

**EPPING FOREST DISTRICT COUNCIL  
EXAMINATION OF THE DISTRICT LOCAL PLAN, 2011-2033**

**MATTER 4: THE SPATIAL STRATEGY/DISTRIBUTION OF  
DEVELOPMENT**

**PRE-HEARING STATEMENT ON BEHALF OF  
EPPING FOREST DISTRICT COUNCIL**

**JANUARY 2019**

## **INTRODUCTION**

Epping Forest District Council ("the Council") submits this statement in response to the Inspector's Matters, Issues and Questions ("MIQs") (ED5). This statement addresses Matter 4: The Spatial Strategy/Distribution of Development and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 6 (ED5, pp 8-11).

This statement has been prepared with the assistance of Arup and AECOM.

Where appropriate, the Council's responses in this statement refer to but do not repeat detailed responses within the hearing statements submitted by them concerning other Matters.

Key documents informing the preparation of this statement to which the Council may refer at the hearing sessions include:

- [EB805 Site Selection Report \(2018\)](#) and [EB805AK Site Selection Methodology \(2018\)](#)
- [EB204 Sustainability and Equalities Appraisal \(2017\)](#)
- [EB1101A Infrastructure Delivery Plan – Part A Report \(2017\)](#)
- [EB1101B Infrastructure Delivery Plan – Plan B Report \(2017\)](#)
- [EB1500 Harlow Strategic Sites Assessment \(2016\)](#)
- [EB201 OAHN Appraisal of Spatial Options \(2016\)](#)
- [EB705A Green Belt Assessment Phase 2 \(2016\)](#)
- [EB1608 Green Belt and District Open Land Background Paper Update \(2018\)](#)
- [EB1203 Memorandum of Understanding for the Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area \(2018\)](#)
- [EB913 The Strategic Flood Risk Assessment \(Site Assessments\) \(2018\)](#)
- [EB503 Transport Assessment Report Update \(2019\)](#)

All documents referred to in this statement are listed in Appendix A of this statement together with links to the relevant document included within the Examination Library.

Examination Library document references are used throughout for consistency and convenience.

***Issue 1: Does the distribution of development in the Plan place too much reliance upon the Garden Community Sites around Harlow at the expense of testing the capacity of the other settlements in the District?***

**Inspector's Question 1**

- 1. How was the amount of housing proposed in the three Garden Town sites allocated in Policy SP5 determined (3,900 dwellings in total)?**

***Response to Question 1***

1. The amount of housing proposed for the three Garden Town sites allocated in Policy SP 5 was determined using a methodology for calculating the indicative capacity of residential sites. The methodology applied is set out in Appendix B1.5.3 of the Site Selection Report 2018 (EB805J). The detailed write-up of the capacity assessment for each of the Garden Town site allocations can be found on pages B908 to B904 of Appendix B1.6.4 to the Site Selection Report 2 (EB805N).

**Inspector's Question 2**

- 2. Could a higher level have been accommodated and would this have reduced the impact of growth proposed elsewhere in the district?**

***Response to Question 2***

2. The Council does not consider a higher amount of growth, including a higher level of housing, could be accommodated on the three Garden Town sites, or the Harlow area. The three Garden Town Sites allocated in the LPSV comprise part of the planned development of approximately 16,100 homes for the area in and around Harlow<sup>1</sup> over the Plan period. For the reason set out below, a higher level of growth at Harlow is not a realistic or appropriate option, and would not be able to reduce the impact of growth proposed elsewhere in the District. Even if it were possible to accommodate a greater level of growth at Harlow (and thereby reduce the amount of

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<sup>1</sup> "In and around Harlow" refers to planned growth within Harlow District in conjunction with the strategic Garden Town allocations in Epping Forest and East Herts Districts.

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growth elsewhere in the District), this is unlikely to be an appropriate strategy as it would not help to meet the needs of the individual settlements and communities across the District— see also, the Council's response to Question 3 (below), at paragraph 6 ff.

3. The Sustainability Appraisal ("SA") carried out in 2016 (EB202) tested different potential amounts of growth around Harlow (~10,500, ~14,150, ~17,650 and ~20,985 dwellings). This appraisal shows that growth of between 14,000 and 17,000 new homes could be accommodated provided that the identified mitigation measures are delivered (including upgrades to Junctions 7 and 8 of the M11 and a new Junction 7A). However, in light of transport modelling findings, Essex County Council considered that higher levels of growth would require significant additional transport infrastructure (for example a Harlow northern bypass) which, over-and-above the infrastructure improvements already required, would likely render this unfeasible in this plan period.
4. The Harlow Strategic Sites Assessment 2016 ("HSSA") (EB1500) shows that there are sufficient suitable sites, to accommodate 16,100 homes, and at Figure 3 illustrates the most suitable spatial option for delivering this growth. Pages 66 to 67 of the report provide the justification for this conclusion.
5. In terms of the proportion of the growth to be delivered specifically within Epping Forest District (i.e., 3,900 homes), the Assessment (EB1500) shows that there are only a limited number of suitable or potentially suitable sites, and analysis of constraints and promoter proposals indicate that, largely in landscape terms, the full extent of many of the proposed sites could not reasonably be expected to be developed,<sup>2</sup> limiting the development capacity within the plan period to around 3,900 homes.

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<sup>2</sup> This applies particularly to site allocation SP 5.1 Latton Priory where landscape constraints limit the developable area. This is explained in greater detail in Appendix 2 to the assessment.

**Inspector's Question 3**

- 3. Conversely, will the level of growth proposed elsewhere in the district be sufficient to support the vitality and viability of individual settlements over the Plan period?**

***Response to Question 3***

6. The Council is satisfied that the proposed level growth and spatial strategy underpinning the Local Plan is sufficient to support their vitality and viability of individual settlements over the Plan period.
7. Beyond the sites allocated for development around Harlow, the LPSV distributes the remaining housing requirement (around 4,146 homes) across eighteen settlements.
8. A broad mix <sup>3</sup> of over one hundred individual sites have been allocated across these towns, large villages, small villages and hamlets for housing, employment development and traveller accommodation to assist in realising the 'visions' for how these places are expected to develop over the Plan period. The visions set out in Chapter 5 of the LPSV include a strong focus on sustainable development to strengthen the settlements' existing roles, and for smaller rural settlements, to support their self-sufficiency and long-term viability while minimising the use of Green Belt land. This is consistent with paragraphs 55 and 17 (Core Principle five) of the NPPF. Paragraphs 2.144 to 2.147 of the Site Selection Report 2018 (EB805) provide a clear summary of how the site allocations were chosen to best meet the needs and aspirations of individual settlements.
9. Finally, the Sustainability and Equalities Impact Appraisal 2017 (EB204) at paragraphs 9.56 to 9.60 considers that the distributed growth planned for the District's settlements will have a positive contribution to meeting the housing, employment and infrastructure needs of all communities. It concludes that "on balance ...the Submission Plan would have significant positive long-term effects on communities and wellbeing." Therefore, the level of growth across the District is considered appropriate to support the viability and vitality of the District's individual settlements.

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<sup>3</sup> In terms of size, existing/proposed land use, capacity, location, ownership and anticipated delivery timescales.

***Issue 2: Beyond the Harlow area, is the distribution of development in the Plan justified having regard to the defined settlement hierarchy?***

**Inspector's Question 1**

- 1. What are the key factors which informed the distribution of development in the Plan beyond the Harlow area?**

***Response to Question 1***

**Housing**

10. The key factors are set out in the Site Selection Report 2018 (EB805) and in the list of key issues raised by respondents reported to the Local Plan Cabinet Committee on 14 May 2018 (EB115A). These informed the distribution of housing development in the Local Plan beyond the Harlow area and are:
- (a) growth should be spread across the District, rather than focussed in specific settlements;
  - (b) development potential within existing settlements should be maximised, focusing on brownfield land with higher densities where possible, before releasing land in the Green Belt;
  - (c) where sites in the Green Belt are required to meet development needs, they should be located in sustainable areas within the defined 'settlement buffer zones'<sup>4</sup>;
  - (d) opportunities for growth of North Weald Bassett should be maximised in line with the findings of the Masterplanning Study 2014 (EB1003);
  - (e) development proposals should support the realisation of the settlement visions; and
  - (f) The distribution of growth should generally reflect the Settlement Hierarchy – this is addressed in more detail in the response to question 2.

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<sup>4</sup> These 'settlement buffer zones' were defined in Chapter 2 of the Green Belt Review Phase 2 report 2016 (EB705A) and dealt with in more detail below in the response to question 2.

**Traveller Accommodation**

11. The key factors influencing the distribution of traveller sites are set out in Section 3 of the Report on Site Selection 2018 (EB805) – see in particular paragraphs 3.16 to 3.19, 3.60 to 3.68 and 3.100 to 3.101. These are:
- (a) distributing pitches across the District, rather than focussing pitches only in areas traditionally favoured by the travelling community, or conversely, only in areas less favoured by the travelling community;
  - (b) ensuring sustainable locations for traveller accommodation are chosen, avoiding locations that are too remote from settlements;
  - (c) avoiding locating sites too near to existing settlements, which is likely to be unpopular with both the traveller and settled communities and which therefore reduces the prospects for promoting the peaceful and integrated co-existence between communities that the Planning Policy for Traveller Sites ('PPTS')<sup>5</sup> advises local planning authorities should seek.
12. Other factors that informed the distribution include:
- (a) the extent to which specific households' needs can be met on sites currently occupied by those households;
  - (b) accordance with the settlement visions and taking account of emerging Neighbourhood Plans where they include site allocations; and
  - (c) the findings of the site selection process, and the potential for sites to contribute to the council's five-year pitch supply.

**Employment**

13. The key factors which informed the distribution of employment development are set out in Section 4 of the Report on Site Selection 2018 (EB805) and throughout the SEA 2017 (EB204) report. These are:
- (a) meeting the need for additional space to serve employment markets, both in the south of the District where demand for B Use Class uses is greatest, including at Loughton and Waltham Abbey, as well as the rest of the District which is more rural (Paragraph 4.8 in the Site Selection Report 2018 (EB805);
  - (b) ensuring that sites are allocated in areas where there is market appetite to develop and focused where new homes are to be provided (see paragraph 7.49 in the SEA 2017 report (EB204));

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<sup>5</sup> [Planning Policy for Traveller Sites 2015, DCLG](#)

- (c) managing the level of traffic growth generated in order to minimise pressure on roads through Epping Forest Special Area of Conservation; and;
- (d) protecting suitable existing employment sites by designating them in the Local Plan (see paragraph 4.67 of the Site Selection Report (EB805)); and prioritising opportunities for extending existing suitable employment sites before allocating new sites (see paragraph 4.45, 4.60 and 4.61 of the Site Selection Report (EB805)).

**Inspector's Question 2**

**2. How was the settlement hierarchy set out in Table 5.1 page 114 defined, and is it justified? Has the settlement hierarchy informed the distribution of development and if not, what is its purpose?**

***Response to Question 2***

**Defining the hierarchy**

14. Section four of the Settlement Hierarchy Technical Paper 2015 (EB1007) explains how the settlement hierarchy was defined. In summary:
- (a) Four categories were established using the non-technical terms ('Town', 'Large Village', 'Small Village' and 'Hamlet') being drawn from a combination of sources. See Table 2 of that Technical Paper.
  - (b) A scoring range was developed based on the likely combined number of facilities and services to be found in each type of settlement, whereby Towns were expected to support a higher number of facilities and services than Villages and Hamlets.
  - (c) An appraisal of the facilities and services offered in each settlement was then carried out and used to assign each of the District's settlements to one of the four categories, based on the total number of facilities and services offered by each settlement. This appraisal of facilities and services is recorded in Table 3 of the Technical Paper.
15. The scoring was also supplemented by the other more qualitative factors which are:
- (a) the historic environment and the degree to which settlements may be considered 'historic towns';
  - (b) employment provision;
  - (c) town centres;

- (d) access to sustainable forms of transport;
  - (e) population; and
  - (f) influences outside Epping Forest District, in particular the relationship of settlements to London and other large towns.
16. Parish, Town and District Councillors were consulted for fact-checking purposes over a six-week period. This feedback, alongside the other qualitative considerations listed above, resulted in some of the settlements being assigned to different categories. A justification for each settlement's position in the hierarchy is provided in the settlement profiles provided at Appendix 3 to the Technical Paper.
17. For the above reasons the Council considers that the settlement hierarchy is justified.

**Informing the distribution of development**

18. The settlement hierarchy informed the distribution of development in four main ways:
- (a) The hierarchy was used identifying the broad areas of the District ('settlement buffer zones') which were generally considered to represent more sustainable locations for growth, and which were considered further through plan-making<sup>6</sup> and site selection. More detail on the 'settlement buffer zones', how they were defined, and the justifications for each, is set out in Chapter 2 of the Green Belt Review Stage 2 report 2016 (EB705A). Detail on how they were used in the site selection process is provided in paragraph 4.13 of the Site Selection Methodology 2018 (EB805AK).
  - (b) The evidence in the Settlement Hierarchy Technical Paper was used as the basis for more detailed settlement appraisal work undertaken in 2016 which informed the amount of growth and mix of sites chosen for allocation for each settlement through the site selection process. This work is recorded in the Settlement Proformas published as Appendix C to the Site Selection Report in 2016 (EB801O).
  - (c) The settlement hierarchy was also used to establish the indicative development capacity for candidate housing sites, whereby sites located within 'Towns' were estimated to support a generally higher baseline density, while sites located within 'Large Villages' or 'Small Villages' were

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<sup>6</sup> These 'settlement buffer zones', consisted of those settlements which were categorised as Towns, Large Villages or Small Villages in the settlement hierarchy, and the defined areas of Green Belt around them, as well as a limited number of other areas. The justification for this is set out in paragraphs 2.15 to 2.20 of the Green Belt Review Stage 2 (EB705A).

estimated to support a marginally lower baseline density. This was done in order to maximise development opportunities in more sustainable locations in accordance with Core Principle eleven (paragraph 17) of the NPPF. More information on how the indicative capacity of residential sites was arrived at can be found in Appendix B1.5.3 to the Site Selection Report 2018 (EB805J).

- (d) The Site Selection Methodology (EB805AK) states at paragraph 4.27 that the settlement hierarchy will only be used as a sense check on the results of the site selection process given that the land available does not tally with the places most likely to provide growth.

### **Inspector's Question 3**

**3. Is the settlement hierarchy justified in respect of how employment opportunities were taken into account e.g. in Nazeing?**

### ***Response to Question 3***

19. The Council considers that the settlement hierarchy is justified in respect of how employment opportunities were taken into account.
20. As set out in paragraphs 3.15 to 3.17 of the Settlement Hierarchy Technical Paper 2015 (EB1007), it is difficult to measure the role of employment opportunities at a settlement level in this District, as the settlements are not self-contained economies, but instead are closely linked to London particularly in terms of out-commuting. Furthermore, the settlement hierarchy was established based on the status quo, which took into account each settlement 'as it was' in 2015. It was for the later settlement appraisals work and the subsequent site selection process to consider the *opportunities* and *constraints* for each settlement.
21. Therefore, existing employment provision was considered and while relevant to some degree to the role and function of each settlement, was not the key determinant of the settlement hierarchy in this District but one of a number of considerations (see response to Question 2 above). Notwithstanding this, the LPSV recognises that the major employment locations within the District are Loughton and Waltham Abbey, both of which are categorised as 'Towns' in the settlement hierarchy, and both of which benefit from residential and employment site allocations.
22. Since the Technical Paper was finalised in 2015, further employment evidence<sup>7</sup> shows that in respect to Nazeing, there are a number of existing employment

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<sup>7</sup> Employment Land Supply Assessment 2017 (EB602), the West Essex and East Hertfordshire Assessment of Employment Needs 2017 (EB610) and the Employment Review 2017 (EB603)

locations close to the village. However, many of the business are in the agricultural and horticultural sectors, are largely dispersed and rural in character, and have a limited relationship with the village or its role and function.

23. Furthermore, the detailed settlement appraisal for Lower Nazeing on pages 53 and 54 of the Technical Paper (EB1007) explains that while the village benefits from some services and facilities, it has limited bus services or other sustainable transport options. Therefore, on balance, the Council considers that the classification of Lower Nazeing as a 'Small Village' in particular, and that the settlement hierarchy more generally, is justified in respect of how employment opportunities have been taken into account.

**Inspector's Question 4**

- 4. Is it justified for North Weald Bassett (NWB) as a Large Village to be allocated more development than the Towns of Loughton, Waltham Abbey and Ongar? More generally, would the proposed growth of NWB be disproportionate, particularly when development at nearby Thornwood and Hastingwood is taken into account?**

***Response to Question 4***

**Justification for Growth at North Weald Bassett**

24. It is justified that the amount of growth proposed in North Weald Bassett is higher than that for some of the other larger established settlements in the District, as this reflects the relative constraints and opportunities affecting each of the settlements.
25. The Site Selection Report 2018 (EB805) and its appendices show that Loughton, while being the largest Town in the District, is one of the most constrained. There is a lack of suitable brownfield sites within the urban area, and locations outside the settlement boundary are constrained by high-performing Green Belt, flood risk and ecological designations.
26. The growth planned for Waltham Abbey and Ongar is considered to be appropriate to realise the visions for those settlements, assisting in regenerating Waltham Abbey and supporting Ongar to become more self-sufficient. Any further development at both of these settlements would be less likely to take advantage of and maximise opportunities for sustainable patterns of growth, due to their distance from the Central Line.
27. North Weald Bassett, conversely, is relatively less constrained, is more sustainably located and offers significant opportunities for growth. The evidence set out in the North Weald Bassett Masterplanning Study 2014 (EB1003) shows that maximising housing growth at North Weald Bassett provides a critical amount

of growth so that it can become more self-sufficient, increasing its sustainability and securing the placemaking and infrastructure benefits sought for the village which include a new local centre, health facilities and additional school places.

**Development in North Weald Bassett, Thornwood and Hastingwood**

28. The proposed growth at North Weald Bassett is considered proportionate when taking into account growth at Thornwood and Hastingwood. Thornwood benefits from good connections to Epping, North Weald, Harlow and the M11, including relatively good bus provision. The quantum of development identified for Thornwood responds to the particular opportunities provided in this settlement and the vision for Thornwood to become more self-sustaining. Development here will benefit from the new and expanded infrastructure, amenities and services planned for Thornwood, Epping and North Weald Bassett, including a new local centre at North Weald. More detail on the existing and planned infrastructure for this area is provided in Parts A and B of the Infrastructure Delivery Plan 2017 (EB1101A and EB1101B).
29. No site allocations have been made for residential or traveller development in Hastingwood. A number of existing employment sites in Hastingwood have been designated to ensure their protection, however, no additional employment development is planned for in this settlement. The Council is not expecting significant development opportunities to come forward, and therefore has no significance to the proposed growth at North Weald Bassett.

**Inspector's Question 5**

**5. 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?**

***Response to Question 5***

30. The proposed growth for each of the settlements in the District is justified by way of the relative constraints and opportunities of each, and by way of the Council's Spatial Strategy. The justification for why each potential site has or has not been proposed for allocation is set out in appendices B1.5.2 (EB805I) and B1.6.6 (EB805P) of the Site Selection Report 2018. With respect to the individual settlements cited, in summary:
- (a) As in Loughton, the potential for growth in Buckhurst Hill is constrained by highly performing Green Belt, flood risk and ecological constraints. Whilst there were a small number of potentially suitable sites within the urban area, many of these were found to be undeliverable; some were too small to warrant allocation; and the allocation of one other site would conflict

with Local Plan Policy E 1 which seeks to protect existing employment sites.

- (b) Theydon Bois is also constrained by high performing Green Belt and proximity to ecological sites. While there were a number of potentially suitable and deliverable sites considered within and around the settlement, responses to the regulation 18 consultation indicated that there were concerns that the total amount of growth for the village should be minimised due to likely recreational impacts on Epping Forest Special Area of Conservation (SAC). This is set out in paragraph 2.137 of the Site Selection Report 2018 (EB805).
- (c) Whilst it is acknowledged that Nazeing and Thornwood are categorised as Small Villages in the settlement hierarchy, these villages benefit from a greater pool of potentially suitable, available and deliverable sites and are less constrained compared with some of the other settlements in the District. A number of these potential sites were chosen for allocation to assist in realising the settlement visions and these allocations are supported by transport modelling and other evidence which informed the Plan.

***Issue 3: Is the distribution of employment land in the Plan justified in light of the distribution of housing?***

**Inspector's Question 1**

- 1. In light of the housing growth proposed around Harlow, does the Plan's proposal to locate the majority of employment land at North Weald Bassett and Waltham Abbey risk creating unsustainable travel to work patterns? How will this be avoided? (Reps Harlow DC).**

***Response to Question 1***

31. The Plan's proposal to locate the majority of employment land at North Weald Bassett and Waltham Abbey does not risk creating unsustainable travel to work patterns. The Council's Strategy for the distribution of employment land in the Plan supports growth at Harlow as well as ensuring the broader District's needs are addressed and that employment growth opportunities are facilitated. The Council's employment strategy thus makes provision for employment where new homes are to be provided, where there is market appetite to develop and where the level of traffic growth generated can be managed such as to minimise pressure on the roads that adjoin the Epping Forest SAC.
32. The Council notes that this question stems from Harlow's Representations to the Regulation 19 Plan [19STAT0026]. It is important to clarify that Harlow withdrew its objections to the Council's Regulation 19 Plan in June 2018 (EB1507) given progress and ongoing joint working as captured in the Memorandum of Understanding for the Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area (EB1203).
33. The Local Plan allocates one hectare of employment land for B1a/B1b use at Dorrington Farm (RUR.E19) within the Latton Priory Garden Town Community. This new allocation combined with an existing one-hectare designation of employment land represents a significant opportunity for a comprehensive redevelopment of this site to deliver considerable new employment opportunities that are well integrated within Latton Priory as well as the wider Garden Town. The delivery of this site for B1a/B1b use fits with aspirations for the Garden Town and will deliver higher density employment uses at a sustainable location. The Local Plan also commits within Policies SP 2 and SP 5 that "other small-scale employment uses are expected to be provided as part of the development mix within the new Garden communities", including within the local centres,

education, community and health facilities, which will generate local employment generating opportunities.

34. Harlow District Council's Local Plan Submission Version provides for a higher quantum of B Use land allocation against the levels identified for Harlow in the West Essex/East Herts Assessment of Employment Needs (EB610). In addition, the Harlow Town Centre Area Action Plan, which is currently being produced, will include potential for further office development within Harlow town centre.
35. The District's Economic and Employment Evidence (EB600) considered functional economic market relationships for Epping Forest District and concluded that current functional flows between the District and Harlow are limited (p 5 & EB600B Chapters 1 and 2). The West Essex/East Herts Assessment of Employment Needs (EB610) sought to identify employment sites and premises requirements for each constituent district within the FEMA. The process for agreeing the report included high level consideration of whether each district could meet its own employment requirement. The assessment (EB610) concluded that Epping Forest District was not required to contribute to meeting any unmet employment needs of Harlow.
36. Section 7.8 of the District's Economic and Employment Evidence (EB600) considers the spatial distribution of existing employment activity within Epping Forest District. This identifies two broad sub-markets. The south and west sub-area which largely falls within the M25 (with the exception of Waltham Abbey) and outside of the M25 which is characterised by smaller towns and rural employment sites. The 2017 Employment Review (EB603) recommends provision is made within the two sub-areas (Section 6.3) noting that there is a strong demand and a shortage of supply of employment space across the District, particularly for locations with strong access to key transport infrastructure routes (i.e. the M25, M11 and Central Line) plus also demand from businesses being displaced from London particularly focused at locations with strong access links back in to the capital. There was no evidence that Harlow was providing a demand stimulus within the District.
37. The distribution of employment sites ensures that employment opportunities are provided at appropriate locations across the District in order to respond not only to the role of the Harlow and the Garden Town communities as set out above, but also the wider distribution of housing proposed in the LPSV. In addition, account has been taken of the fact that the focus of uses is primarily for B2/B8 uses, and it is therefore necessary to consider the need for access to the strategic road network to avoid increases in HGVs in particular, on the local road network. The approach therefore provides greater opportunities for new residents to access jobs locally, thus reducing the need to travel longer distances to access employment. Furthermore, the employment sites at Waltham Abbey and North Weald Bassett in particular provide the critical mass needed to support alternative modes of travel in accordance with Policy T 1 of the LPSV.

***Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?***

**Inspector's Question 1**

1. Paragraph 14 of the NPPF generally requires that a Local Plan should meet the objectively assessed development needs of the area. However, it also confirms (via footnote 9) that Green Belt is one of the constraints which indicates that development should be restricted. How has this tension been resolved in favour of the conclusion that there are exceptional circumstances to justify the alteration of Green Belt boundaries?

***Response to Question 1***

38. The Council has taken many steps to resolve this tension, and has undertaken an exhaustive search for sites across the District to minimise development in the Green Belt. This has included a robust and stringent process for identifying brownfield land. Further details of the process adopted by the Council is provided in response to Part C of this question.
39. The Council considers that the need to promote sustainable patterns of development to meet objectively assessed needs over the Plan period can only be achieved with the release of land from the Green Belt. Failing to deliver development to meet those needs would not contribute to the achievement of sustainable development in accordance with national planning policy. It therefore considers that Green Belt release is justified and required in order to facilitate wider strategic development goals in the HMA (in relation to development proposed around Harlow) and in the rest of the District. Further detail on the growth aspirations of the HMA is provided in the response to Matter 4 Issue 1.
40. Section 4 of the Sustainable Appraisal of Strategic OAHN Spatial Options 2016 (AECOM) (EB203) states that the re-use of brownfield land to support regeneration within Harlow was maximised before the three Council's looked at the most appropriate sites within the Green Belt. The Gilston Area, also located in the Green Belt, was found to be sound at the recent examination of the East Herts District Plan. Paragraph 69 of the East Herts Inspector's Report 2018 (EB1506) outlines how the Gilston Area represents the most sustainable growth solution for the wider area.

**In particular:**

- a. How do the specific development needs of the District weigh against the importance given to Green Belt protection?**
- b. What would be the consequences of not releasing Green Belt land to help meet development needs?**

- 41. Protection of the Green Belt is one of the Council's main concerns. The Green Belt Background Paper Update 2018 (EB1608) confirms at paragraph 3.4 that development need alone is not a sufficient justification for altering Green Belt boundaries. The Council therefore undertook further analysis of specific local circumstances, in order to demonstrate exceptional circumstances.
- 42. The Council's strategy for allocating sites has taken into account the needs, risks and constraints of each settlement. The Land Preference Hierarchy, set out in Paragraph 2.78 of the Site Selection Report 2018 (EB805), has assigned sites to different categories in order to prioritise previously developed land within settlements (Category 1) and minimise allocations in the Green Belt.
- 43. Paragraph 3.12 of The Green Belt Background Paper Update 2018 (EB1608) states that the Site Selection process, along with other evidence base studies has determined that there is insufficient land available outside of the Green Belt to meet the development requirements of the District. Without the release of Green Belt land, the Council would be unable to meet its development requirements as there are insufficient appropriate non-Green Belt sites in the District. This would be contrary to the achievement of sustainable development, a direct component of national planning policy.

**c. Have alternatives to Green Belt release been fully considered:**

- i. Has full use been made of previously developed land? Has a Brownfield Land Register been published and how has it been taken into account?**

- 44. Yes, alternatives to Green Belt release have been fully considered. Section 2.4 of the Site Selection Report 2018 (EB805) sets out the site identification process. In line with the requirements of Planning Practice Guidance, an exhaustive process was undertaken which includes review of Strategic Land Availability

Assessment (SLAA), the 'Call for Sites' process and reviewing council landholdings. The Settlement Capacity Study 2016 (EB803) further outlines the process the Council took to re-examine options for the provision of additional development in existing settlements, and looked to identify potential sites of previously developed land. Further detail on the process for reviewing and refining the site pool is set out in Paragraph 2.13.

45. The Site Selection Methodology 2018 (SSM) (EB805AK) sets out the process followed by the Council for identifying sites for allocation. Paragraph 4.26 of the SSM sets out the Land Preference Hierarchy. This approach has ensured that the Council has made full use of all suitable, available and achievable brownfield land in the District.
46. The Council has a published Brownfield Land Register 2018 (EB141), informed by the evidence base, including the Strategic Land Availability Assessment 2016 (SLAA) (EB800) and the Site Selection Report 2018 (EB805). The Register lists the 50 brownfield Local Plan allocations as well as 40 other smaller brownfield sites that have been identified as appropriate for residential development. The Brownfield Land Register is regularly updated by the Council and will form part of a future monitoring exercise to keep the Council informed about available brownfield sites in the District.

**ii. Has the density of development been maximised, on brownfield and greenfield allocations?**

47. Yes, the Council considers it has maximised the density of development on both brownfield and greenfield allocations. As part of the site selection process, the Council undertook a review of the potential capacity of sites which were identified for further testing to ensure that the site capacity was optimised having regard to site specific characteristics and constraints.
48. Further details on the approach to maximising density and the results of the assessment can be found in the following documents:
  - (a) Paragraphs 4.31 to 4.33 of the SSM 2018 (EB805AK) identifies the need for and the purpose of the review of site density assumptions.
  - (b) Table 2 of Appendix B1.5.3 - Detailed Methodology Capacity Assessment 2018 (EB805J) provides a summary of the methodology adopted to undertake a detailed assessment of residential site capacity.
  - (c) Appendix B1.6.4 Result of Capacity and Deliverability Assessment 2018 (EB805N) presents the results of the Stage 3/6.3 capacity assessment.

**iii. Could vacant homes be brought back into use? Have approximately 1000 properties in the Epping Area been empty for more than 6 months?**

49. The Council takes an active approach to bringing empty residential properties back into use, particularly those that are long-term or problematic. Latest information available from the Council Tax System (December 2018) suggests approximately 740 properties across the District that have been empty for over 6 months, 14 of which are Council owned properties. Of the Council owned empty properties, 6 of these are in the allocation process. Within the settlement of Epping, Council figures suggest that only 65 properties have been vacant for longer than 6 months.
50. There are a range of reasons why these properties are vacant, including those identified as probate properties, prohibited by law, mortgagor in possession, or undergoing major structural works. The Council's approach is set out in further detail in the EFDC Empty Property Strategy 2016 (EB806).

**iv. Has the potential for windfall development during the Plan period been underestimated?**

51. The Council has made a conservative, but justified, estimate of the amount of windfall development based on historic delivery of housing in the District. Table 2.14 of the Housing Implementation Strategy 2017 (EB410) shows historic housing delivery in Epping Forest District 2001/02 to 2010/11. Paragraph 2.14 sets out how the Council has a good track record of delivering housing against its identified requirements, and exceeded the East of England Plan requirement by more than 40% by the end of 2011.
52. To avoid double counting between windfall sites and commitments, the Council has not made any windfall allowance in the first five years following the adoption of the Local Plan. A conservative allowance of 35 dwellings per annum has been applied for the remaining Plan period. The full justification for the Council's windfall calculation can be found in paragraphs 3.5-3.6 of the Housing Implementation Strategy 2017 (EB410).

v. **Could any other authority within the HMA have accommodated some of the District's housing need on non-Green Belt land?**

53. No. In line with national guidance, the Council formally sought assistance from neighbouring authorities within the HMA in November 2017, to address the shortfall in supply during the early years of the Plan period.
54. The Council received responses from Harlow Council, East Herts Council and Uttlesford District Council, confirming that they would not be able to contribute towards the identified undersupply within the EFDC Local Plan, as a result of similar constraints and difficulties.

**Inspector's Question 2**

**2. Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt (EB74A-B; and EB705A-B)? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?**

***Response to Question 2***

55. Yes, the Council undertook a comprehensive Green Belt Assessment Stage 2 2016 (EB705A). The assessment was undertaken in accordance with the requirements of national planning policy, and provides a robust assessment of the performance of the District's Green Belt against the five purposes, which is of sufficient level of granularity to inform the site assessment process.
56. The findings of the Green Belt Reviews informed various stages of the site selection process and were given significant weight in the decision-making process. Further details are provided in Sections 2.6 – 2.8 of the Site Selection Report 2018 (EB805).
57. When coming to a judgement on the sites to be allocated in the Local Plan, the Council sought to identify sites for allocation which supported the distribution of growth identified in the Local Plan Strategy and maximise the sites allocated in each land preference category before moving onto the next, thus reducing the allocation of sites in the Green Belt. Further details of this process are summarised in Section 2.9.3 of the Site Selection Report 2018 (EB805).

**Inspector's Question 3**

- 3. Is the scale of Green Belt release proposed at NWB, Thornwood and Waltham Abbey justified and proportionate to the size of the existing built up areas?**

***Response to Question 3***

58. Yes, in order to inform the site selection process and the Local Plan Spatial Strategy, a review of the District's 12 settlements was undertaken. The assessments are set out in full in Appendix C – Site Selection Settlement Proformas 2016 (EB801O).
59. The scale of Green Belt release reflects the relative constraints and opportunities offered by each settlement, and the contribution of Green Belt to the NPPF Purposes, in line with the Council's Land Preference Hierarchy and site selection methodology. The proposed release across the settlements also reflects appropriate growth in order to realise the settlement visions. The response to Matter 4 Issue 2 above provides further details on growth at the settlement level.

**Inspector's Question 4**

- 4. How have anomalies in the Green Belt boundary been identified and does the need to correct them amount to the exceptional circumstances necessary to alter the boundaries? Should sites with planning permission for residential development in the Green Belt (such as land north of Ivy Chimneys Road, Epping) be removed from the Green Belt? (See Reps 19LAD0022 re. land north of Ivy Chimneys Road, Epping).**

***Response to Question 4***

60. Anomalies in the Green Belt boundary have been identified in a number of ways, including:
- (a) Through the Green Belt Review Stage 1 report 2015 (EB704A) and Phase 2 report 2016 (EB705A), which identified where development in the Green Belt had taken place;
  - (b) Where current boundaries cut through sites;
  - (c) Where planning permission has been granted for development in the Green Belt.

61. The argument for exceptional circumstances goes beyond the correction of anomalies. The anomalies are looked at as part of the need to ensure that recognisable and defensible boundaries (as required by the NPPF) are in place so that the permanence of the Green Belt is maintained throughout the Plan period and beyond.
62. The land north of Ivy Chimneys Road, Epping (SR-0466) has an outline application with all matters reserved for the demolition and removal of stables and hardstandings, provision of an access road, and erection of three detached dwellings with garages and car spaces.<sup>8</sup> The Officer Report<sup>9</sup> states that the outline application “would not result in any greater harm to the openness of the Green Belt”. The proposed dwellings, located on the existing development footprint, were not considered to alter the land such that it would no longer fulfil the purposes of the Green Belt. The site does therefore not represent an anomaly that would require removal.

**Inspector's Question 5**

**5. Having regard to paragraph 85 of the NPPF, and to the potential for an increased level of housing need in the District to be identified in the future, how has the Council satisfied itself that Green Belt boundaries will not need to be altered at the end of the Plan period? Is it necessary to identify areas of safeguarded land between the urban area and the Green Belt?**

***Response to Question 5***

63. Paragraph 3.17 of the Green Belt Background Paper Update 2018 (EB1608) sets out how consideration was given to the most suitable and defensible alterations for future Green Belt boundaries to accommodate the residential, employment and traveller allocations/designations in the LPSV.
64. Safeguarding is not a requirement for every local authority with Green Belt land, and may not be necessary depending on a range of factors. The Council does not consider it necessary at this stage, and has decided not to specifically include provision for safeguarded land.
65. Having regard to the changes in national Green Belt policy within the Chapter 13 of the revised Framework (July 2018), in particular paragraphs 135 to 139, it would be wholly inappropriate to identify areas of safeguarded land within the existing Green Belt areas in the District. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), will require the Council, as local planning authority, to complete a review of this Local Plan

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<sup>8</sup> Reference EPF/0458/15

<sup>9</sup> <http://planpub.eppingforestdc.gov.uk/NorthgatePublicDocs/00463148.pdf>

within five years of its adoption. Given the changes to national planning policy, including the changes to Green Belt policy (mentioned above) and those relating to housing supply and delivery, at this stage, it is impossible to know whether the exceptional circumstances necessary to alter existing Green Belt boundaries will exist in the future.

66. On any view, in the circumstances, "the potential for an increased level of housing need in the District to be identified in the future" is but one of many material considerations that will be relevant to any future review of this Local Plan. Of itself, "the potential for an increased level of housing need" cannot rationally be considered a proper reason to identify in this Plan areas of 'safeguarded land' on the District. To do so would be to ignore other material planning considerations, not least the potential for the development needed to meet any future increased housing need to be delivered in areas beyond the Green Belt outside the District.
67. For all these reasons, at this stage, it cannot reasonably be considered necessary to identify in this Local Plan areas of 'safeguarded land' within the Green Belt.

**Issue 5: Is the distribution of development justified in respect of the approach to flood risk; and to protecting water quality?**

**Flood Risk**

**Inspector's Question 1**

1. Notwithstanding that the Plan requires all residential development on allocated sites to take place within Flood Zone 1, has the potential impact of climate change been allowed for in the site allocation process? Should the relevant policies in the Plan require all residential development to take place in Flood Zone 1, allowing for climate change? Should this requirement relate only to the housing and ancillary development itself, and permit associated development such as amenity open space to be provided in higher risk zones?

***Response to Question 1***

68. The Council published its Level 1 Strategic Flood Risk Assessment ('SFRA') Update (EB909) in 2015. The assessment took into account climate change guidance available at the time (see EB909, paragraph 4.2.24) and identified local flood risks at a broad/strategic scale. The assessment was used to inform the Council's site allocation process as outlined in paragraph 3.7 and 4.26 of the Site Selection Methodology 2018 (EB805AK).
69. Since the Level 1 SFRA 2015 (EB909) was published, new climate change guidance has been published by the Environment Agency (EA),<sup>10</sup> which introduces an increase in the 'allowance factors' that needs to be applied in new SFRAs. Following the Regulation 19 publication, the Council has commissioned AECOM to undertake additional work to address concerns raised by the Environment Agency through their Regulation 20 representations in relation to the need to respond to the new guidance. The outcome of that additional work is recorded in the 'Strategic Flood Risk Assessment – Site Assessment' 2018 (EB913).
70. The EA is satisfied with the methodology adopted and the findings within the SFRA - Site Assessments and has since withdrawn all their objections to the LPSV, subject to a number of proposed modifications, through the agreed Statement of Common Ground between the Council, the Environment Agency and Thames Water 2018 (ED3). These changes include additional wording to relevant policies which make it clear that, except for essential infrastructure and water compatible developments, no development will be permitted within Flood

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<sup>10</sup> <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Zone 2 and 3 as identified in the Council's latest SFRA, including the appropriate allowance for climate change.

**Inspector's Question 2**

**2. The following allocations include some land within or adjacent to Flood Zones 2/3: SP5.2 (Water Lane Area); SP5.3 (East of Harlow); NWB.R3 (in North Weald Bassett); NAZE.R1 & R4 (in Nazeing); and LOU.R11 (in Loughton).**

**a. Do the above allocations pass the Sequential Test required by paragraph 100 of the NPPF?**

***Response to Question 2***

71. The allocations identified pass the Sequential Test required by paragraph 100 of the NPPF, which together with paragraph 101, require Local Plans to steer new development to areas with the lowest probability of flooding and avoid inappropriate development in areas at risk of flooding. The Council has adopted a sequential approach in the Local Plan site allocation process which "proposes land [for allocation] in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1" (see EB805AK, paragraph 4.26). Relevant LPSV policies also make clear that (subject to the proposed amendments set out in the agreed Statement of Common Ground between the Council, the Environment Agency and Thames Water (ED3) and further proposed amendments detailed below), no built development will be permitted within Flood Zone 2/3, except for essential infrastructure and water compatible developments. The Council therefore submits that all the housing allocations, including the five sites identified, are compliant with relevant NPPF requirements.

**b. Does the Strategic Flood Risk Assessment (Site Assessments) March 2018 (EB913) constitute a Level 2 Strategic Flood Risk Assessment? Has it considered site specific flood risk characteristics, including climate change?**

72. The Strategic Flood Risk Assessment (Site Assessments) March 2018 (EB913) does not constitute a Level 2 Strategic Flood Risk Assessment. Based on the findings of the assessment which are accepted by the EA, EFDC and the EA are both satisfied that, subject to a number of proposed modifications, a Level 2 SFRA is also not required and the EA has withdrawn their objections to the LPSV.

73. As stated above, in 2018, the Council commissioned the ‘Strategic Flood Risk Assessment - Site Assessments’ (EB913) in response to concerns raised by the Environment Agency through their representation on the LPSV. The assessment builds on the Level 1 SFRA and includes site specific assessments for a number of LPSV allocations that are either located within or adjacent to Flood Zones 2 and 3, including sites NWB.R3, NAZE.R1, LOU.R11, SP5.2 and SP5.3 (referred to in the report as site SP4.2 and SP4.3). Guidance published by the EA, including its latest guidance on climate change allowances for river basin districts across England has been applied to the assessment. The assessment’s methodology has been development and agreed with the EA and is considered to be robust and proportionate.

**c. Are the above allocations required to pass the Exception test and, if so, do they?**

74. The Council’s position is that an Exception Test is not required on these sites because relevant LPSV policies have made it clear that no built development (except for essential infrastructure and water compatible uses) will be permitted in Flood Zones 2/3. Without prejudice to that position, were Exception Tests are required, the Strategic Flood Risk Assessment - Site Assessments (EB913) states that because the majority of the site is in Flood Zone 1, through considered management of flood risk it is likely that a development layout could be determined to pass the Exception Test (please refer to the Non Technical Summary within EB913). To provide further clarification and ensure consistency between policies, the Council proposes the following amendments to the LPSV.

<b>LPSV</b>	<b>Proposed Changes</b>
Policy DM 15	[a new section H] <u>Site specific Flood Risk Assessment must be undertaken in accordance with relevant national and local requirements. Revised hydraulic modelling including climate change allowance will be required as part of a site specific Flood Risk Assessment where this is deemed necessary by the Council.</u>

**Matter 4: The Spatial Strategy/Distribution of Development  
Statement by Epping Forest District Council  
January 2019**

LPSV	Proposed Changes
Paragraph 4.99	The Epping Forest District Council Strategic Flood Risk Assessment (SFRA) Level 1 Update 2015 <u>and the SFRA – Site Assessment</u> contains a great deal of detail on the matter of flood risk. The forms of flooding experienced in the District are: ‘fluvial’ from rivers and other watercourses; ‘pluvial’ from rain i.e. surface water flooding resulting from rain; and ‘groundwater’ flooding which is the emergence of water from the ground away from river channels
Part I of Policy P 1 Epping	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>
Part K of Policy P 2 Loughton	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>
Part L of Policy P 3 Waltham Abbey	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>
Part H of Policy P 4 Ongar	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>

**Matter 4: The Spatial Strategy/Distribution of Development  
Statement by Epping Forest District Council  
January 2019**

<b>LPSV</b>	<b>Proposed Changes</b>
Part H of Policy P 5 Buckhurst Hill	<p><u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u></p>
Part J of Policy P 6 North Weald Bassett	<p><u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u></p> <p>*This supersedes the proposed modification to Policy P 6 in document ED3</p>
Part F of Policy P 7 Chigwell	<p><u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u></p>
Part G of Policy P 8 Theydon Bois	<p><u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u></p>
Part E of Policy P 9 Roydon	<p><u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u></p>

**Matter 4: The Spatial Strategy/Distribution of Development  
Statement by Epping Forest District Council  
January 2019**

<b>LPSV</b>	<b>Proposed Changes</b>
Part E of Policy P 11 Thornwood	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>
Part H of Policy P 12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbots	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>
Part I of Policy P 13 Rural Sites in the East of the District	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>
Part F of Policy P 14 Rural Sites in the West of the District	<u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest SFRA maps, including the appropriate allowance for climate change. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1.</u>

**Inspector's Question 3**

- 3. Document EB913 identifies several employment allocations in flood risk areas or which have watercourses running through them. Do these sites pass the Sequential Test and, if necessary, the Exception Test required by paragraph 100 of the NPPF?**

***Response to Question 3***

75. The Council considers that employment sites identified in the Strategic Flood Risk Assessment (EB913) pass the Sequential Test and, if necessary, the Exception Test as required by paragraph 100 of the NPPF.
76. Flood risk has been factored into the Council's site selection process. Full details of the approach followed, and the results of the site selection process can be found in the Site Selection Report 2018 (EB805). For example, sites were excluded from further assessment at an early stage of the selection process if they were entirely constrained by Flood Zone 3b. Flood risk was again assessed through criterion 1.7b in Appendix A of the Site Selection Methodology (see EB805AK, page A31) which informed site scoring and site ranking.
77. Decisions on employment site allocation were also informed by the Council's approach to employment provision, which is to focus on protecting and enhancing existing employment sites (LPSV, paragraph 3.44 and 3.45). In respect of new employment provision, the extension of existing employment sites will be preferred ahead of new employment sites (see EB805AK, page A26, paragraph 4.75). The outcome of employment site selection is detailed in Appendix F1.5.3 2018 (EB805AH).
78. The majority of the sites identified are existing employment sites, except site LOU.E2 and site WAL.E6 which involved extension of existing employment sites, and site WAL.E8 which is an entirely new allocation. The Council has not planned for a specific quantum of additional employment development on designated existing employment sites. Should this eventuality arise in the future (e.g., in the form of windfall employment development), the development proposals in question will be subject to the Sequential and if necessary, Exception Tests at that time.
79. For site LOU.E2 and site WAL.E6, new employment areas are being allocated through extensions to existing employment sites. In both cases, the new employment areas are located outside of Flood Zones 2 or 3, meaning that development proposals for employment use will not require the Sequential Test or Exception Test to be undertaken. For site WAL.E8, less than 0.1% of the site is within Flood Zones 2 and 3.
80. With regards to the Exception Test, employment uses (Class B uses) are classified as 'less vulnerable' use in terms of flood risk: see PPG, paragraph 7-

066 (Reference ID: 7-066-20140306). In accordance with national guidance, the Exception Test is not required for this type of development: see PPG, paragraph: 7-067 (Reference ID: 7-067-20140306).

## **Water Quality and Wastewater Treatment**

### **Inspector's Question 4**

- 4. Is the level of growth and the distribution of development in the Plan justified in the absence of a specific strategic assessment to demonstrate that there is sufficient capacity in the water supply network and waste water treatment network to support it without detriment to the water environment? The Environment Agency has suggested that a Water Cycle Study could have been prepared, but that other evidence, including consultation with relevant service providers, could be sufficient. What is the evidence to demonstrate that the Plan is sound in this regard? Is the Council carrying out the three actions suggested by the Environment Agency in its representations on Policy DM18?**

### ***Response to Question 4***

81. The level of growth and the distribution of development in the Plan is justified in terms of water quality and wastewater treatment. To address issues raised in the Environment Agency's representation 2018 (19STAT0036), the Council has undertaken further consultation with Thames Water who is the main waste water undertaker for the District. A Statement of Common Ground (SoCG) has since been agreed between the three parties (ED3) and objections from both the Environment Agency (EA) and Thames Water have been withdrawn subject to continued partnership working between stakeholders and a number of proposed modifications to the Local Plan.
82. In the process of agreeing the SoCG, Thames Water has made it clear that it does not anticipate any major constraints to growth based on allocations in the LPSV. Where upgrades may be required to some of the treatment works these are not expected to result in the need for any amendments to existing permits agreed with the EA.
83. In response to the three actions suggested by the EA in its Regulation 20 representations in relation to Policy DM 18, the Council has:
- (a) incorporated recommendations received from Thames Water and proposed modifications to the LPSV accordingly through the SoCG (document ED3);

- (b) worked with partners (see EB1111, Harlow Water Cycle Study 2018 Executive Summary) to complete the recently published Study 2018 (EB1111); and
  - (c) committed to work together with the EA and other partners to identify any further studies that may be required for future updates to the Local Plan.
84. With regard to capacity in the water supply network, no objection or concern has been raised by Thames Water 2018 (19STAT0022) or Affinity Water 2018 (19STAT0007) – the two main water undertakers in the District.

**Inspector's Question 5**

**5. Thames Water has identified that significant infrastructure upgrades will be required to the Abbess Roding Sewage Treatment Works (STW), the Epping STW, the North Weald STW, the Stanford Rivers STW and the Thornwood STW in order to support planned growth. Furthermore, the impact of cumulative development in nearby Council areas upon the Deephams STW and the Rye Meads STW will need to be kept under review. Capacity at the Theydon Bois STW and the Willingdale STW might also need to be reviewed. What work is being undertaken in respect of these matters to ensure that the Plan's allocations are deliverable at the appropriate time?**

***Response to Question 5***

85. Due to the extent of growth proposed both in the District and in nearby areas, upgrades are likely to be required for a number of sewage treatment works to accommodate the increase in development. Thames Water is currently confirming their business plan for the period 2020 – 2025. Sewage treatment works which require upgrades within this timeframe will be identified using local plan development trajectories and other information received from councils and developers. Several treatment works, including Stanford Rivers STW and Thornwood STW, have been identified as requiring upgrades within this period and are currently included within the business plan. Requirements for the upcoming plan period and beyond will be subject to further review and prioritisation as per Thames Water's standard growth process. This includes a review of growth projected and a modelled view of risk to prioritise which sites will need a project and when, to ensure capacity is in place ahead of development coming forward.
86. The Council acknowledges that upgrades are likely to be required to a number of local Sewage Treatment Works in order to support planned growth both in the District and in nearby areas. Modifications to the LPSV have therefore been proposed to Part B of Policy DM 18 (see Statement of Common Ground (ED3), page 5) requiring developers to 'demonstrate, through the planning application

process, that consultation has taken place with local sewerage infrastructure provider and that any necessary upgrade can be delivered in advance of the occupation of development.’ This is considered as a proportionate approach and is supported by both the EA and Thames Water as part of the agreed Statement of Common Ground.

87. The Council has also worked with Harlow District Council on the recently published Harlow and Gilston Town Water Cycle Study Update 2018 (EB1111). The study assesses the potential issues relating to future developments within the Harlow-Gilston Garden Town study area (including site SP5.1, SP5.2 and SP5.3 in the LPSV) and the impacts on water supply, wastewater collection and waste water treatment. The study concluded that there is no strategic-scale water or wastewater constraints on growth within the study area. It also confirmed that the Rye Meads Waste Water Treatment Works has sufficient capacity to accommodate all planned growth from Harlow District and the Harlow-Gilston Garden Town, as well as contributing to growth planned in areas of the six neighbouring Local Planning Authorities of Broxbourne, East Herefordshire, Epping Forest, North Hertfordshire, Stevenage and Welwyn Hatfield, up to 2036 (p91, section 10.1). This position is also supported by the position statement published by Thames Water in October 2018 (EB1110).
88. The Council will continue to work with Thames Water and other stakeholders to ensure that the Plan’s allocations are delivered at the appropriate time.

***Issue 6: Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District? Will the Plan be effective in securing the infrastructure necessary to support proposed growth?***

**Inspector's Question 1**

**Transport**

- 1. Have the transport impacts of the Plan as a whole been tested? Has all necessary mitigation been identified and is there confidence that it can be delivered in time to support the proposed growth? Are there any remaining uncertainties or shortcomings?**

***Response to Question 1***

89. The transport impacts of the Plan as a whole have been tested, the appropriate mitigation identified, and the Council is confident that it can be delivered in time to support the proposed growth. The preparation of the Local Plan has been informed by extensive transport modelling work and close liaison with relevant authorities, including Essex County Council (as Local Highway Authority), Highways England, and neighbouring local planning authorities. This has been an iterative process which has culminated in the publication of the Transport Assessment Report, Essex Highways/Jacobs, 2019 ("TAR") (EB503). The assessment represents a 'worst-case' scenario in relation to traffic growth and therefore provides a robust assessment of the predicted traffic-related effects arising from the LPSV. The Council is satisfied that there are no remaining uncertainties or shortcomings regarding the work undertaken to test the transport impacts of the Plan.
90. The TAR builds on the Highway Assessment Report (Essex Highways/Jacobs, 2017) (EB502) which was published as part of the evidence base supporting the Regulation 19 publication of the LPSV. It provides details of the work undertaken to assess the potential transport related effects of the LPSV, together with a summary of the physical highway interventions considered at different junctions across the network, as well as potential bus and cycle improvements. The assessment includes updates to the modelling methodology as well as a more detailed assessment of a potential highway mitigation package to accommodate future Local Plan traffic growth. The key updates are summarised at paragraph 2.2.2 (pages 6 and 7) of the TAR (EB503).
91. Section 3 of the TAR (EB503) provides a description of the Highway Model used to assess the effects of LPSV development on the local highway network. It also

provides an overview of the 'Strategic Harlow Model' and the traffic model that is specific to the highway network located within and adjacent to the Epping Forest Special Area of Conservation. The transport modelling has taken into account potential growth in traffic arising from development outside of the Epping Forest District administrative boundary to assess the 'in-combination' effect of other plans on the highway network with and without development proposed in LPSV. All proposed housing and employment development including development on windfall sites, as well as new education provision, has been modelled. As such, the outputs from the traffic modelling represent a 'worst-case' scenario in relation to traffic growth.

92. The traffic impacts of the LPSV have been assessed using the forecast year of 2033. The weekday AM and PM worst-case peak hours have been modelled for a number of scenarios to assess the effects of LPSV development on the highway network.
93. The 'Strategic Harlow Model' referred to in paragraph 3 above has been used to assess the impact of development proposed in the West Essex/East Hertfordshire (WEEH) districts in and around Harlow, including Epping Forest, Harlow, Uttlesford and East Herts. In particular, the model has been used to identify and test major infrastructure requirements around and within the town of Harlow leading to the M11. A summary of the outputs from the Strategic Harlow Model as they relate to the LPSV are set out at Section 12 of the TAR (EB503).
94. Throughout the preparation of the Plan, Essex Highways/Jacobs have produced a series of Technical Notes which have reported on modelled development and informed the process (see TN1 to TN8 EB500A - EB500H). These Technical Notes identified locations where the network would be under particular stress in the wider Harlow area and also assessed the impacts that alternative options to improve capacity around larger development sites, including Gilston, East Harlow, Latton Priory and Water Lane area (including West Katherine's and West Sumners).
95. The transport related infrastructure improvements for the District are set out within the Infrastructure Delivery Plan ("IDP") (EB1101A/B). The Council's IDP Topic Paper (EB1101C) provides further detail in relation to the delivery and funding of these highway mitigation measures.
96. The emerging IDP for the Harlow and Gilston Garden Town will provide details of the transport related infrastructure improvements required for the Garden Town as a whole. This will identify when those improvements need to be delivered and how much they are expected to cost. The Garden Town IDP will also identify the sites that will be expected to deliver, or contribute to, infrastructure improvements and will apportion estimated infrastructure costs to specific sites. It is anticipated that the draft Garden Town IDP will be available for publication at the end of March.
97. The methodologies set out at Section 2.1 (page 5), Section 5 (page 27 onwards), Section 6 (page 32 onwards) and Section 7 (page 45 onwards) of the TAR

- (EB503) demonstrate that a robust approach has been taken to testing the transport impacts of the LPSV. The TAR has built on the previous transport and highways assessments which were undertaken to inform the overall spatial strategy, the Draft Local Plan 2016 (EB123) and the LPSV.
98. The Site Selection Methodology (EB801A, EB802A and EB805AK) included criteria to better understand the accessibility, or potential accessibility, of each site to both alternative transport modes and to local services. The appraisal of sites undertaken following the Draft Local Plan 2016 (Regulation 18) consultation and the publication of the LPSV included undertaking 'sensitivity testing' to better understand the opportunities for minimising transport impacts and congestion, and the transport impacts on the town of Epping in particular (EB805 and EB502 paragraph 3.3.10 and Table 3.1 page 10).
99. The TAR (EB503) and the IDP (EB1101A/B) identify the mitigation measures required by the end of the plan period, based on a sequential approach whereby physical highway works are the 'option of last resort'. The approach taken is in accordance with national guidance such as the advice set out in the 'Transport Evidence Bases for plan making' sections of the Planning Practice Guidance (including Paragraph: 004 Reference ID: 54-004-20141010) and Department for Transport (WebTAG) modelling principles<sup>11</sup>. In particular it has reviewed the effects of the LPSV both with and without physical highway mitigation measures in order to understand the effects (both positive and negative) on the highway network.
100. All of the transport assessments informing the preparation of the LPSV have adopted a precautionary 'worst case' approach. The elements of the transport modelling where 'worst-case' assumptions have been used include the following:
- (a) All LPSV housing allocations have been modelled, as well as a 'windfall' allowance. Consequently, whilst the 'housing requirement' for the District to the end of the plan period is 10,020 new dwellings using the base date of 2017 the LPSV makes provision for 11,822 net additional dwellings and it is this latter figure which has been included within the transport modelling assumptions. This provides for a greater level of housing than the minimum requirement identified in the LPSV (the components of which are set out in Table 2.3 page 29 of the LPSV). The level of assumed housing supply provides for choice in the market and flexibility recognising that, based on past experience, not all sites will come forward for development within the plan period, or that the rate of delivery on some larger sites may be slower than originally profiled within the housing trajectory. Allocations for new employment development and the locations of schools have also been modelled;

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<https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>  
<https://www.gov.uk/government/publications/tag-data-book>

- (b) The traffic growth assumptions have not been 'discounted' to fully take account of linked trips (i.e. those that have multiple destinations), trips that remain internal to a development site (this is particularly relevant to the larger sites), pass-by and diverted trips (i.e. trips that are already on the road network which will turn into a site or which will divert from their existing route), transferred trips (i.e. those that are already present on the network that have the potential to transfer their destination), or pairing of new residential and new employment trips. Therefore, there is an element of 'overcounting' on peak hour traffic movements;
  - (c) The traffic growth assumptions do not take account instances where existing residents and commuters switch from cars to other transport modes as a result of improvements to public transport, walking and cycling infrastructure;
  - (d) Traffic growth assumptions for trips which start and end outside of the District (i.e. 'through-traffic') use a precautionary approach of 3% to provide some additional buffer to account for fluctuations in traffic notwithstanding that current evidence would suggest that this figure is nearer 1%;
  - (e) The traffic model used does not have the flexibility to factor in changes in route choices to make better use of available capacity on the network (i.e. people deciding to use a different route because of increased delays at particular junctions, or as a result of provision of new or improved infrastructure such as improvements to Junction 7 and provision of new Junction 7a on the M11);
  - (f) The modelling assumptions are based on a housing mix which is based on 2011 Census data for individual settlements as a proxy to inform TRICS based trip rate assumptions. This has a high proportion of houses which have a higher trip rate than flats. Therefore, there may be an overestimate of trip rates, particularly in relation to Loughton.
101. A number of the LPSV site allocations are located in close proximity to London Underground stations. For these sites a significant reduction in parking provision is sought as set out in Appendix 6 to the LPSV. Paragraph 6.5.13 of the TAR (EB503) explains the precautionary approach taken in terms of modelling assumptions for these sites. However, in reality it is anticipated that such sites would generate lower vehicle trips than has been tested.
102. The TAR (EB503) has assessed the potential for car trips to reassign to access railheads within the District. Section 6.10 sets out the methodology used. The modelling outputs indicate that less than 3% of journeys overall would reassign but that impacts could be greater on some parts of the network with up to 9% of development trips either removed from or added to a junction. However, these travel patterns could be influenced by future changes in capacity and pricing which would reduce the impacts on some parts of the highway network, particularly those parts of the network used to access London Underground

stations. In particular potential improvements to rail services to the west of the District arising from the implementation of the Crossrail 2 project, which is currently programmed to be operational in 2030, and separately the continuing dialogue between partners regarding the equalisation of fare structures between the Greater Anglia rail service and London Underground would result in changes in car travel patterns.

103. In order to reflect the fact that the modelling outputs and the identified physical highway schemes are based on a 'worst case' scenario, Section 11 of the TAR (EB503) provides the rationale for using a 'peak spreading' methodology to assess the impacts of LPSV developments. Such an approach provides a reasonable alternative against which to assess the impacts of the LPSV. It is also important to recognise that the modelling outputs are based on the effects on the highway network at the end of the Local Plan period (i.e., 2033). Also, the individual key junction assessments identify the effects based upon the 'worst operating' arm of each junction; in reality, not all arms would 'underperform'.
104. Indicative conceptual design solutions for potential physical works to a number of key junctions across the District have been developed and are included at Appendix F of the recently published TAR (EB503). These have been used to inform the transport modelling work as well as the development of the LPSV Infrastructure Delivery Plan (EB 1101A/B). The feasibility of the design solutions is subject to further work at both the preliminary and detailed design stage and in a number of cases may require land outside of the highway boundary.
105. Monitoring of traffic growth and levels of congestion will determine the need for their implementation. In the case of Wake Arms and Robin Hood Roundabouts, project-level Habitats Regulations Assessments would be required as, in those cases only, physical improvements are likely to require small amounts of land that currently forms part of the Epping Forest Special Area of Conservation ("the SAC"). Notwithstanding this, the transport modelling of the Plan has included assessing the LPSV planned development both 'with' and 'without' the implementation of physical highway works.
106. Finally, the need for physical highway works and network management interventions at Junction 5 of the M11 Motorway, and whether those works are likely to be needed, will be addressed under Matter 15 Issue 2 (Loughton).

**Inspector's Question 2**

- 2. Is planned growth dependent upon a “step-change” towards sustainable travel? What does this mean and how will the Plan facilitate it? What has been done to assess the need for increased public transport and how will this be provided? How will success be monitored?**

***Response to Question 2***

107. Planned growth will need to be supported by an increase in journeys undertaken by sustainable travel modes during the AM and PM peaks. Improvement to the existing level of sustainable transport supply across the District has been assessed within the TAR (EB503) to derive transport modelling assumptions which allow for a reasonable level of modal shift. The improvements in sustainable transport opportunities could equate to a future 8% reduction in car trips when compared to a ('Low Sustainability') scenario where no improvements are added over and above the existing supply (see Section 7.1 pages 49-50 in the TAR (EB503)). The Draft Transport Strategy being prepared for the Harlow and Gilston Garden Town (HGGT) includes an ambition of achieving 60% non-car modal share for the new Garden Town Communities and a 50% non-car modal share for the existing built-up area of Harlow. Outside of the HGGT area, planned growth is therefore not dependent on a significant “step-change” towards sustainable travel.
108. The Plan facilitates sustainable travel through Policy T 1 (Sustainable Transport Choices). This builds on the approach to site selection referred to in paragraph 98 above which includes an assessment of individual sites in terms of their accessibility to local services, such as schools and doctors' surgeries, as well as to public transport services. In addition, a number of site allocations are located in close proximity to London Underground stations. Development of these sites are expected to make limited on-site residents' parking provision to service the essential needs of the development (e.g. for car clubs, visitor parking and blue badge holders). Opportunities exist across the District to secure enhancements to existing bus services and supporting infrastructure, or through the introduction of new bus services and supporting infrastructure, as part of development proposals, particularly in the Masterplan areas. Such enhancements to the network will provide sustainable transport choices for future occupiers as well as existing residents and businesses. In addition, where appropriate, development proposals will be expected to support improvements to the cycle network in the District as set out in the Cycle Action Plan for Epping Forest District published in March 2018<sup>12</sup>. In addition, the strategic sites are expected to be supported by

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<https://www.essexhighways.org/uploads/files/Getting%20Around/Cycling/Epping-Forest-District-Cycle-Action-Plan.pdf>

services and infrastructure which will reduce the need to travel for day to day needs.

109. All proposals over a certain scale (as currently defined in Appendix A to the Council's Local List of Validation Requirements EB912) are required to submit a Transport Statement or Transport Assessment, which will need to demonstrate how the scheme has maximised sustainable travel opportunities in accordance with Policy T 1 of the LPSV and, where appropriate, be supported by a Travel Plan.
110. As well as securing sustainable transport opportunities through Policy T 1, the LPSV also supports opportunities for reducing the need to travel in the first place through Policy D 5 (Communications Infrastructure) by requiring all major development to demonstrate how high-speed broadband infrastructure will be accommodated within the development. This will support 'home-working', which is anticipated to increase over the period of the Plan (see paragraph 4.2.1 page 26, Figure 4.2 page 27 and Section 5.4 page 35 of the West Essex and East Hertfordshire Assessment of Employment Needs 2017 EB610). In transport terms empirical evidence suggests that the number of trips people make have been steadily reduced over the past 20 years partly due to increased connectivity and more flexible working. The Department for Transport's Road Traffic Forecast and National Travel Survey 2018<sup>13</sup> shows at paragraphs 3.45-3.49 and Figure 16 (pages 38 and 39) that commuter trips have reduced by 13% since 2002 with a 4% reduction in commuter trips between 2011-2016.
111. Paragraphs 4.6.2 – 4.6.4 of the TAR (EB503, pp 18-20) provides an assessment of existing bus services within the District. Paragraph 7.3.3 of the TAR (EB503) identifies the opportunities for enhancing bus services and supporting infrastructure across the District and Figure 7.1 on page 55 of the TAR (EB503) provides an overview of potential Bus and Cycle Improvements and Wider Harlow Sustainable Travel Corridors (STCs). In addition, the settlements of Waltham Abbey, Loughton and parts of Chigwell are served by buses operated by Transport for London (TfL). The enhancement of bus services is set out in Proposal 57, (page 158) of the Mayor's Transport Strategy 2018<sup>14</sup> and forms part of the approach to supporting the Mayor of London's stated ambition (Policy 1 at page 21 of that Strategy) that 80% of all journeys will be undertaken by foot, cycle or public transport by 2041.
112. Travel Plans developed to support planning proposals provide the key mechanism for monitoring, measuring and reporting mode shift performance to both EFDC and Essex County Council. The Department for Transport's 'Trafficmaster' data can also be used to compare changes in journey times, congestion and delay across the district. In addition, programmes of annual data

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<sup>13</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740399/road-traffic-forecasts-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740399/road-traffic-forecasts-2018.pdf)

<sup>14</sup> <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

collection can provide an assessment of real traffic growth against predicted growth to 'sense check' the need for costly infrastructure. Essex County Council's 'The Essex Transport Strategy: the Local Transport Plan for Essex' 2011 (EB500), at Section 10.4 (page 132-133) sets out the approaches to monitoring that it will undertake as the Local Highway Authority.

### **Inspector's Question 3**

#### **Other Infrastructure**

- 3. Does the Infrastructure Delivery Plan and Schedule (EB1101A & B) demonstrate that the development in the Plan can be served by adequate infrastructure at the appropriate time? Are there any significant omissions or funding gaps?**

### ***Response to Question 3***

113. The Council considers that the Infrastructure Delivery Plan (IDP) and Schedule (EB1101A/B) adequately demonstrate that the development in the Plan can and will be served by adequate infrastructure at the appropriate time. The Council considers that there are no significant omissions within the documents, and that the funding sources and potential funding gaps are clearly identified. The Council is satisfied that the documentation sufficiently identifies that infrastructure can and will be delivered in accordance with national planning policy (paras 162 and 177 of the NPPF (2012) and paragraph 018 of Planning Practice Guidance).
114. The IDP (EB1101) includes a review of existing infrastructure and identifies any shortfalls in provision, informed by consultation with infrastructure and service providers. From this starting point, the impact of growth over the Plan period has been considered, and new infrastructure requirements identified. Responsibilities for delivery and funding mechanisms have also been identified.
115. The IDP includes an Infrastructure Delivery Schedule (EB1101B), which pulls together the identified outputs and infrastructure requirements. The purpose of the Schedule is to:
- (a) Present indicative costs associated with delivering the infrastructure required to support growth.
  - (b) Summarise the potential funding sources that could be used to deliver infrastructure, recognising that developer contributions will be a key part of this.

- (c) Prioritise the infrastructure interventions according to whether it is considered to be 'critical', 'essential' or 'desirable', and identify when in the Plan period the infrastructure will be required.
  - (d) Identify, where possible, the scale of the funding gap where funding is not fully committed.
  
- 116. To inform the Local Plan Examination, the Council has prepared a Topic Paper on infrastructure delivery (EB1101C), which supplements the IDP and Schedule. The purpose of the Topic Paper is to provide additional information on infrastructure delivery, as well as a more general update on the work undertaken since the IDP was published. The topic paper includes a high-level framework for apportionment and pooling arrangements to be taken forward for key infrastructure (highways, public transport, education, health, and open space, sports, green infrastructure and community facilities). The Topic Paper recognises that as proposals develop through from a Local Plan allocation to planning applications, there will inevitably need to be a finer level of detail in relation to funding and delivery arrangements for specific infrastructure projects to support the development management process. This goes beyond what would be possible, required or appropriate within an Infrastructure Delivery Plan to support a Local Plan. Further discussions and negotiations will be required through the production of strategic masterplans, concept frameworks and planning applications, which will determine specific pooling and delivery arrangements as further information becomes available.
  
- 117. Three Addenda to the Topic Paper are being produced to support the development management stage, which will provide further site-specific details on delivery and funding apportionment for the following key infrastructure types:
  - (a) New educational facilities and contributions towards expansion of existing facilities;
  - (b) Highway mitigation measures; and
  - (c) Sports infrastructure.
  
- 118. As well as a framework for apportionment, the Topic Paper provides additional information on those external funding sources outlined in the IDP, including the work currently ongoing to progress/secure external funding sources, and any risks of funding not being in place and contingency measures for this.
  
- 119. Separately, the Council is working with the other 'Garden Town' local authorities (Harlow District Council, East Herts District Council, Hertfordshire County Council and Essex County Council) to produce an IDP for the entire Harlow and Gilston Garden Town. Whilst the infrastructure required to support the delivery of the Garden Town sites that are located within Epping Forest District (SP 5.1, SP 5.2 and SP 5.3) is already sufficiently identified and set out within the Infrastructure Delivery Plan (IDP) and Schedule (EB1101A/B) in support of the Local Plan, the

production of the Garden Town IDP recognises the need to coordinate the planning and delivery of complex strategic infrastructure over the entire plan period (and beyond) across the entirety of the Garden Town, covering three District Council areas and two County Council areas.

120. Once complete, the Garden Town IDP will supplement the Infrastructure Delivery Plan (IDP) and Schedule (EB1101A/B) and identify in further detail the infrastructure required across the Garden Town as a whole to support housing and employment growth, when it needs to be delivered and how much it is expected to cost. The document will also identify which sites will be expected to deliver or contribute to infrastructure; and apportion estimated infrastructure costs to specific sites.

**APPENDIX A: Examination documents referred to in this statement**

<b>Reference</b>	<b>Document Title</b>	<b>Author</b>	<b>Date</b>
19STAT0007	<a href="#">Affinity Water Regulation 20 Representation</a>	<i>Affinity Water</i>	2018
19STAT0022	<a href="#">Thames Water Regulation 20 Representation</a>	<i>Thames Water</i>	2018
19STAT0026	<a href="#">Harlow District Council Regulation 20 Representation</a>	<i>Harlow District Council</i>	2018
19STAT0036	<a href="#">Environment Agency Regulation 20 Representation</a>	<i>Environment Agency</i>	2018
EB1003	<a href="#">North Weald Masterplanning Study Part A</a> <a href="#">North Weald Masterplanning Study Part B</a>	<i>Allies &amp; Morrison Urban Practitioners</i>	2014
EB1007	<a href="#">Settlement Hierarchy Technical Paper</a>	<i>EFDC</i>	2015
EB1101A	<a href="#">Infrastructure Delivery Plan (IDP) Part A Report</a>	<i>Arup</i>	2017
EB1101B	<a href="#">Infrastructure Delivery Plan (IDP) Part B Report</a>	<i>Arup</i>	2017
EB1101C	<a href="#">Infrastructure Delivery Plan Topic Paper</a>	<i>EFDC</i>	2018
EB1110	<a href="#">Thames Water – Greater Harlow Position Statement</a>	<i>Thames Water</i>	2018
EB1111	<a href="#">Harlow and Gilston Garden Town Water Cycle Study Update</a>	<i>JBA</i>	2018
EB115A	<a href="#">Report Analysing Responses Received to the Regulation 19 Publication of the Epping Forest District Local Plan Submission Version 2017</a>	<i>EFDC</i>	2018
EB1200	<a href="#">Memorandum of Understanding Managing the Impacts of Growth within the West Essex / East Hertfordshire HMA on Epping Forest SAC</a>	<i>Co-operation for Sustainable Development Board</i>	2017

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EB1201	<a href="#">Memorandum of Understanding on Highways &amp; Transportation Infrastructure for the West Essex / East Hertfordshire Housing Market Area</a>	<i>Co-operation for Sustainable Development Board</i>	2017
EB1202	<a href="#">Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex / East Hertfordshire Housing Market Area</a>	<i>Co-operation for Sustainable Development Board</i>	2017
EB1203	<a href="#">Memorandum of Understanding the Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area</a>	<i>FEMA Authorities: East Herts; Epping Forest; Harlow; and Uttlesford District Council</i>	2018
EB123	<a href="#">Epping Forest District Council Draft Local Plan</a>	<i>EFDC</i>	2016
EB131	<a href="#">Community Choices Issues &amp; Options – Consultation Document</a>	<i>EFDC</i>	2012
EB141	<a href="#">Brownfield Land Register</a>	<i>EFDC</i>	2019
EB1500	<a href="#">Harlow Strategic Site Assessment</a>	<i>AECOM</i>	2016
EB1506	<a href="#">East Herts District Local Plan Inspector's Report</a>	<i>Christine Thorby MRTPI IHB</i>	2018
EB1507	<a href="#">Epping Forest Local Plan – Regulation 18 and 19 – Withdrawing Objections</a>	Harlow District Council	2018
EB1608	<a href="#">Green Belt and District Open Land Background Paper</a>	<i>EFDC</i>	2018
EB202	<a href="#">Interim Sustainability Appraisal Report for the Epping Forest District Local Plan</a>	<i>AECOM</i>	2016
EB203	<a href="#">Sustainability Appraisal of Strategic OAHN Spatial Options</a>	<i>AECOM</i>	2016
EB204	<a href="#">Sustainability and Equalities Impact Appraisal</a>	<i>AECOM</i>	2017
EB403	<a href="#">Essex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment</a>	<i>ORS</i>	2014

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	<a href="#">on behalf of Essex Planning Officers Association</a>		
EB410	<a href="#">Housing Implementation Strategy</a>	<i>EFDC</i>	2017
EB500	<a href="#">The Essex Transport Strategy: the Local Transport Plan for Essex' covering the period 2011-2026 And Delivery Plan 2015-2020</a>	<i>Essex County Council</i>	2011
EB500A	<a href="#">Technical Note 1: Base Year Junction Capacity Modelling</a>	<i>Essex Highways</i>	2013
EB500B	<a href="#">Technical Note 2: Spreadsheet Model Development, Latest Study Position and Next Steps</a>	<i>Essex Highways</i>	2014
EB500C	<a href="#">Technical Note 3: Early-Stage Forecast Modelling Results – Background Growth Only and Initial Local Plan 'Scenario'</a>	<i>Essex Highways</i>	2014
EB500D	<a href="#">Technical Note 4: Forecast Modelling Results from 7 x Development Scenario Tests</a>	<i>Essex Highways</i>	2014
EB500E	<a href="#">Technical Note 5: Preliminary Mitigation Measures Modelling</a>	<i>Essex Highways</i>	2014
EB500F	<a href="#">Technical Note 6: Sustainable Accessibility Mapping and Analysis</a>	<i>Essex Highways</i>	2014
EB500G	<a href="#">Technical Note 7: Sustainable Accessibility Ranking, Mapping and Analysis</a>	<i>Essex Highways</i>	2015
EB500H	<a href="#">Technical Note 8: Sensitivity Testing / Car Ownership &amp; Use Mapping</a>	<i>Essex Highways</i>	2016
EB502	<a href="#">Highway Assessment Report</a>	<i>Ringway Jacobs</i>	2017
EB503	<a href="#">Transport Assessment Report</a>	<i>Essex Highways</i>	2019
EB600	<a href="#">Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy</a>	<i>Hardisty Jones Associates</i>	2015
EB600B	<a href="#">Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy-</a>	<i>Hardisty Jones Associates</i>	2015

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	<a href="#">Appendix 2 Evidence &amp; Consultations</a>		
EB602	<a href="#">Employment Land Supply Assessment</a>	Arup	2017
EB603	<a href="#">Employment Review</a>	Hardisty Jones Associates	2017
EB610	<a href="#">West Essex and East Hertfordshire Assessment of Employment Needs</a>	Hardisty Jones Associates	2017
EB704A	<a href="#">Green Belt Review Stage 1 Report</a>	EFDC	2015
EB705A	<a href="#">Green Belt Assessment: Phase 2</a>	Land Use Consultants	2016
EB800	<a href="#">Strategic Land Availability Assessment</a>	Nathaniel Lichfield & Partners	2016
EB801	<a href="#">Report on Site Selection</a>	Arup	2016
EB801A	<a href="#">Appendix A -Site Selection Methodology</a>	Arup	2016
EB801O	<a href="#">Appendix C – Site Selection Settlement Proformas</a>	Arup	2016
EB802A	<a href="#">Updated Site Selection Methodology</a>	Arup	2016
EB803	<a href="#">Settlement Capacity Study</a>	Fregonese Associates	2016
EB805	<a href="#">Site Selection Report</a>	Arup	2018
EB805AH	<a href="#">Appendix F1.5.3 – Results of Identifying Sites for Allocation</a>	Arup	2018
EB805AK	<a href="#">Appendix A – Site Selection Methodology</a>	Arup	2018
EB805E	<a href="#">Appendix B1.4.1- Detailed Methodology for Stages 2 and 6.2 Assessment</a>	Arup	2018
EB805I	<a href="#">Appendix B1.5.2 – Results of identifying sites for Further Testing</a>	Arup	2018
EB805J	<a href="#">Appendix B1.5.3 Detailed Methodology Capacity Study</a>	Arup	2018
EB805N	<a href="#">Appendix B1.6.4 – Results of Capacity and Deliverability Assessments</a>	Arup	2018

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EB805O	<a href="#">Appendix B1.6.5 – Technical Assessment Testing</a>	<i>Arup</i>	<i>2018</i>
EB805P	<a href="#">Appendix B1.6.6 - Results of Identifying Sites for Allocation</a>	<i>Arup</i>	<i>2018</i>
EB805Q	<a href="#">Appendix C1 – Settlement Proformas</a>	<i>Arup</i>	<i>2018</i>
EB806	<a href="#">Epping Forest District Council Housing Service Strategy - Empty Homes in the Private Sector</a>	<i>EFDC</i>	<i>2016</i>
EB909	<a href="#">Level 1 Strategic Flood Risk Assessment Update</a>	<i>URS</i>	<i>2015</i>
EB912	<a href="#">Epping Forest District Council Planning Application Validation Requirements Checklist</a>	<i>EFDC</i>	<i>2017</i>
EB913	<a href="#">Strategic Flood Risk Assessment – Site Assessments</a>	<i>AECOM</i>	<i>2018</i>
ED3	<a href="#">Statement of Common Ground between Epping Forest DC, Environment Agency &amp; Thames Water</a>	<i>AECOM</i>	<i>2018</i>