications for the use of the power exist. For the circumstances in which those powers may be exercised, see the Department for Communities and Local Government's "Compulsory purchase process and the Crichel Down Rules: guidance".

Alternative Options – Housing

Set a Housing target based on capacity within existing settlements and use of brownfield sites only.

This would provide for only part of the District's Objectively Assessed Housing Need. Limiting the housing target to this level would not support the future needs of the residents of the District or its local economy. It would also result in growing affordability issues, would significantly limit the Council in fulfilling its wider housing obligations, increase the levels of commuting into the District and limit the opportunities to secure improvements in infrastructure. Furthermore, it would limit the opportunities for a number of communities across the District to be able to address their own more local housing needs and maintain mixed and sustainable communities because of the limitations on the availability of brownfield sites in some locations. Ultimately the Local Plan could not be considered to be 'sound' and therefore could not be adopted by the Council.

Set a housing target based on capacity within existing settlements, use of brownfield sites and strategic allocations around Harlow

This would provide for a greater proportion of the District's Objectively Assessed Housing Need. However, if would not, as with Option 1 above, support sufficient levels of housing to support the future needs of the residents of the District or its local economy. The issues identified in Option 1 are also pertinent to this Option.

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

chapter 5

Places

Introduction

5.1 This section sets out the vision and policies for settlements and Town Centres within the District. The District's settlements are listed in Figure 5.1, which is taken from the Settlement Hierarchy Technical Paper (2015), and the Town Centres are as identified in the Town Centre Review (2016). Visions and policies have been produced for all settlements categorised as a Town or Large Village, as these represent the largest settlements within the District. In addition, visions and policies are included for a number of Small Villages and Hamlets which have been identified as having employment potential, or which have sites allocated within them. For each settlement, the proposed vision and aspirations up until 2033, the proposed site allocations and associated alterations to the Green Belt boundary, the resulting infrastructure requirements and the approach to promoting and managing Town and Small District Centres are presented.

Figure 5.1 Settlements in Epping Forest District

Category	Settlement
Town	Chipping Ongar, Epping, Loughton/ Loughton Broadway, Waltham Abbey
Large Village	Buckhurst Hill, Chigwell, North Weald Bassett, Theydon Bois
Small Village	Abridge, Chigwell Row, Coopersale, Fyfield, High Ongar, Nazeing, "Matching" (incorporating Matching Green, Matching Tye and Matching), Roydon, Sheering, Stapleford Abbots, Thornwood

Alternative Options

Hamlet

Abess Roding, Beauchamp Roding, Berners Roding, Bobbingworth, Broadley Common, Bumbles Green, Dobb's Weir, Epping Green, Fiddlers Hamlet, Foster Street, Hare Street, Hastingwood, High Beach, High Laver, Jacks Hatch, Lambourne End, Little Laver, Long Green, Lower Sheering, Magdalen Laver, Moreton, Newmans End, Nine Ashes, Norton Heath, Norton Mandeville, Roydon Hamlet, Sewardstone, Sewardstonebury, Stanford Rivers, Stapleford Tawney, Theydon Garnon, Theydon Mount, Toot Hill, Upper Nazeing, Upshire, Willingale

5.2 This section does not address the strategic sites proposed around Harlow, which are presented in Draft Policy SP 3. A number of the District's settlements are in the process of developing Neighbourhood Plans. The Council will support the preparation and production of Neighbourhood Plans as set out in Draft Policy D 6.

Overview of site selection process

5.3 The National Planning Policy Framework states that a Local Plan must allocate sufficient land in appropriate locations to ensure supply for the Plan period. This includes sites for residential development, traveller accommodation¹ and employment land (B Class Uses).

5.4 The Council developed two methodologies (a site selection methodology for residential and employment development and a traveller site selection methodology for traveller accommodation), which detail the process the Council followed to identify sites for allocation in the Draft Local Plan. An overview of the key stages in the site selection process is illustrated in Figure 5.2.

¹ This includes both pitches and yards. There is no official definition as to what constitutes a single traveller residential pitch. Travellers require various sizes of accommodation, depending on the numbers of caravans per pitch which varies with different families living at different densities. However, the caravan to pitch ratio is usually considered to be one mobile home and one touring caravan per pitch. Travelling Showpeople are likely to require a larger area, (a "yard"), as they are likely to need space for the storage of equipment.

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

Appendix 2

Extracts from Draft Local Plan – Submission Draft



Epping Forest District Local Plan

Submission Version 2017



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Policy SP 2 Spatial Development Strategy 2011-2033

- A. Within the period 2011-2033 the Local Plan will provide for a minimum of 11,400 new homes allocated in accordance with the following sequential approach:
- (i) The creation of Garden Town Communities around Harlow recognising its strategic economic role and needs;
 - (ii) A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
 - (iii) Sites located on previously developed land within settlements;
 - (iv) Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;
 - (v) Previously developed land within the Green Belt;
 - (vi) 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.
 - (vii) 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.
 - (viii) Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.
- B. The new homes will be distributed as follows:

Settlement	Allocated Housing
Sites around Harlow	~ 3,900
Epping	~ 1,305
Loughton	~ 1,021

Waltham Abbey	~ 858
Ongar	~ 590
Buckhurst Hill	~ 87
North Weald Bassett	~ 1,050
Chigwell	~ 376
Theydon Bois	~ 57
Roydon	~ 62
Nazeing	~ 122
Thornwood	~ 172
Coopersale, Fyfield, High Ongar, Lower Sheering, Sheering and Stapleford Abbots	~ 175
Rural East	~ 41

- C. The new homes will be delivered by:
- (i) permitting development proposals within the defined settlement boundaries where they comply with all other relevant policies of the Local Plan;
 - (ii) the development of Garden Town Communities around Harlow and at other settlements as allocated through this Local Plan (as identified in Policy SP 5 and Chapter 5);
 - (iii) Permitting rural exception sites in accordance with Policy H 3 and all other relevant policies of the Local Plan;
 - (iv) the delivery of sites identified in made Neighbourhood Plans;
 - (v) making the best use of land by ensuring that development densities are appropriate to the location and size of the site in accordance with Policy SP 3; and
 - (vi) resisting developments which would result in a net loss of homes, unless it can be demonstrated that the benefits of doing so will materially outweigh the harm.
- D. An additional 38 pitches and 1 yard will be provided through the allocation of sites in the Local Plan to accommodate the needs of Travellers as identified in Policy SP 5 and Chapter 5. This provision will be delivered through the following sequential approach:

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

- (i) the regularisation of existing sites with temporary permissions or other unauthorised sites where appropriate;
 - (ii) making the best use of existing traveller sites through intensification and extension, and the review of personal permissions where appropriate;
 - (iii) new sites in locations outside the Green Belt which are appropriately located in terms of access to healthcare, education and other services
 - (iv) new Traveller sites in Green Belt areas which are appropriately located in terms of access to healthcare, education and other services;
 - (v) the provision of land as part of the development of the Garden Town Communities around Harlow and other allocated sites in this Local Plan; and
 - (vi) permitting additional Traveller sites in accordance with Policy H 4.
- E. Within the period 2011-2033 the Local Plan will provide for employment needs by:
- (i) retaining and enhancing existing employment sites and premises where appropriate;
 - (ii) allocating 23 hectares of new employment land at appropriate locations across the District as set out in Policy E 1 to provide a flexible supply of future sites to cater for needs, and to meet the economic needs of the wider sub-region, and complement Harlow Enterprise Zone; and
 - (iii) promoting new small-scale employment opportunities within mixed-use developments, including at the Garden Town Communities.
- F. In addition, the Council will:
- (i) promote and support town centre development and regeneration;
 - (ii) encourage town centres to complement other larger sub-regional and regional comparison retail destinations outside of the District;
 - (iii) support growth in the food production and glasshouse industry;
 - (iv) support growth in the tourism industry and visitor economy;
 - (v) seek to provide suitable training and skills development for local residents, to provide them with the skills needed to access future employment opportunities both within and outside the District;
- (vi) seek to increase workforce participation and encouraging older workers to continue to work; and
 - (vii) attract new businesses, encourage start-ups, and help growing businesses.
- G. Development proposals will be required to demonstrate that they accord with infrastructure requirements established through the Infrastructure Delivery Plan and all other policies of the Plan.
- 2.77 The identified housing supply to 2033 exceeds the requirement. This serves two functions. Firstly, it provides a contingency to allow for flexibility. Contingency planning is necessary to allow for eventualities beyond the Council's control, including the economic cycle and factors relating to specific sites or developers, which could result in stalled sites. The Plan provides a range of sites in different locations which means that it is not reliant on delivery at a single location. A breakdown of the housing supply is included at Appendix 5.
- 2.78 Secondly, as identified above, the Council recognises that recent household projections demonstrate a further upward trend in housing need and the identification of additional sites demonstrates the Council's commitment to positive planning.
- 2.79 The Council's positive approach may also require it to use its compulsory purchase powers under section 226 of the Town and Country Planning Act 1990. That power gives the Council a positive tool to help to assemble land where this is necessary to implement proposals in the Local Plan or where strong planning justifications at for the use of the power exist. For the circumstances in which those powers may be exercised, see the Department for Communities and Local Government's 'Compulsory purchase process and the Crichel Down Rules: guidance'.
- 2.80 The Council recognises the importance of delivering housing to meet the requirements set out within Policy SP 2, and ensuring that the Plan includes sufficient flexibility to respond to

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

unanticipated changes in circumstances including the unforeseen failure of site(s) to deliver as planned. As a result, the Council is committed to monitoring and reviewing the Plan following adoption.

- 2.81 The Council will monitor housing delivery against the housing trajectory (Appendix 5 and Housing Implementation Strategy) for the District using the indicators specified in the Monitoring Framework set out in the Local Plan. If the Authority Monitoring Report (AMR) demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is the lower) for three consecutive years, the Council will undertake a partial review of this Plan. In undertaking this review, the Council will ensure that sufficient infrastructure capacity is available and that the potential allocation of additional housing sites will not prejudice delivery of the infrastructure required by the Plan.

Place Shaping

- 2.82 Place shaping is a holistic process that aims to bring together all the component parts of a successful place. It provides an opportunity to encourage an integrated approach to development by focusing on, and creating better social, physical and economic environments.
- 2.83 National planning policy emphasises the importance of high quality design and place shaping. It states that well designed places exhibit qualities that benefit users and the wider area. Development should ensure that new or changing places: are functional; support mixed uses and tenures; include successful public spaces; are adaptable and resilient; have a distinctive character; are attractive; and encourage ease of movement.
- 2.84 Allocations in the Local Plan (as identified in Policy SP 5 and Chapter 5) need to be planned carefully to ensure that they become successful places. The Local Plan has an important role to play in the creation of sustainable communities at these locations. It is important that these areas work as places and are attractive,

prosperous and encourage safe communities where people want to live, work or visit.

Key Evidence

- Creating Garden Cities and Suburbs Today (TCPA, 2012);
- Landscape Character Assessment (Chris Blandford Associates, 2010); and
- Settlement Edge Landscape Sensitivity Study (Chris Blandford Associates, 2010).

Approach

- 2.85 The Council's approach to place shaping seeks to achieve successful and desirable developments. This policy sets out the framework and key principles that will guide the future development of allocations in the Local Plan (as identified in Policy SP 5 and Chapter 5).
- 2.86 Given the importance and scale of the allocations, development proposals will be required to accord with a range of place shaping principles, and where applicable, it will be necessary to demonstrate compliance through the production of Strategic Masterplans as required.
- 2.87 The Council is committed to working with Harlow Council, Uttlesford District Council and East Hertfordshire District Council, Hertfordshire County Council and Essex County Council, in partnership with relevant Local Enterprise Partnerships to bring forward transformational growth in and around Harlow. The Councils have a strong collective commitment to achieving Garden City principles in strategically planned development. The partners understand and recognise the need to promote high quality, cohesive growth, supporting the core ethos and objectives set out in the Town and Country Planning Association's key guiding principles. Policy SP 4 seeks to ensure that these aspirations can be achieved.
- 2.88 The appreciation of housing density is crucial to realising the optimum potential of sites. It is not appropriate to apply density ranges set out in Policy SP 3 mechanistically but to consider the density appropriate to the location taking account of relevant factors to optimise potential

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

Introduction

5.1 This section sets out the vision and policies for settlements, Town and Small District Centres within the District. The District's settlements are listed in Table 5.1, in line with the Settlement Hierarchy Technical Paper (2015). The Town Centres are as identified in the Town Centre Review (2016).

Table 5.1: Settlements in Epping Forest District

Category	Settlement
Town	Ongar, Epping, Loughton/Loughton Broadway, Waltham Abbey
Large Village	Buckhurst Hill, Chigwell, North Weald Bassett, Theydon Bois
Small Village	Abridge, Chigwell Row, Coopersale, Fyfield, High Ongar, Nazeing, "Matching" (incorporating Matching Green, Matching Tye and Matching), Roydon, Lower Sheering, Sheering, Stapleford Abbots, Thornwood

5.2 This section does not consider the strategic sites around Harlow, which are set out in Policy SP 3. A number of the District's settlements are in the process of developing Neighbourhood Plans. The Council will support the preparation and production of Neighbourhood Plans as set out in Policy D 6.

Overview of the Site Selection

Process

5.3 The National Planning Policy Framework states that a Local Plan must allocate sufficient land in appropriate locations to ensure supply for the Plan period. This includes sites for residential development, Traveller Accommodation and employment land (B Use Class).

5.4 The Council has selected its allocated sites in line with the two site selection methodologies (residential and employment, and traveller). Sites identified for allocation have been selected following a rigorous application of the relevant site selection methodology, and represent those sites the Council considers to be suitable,

available and achievable within the Plan period based on the best available information.

Town and District Centres

5.5 The Council has identified two Town Centres and four Small District Centres within the District. The Local Plan sets out the defined Town Centre boundaries, Primary Shopping Areas, and Primary and Secondary Retail Frontages.

5.6 The District's town centre hierarchy, in accordance with Policy E 2 is set out in Table 5.2.

Table 5.2 Town Centre hierarchy

Category	Settlement
Town Centre	Epping, Loughton High Road
Small District Centre	Buckhurst Hill, Ongar, Loughton Broadway, Waltham Abbey

Key Evidence

- 5.7 Key evidence which informed the Council's approach to settlements in the District are:
- Settlement Hierarchy Technical Paper (EFDC, 2015);
 - Site Selection Report (Arup, 2017);
 - Town Centres Review (Arup, September 2016);
 - Green Belt Review (Land Use Consultants, 2016);
 - Employment Land Supply Assessment (Arup, 2017);
 - Employment Review (Hardisty Jones Associates, 2017);
 - Infrastructure Delivery Plan (Arup, 2017); and
 - Epping Forest District Council: Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Summary Report (ORS, 2017).

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

Appendix 3

Extracts from Settlement Hierarchy Technical Paper, September 2015



**Epping Forest
District Council**

**Settlement Hierarchy
Technical Paper**

September 2015

- 1.7 The core principles of the NPPF reflect the need to identify and plan for the housing, employment and other needs of an area. The principles also emphasise the preference for efficient use of resources by prioritising development on previously developed land and, where appropriate, reuse of existing buildings whilst protecting natural assets. The NPPF highlights the importance of town centres, stating that these should be supported through positive planning policies which encourage their viability and vitality. It recognises that identified centres are preferable locations for development. In more rural locations, there is strong support for (i) retention, and making best use of services and facilities, including sustainable modes of transport, and (ii) growth of rural businesses.

Purpose of this Technical Paper

- 1.8 This document establishes a hierarchy of settlements within the District, and identifies relationships with settlements outside the District. This will subsequently be used to inform the preparation of the Local Plan, and in considering planning applications. It is therefore a planning tool which identifies how existing settlements function and establishes a measure of relative sustainability of and between those settlements.

4. Settlement Hierarchy for Epping Forest District

- 4.1 The categories for settlements have been established using non-technical terms. These are:
- Town
 - Large Village
 - Small Village
 - Hamlet
- 4.2 There are several definitions of these categories, and no single accepted definition in planning terms. Table 2 is based on a combination of sources, including the Oxford English Dictionary, existing Local Plan policies and text, and judgement reflecting the research undertaken. The table also shows the scores that are allocated to each settlement type.

Table 2 – Points for Settlement Assessment

Settlement Category	Combined facilities
<p><i>Town</i></p> <p>A built up area with a name, defined boundaries, and local government, that is larger than a large village and smaller than a city. There are a good range of services and facilities, including good public transport access.</p>	21+
<p><i>Large Village</i></p> <p>A settlement that is smaller than a town, containing moderate facilities including reasonable public transport access. Can meet most local demands for “everyday” services.</p>	14 - 20
<p><i>Small Village</i></p> <p>Smaller than a larger village, but larger than a hamlet. Few facilities and limited public transport access.</p>	7 - 13
<p><i>Hamlet</i></p> <p>The smallest of settlements with very limited services and facilities. There is usually no discernible centre.</p>	0 - 6

- 4.3 An assessment of the available services and facilities in the settlements of the District has been completed. The profiles of each settlement are contained in Appendix 3, and a summary is shown in Table 3 below.

Table 3 – Settlement Assessment Summary

	Abrdge	Buckhurst Hill	Bumbles Green	Chigwell	Chigwell Row	Chipping Ongar	Coopersale	Epping	Epping Green	Fyfield	High Beach	High Ongar	Loughton-Debden	Lower Nazling	Lower Sheering	Matching Green	Moreton	North Weald	Roydon	Sewardstone	Sheering	Stapleford Abbotts	Theydon Bois	Thornood	Waltham Abbey	Willingale	
Population (11' Census)	2013	11380	na	12987	2207	6251	na	11461	831	796	na	1255	31106	3874	2014	661	321	4477	2193	1118	891	1008	4062	969	18913	501	
Area (ha)	1042	385	na	1190	378	902	na	773	1773	991	na	1586	1512	989	530	1262	596	661	705	80	304	957	832	498	1999	1398	
# Dwellings	1.9	29.6	na	9.05	5.8	6.93	na	14.8	0.47	0.8	na	0.79	20.57	3.9	3.8	0.52	0.54	6.77	3.1	13.98	2.93	1.05	1.95	9.46	0.36		
Education																											
Nursery	Y	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	Y	N	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Primary	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	N	N	Y	Y	N
Secondary	N	N	N	Y	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	Y	N
Higher	N	N	N	N	N	Y	N	N	N	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Health																											
GP	Y	Y	N	N	N	Y	N	Y	N	N	N	N	Y	Y	N	N	N	Y	N	N	N	N	Y	N	Y	N	N
Dentist	N	Y	N	Y	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Y	N	N
Optician	N	Y	N	Y	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y	N	N
Pharmacy	N	Y	N	Y	N	Y	N	Y	N	N	N	N	Y	Y	N	N	N	Y	Y	N	N	Y	N	Y	Y	N	N
Hospital	N	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N

Settlement Hierarchy Technical Paper
September 2015

	Abtidge	Buckhurst Hill	Bumbles Green	Chigwell	Chigwell Row	Chipping Ongar	Coopersale	Epping	Epping Green	Fyfield	High Beach	High Ongar	Loughton-Debden	Lower Nazeing	Lower Sheering	Matching Green	Moreton	North Weald	Roydon	Sewardstone	Sheering	Stapleford Abbotts	Theydon Bois	Thornood	Waltham Abbey	Willingale		
Transport																												
Bus Service (Level 1)	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
Bus Service (Level 2)	Y	Y	N	Y	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	
Rail	N	N	N	N	N	N	N	N	N	N	N	N	N	N	Y	N	N	N	Y	N	N	N	N	N	N	N	N	
Underground (Loop)	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	
Underground (Direct)	N	YY	N	N	N	N	N	YY	N	N	N	N	YY	N	N	N	N	N	N	N	N	N	YY	N	N	N	N	
Retail																												
Post Office	Y	Y	N	Y	Y	Y	N	Y	N	Y	N	Y	Y	N	N	N	N	Y	Y	N	Y	N	Y	N	Y	Y	N	N
Local Shop	Y	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	Y	N	N	N	Y	Y	Y	Y	N	Y	Y	Y	Y	N	N
Supermarket (> 3000m ²)	N	Y	N	N	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y	Y	N	N
ATM	Y	Y	N	Y	N	Y	N	Y	N	N	N	N	Y	Y	N	N	N	Y	Y	N	N	N	Y	Y	Y	Y	N	N
Bank	N	N	N	Y	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y	Y	N	N
Pub, Restaurant	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Community Facilities/Services																												
Place of Worship	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y
Community Hall	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Settlement Hierarchy Technical Paper
September 2015

	Abrdge	N	N	Y	N	N	N	N	N	12
	Buckhurst Hill	N	Y	Y	Y	N	N	N	Y	22
	Bumbles Green	N	Y	N	N	N	N	N	N	4
	Chigwell	N	Y	Y	Y	N	N	N	Y	20
	Chigwell Row	N	N	Y	N	N	N	N	N	8
	Chipping Ongar	Y	Y	Y	Y	N	N	N	Y	23
	Coopersale	N	N	Y	N	N	N	N	N	8
	Epping	Y	Y	Y	Y	Y	Y	Y	Y	27
	Epping Green	N	N	Y	N	N	N	N	N	5
	Fyfield	N	N	Y	N	N	N	N	N	8
	High Beach	N	Y	N	N	N	N	N	N	6
	High Ongar	N	N	Y	N	N	N	N	N	7
	Loughton-Deben	Y	Y	Y	Y	Y	Y	Y	Y	27
	Lower Nazling	N	N	Y	N	N	N	N	Y	10
	Lower Sheering	N	N	N	N	N	N	N	N	3
	Matching Green	N	N	Y	N	N	N	N	N	8
	Moreton	N	N	Y	N	N	N	N	N	6
	North Weald	N	Y	Y	Y	N	N	N	N	15
	Roydon	N	Y	Y	N	N	N	N	Y	14
	Sewardstone	N	N	Y	N	N	N	N	N	6
	Sheering	N	N	Y	N	N	N	N	N	9
	Stapleford Abbotts	N	N	Y	N	N	N	N	N	8
	Theydon Bois	N	Y	Y	N	N	N	N	N	17
	Thornwood	N	Y	Y	N	N	N	N	N	8
	Waltham Abbey	Y	Y	Y	Y	N	Y	Y	Y	23
	Willingale	N	Y	Y	N	N	N	N	N	5
	TOTAL									

Lower Nazeing			
Parish	Population (2011 Census)	Area (hectares)	Number of Dwellings (2011 Census)
Nazeing	3,874	989	1632
<i>Population and housing statistics have been based on those for Nazeing Ward. This also includes rural areas, and the Hamlet of Dobbs Weir.</i>			
Existing Services & Facilities			
Education			
Nursery / Childcare	N		
Primary	Y	Nazeing Primary School	
Secondary	N		
Higher / Further	N		
Health			
GP	Y	Nazeing Valley Health Centre	
Dentist	N		
Optician	N		
Pharmacy	Y	Elgon Chemists	
Hospital	N		
Transport			
Bus Service (Level 1)	Y	52 departures/arrivals daily on weekdays connecting to Harlow, Waltham Abbey and Chingford. No Sunday service. (Routes SB01, SB02, 390, 391, 392, 393, 505)	
Bus Service (Level 2)	N		
Rail Station	N		
Underground Station (Loop)	N		
Underground Station (Direct)	N		
Retail			
Post Office	N		
Local Shop	Y	Nazeingbury Parade (inc general store, newsagent, retail, pharmacy and post office)	
Supermarket (over 3,000 m ²)	N		
ATM	Y	Abbey News, Nazeing General Store	
Bank	N		
Pub, Restaurant	Y	Sun Inn, Crooked Billet,	
Community Facilities & Services			
Place of Worship	Y	Saint Giles COE	
Community Hall	N		
Fire Station	N		
Leisure/Sports Facility	N		
Recreational Amenities	Y	Lea Valley recreational amenities are located adjacent to the settlement.	
Library	N		
Police Station	N		
Citizens Advice Bureau	N		
Public Car Park	Y	In front of Nazeingbury Parades	
TOTAL	10		
Qualitative Analysis			
<p>Lower Nazeing is on the western edge of the District, adjoining the Borough of Broxbourne. The settlement is partly within the Lee Valley Regional Park on its western boundary, and is within a broad area that contains a large number of horticultural glasshouses. HGV traffic as a result is noted as an issue for the small rural roads.</p> <p>There are a number of services and facilities present that would also serve the wider rural area, including smaller settlements such as Bumble's Green and Nazeing village.</p> <p>Lower Nazeing is connected by bus services towards Waltham Abbey, Broxbourne, Roydon and</p>			

Theydon Bois			
Parish	Population (2011 Census)	Area (hectares)	Number of Dwellings (2011 Census)
Theydon Bois	4,062	832	1,679
<i>Population figures have been based on those for Theydon Bois Parish and also includes rural areas outside of the settlement itself.</i>			
Existing Services & Facilities			
Education			
Nursery / Childcare	Y	Theydon Bois Pre-school Group	
Primary	Y	Theydon Bois Primary School	
Secondary	N		
Higher / Further	N		
Health			
GP	Y	Theydon Bois Surgery (Part Time Service)	
Dentist	Y	Theydon Dental Surgery	
Optician	N		
Pharmacy	Y	Theydon Bois Pharmacy	
Hospital	N		
Transport			
Bus Service (Level 1)	Y	40 departures/arrivals daily on weekdays, connecting to Loughton, Epping, Harlow and Romford. (Routes: 541, 575)	
Bus Service (Level 2)	Y		
Rail Station	N		
Underground Station (Loop)	N		
Underground Station (Direct)	YY	Theydon Bois Underground Station (Central Line, Direct)	
Retail			
Post Office	Y	Theydon Bois Post Office	
Local Shop	Y	Coppice Row and Forest Drive local shops inc. Restaurants, Newsagents, Retail, Grocers, Tesco Metro	
Supermarket (over 3,000 m ²)	N		
ATM	Y	Tesco Metro	
Bank	N		
Pub, Restaurant	Y	Queen Victoria, The Bull, Sixteen String Jack. Restaurants and takeaways in village centre.	
Community Facilities & Services			
Place of Worship	Y	Theydon Bois Baptist Church, St Mary Parish Church	
Community Hall	Y	Theydon Bois Village Hall, Theydon Bois Community & Youth Centre	
Fire Station	N		
Leisure/Sports Facility	Y	Theydon Bois Golf Club, Theydon Bois Lawn Tennis Club, Theydon Bois Cricket Club	
Recreational Amenities	Y	Theydon Bois Green, Theydon Plain.	
Library	N		
Police Station	N		
Citizens Advice Bureau	N		
Public Car Park	N		
TOTAL	17		
Qualitative Analysis			
<p>Theydon Bois is to the south of the M25 and the west of the M11, to the north of Loughton/Debden. The settlement is served by London Underground, and the central part of the settlement contains a small parade of shops, restaurants and pubs. Further, there is a primary school, pre-school and youth club in the village.</p> <p>Theydon Bois is largely constrained to the west by parts of Epping Forest, and is bounded to the east by the Central Line.</p>			

Settlement Category

Large Village

DRAFT

Thornwood			
Parish	Population (2011 Census)	Area (hectares)	Number of Dwellings (2011 Census)
North Weald Bassett	969	498	446
<i>Figures are based on the portion of Epping Lindsey and Thornwood Common Ward which is not located within Epping Parish. This includes rural areas outside of the settlement itself.</i>			
Existing Services & Facilities			
Education			
Nursery / Childcare	Y	Little Flyers Day Nursery	
Primary	N		
Secondary	N		
Higher / Further	N		
Health			
GP	N		
Dentist	N		
Optician	N		
Pharmacy	N		
Hospital	N		
Transport			
Bus Service (Level 1)	Y	119 departures/arrivals daily on weekdays connecting to Harlow, Epping, Ongar, Brentwood, Loughton and Romford. (Routes 19, 20, 21, 575. Limited/Sunday Routes: 501, 541)	
Bus Service (Level 2)	Y		
Rail Station	N		
Underground Station (Loop)	N		
Underground Station (Direct)	N		
Retail			
Post Office	N		
Local Shop	Y	Local shop within both petrol filling stations, kitchen shop, garden centre	
Supermarket (over 3,000 m ²)	N		
ATM	Y	Moneybox Corporation Ltd (Neal Service Station)	
Bank	N		
Pub, Restaurant	N	<i>*Indian Restaurant currently closed</i>	
Community Facilities & Services			
Place of Worship	N		
Community Hall	Y	Thornwood Village Hall	
Fire Station	N		
Leisure/Sports Facility	Y	Upper Clapton Football Club, Golf Range (Upland Road)	
Recreational Amenities	Y	Thornwood Common	
Library	N		
Police Station	N		
Citizens Advice Bureau	N		
Public Car Park	N		
TOTAL	8		
Qualitative Analysis			
Thornwood is to the north of Epping, and is characterised by a range of property types, styles and ages. The B1393 road passes broadly north-south through the village, and the frequency of bus services along this route contributes heavily to the score achieved. There are some local services that would cater to some everyday requirements of residents, but for the majority of demands travel to larger nearby settlements would be necessary.			
Settlement Category			
Small Village			

Appendix 4

Extracts from Site Selection Report / Appendix B1.6.5

B1.6.5 Technical Assessment Testing

Introduction

This appendix explains the three technical assessments which were undertaken by Epping Forest District Council in September 2017 to consider the implications of District wide distribution of housing, employment and infrastructure needs taking into account the further site selection work in 2017. The identification of these technical assessments was based on the preferred spatial strategy set out in the Draft Local Plan (2016). The Draft Local Plan (2016) included all of the existing and potential employment sites in the District which had been identified at that time by the Council as a starting point; as the site selection process had not been completed to enable the selection of the most appropriate employment sites across the District.

When undertaking the technical assessment testing in 2017, updated and emerging evidence was available to be taken into account including the Employment Review (2017), Employment Land Supply Assessment (2017), transport modelling, Habitats Regulation Assessment work, Infrastructure Delivery Plan and the updated Strategic Housing Market Assessment (2017). The residential sites subject to further technical assessment were drawn from the site allocations in the Draft Local Plan and those sites identified for further testing as part of Stage 6.3 (see paragraph 2.97, of Report on Site Selection (2018)). Potential locations for employment site allocations were informed by the emerging findings of the Employment Review and the Employment Land Supply Assessment. Based on the nature of the technical assessments 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.

The purpose of the assessments was to test a range of potential variant options in order to 'test the boundaries' and understand the impacts of making contrasting amendments to the proposed allocations in the Draft Local Plan in order to inform final site selection. The testing was undertaken in order to inform the potential for revisions to the Draft Local Plan taking into consideration the latest evidence and responses to the Draft Local Plan consultation in order to inform decisions on site allocations to be included in the Local Plan Submission Version. The assessments developed took into account the following issues identified from the review of the latest evidence and responses to the Draft Local Plan consultation:

- whether transport impacts on Epping could be minimised;
- whether air quality impacts on Epping Forest could be minimised;
- whether transport impacts and congestion generally across the District could be minimised;
- the best location of and potential impacts from decisions on key infrastructure, particularly Princess Alexandra Hospital and the location of two new secondary schools;
- contribution to five year land supply within the Local Plan; and

- potential alignment with emerging Neighbourhood Plans.

Three reasonable District-wide quantum and distributions of development were identified and labelled Technical Assessments A, B and C. These assessments were tested through the Sustainability Appraisal; a transport assessment exploring alternative travel patterns; and an assessment of the impacts of alternative locations for the provision of schools across the District undertaken by Essex County Council.

The following text and summary tables give further detail of the alternatives tested alongside the results. The site reference schedules for each alternative are found in the Schedules section at the end of this appendix.

Technical Assessments District Wide Alternatives 2017

A summary description of each scenario is provided below, alongside tables providing an overview of the distribution in each of the technical assessments. Table 4 provides an overall picture of the quantum of residential units and employment floorspace across the assessments.

Technical Assessment A - Minimising change to the Draft Local Plan

This distribution took sites from the Draft Local Plan together with Tranche 2 sites from the Site Selection process in 2017. It assessed whether these amendments would be more suitable than the proposals sets out in the Draft Local Plan. This distribution included the following elements:

- A different distribution of growth at Epping so that sites with higher landscape sensitivity were removed and sites which more closely reflected the pattern of development in the draft Epping Neighbourhood Plan were included (this maximised growth to the south of the town).
- The availability of further suitable brownfield sites in Loughton led to a potentially different pattern of growth within the preferred spatial strategy and proposed lower growth on managed open space sites.
- Due to the withdrawal of a site in Coopersale a new distribution was suggested.
- Lower employment growth at North Weald Airfield compared to that tested in Alternative B was included, with lower employment at Latton Priory and higher employment growth at Waltham Abbey compared to that tested in Alternatives B and C.
- Employment provision for Small and Medium Enterprises (SME) was made at Loughton.
- Two new secondary schools were proposed on two strategic sites around Harlow – Latton Priory and East of Harlow – together with the expansion of secondary schools in Waltham Abbey and Loughton.
- Distribution of housing at strategic sites around Harlow was the same as in the Draft Local Plan, with Princess Alexandra Hospital on East of Harlow site.

Table 1: Technical Assessment A Overview

	Residential	Employment	Infrastructure
Technical Assessment A	Epping – different distribution of growth	North Weald Bassett – lower growth at the Airfield	Two new secondary schools at Latton Priory and East of Harlow
	Loughton – different distribution of growth	Waltham Abbey – higher employment growth	Expansion of Waltham Abbey secondary school
	Harlow, Theydon Bois, Waltham Abbey, Ongar, North Weald Bassett, Chigwell, Roydon, Stapleford Abbots, Buckhurst Hill, Fyfield, Nazeing/Lower Nazeing, High Ongar, Sheering, Lower Sheering and Thornwood – Draft Local Plan allocations	Dorrington Farm (Latton Priory) – lower provision in Harlow Strategic Sites	Expansion of Loughton secondary schools
		Loughton – SME provision	Princess Alexandria Hospital in East of Harlow site

Technical Assessment B - Exploring alternative travel patterns

- This alternative assessed the impacts of changing the distribution of sites on the travel patterns across the District, taking into account air quality, using a combination of proposed site allocations in the Draft Local Plan together with Tranche 2 sites from the 2017 site selection process. This distribution included the following elements:
- Significantly lower growth at Epping and Theydon Bois compared to the Draft Local Plan with higher growth at Waltham Abbey to support regeneration opportunities and Ongar aimed at reducing impacts on the Epping Forest Special Area of Conservation.
- Changes to the distribution in Roydon, Buckhurst Hill, Coopersale, Nazeing and Thornwood to reflect where suitable new sites had been promoted and assessed as suitable. The overall capacity of these settlements remained unchanged but an alternative distribution of sites was tested.
- A higher quantum of employment growth across the District with three large allocations at the strategic sites around Harlow and higher growth at North Weald Airfield with no growth at Waltham Abbey.
- A new secondary school at Waltham Abbey and on the East of Harlow site coupled with expansion of secondary schools in Loughton.
- Distribution of housing at strategic sites around Harlow was the same as in the Draft Local Plan, with Princess Alexandra Hospital on East of Harlow site.

Table 2: Technical Assessment B Overview

Technical Assessment B	Residential	Employment	Infrastructure
	Ongar – slightly higher growth (c. 200 homes)	Dorrington Farm (Latton Priory)	New secondary school at Waltham Abbey
	Waltham Abbey – higher growth (c. 1000 homes)	Latton Priory	Expansion of Loughton secondary schools
	Theydon Bois – lower growth	East of Harlow	Princess Alexandria Hospital in East of Harlow site
	Harlow, Loughton, North Weald Bassett, Chigwell, Stapleford Abbots, High Ongar, Sheering, Fyfield, Lower Sheering – Draft Local Plan Allocations	Loughton - SME provision	
	Roydon, Buckhurst Hill, Coopersale, Nazeing, and Thornwood – different distribution including new sites		

Technical Assessment C - School variation across the District

This distribution assessed the impacts of the location of schools in the District on sites included in the Draft Local Plan, as no previous assessment on the potential location of schools had been done. In particular, this assessment sought to evaluate the suitability of secondary schools at Latton Priory and East of Harlow. The overall assessment included sites both from the Draft Local Plan together with new and amended sites from the 2017 site selection process (Tranche 2). This distribution included the following elements:

- A different distribution of growth at Epping so that sites with higher landscape sensitivity were removed and sites which more closely reflected the pattern of development in the draft Epping Neighbourhood Plan were included (this maximised growth to the south of the town), as in Technical Assessment A.
- The promotion of further suitable brownfield sites in Loughton led to a potentially different pattern of growth within the preferred spatial strategy and proposed lower growth on managed open space sites, as in Technical Assessment A.
- The level of growth proposed for Theydon Bois was reduced compared to that included in the Draft Local Plan with the number for Ongar slightly increased, as in Technical Assessment B.
- Due to the withdrawal of a site in Coopersale a new distribution was suggested, as in Alternative A.
- Employment growth was proposed at Waltham Abbey, with a lower level of employment growth at North Weald Airfield in addition to higher growth strategic sites around Harlow.
- New secondary schools were tested on the East of Harlow site and in Epping together with the expansion of secondary schools in Loughton and Waltham Abbey.

Distribution of housing at strategic sites around Harlow was the same as in the Draft Local Plan, with Princess Alexandra Hospital on East of Harlow site.

Table 3: Technical Assessment C Overview

Technical Assessment C	Residential	Employment	Infrastructure
	Ongar – slightly higher growth (c. 200 homes)	Waltham Abbey – employment growth	New secondary school at Epping
	Theydon Bois – lower growth	Dorrington Farm (Latton Priory)	Expansion of Waltham Abbey secondary school
	Loughton – different distribution of growth	Latton Priory	Expansion of Loughton secondary schools
	Harlow, Waltham Abbey, North Weald Bassett, Chigwell, Roydon, Stapleford Abbots, Buckhurst Hill, Fyfield, Nazeing/Lower Nazeing, High Ongar, Sheering, Lower Sheering and Thornwood – draft allocations	Loughton – SME provision	Princess Alexandra Hospital in East of Harlow site

Table 4a: Dwelling Numbers and Employment Land and Floorspace

Settlement or site	Draft Local Plan	Alternative A	Alternative B	Alternative C
Buckhurst Hill	90	88	106	88
Chigwell	430	395	395	395
Ongar	600	599	811	811
Coopersale	50	47	55	47
Epping	1640	1,602	1,043	1,602
Fyfield	90	82	82	82
Harlow	3900	3,885	3885	3,885
High Ongar		10	10	10
Loughton/Debden	1,190	1,120	1,178	1,120
Nazeing/Lower Nazeing	220	218	217	218
Lower Sheering	30	26	26	26
North Weald Bassett	1,580	1,683	1,813	1,683
Roydon	40	33	80	33
Stapleford Abbots	10	10	10	10
Sheering	120	117	117	117
Theydon Bois	360	354	90	90
Thornwood	130	124	0	124
Waltham Abbey	800	736	1,684	736
Total Residential units (excl. planning permissions)	11,290	11,124	1,1588	11,072

Table 4b: Employment Land and Floorspace*

Settlement or site	Alternative A	Alternative B	Alternative C
North Weald Bassett – Airfield	1ha B2/ 4 ha B8 (20,000sqm)	2ha B2/8ha B8 (40,000sqm)	1ha B2/ 4 ha B8 (20,000sqm)
Waltham Abbey	SR – 10340-Z 2ha B2 / 8ha B8 (40,000sqm) & SR – 0375 c.1.5ha B8 (6,000sqm)	-	SR – 10340-Z 2ha B2/ 8ha B8 (40,000sqm)
Dorrington Farm (part of Latton Priory)	c.1ha B1 (6,000sqm)	c.1ha B1 (6,000sqm)	c.1ha B1 (6,000sqm)
Latton Priory	-	5ha B1/ 5ha B2 (50,000sqm)	5ha B1/ 5ha B2 (50,000sqm)
Loughton (SME provision on publicly owned sites)	1ha (assumes B1) (6,000sqm)	1ha (assumes B1) (6,000sqm)	1ha (assumes B1) (6,000sqm)
East of Harlow		c.10ha – 5haB1/ 5ha B2 (50,000sqm)	
Total Floor space	78,000sqm	152,000sqm	122,000sqm
Total Hectares	18.5	32	27

Note: *No values are shown for employment floor space for the Draft Local Plan as all possible sites were included

Sustainability Appraisal – Overview and Findings

The Sustainability Appraisal (SA)²⁹ was undertaken against the set of objectives presented in the Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan (December 2017). This explanation of the overview and findings reflects the appraisal presented in that report.

The three alternatives were assessed against the SA objectives, which cover the following topics:

- Air Quality
- Biodiversity and green infrastructure
- Climate change (mitigation and adaptation)
- Community and Well being
- Economy and employment
- Equality, diversity and inclusion
- Historic environment
- Housing

²⁹ <http://www.efdclocalplan.org/wp-content/uploads/2017/12/Sustainability-and-Equalities-Impact-Assessment-AECOM-December-2017-EB204.pdf>

- Land and waste
- Landscape
- Transport
- Water

Table 3 is an extract from the SA report showing the outcomes against each topic for the technical assessment alternatives.

Table 5: Summary of technical assessment findings and conclusions of the SA

Topic	Categorisation and rank		
	Technical Assessment A Minimising change to the Draft Local Plan	Technical Assessment B Exploring alternative travel patterns	Technical Assessment C School variation across the District
Air quality	=	=	=
Biodiversity and green infrastructure	2	2	1
Climate change (mitigation and adaptation)	1	2	2
Community and wellbeing	=	=	=
Economy and employment	=	=	=
Equality, diversity and inclusion	=	=	=
Historic environment	=	=	=
Housing	2	1	2
Land and waste	★	3	★
Landscape	=	=	=
Transport	1	3	2
Water	=	=	=
Key:		Used to represent the nature of the significant effect as positive.	
		Used to represent the nature of the significant effect as negative.	
	=	Instances where the assessments perform on a par and it is not possible to differentiate between them.	
	1	A star is used to highlight the assessment that is preferred from an SA perspective.	

The appraisal found that for a number of topics the alternatives tested did not result in any significant differences or were likely to generate any significant effects at a District scale. There were differences between alternatives at a local level in terms of positive and negative effects against the majority of SA topics. This in particular relates to Biodiversity, Landscape, Historic Environment and Transport. However since they were localised effects that were not found to be significant once mitigation is taken into account (Paragraph 7.35).

The SA notes that in terms of significant effects the appraisal found that all of the alternatives have the potential to have a significant long term positive effect on matters relating to Community Wellbeing, Economy and Employment and Housing. The delivery of housing and employment as well as associated improvements in infrastructure, including community facilities/services and public transport would help to meet the needs of communities and have a positive effect for the District. Alternative B performed slightly better against the housing topic as it would deliver a slightly higher level of overall housing growth.

There is the potential for the alternatives to have a significant negative effect on the Land and Waste through the loss of greenfield and agricultural land. Technical Assessment B performs the worst against this topic as it proposes less brownfield development in Loughton compared to the others.

The alternatives scored evenly (District-wide) in respect of Air Quality, Community and Wellbeing, Economy and Employment, Equality, Diversity and Inclusion, Historic Environment, Landscape and Water. Alternative C was preferable in respect of Biodiversity and Green Infrastructure as it directs more growth away from the sensitive receptors such as Epping Forest and the Lee Valley Regional Park.

In respect of Transport there is existing congestion in the south of the District and focusing development there could exacerbate this. However, conversely the settlements in the south of the District also have good access to the London Underground network and services/facilities. This therefore means that housing within and around these settlements with accompanying improvements to public transport infrastructure could help to reduce the use of the private vehicles and therefore traffic by encouraging the use of more sustainable modes of transport. Alternative A proposes the greatest level of growth along the London Underground Central Line, so performs better against Transport than the other alternatives. It was followed by Alternative C with Alternative B performing worse as it directs growth away from the London Underground Central Line.

Following on from the findings of the transport assessment, the appraisal found that Alternative A performed slightly better against climate change as it is more likely to reduce the need to travel and use of the private vehicle so would minimise traffic related emissions to air.

Overall, Alternative A was rated against three topics as the most sustainable option – they were Climate Change and Transport with positive effects and Land and Waste with the least negative effects of the three scenarios. Refer to Page 41 of the SA report for the full summary of findings.

Transport – Overview and Findings

The transport testing used District modelling to assess the likely traffic impacts of the alternatives, forecast the traffic impacts and report on the main traffic issues. The full Highways Assessment Report (2017) then evaluated traffic patterns and likely modal shift across the District to inform the Local Plan Submission Version (available on the Epping Forest District Local Plan website³⁰). The technical assessments are labelled 6a, 6b and 6c in the report under Assessment 4; the SA assessment of transport impacts is derived from this assessment.

The modelling found that key traffic impacts were likely to arise in Epping and Waltham Abbey, with the Wake Arms Roundabout being a key constraint. The outcomes of the assessment indicated that even with an allowance for increased school traffic, the proposed lower level of employment and redistributed housing growth in all of the technical assessments would generally improve on the Draft Local Plan forecast highway impact with respect to average model network flow. The Draft Local Plan scenario (including a high level of employment growth with reasonable modal shift) represents a forecast approximately a 52% increase in traffic. Alternative A presents the lowest likely general traffic growth across the network (at approximately 40% increase) whilst Alternatives B and C could also reduce the impact on some parts of the network. The inclusion of secondary schools at Waltham Abbey and Epping would have some minor localised impacts not previously identified caused by increases in school traffic. This impact is generally isolated to the morning peak period and most notably in Waltham Abbey in Alternative B and Epping in Alternative C where two new secondary schools were tested respectively. The differences between the alternatives are summarised in Table 6, for full explanation of the traffic impacts please refer to the Highways Assessment Report.

Table 6: Traffic Impacts of Alternatives - Peak Periods*

	Morning Peak	Afternoon Peak	Comment
Wake Arms Roundabout	Alternative C performs slightly worse. No significant differences between Alternatives A and B.	No significant differences between alternatives.	All alternatives bring reduced traffic impact compared to Draft Local Plan.
Epping	Alternative B performs best. Alternative C performs worst due to new school at Epping. Alternative A falls between Alternatives B and C.	Alternative B performs best. Alternatives A and C perform similarly.	All alternatives bring increased traffic impact compared to Draft Local Plan apart from Alternative B in the afternoon.
Loughton	All alternatives perform similarly.	All alternatives perform similarly.	All alternatives bring reduced traffic impact, particularly in the

³⁰ Highway Assessment Report, 2017 <http://www.efdclocalplan.org/wp-content/uploads/2017/12/Highway-Assessment-Report-Ringway-Jacobs-2017-EB502.pdf>

	Morning Peak	Afternoon Peak	Comment
			morning, compared to Draft Local Plan.
Waltham Abbey	Alternative B performs significantly worse. No significant differences between Alternatives A and C.	Alternative B performs significantly worse. No significant differences between Alternatives A and C.	All alternatives bring increased traffic impact compared to Draft Local Plan.
Harlow	Alternative A performs better likely due to higher level of employment growth at the Harlow Strategic Sites in Alternatives B and C. Alternative B performs worse followed by C.	Alternative A performs better likely due to higher level of employment growth at the Harlow Strategic Sites in Alternatives B and C. Alternative B performs worse followed by C.	All alternatives bring increased traffic impact compared to Draft Local Plan, apart from Alternative A in the afternoon.

Education – Overview and Findings

The location of new secondary schools is a key issue shaping education provision during the Plan period. The education assessment was undertaken by Essex County Council and evaluated the impacts of different approaches to school provision and assessed the alternatives in respect of supporting new and expanded schools. The key results relate to secondary schools as their potential impact is greater than primary schools when assessing the distribution of development within the district wide spatial strategy.

The location of a new school at the East of Harlow site was factored into all alternatives and can be accommodated. However, there were significant doubts in relation to the ability to deliver a new secondary school at Waltham Abbey at the current time as a result of concerns arising from forecast traffic impacts and whether the level of growth would be sufficient to deliver the school. Latton Priory formed Essex County Council's preferred location for a second school because it has a comparatively reduced impact on traffic. The assumption made was that secondary schools in the south of the District would be expanded to cater for growth needs. Through discussion with Essex County Council, the potential for the relocation and expansion of King Harold School at Waltham Abbey into the new masterplan area to the north of Waltham Abbey emerged as a possibility to be explored further.

Conclusion

The assessment findings were presented at officer workshops during October 2017, which focused on identifying sites for allocation in the Local Plan Submission Version. The Council re-visited conclusions reached in 2016 and determined whether any draft site allocations should be removed, and whether any sites not previously identified for allocation should be proposed. The outcomes of the technical assessments were considered alongside analysis of the Draft Local Plan consultation feedback, updated evidence base information, emerging

Neighbourhood Plans and local knowledge (for full list of considerations please see paragraphs 2.131 and 2.132 of the Report on Site Selection). Sites were assessed in accordance with the Local Plan strategy and associated hierarchy with factors such as accordance with settlement visions, five year land supply, providing a mix of size sizes, infrastructure constraints arising from the Infrastructure Delivery Plan and availability/achievability assessments taken into account. For a more detailed overview of the decisions reached regarding sites proposed for allocation refer to Report on Site Selection (2018) (Section 4.7.3).