

HEARING STATEMENT

In respect of

Epping Forest District Local Plan

Matter 5: Site Selection Methodology and Viability of Site Allocation

On behalf of

CK Properties Theydon Bois Ltd

JLN0243
Final
21 February 2019

REPORT

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Contents

1	INTRODUCTION.....	1
2	BACKGROUND	2
3	SITE SELECTION PROCESS	4
4	THEYDON BOIS UNDERGROUND CAR PARK.....	8
5	SUMMARY AND CONCLUSION	9

Appendices

Appendix 1	Extracts from Draft Local Plan - Consultation Draft
Appendix 2	Site Selection Assessment - September 2016
Appendix 3	Extracts from Draft Local Plan - Submission Draft
Appendix 4	Site Selection Report - March 2018
Appendix 5	Local Plan Housing Allocations
Appendix 6	Representation from Conservators of Epping Forest (December 2016)

1 INTRODUCTION

- 1.1 This hearing statement has been prepared in relation to Matter 5: “Site Selection Methodology and Viability of Site Allocations”, which forms part of the examination of the Submission Version of the Epping Forest District Local Plan (December 2017) (“SVLP”).
- 1.2 The hearing statement has been prepared on behalf of CK Properties Theydon Bois Limited (“CK”), who are the owners of the Land East of Central Line / North of Abridge Road (including the Old Foresters site), Theydon Bois (“**representation site**”). CK made representations upon the consultation draft of the Local Plan in December 2016 and upon the SVLP in January 2018 and April 2018. This hearing statement concentrates on Matter 5. CK submitted a hearing statement in relation to Matter 4 in January 2019.
- 1.3 Matter 5 as identified by the examination Inspector is as follows:
“Site Selection Methodology and Viability of Site Allocations”
- 1.4 This hearing statement focuses on Issue 1 which is as follows:
“Have the Plan’s housing allocations been chosen on the basis of a robust assessment process?”
- 1.5 More specifically, the statement addresses Question 3 under the Issue 1 heading:
“As raised in Matter 1, Issue 2, some sites which were proposed for allocation in the Regulation 18 version of the Plan are not proposed in the Regulation 19 / submitted version and vice versa. Is this due to changes in the site selection process, or something else? Are the different conclusions reached about the relevant sites explained and justified?”
- 1.6 With regard to Question 3, this statement relates primarily to the Council’s consideration of Land East of Central Line / North of Abridge Road (including the Old Foresters site), Theydon Bois (“**representation Site**”). Notably the statement considers the “justification” for removing the representation site’s housing allocation, as contained in the consultation draft (October 2016) (“**Consultation Draft**”).
- 1.7 This hearing statement also addresses Question 6 under Issue 1, which is as follows:
“Is it justified to allocate station car parks (EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2) and other car parks (EPP.R6; EPP.R7) for housing? Can adequate parking for both commuters and residents be provided; and how will short terms disruption to commuter parking during the construction phase be addressed?”
- 1.8 Notably, this statement also explores the justification for the allocation of the Theydon Bois London Underground Station car park for residential development.

2 BACKGROUND

2.1 This statement addresses the Council's changed position in relation to the representation site. The representation site was allocated for residential development in the consultation draft (see Policy P8, Site SR-0026B). The policy stated that the site be allocated for "approximately 137 homes".

2.2 CK pursued a legal challenge to the Council's decision to approve its Local Plan. Although the challenge was dismissed, Mr Justice Supperstone found the following at paragraph 91:

"...[the Claimant's] concerns regarding the soundness and legal compliance of the draft plan will be addressed through the independent examination process. The essence of the Claimant's complaint is that Appendix B was not available at the time of the Decision. In my view, whilst it is a matter for the discretion of the Inspector whether to allow further representations, I consider it highly unlikely he will refuse to have regard to timely representations made by the Claimant now it has had sight of Appendix B. That being so I consider that the independent examination of the draft plan will provide the Claimant with an alternative remedy. In my view an order quashing the decision would be unnecessary and disproportionate."

(my emphasis)

2.3 CK's legal challenge concerned the inability to make site specific representations prior to the Council's decision to submit the Local Plan for examination, as Appendix B was not made available until many months after this decision. Appendix B is of course the key document that confirmed why sites were allocated (or not) in the Local Plan, or added or removed between the Regulation 18 and 19 stages. Accordingly, it is clear that the Local Plan examination – and in particular through this Matter 5 - is the correct forum upon which to consider the merits of the representation site, and importantly, provides an opportunity to consider the justification for the Council's removal of its housing allocation. This confirmation is welcomed within the e-mail dated 20 January 2019 from the Local Plan programme officer:-

"Representors that are promoting an "Omission" site have not been included in the relevant place Hearing Session, but in Matter 5 Site Selection as this is the appropriate hearing session in which to discussion this issue".

2.4 Although the contents of this statement are largely site specific, they do need to be considered in light of other wider matters submitted to the examination and in response to the Examiner's questions, either directly by CK or by the Epping Forest Housing Forum, of which CK is a part. Notably, the following matters are relevant:-

- Does the Plan's housing requirements properly reflect objectively assessed need? (Matter 3).
- Does the Plan provide for a land supply sufficient to meet housing requirements? (Matter 6);
- Will the Plan ensure there is a realistic prospect of a five year housing supply being achieved? (Matter 6);

- Is the distribution of development in the Plan justified (especially with regard to limited growth within Theydon Bois)? (Matter 4);
- Are housing allocations in the Plan based on sound evidence and are such sites deliverable? (Matter 15)

2.5 In light of the above matters, evidence prepared either by CK or by the Epping Forest Housing Forum suggests that there is a clear requirement to make further housing allocations in the Plan, in order to make the Plan sound. The representation site is promoted on this basis.

3 SITE SELECTION PROCESS

Regulation 18 - Consultation Draft

- 3.1 The consultation draft made provision for approximately 360 homes in Theydon Bois. As explained in paragraph 5.319 of the consultation draft:
- “...The provision of approximately 360 homes has been informed by the aspiration for Theydon Bois to maintain its local feel and character, and provide a mix of housing alongside retail, leisure, and social infrastructure to support its residents.”**
- 3.2 The consultation draft went on to explain within paragraph 5.140 that it had been concluded that there are two suitable spatial options:
- **“Intensification within the existing settlement – provides opportunities to maximise existing urban brownfield land; and**
 - **Expansion of the settlement to the north east – provides an opportunity to promote housing development in a suitable development close to Theydon Bois station, while minimising potential harm to the Green Belt, landscape and environmental designations around the settlement”**
- 3.3 Following an assessment of the suitability, availability and achievability of residential sites located within the spatial options, the Council identified five sites to meet the identified housing requirement, one of which was the representation site, allocated for approximately 133 homes. Relevant extracts of the consultation draft are included as **Appendix 1**.
- 3.4 The consultation draft's housing allocations, including for Theydon Bois, were informed by the Arup's site selection assessment undertaken in September 2016. Relevant extracts of the Arup's September 2016 report are provided as **Appendix 2**.
- 3.5 The details of the Arup's September 2016 assessment are addressed in CK's representations upon the consultation draft. However, relevant matters as recorded by Arup are summarised below:
- **Impact on Epping Forest Buffer Land** – the site is unlikely to impact on Epping Forest Buffer Land.
 - **Impact on Air Quality** – site lies outside of the area identified as being at risk of poor quality.
 - **Level of harm to Green Belt** – the site is within Green Belt, where the level of harm caused by release of land for development would be very low, low or medium.
- 3.6 Based on this assessment, Arup's were able to recommend to the District Council that the representation site should be allocated for housing (see Appendix B1.1 of September 2016 report) (**Appendix 2**).

Submission Version of Local Plan

- 3.7 The representation site's housing allocation was removed in the SVLP. Extracts from the SVLP are included as **Appendix 3**. The Council's apparent "justification" is explained in Appendix B of the site selection report prepared by Arup's in March 2018. Appendix B1.6.6 is significant, the relevant extracts of which are provided as **Appendix 4**.
- 3.8 The key points apparently justifying the omission of the representation site can be summarised as follows:
- The site is less preferred by the community as a result of the scale of growth
 - The Conservators of Epping Forest ("**Conservators**") have concerns about the overall scale of growth in Theydon Bois and the potential effects arising from recreational pressure and air quality. The Conservators identified the need for a SANG to compensate for the scale of growth.
 - Other sites are more preferred in Theydon Bois, which would be preferable and would provide the desired growth.
- 3.9 Notwithstanding the above, Arup's assessment of the representation site was materially the same as that in September 2016. Notably, Arup's consideration in relation to the issues of Epping Forest buffer land, air quality and the Green Belt were unchanged.
- 3.10 Accordingly, based on the site selection process undertaken by the Council's own consultants, there is no justification on planning grounds for removal of the housing allocation on the representation site – and indeed no justification appears to be provided by the Council for the reduction in growth in Theydon Bois. The matters raised in Appendix B1.6.6 are considered in the sections below.

Scale of Growth

- 3.11 It is noted that residents of Theydon Bois are concerned about growth. This in itself is not a justifiable reason to delete housing allocations. In this connection, Theydon Bois is identified as a "large village" and in terms of the Local Plan's hierarchy of settlements, it is logical that it should take its proportionate share of allocated housing. In any event, Theydon Bois position adjacent to the London Underground Central Line makes it an obvious candidate to accommodate an increase in housing. Furthermore, as highlighted by Appendix B1.6.5 (Technical Assessment Testing) (see **Hearing Statement, Matter 4, Appendix 4**), the provision of a high growth strategy for Theydon Bois has significant advantages in terms of sustainability and indeed is strategically more favourable than the other options tested.
- 3.12 Notably, as clear from **Appendix 5**, Theydon Bois has experienced by far the largest percentage decrease (84%) of any settlement in the District. Furthermore, Theydon Bois has by some margin the lowest housing allocation of any of the Districts large villages. As explained in the appellant's **Hearing Statement, Matter 4**, there is no justification for reducing the scale of housing growth in Theydon Bois.

Conservators of Epping Forest

- 3.12 The Conservators have raised concerns about the prospect of an increase in housing across Epping Forest district. For example, Page 2 of their December 2016 representation (provided as

Appendix 6) states their concern is “the current plan is being disproportionately led by housing targets”. They also raise issues in relation to the release of Green Belt sites, for example at Theydon Bois and Epping. However, the Conservators are not expressly resisting a housing allocation on the representation site. Rather they are suggesting suitable alternative natural greenspace (SANG) will be required, so as to accommodate an increase in population in the settlement. With regard to the SANG point and other matters raised by the Conservators, the following points are relevant:

- i. The housing allocation for the representation site as contained in the consultation draft proposes 133 dwellings. However, the Council’s habitat regulations assessment of November 2016, to coincide with the consultation draft, imposed a 400 house threshold for SANG. The document contains a recommendation that applications for more than 400 dwellings in Loughton, Epping, Waltham Abbey, Theydon Bois and Chigwell should contain their own on-site SANG (typically at a rate of 8 hectares per 1000 population). The Council have adopted the same approach in the latest version of their habitat regulations, to coincide with the SVLP. In other words, the requirements for SANG only comes in to play when a housing allocation exceeds 400 units. Accordingly, based on the Council’s habitat regulations, a SANG is not required on the representation site.
- ii. Notwithstanding the above, it may be possible to accommodate a SANG on the representation site. If not, there is certainly scope to provide a SANG on adjoining land, in the same ownership. Accordingly, the Conservators’ concern that the need for SANG may affect deliverability does not apply in this case.
- iii. As noted in the Arup’s site assessment (see **Appendices 2 and 4**), the representation site lies outside of areas identified as being of risk of poor air quality. Accordingly, the Conservators’ concerns on air quality grounds are unfounded. Therefore, there is no justification for resisting development on the representation site on air quality grounds.

3.13 The Council’s reliance on the Conservators objection as a reason to de-allocate the Theydon Bois site is inconsistent with their approach elsewhere. For example, the Conservators objected to the loss of green space at Borders Lane and Jessel Green. It was claimed that if Jessel Green was lost it would place considerable place on the nearby Forest and would seem to be in contradiction to the green infrastructure policies in the draft Local Plan. Notwithstanding the Conservators view, the SVLP allocates Jessel Green for housing.

Other Sites

3.14 It is not accepted that there are other sites in Theydon Bois which are more preferable in terms of their overall suitability. The representation site has considerable benefits, notably its position immediately adjacent to the Theydon Bois Underground station. Plus, the site can potentially provide a SANG if required, unlike other sites proposed for housing in Theydon Bois. For reasons explained in this statement and within Plan representations made by CK, it can be legitimately concluded that the representation site is the best and most sustainable site in Theydon Bois to accommodate a level of housing, consistent with its “large village” status.

Other Relevant Matters

- 3.15 Based on the above assessment, there is no justifiable reason to delete the housing allocation on the representation site. Rather, the opposite, there is benefit in providing housing on the representation site. The justification in support of a housing allocation is set out in full in CK's representations upon the both the consultation draft and the SVLP. In summary, the benefits of the representation site are as follows:-
- Relatively unconstrained in planning terms (for example, not subject of a landscape or wildlife designation and not designated as Epping Forest Buffer Lands).
 - Immediately adjacent to built up area of Theydon Bois.
 - Immediately adjacent to Theydon Bois Underground Station. Notably, the ability to provide direct access to the Underground Station is a clear benefit.
 - The site is able to benefit from an existing access point off Abridge Road.
 - The site is large enough to provide for a range and mix of housing, plus provision of open space.
 - Limited harm to the Green Belt, as accepted by the Council's consultants.
- 3.16 Furthermore, the representation site has the ability to make a meaningful contribution to meeting the Council's housing requirements, both for market and affordable housing. Also, it is significant that the site is deliverable and available for development within the first five years of the Plan period. This fact is recognised by Arup's – see Appendix B1.6.6 (see **Appendix 4**). In terms of this issue, it should be noted that the representation site is in one ownership, access is straight forward and there are no issues in relation to ground conditions.

4 THEYDON BOIS UNDERGROUND STATION CAR PARK

Background

- 4.1 Theydon Bois Underground Station car park was part of a larger site allocation (including adjacent commercial yard), proposed for approximately 19 homes in the consultation draft. The size of the allocated site was reduced in the SVLP, with the commercial yard being excluded. Accordingly, the land allocated for housing now comprises just the Underground Station car park, proposed for approximately 12 homes (see Policy 8, Site THYB.R2).
- 4.2 The Underground Station car park is now one of only three sites allocated for housing development in Theydon Bois. The others being as follows:
- Land at Forest Drive – approximately 39 homes (THYB.R1)
 - Land at Coppice Row – approximately 6 homes (THYB.R3)
- 4.3 Accordingly, the Underground Station car park site is the second largest housing allocation in Theydon Bois.

Issue

- 4.4 The Underground Station car park provides 65 spaces. It is the only dedicated car park that directly serves the station. There is no other public car park in Theydon Bois. Based on observation and experience, it is very well used. There are very rarely any spaces available during working days. Owing to parking restrictions, there are very few other opportunities to park in Theydon Bois. Indeed, it is known there is an ongoing problem of commuters parking along Abridge Road and also elsewhere in the village.
- 4.5 It is assumed that any proposals for redevelopment of the Station car park site will require the retention of car parking, but this is not clear from the SVLP. Of course, the loss of dedicated car parking for commuters will be highly undesirable. Indeed, the loss of the spaces for a temporary period of let's say one year will be undesirable, adding pressure to park elsewhere in the village during that time.
- 4.6 In any event, the deliverability of proposals on this site appear questionable. For example, the viability of a 12 unit scheme is not clear especially in light of the requirement to retain car parking and provide for affordable housing.
- 4.7 For information, future residents on the representation site, in the event of a housing development proceeding, will have the benefit of being able to walk to the Theydon Bois Underground Station. In other words, development of the representation site will not add to the pressure for parking in Theydon Bois.

5 SUMMARY AND CONCLUSION

- 5.1 There is no justification (provided by the Council or otherwise) for reducing the scale of housing growth in Theydon Bois or for removing the proposed housing allocation on Land East of Central Line / North of Abridge Road (including the Old Foresters site), Theydon Bois. This is particularly where the Council's own Technical Assessment Testing found that increased growth in Theydon Bois was preferred over alternative growth options.
- 5.2 In addition, matters raised by objectors, including the Conservators of Epping Forest, should not legitimately weigh against a housing allocation. Rather, allocation of further housing sites in Theydon Bois and more particularly the representation site can assist in remedying a number of shortcomings in the Local Plan – not least the evidenced deficit of housing allocations against the identified need. Accordingly, it is suggested that the representation site be allocated for housing (in addition to potentially a number of additional housing allocations in Theydon Bois) in order that the SVLP can be made sound.
- 5.3 The allocation of the Theydon Bois Underground Station car park could result in a loss of much needed car parking, certainly for a temporary period. This is unacceptable. Plus there are doubts as to whether this site is deliverable. In order to make the SVLP sound, it is suggested that the housing allocation be removed and replaced with a more suitable alternative such as the representation site.

Appendix 1

Extracts from Draft Local Plan – Consultation Draft



epping forest district

draft local plan

consultation 2016



**Epping Forest
District Council**

www.eppingforestdc.gov.uk

Alternative options

Residential sites – spatial options

Expansion to the north of the settlement	These spatial options would cause significant harm to the Green Belt, risking the coalescence of Chigwell and Loughton/Buckhurst Hill.
Expansion to the west of the settlement	

Sites for traveller accommodation – spatial options

Traveller accommodation focused in parts of the District traditionally favoured by the travelling community	Epping Forest District Council's Gypsy and Traveller Accommodation Assessment Interim Briefing Note (2016) has indicated that the majority of newly arising housing need will be from the expansion of existing households. While this option is understood to be favoured by the travelling community it was felt that this option would place undue pressure on local infrastructure and services and therefore did not represent the most sustainable option to accommodating traveller accommodation.
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Traveller accommodation focused in parts of the District not traditionally favoured by the travelling community	This option was not considered to be deliverable since it was not considered to be realistic to expect all additional households to form within the parts of the District not currently favoured by the travelling community.
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Employment sites

No spatial options have yet been identified for employment sites. This will be considered as part of the further work being undertaken by the Council to identify employment site allocations.

Theydon Bois

Vision and aspirations for Theydon Bois

What you told us?

5.136 Responses from the Community Choices consultation and stakeholder engagement on the future of Theydon Bois included:

- mixed views on the capacity of Theydon Bois to cater for growth in the District. Positive support for development in the settlement, referred particularly to the good transport links which make it a sensible location for growth;
- concerns about the capacity of a number of services to cater for increased growth, including electricity, gas, water, sewerage as well as schools and health facilities, which are currently nearing capacity;
- the Plan should protect and maintain the local character of Theydon Bois and any new development should be small scale and reflect the current density of homes;
- concerns about the impact of growth upon agricultural land, protected trees and environmental designations such as Epping Forest Site of Special Scientific Interest and Special Area of Conservation; and
- the Plan should conserve the vitality of existing shopping areas. Local independent shops, which sell local produce should be retained.

What are the key issues to address in Theydon Bois?

5.137 The following key strengths and weaknesses have been identified for Theydon Bois:

- Theydon Bois has an attractive parade of shops offering local convenience retail which should be maintained and enhanced;
- the prevention of ribbon development in Theydon Bois and the retention of a gap between Theydon Bois and the neighbouring settlements of Epping and Loughton;
- social infrastructure is limited within the settlement, with no library and only a satellite GP service at present. The local primary school is nearing capacity;
- the village has good transport links given its Central Line station. Bus services are infrequent and the settlement is subject to congestion at peak times; and
- the village operates a unique 'dark skies' policy (i.e. no street lighting), which has traditionally been supported by the majority of residents.

5.138 Based on the findings from community consultation, stakeholder engagement and evidence based documents the following vision is proposed for Theydon Bois:

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies¹

Vision for Theydon Bois

Theydon Bois will continue to maintain its local feel and character and preserve its rural setting, adjacent to Epping Forest, while providing a mix of housing, key local services and high-quality independent retail. Theydon Bois will also enhance its leisure facilities and social infrastructure to support existing and future residents.

Preferred Approach

Residential sites

5.139 Draft Policy SP 2 sets out the estimated likely number of homes the Council will plan for in Theydon Bois over the Plan period. The provision of approximately 360 homes has been informed by the aspiration for Theydon Bois to maintain its local feel and character, and provide a mix of housing, alongside retail, leisure and social infrastructure to support its residents.

5.140 The Council has considered the possible spatial options to accommodate new homes at Theydon Bois and concluded that there are two suitable spatial options:

- Intensification within the existing settlement - provides opportunities to maximise existing urban brownfield land; and
- Expansion of the settlement to the north-east - provides an opportunity to promote housing development in a sustainable location close to Theydon Bois station, while minimising potential harm to the Green Belt, landscape and environmental designations around the settlement.

5.141 Following an assessment of the suitability, availability and achievability of residential sites located within these spatial options, the Council has identified five sites for potential allocation to meet the identified housing requirement, as illustrated in Figure 5.17. The Council will be undertaking further work to enable more detailed guidance to be provided on the proposed residential allocation within the Local Plan. It will also be holding discussions with promoters, with the aim of entering into Statements of Common Ground.

Sites for traveller accommodation

5.142 The Council has considered the possible spatial options to accommodate traveller accommodation across the District and concluded that the most suitable spatial option is to distribute pitches across the District. This option balances the preferences of the travelling community with not placing undue pressure on services in a single location. Based on the findings of the assessment undertaken by the Council no allocations for traveller accommodation are proposed at Theydon Bois.

Employment sites

5.143 Draft Policy E 1 sets out the Council's preferred approach to identifying sites for employment (B use class) uses. This is to support the redevelopment, renewal or extension of existing premises for their designated use before identifying new sites.

5.144 Theydon Bois has no existing employment land that has been identified. A possible new employment site has been identified in the SLAA at Blunts Farm Motorway Maintenance Compound (SR-0552).

5.145 The location of the potential new employment site is illustrated in Figure 5.17.

5.146 The Council will be undertaking further work to enable specific employment allocations to be identified within the Local Plan, and to further consider opportunities to intensify and extend existing sites where appropriate.

Alterations to the Green Belt boundary

5.147 The supporting text to Draft Policy SP 5 confirms that in order to deliver the Local Plan Strategy the Council proposes to alter the Green Belt boundary. An indicative alteration to the existing Green Belt boundary around Theydon Bois is proposed to the north and east of the settlement to remove the proposed site allocations from the Green Belt. The proposed indicative alteration to the Green Belt boundary is illustrated in Figure 5.17.

Infrastructure requirements

5.148 The supporting text to Draft Policy SP 2 confirms the importance of identifying and delivering key infrastructure to support residential and employment growth across the District. The infrastructure needs for Theydon Bois will be set out in the Infrastructure Delivery Plan.

Draft Policy P 8 Theydon Bois

A. Residential sites

In accordance with Policy SP 2 the following sites are allocated for residential development:

- SR-0026B (land East of Central Line/North of Abridge Road, including the Old Foresters Site) – approximately 133 homes;
- SR-0026C (part of the Thrifts Hall Farm, Abridge Road) – approximately 121 homes;
- SR-0070 (land at Forest Drive) – approximately 52 homes;
- SR-0228i (Theydon Bois London Underground Car Park, and commercial yard adjacent to Theydon Bois Station, to west of Central Line) – approximately 29 homes[▲]; and
- SR-0228ii (Theydon Bois London Underground Car Park, and commercial yard adjacent to Theydon Bois Station, to east of Central Line) – approximately 19 homes[▲].

[▲] Redevelopment of car parks will include new homes and retained car parking

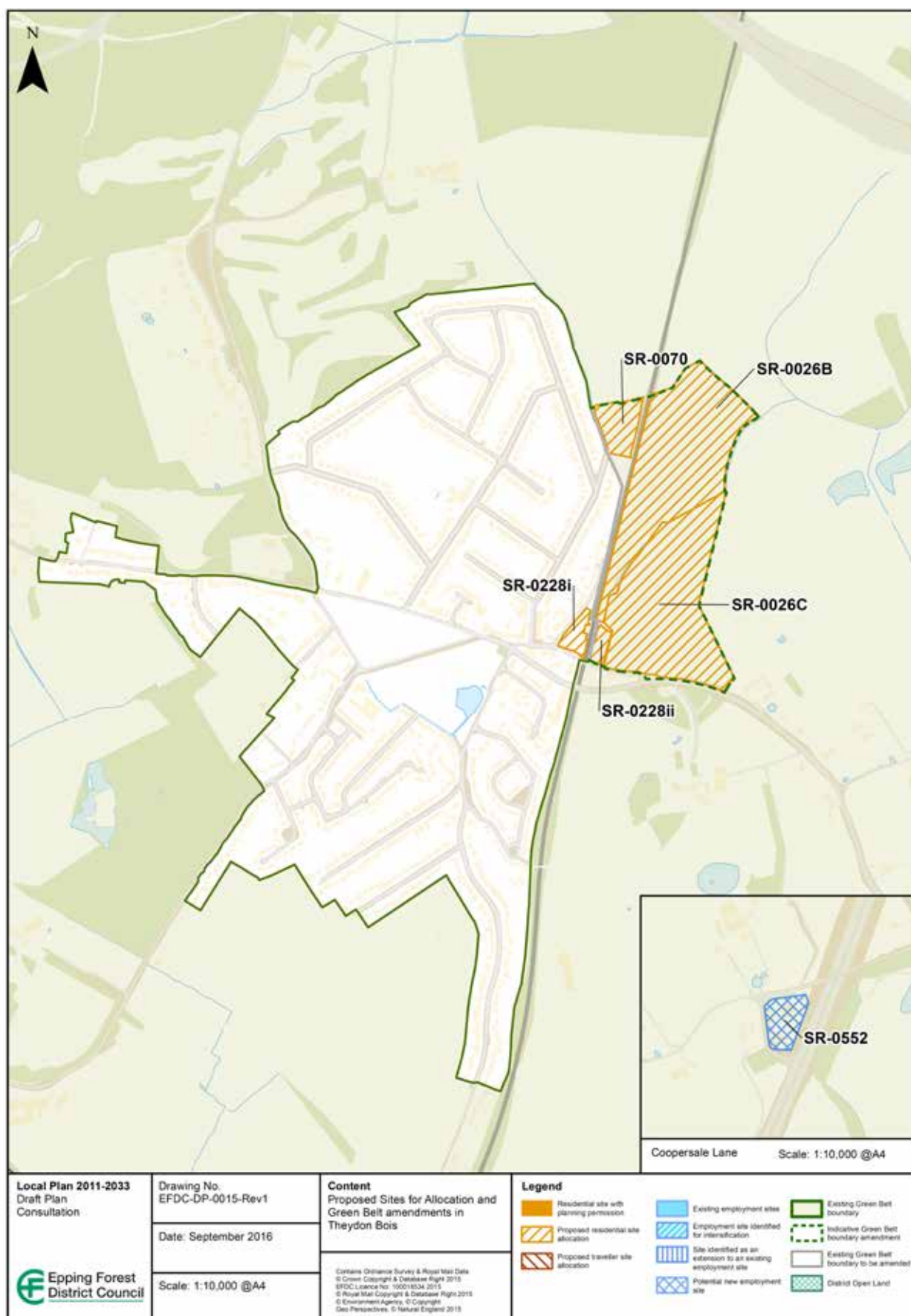
Proposals for residential development will be expected to comply with the place shaping principles identified in Policy SP 4.

B. Infrastructure requirements

Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan.

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

Figure 5.17 Site allocations for Theydon Bois



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

Alternative options

Residential sites – spatial options

Expansion to the north of the settlement	This is the most sensitive location in landscape terms as a result of its rising topography, and may harm the Epping Forest Buffer Land.
Expansion to the west of the settlement	Within this option, development would be too close to the Epping Forest Special Area of Conservation, which is sensitive to further urbanisation and increasing pollution from traffic.
Expansion to the south of the settlement	This option, which is aligned with the northern expansion of Loughton/ Loughton Broadway, would cause substantial harm to the Green Belt, risking coalescence between Loughton and Theydon Bois.

Sites for traveller accommodation – spatial options

Traveller accommodation focused in parts of the District traditionally favoured by the travelling community	Epping Forest District Council's Gypsy and Traveller Accommodation Assessment Interim Briefing Note (2016) has indicated that the majority of newly arising housing need will be from the expansion of existing households. While this option is understood to be favoured by the travelling community it was felt that this option would place undue pressure on local infrastructure and services and therefore did not represent the most sustainable option to accommodating traveller accommodation.
Traveller accommodation focused in parts of the District not traditionally favoured by the travelling community	This option was not considered to be deliverable since it was not considered to be realistic to expect all additional households to form within the parts of the District not currently favoured by the travelling community.

Employment sites

No spatial options have yet been identified for employment sites. This will be considered as part of the further work being undertaken by the Council to identify employment site allocations.

Roydon

Vision and aspirations for Roydon

What you told us?

5.149 Responses from the Community Choices consultation and stakeholder engagement on the future of Roydon included:

- mixed views regarding the levels of growth that Roydon can support in the future. Concerns regarding the proposed growth options were primarily focused on the loss of the village's character, flood risk, and pressure from additional traffic congestion.
- Support for the retention of the glasshouse industry in the area; however, mixed views with respect to future glasshouse expansion.
- Support for the protection of local convenience retail.
- A desire to improve the pedestrian environment in the centre of the village.

What are the key strengths and weaknesses to address in Roydon?

5.150 The following key strengths and weaknesses have been identified for Roydon.

- The area has a very distinctive character and heritage, including a number of listed buildings and the Conservation Area in the centre of the settlement.
- The village is served by a mainline railway station.
- There are a large number of HGV movements through Roydon, which impact on traffic congestion and safety.
- Flooding is a key issue in the village, given the close proximity of the River Stort. As a result, much of the land towards the north of the village is within Flood Zones 2 and 3.
- The retail offer is very limited, with only one convenience retail unit in the village.

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

Appendix 2

Site Section Assessment – September 2016

B1.1 Overview of Assessment of Residential Sites

Appendix B1.1

Overview of Assessment of Residential Sites

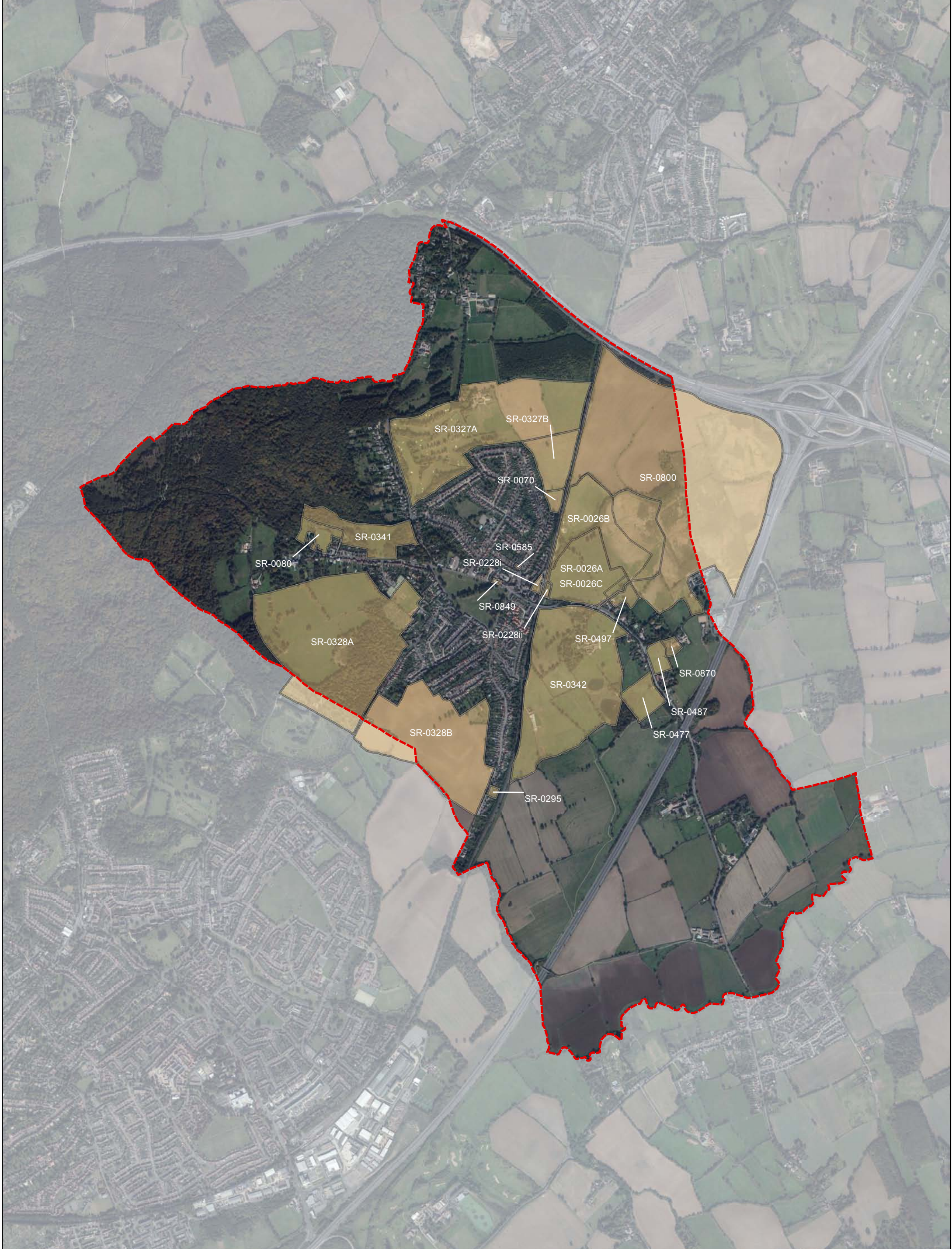


Site proceeds at this stage.
Site does not proceed at this stage.
This stage is not applicable for this site.

SR-0111

Site references in *italics* denote that this site was originally one part of a site comprising multiple parts sharing a single SLAA reference number. An amendment to the site reference was made to create a unique identifier for each site.

Site Ref	Address	Parish	Settlement (Sites proceeding to Stage 2 only)	Promoted Use	Secondary Use	Split Site	Pre-Stage 1	Stage 1	Stage 2	Stage 3	Stage 4	Justification
SR-0017	Home Farm, Chigwell Lane, Chigwell	Chigwell	Chigwell	Housing								This site is part of a strategic option which was judged to be a less favourable growth direction for the settlement. This option would cause significant harm to the Green Belt, risking the coalescence of Chigwell and Loughton.
SR-0018	Former Bank of England sports ground. Now part is the Academy Britannia Club, Langston Road, Loughton	Loughton		Housing	Employment							Site is subject to extant planning permission dated prior to 31st July 2016.
SR-0019	Side of Argosons, Kents Lane, Kents lane Nursery, North Weald, Epping, CM16 6AX	Magdalen Laver		Housing								Site subject to Major Policy Constraint.
SR-0020	Land at Paternoster Hill, Waltham Abbey	Waltham Abbey	Waltham Abbey	Housing								Whilst the site was considered as potentially suitable for development, it did not fall within a category of land taken forward based on the land preference hierarchy set out in the Site Selection Methodology. The site should not proceed for further testing.
SR-0021	Land lying to the north of Honey Lane and west of Mason Way, Ninefields, Waltham Abbey, Essex	Waltham Abbey	Waltham Abbey	Housing								Whilst the site was considered as potentially suitable for development, it did not fall within a category of land taken forward based on the land preference hierarchy set out in the Site Selection Methodology. The site should not proceed for further testing.
SR-0022	Rear of 101-103 High Street, Chipping Ongar	Chipping Ongar		Housing								Site is subject to extant planning permission dated prior to 31st July 2016.
SR-0023i	Weald Place Farm, Thornwood, Epping, Essex	North Weald Bassett	Thornwood	Housing		SR-0023						Whilst the site was considered as potentially suitable for development, it did not fall within a category of land taken forward based on the land preference hierarchy set out in the Site Selection Methodology. The site should not proceed for further testing.
SR-0023ii	Weald Place Farm, Thornwood, Epping, Essex	North Weald Bassett		Housing		SR-0023						Site subject to Major Policy Constraint.
SR-0025	Brook Farm, Stapleford Road, Stapleford Abbotts, Essex	Stapleford Abbotts	Stapleford Abbotts	Housing								This site scores poorly against several criteria, including harm to the Green Belt. It was judged that it would promote unsustainable development patterns, ribbon development away from the settlement edge, and the site should not be considered further.
SR-0026A	Land adjacent to Theydon Bois bound by M25, M11, Coopersale Lane, Abridge Road and Central Line	Theydon Bois	Theydon Bois	Housing	Employment							Although this site is identified as available, it has a complex ownership pattern and it is not clear whether all landowners are supportive of development. Additionally, one of the landowners is promoting an overlapping site for development. The site should not be allocated.
SR-0026B	Land East of Central Line/North of Abridge Road (Including The Old Foresters Site), Theydon Bois	Theydon Bois	Theydon Bois	Housing								Site is recommended for allocation.
SR-0026C	Part of the Thrifts Hall Farm, Abridge Road, Theydon Bois	Theydon Bois	Theydon Bois	Housing								Site is recommended for allocation.
SR-0027	Woodgrange Poultry Farm, 52 Chipping Ongar Road, Abridge, Essex, RM4 1UH	Lambourne	Abridge	Housing								Whilst the site was considered as potentially suitable for development, it did not fall within a category of land taken forward based on the land preference hierarchy set out in the Site Selection Methodology. The site should not proceed for further testing.
SR-0028	Land adjacent to Waterman's Way North Weald	North Weald Bassett		Housing								Site subject to Major Policy Constraint.



<div>Report on Site Selection</div> <div>ARUP</div> <div>Epping Forest District Council</div>	<div>Drawing No. EFDC-S2-0017-Rev1</div>	<div>Content</div> <div>Residential Sites for Stage 2 Assessment in Theydon Bois</div> <div>Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community.</div>	<div>Legend</div> <div><div>Stage 2 Sites</div><div>Parish Boundary</div></div> <div>N</div>
	<div>Date: September 2016</div>		
	<div>Scale: 1:17,500 @A3</div>		

Site Suitability Assessment

Site Reference: SR-0026B
Parish: Theydon Bois
Settlement:
Size (ha): 12.95
Address: Land East of Central Line/North of Abridge Road (Including The Old Foresters Site), Theydon Bois

Primary use: Housing
SLAA notes: None

SLAA yield: 180 - 300 dwellings

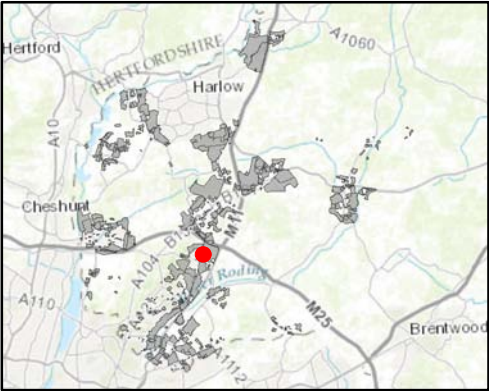
SLAA source for baseline yield: Indicated in Call for Sites (equivalent to 14-23 dph)

SLAA site constraints: Circa 5% reduction in site capacity because of the presence of TPO's. Circa 50% of the site is also covered by SR0800, as such a reduction in yield is applied to avoid double counting. However dwelling density is quite low so the dwelling quantity stated

Site selection adjustment: Based on supporting material submitted for site.

Community feedback: Feedback was received on THB-C which is within or near to this site. Refer to Appendix B1.4 for further details.

Dwellings: 200



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

Drawing Status

Issue

Drawing No

SR-0026B

Issue

P1

ARUP

Epping Forest District Council

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community



Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	(-)	Effects of allocating the site for the proposed use are not likely to be significant alone but should be checked for in-combination effects.	
1.2 Impact on Nationally Protected sites	0	Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSI's.	
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	(-)	Site contains Ancient and/or Veteran trees but at a sufficiently low density across the site that removal could be largely avoided or possible impacts could be mitigated.	There is 1 Ancient tree directly affected by the site. The tree is located in the west of the site and may be affected by development. Impacts may be mitigated by considered masterplanning or transposition.
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	Site is not touching Buffer Land.
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	The site is partially within a Deciduous Woodland buffer zone. The site may indirectly affect the BAP priority habitat, but mitigation can be implemented to address this.
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	No effect likely on historic assets due to distance from site.	
1.8b Impact on archaeology	0	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(-)	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	
3.1 Distance to the nearest rail/tube station	0	Site is between 1000m and 4000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	0	Site between 400m and 1000m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.4 Distance to local amenities	(-)	Site is more than 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	(+)	Site is less than 1000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	100% greenfield site, adjacent to an existing settlement (Theydon Bois).
4.2 Impact on agricultural land	(--)	Development would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	(+)	Development could provide an opportdwellingly to improve links to adjacent existing public open space or provide access to open space which is currently private.	No public open space is located in the site area. Development will not involve the loss of public open space. An existing site masterplan identifies opportunities to provide new public open spaces in the development proposal.
5.1 Landscape sensitivity	(-)	The site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	The key characteristics of the adjacent assessed landscape sensitivity zone extend to this site. The form and extent of any development would have to be sensitive to the location to avoid potential adverse impact on adjacent landscape character area.
5.2 Settlement character sensitivity	0	Development is unlikely to have an effect on settlement character.	Site is identified as a potential regeneration area. Proposed masterplan for site responds to landscape setting, and is separated from settlement by railway line. Proposed amount of development and its layout is unlikely to impact settlement character.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	Although protected trees are present on the site, it is likely that they could be incorporated into the proposed layout, subject to reasonable care, without adverse impact on the suitability of the site for development.
6.4 Access to site	(+)	Suitable access to site already exists.	Off Station Hill.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.	Potential contamination. Potential adverse impact, but could be mitigated.
6.6 Traffic impact	0	Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to affect congestion.	

Appendix 3

Extracts from Draft Local Plan – Submission Draft



Epping Forest District Local Plan

Submission Version 2017



Epping Forest
District Council

www.eppingforestdc.gov.uk

Theydon Bois

- 5.111 Lying to the north of Loughton and south west of Epping, Theydon Bois is a village with a strong rural feel.
- 5.112 The settlement benefits from an attractive parade of shops offering local convenience retail, whilst a station on the London Underground network provides a direct link with London.
- 5.113 The village operates a unique 'dark skies' policy (i.e. no street lighting), which has traditionally been supported by the majority of residents.

Vision for Theydon Bois

Theydon Bois will continue to maintain its local feel and character and preserve its rural setting, adjacent to Epping Forest, while providing a mix of housing, key local services and high quality independent retail. Theydon Bois will also enhance its leisure facilities and social infrastructure to support existing and future residents.

Residential Sites

- 5.114 Policy SP 2 sets out the number of homes the Council will plan for in Theydon Bois over the Plan period. The provision of approximately 57 homes has been informed by the aspiration for Theydon Bois to maintain its local feel and character.
- 5.115 The Council considered the possible spatial options to accommodate new homes at Theydon Bois and concluded that there is one appropriate spatial option which comprises intensification within the existing settlement with a small expansion to the north. This option provides opportunities to focus development in the most sustainable locations within the settlement, to use previously developed land, and will minimise any harm to the wider landscape and Green Belt around the settlement. The small northern expansion provides a natural extension to the settlement and is the least harmful to the Green Belt.
- 5.116 Following an assessment of the suitability, availability and achievability of Residential Sites located within this spatial option, the Council has identified three sites for potential allocation

to meet the identified housing requirement, as set out in Policy P 8.

- 5.117 Proposals for residential development will be expected to accord with site specific requirements as set out in Appendix 6.

Sites for Traveller Accommodation

- 5.118 Policy SP 2 sets out the Council's approach to Traveller Sites within the District. There are no allocations for Traveller Accommodation in Theydon Bois.

Employment Sites

- 5.119 Policy E 1 sets out the Council's preferred approach to identifying sites for employment (B use class) uses.
- 5.120 There are no existing Employment Site designations or new Employment Site allocations in Theydon Bois identified in the Local Plan.

Infrastructure Requirements

- 5.121 The supporting text to Policy SP 2 confirms the importance of identifying and delivering key infrastructure to support residential and employment growth across the District. The infrastructure needs for Theydon Bois will be set out in the Infrastructure Delivery Plan.

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

Policy P 8 Theydon Bois

- A. Proposals for development on allocated sites should accord with the site specific requirements set out in Appendix 6.

Residential Sites

- B. In accordance with Policy SP 2 the following sites are allocated for residential development:
- (i) THYB.R1 Land at Forest Drive – Approximately 39 homes
 - (ii) THYB.R2 Theydon Bois London Underground Station car park – Approximately 12 homes
 - (iii) THYB.R3 Land at Coppice Row – Approximately 6 homes

Infrastructure Requirements

- C. Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Specifically, development in Theydon Bois will be expected to contribute proportionately towards the following infrastructure items:
- (i) Highways and junction upgrades;
 - (ii) Local upgrades to the existing waste water network and drainage infrastructure; and
 - (iii) The improvement of open space throughout the settlement.
- D. The Council will only permit planning applications that contribute towards the delivery of those infrastructure items set out above and in the Infrastructure Delivery Plan, unless subsequent iterations of the Infrastructure Delivery Plan or discussions with providers determine that these items are no longer required.

Air Pollution

- E. The development of the allocated sites within Theydon Bois have the potential to produce air pollution that could impact upon air quality in the District, including Epping Forest. In accordance with Policy DM 2 and Policy DM 22, all proposals on sites which require a Transport Assessment/Transport Statement will be required to undertake an air quality assessment that identifies the potential impact of the development, together with contributions towards air quality monitoring.

Recreational Pressure

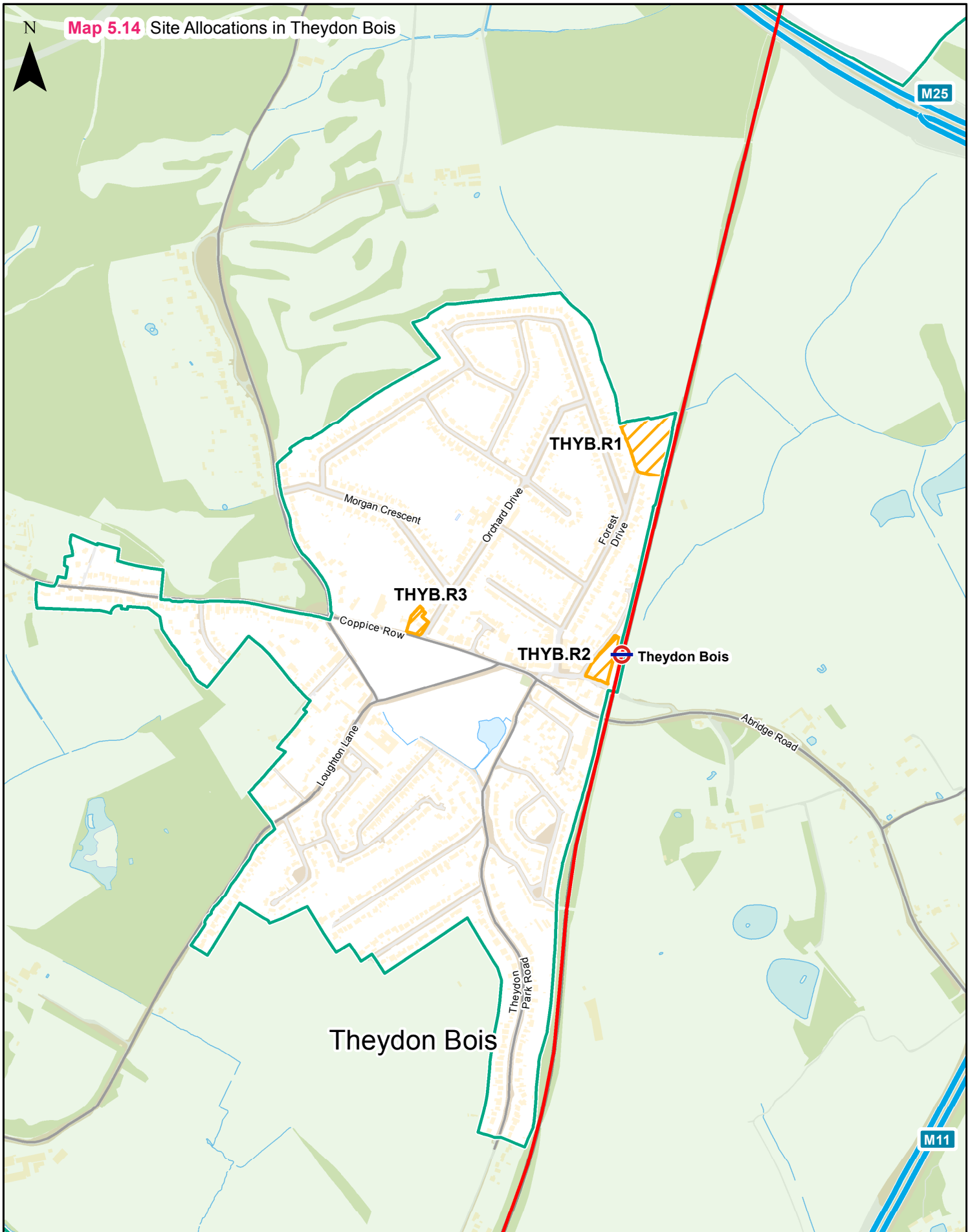
- F. Due to their proximity to Epping Forest,

development of the above allocated sites within Theydon Bois will be required to make a contribution to the access management and monitoring of visitors to the Forest in accordance with Policy DM 2.

Flood Risk

- G. In accordance with Policy DM 15, development on residential allocations must be located wholly within Flood Zone 1.

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



<div>Epping Forest District Local Plan</div> <div>Submission Version December 2017</div> <div> Epping Forest District Council</div>	<div>Drawing No. EFDC-SP-0015-Rev2</div>	<div>Map 5.14</div> <div>Site Allocations in Theydon Bois</div>	<div>Legend</div> <div><div><div> Residential site allocation</div><div> Residential and traveller site allocation</div><div> Green Belt Boundary</div></div><div><div> Employment site allocation</div><div> Masterplan Area</div><div> District Open Land</div></div><div><div> Traveller site allocation</div><div> Concept Framework Plan Area</div><div> Local Authority boundary</div></div></div> <div>This legend shows only the key Local Plan policy designations. A full legend can be found in Appendix 6: Site Specific Requirements for Site Allocations.</div>
	<div>Date: December 2017</div>		
	<div>Scale: 1:10,000 @ A4</div>	<div><div>Contains Ordnance Survey & Royal Mail Data © Crown Copyright & Database Right 2016 EFDC Licence No: 100018534 2016</div><div>The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.</div></div>	

Appendix 4

Site Selection Report – March 2018

B1.1 Overview of Assessment of Residential Sites

Appendix B1.1

Overview of Assessment of Residential Sites



Site proceeds at this stage.
 Site does not proceed at this stage.
 This stage is not applicable for this site.

Site Ref	Address	Parish	Tranche	Settlement (Sites proceeding to Stage 2 only)	Promoted Use	Stage 1 /Stage 6.1	Stage 6.1B	Stage 2 /Stage 6.2	Stage 3 /Stage 6.3	Stage 4 /Stage 6.4	Justification
SR-0026B	Land East of Central Line/North of Abridge Road (Including The Old Foresters Site), Theydon Bois	Theydon Bois	Tranche 1	Theydon Bois	Residential		N/A				Although the site was proposed for allocation in the Draft Local Plan (2016) and remains available within the first five years of the Plan period it is not proposed for allocation. Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community as a result of the scale of growth proposed. Additionally the Conservators of Epping Forest raised concerns around the overall scale of growth proposed in Theydon Bois, which is located in close proximity to the Epping Forest SAC, and the potential effects arising from recreational pressure and air quality. The Conservators identified the need for a SANG to compensate for the scale of growth, which may adversely affect the deliverability of the site. It was considered that other sites in Theydon Bois were more preferable in terms of their overall suitability and if allocated they would provide the desired growth in the settlement. This site is not proposed for allocation.
SR-0026C	Part of the Thrifts Hall Farm, Abridge Road, Theydon Bois	Theydon Bois	Tranche 1	Theydon Bois	Residential		N/A				Although the site was proposed for allocation in the Draft Local Plan (2016) and remains available within the first five years of the Plan period it is not proposed for allocation. Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community as a result of the scale of growth proposed. Additionally the Conservators of Epping Forest raised concerns around the overall scale of growth proposed in Theydon Bois, which is located in close proximity to the Epping Forest SAC, and the potential effects arising from recreational pressure and air quality. The Conservators identified the need for a SANG to compensate for the scale of growth, which may adversely affect the deliverability of the site. It was considered that other sites in Theydon Bois were more preferable in terms of their overall suitability and if allocated they would provide the desired growth in the settlement. This site is not proposed for allocation.
SR-0027	Woodgrange Poultry Farm, 52 Ongar Road, Abridge, Essex, RM4 1UH	Lambourne	Tranche 1	Abridge	Residential		N/A				This site was considered to be suitable but is ranked lower in the land preference hierarchy which, based on the Council's Local Plan Strategy, as set out in the Site Selection Methodology, states the order in which sites should be identified for allocation. It did not proceed for further testing beyond Stage 3.
SR-0028	Land adjacent to Waterman's Way North Weald	North Weald Bassett	Tranche 1		Residential		N/A				Site is located outside the Settlement Buffer Zones, one of the Major Policy Constraints. The site therefore did not proceed beyond Stage 1.
SR-0032	Land at Lower Sheering	Sheering	Tranche 1	Lower Sheering	Residential		N/A				Site is proposed for allocation. The justification for the allocation can be found in Appendix B1.6.6.
SR-0033	Daubneys Farm, Sheering, Harlow, Essex, CM22 7LU	Sheering	Tranche 1	Sheering	Residential		N/A				Site is proposed for allocation. The justification for the allocation can be found in Appendix B1.6.6.
SR-0034	Land to east of Waltham Abbey	Waltham Abbey	Tranche 1	Waltham Abbey	Residential		N/A				This site falls within a strategic option which was considered to be less suitable. Refer to the strategic options justification in Appendix B1.5.2 for further details.
SR-0036	Land at Blumans, North Weald (north/south of A414)	North Weald Bassett	Tranche 1	North Weald Bassett	Residential		N/A				Site is proposed for allocation. The justification for the allocation can be found in Appendix B1.6.6.

B1.6.6 Results of Identifying Sites for Allocation



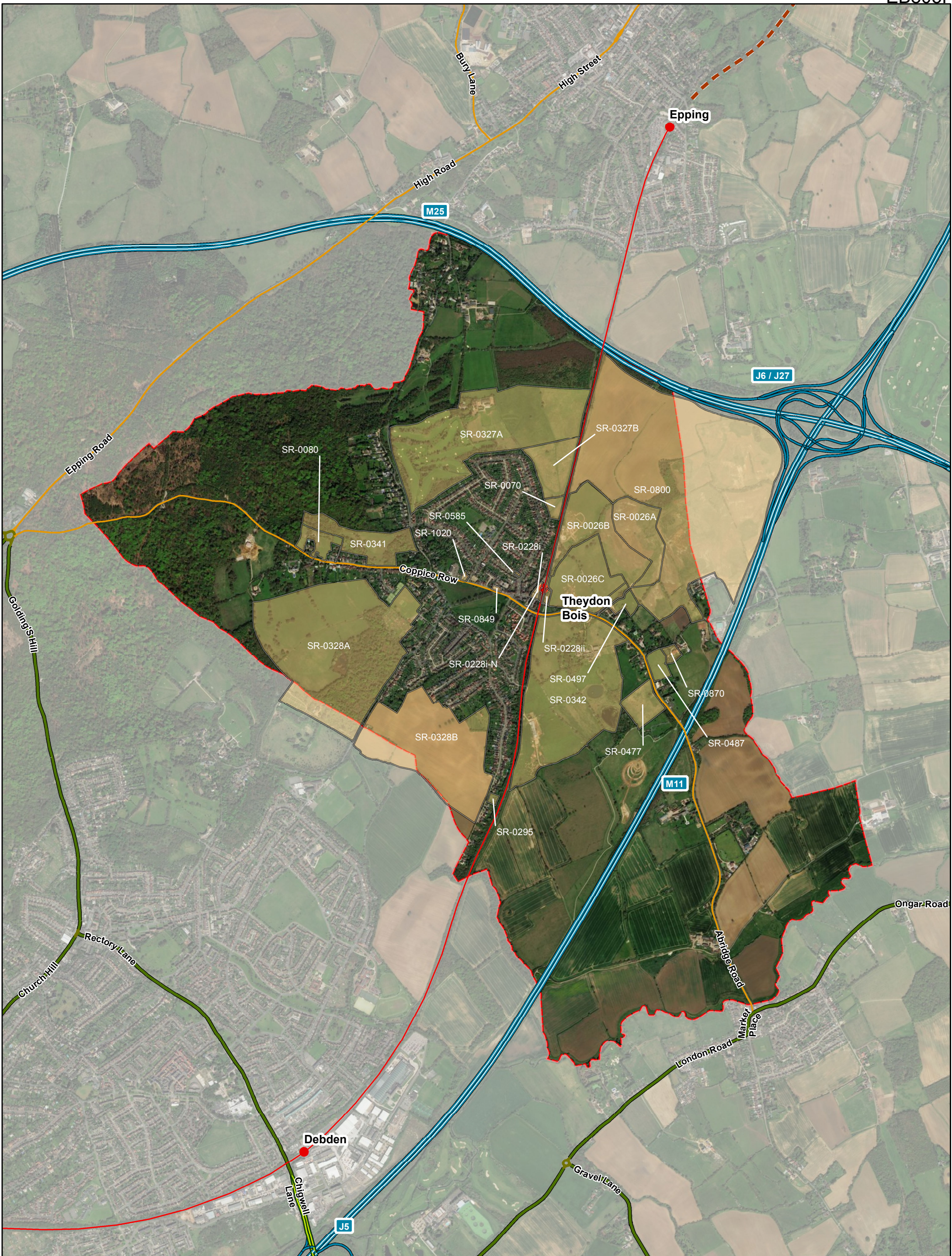
<div>Report on Site Selection</div> <div>ARUP</div> <div>Epping Forest District Council</div>	<div>Drawing No.</div> <div>EFDC-RS4-0020-Rev2</div>	<div>Content</div> <div>Results of Stage 4 and Stage 6.4 Assessment for Residential Sites in Theydon Bois</div> <div>Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community.</div> <div>Contains Ordnance Survey & Royal Mail Data (c) Crown Copyright & Database Right 2016 EFDC License No: 100018534 2016</div>	<div>Legend</div> <div><div>Proposed for allocation</div><div>Not proposed for allocation</div></div> <div>This legend shows only key map symbology. A full legend can be found at the beginning of the Appendix.</div>	<div>N</div> <div>B1119</div>
	<div>Date: March 2018</div>			
	<div>Scale: 1:14,000 @A3</div>			




Appendix B1.6.6 Decisions on Residential Sites for Allocation in Theydon Bois

Site Ref	Address	Settlement	Size (Ha)	Capacity (Units)	Assessment of Inseparable Constraints	Decision	Allocation Justification
SR-0026A	Land to east of Theydon Bois London Underground station, north of Abridge Road	Theydon Bois	30.33	768	On-site restrictions were identified, but it was considered that these could be overcome, and it was considered that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	Although this site was identified as available, it has a complex ownership pattern and it is not clear whether all landowners are supportive of development. Additionally, one of the landowners is promoting an overlapping site for development. The site is not proposed for allocation.
SR-0026B	Land East of Central Line/North of Abridge Road (Including The Old Foresters Site), Theydon Bois	Theydon Bois	6.99	113	On-site restrictions were identified, but it was considered that these could be overcome, and it was considered that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	Although the site was proposed for allocation in the Draft Local Plan (2016) and remains available within the first five years of the Plan period it is not proposed for allocation. Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community as a result of the scale of growth proposed. Additionally, the Conservations of Epping Forest raised concerns around the overall scale of growth proposed in Theydon Bois, which is located in close proximity to the Epping Forest SAC, and the potential effects arising from recreational pressure and air quality. The Conservations identified the need for a SANG to compensate for the scale of growth, which may adversely affect the deliverability of the site. It was considered that other sites in Theydon Bois were more preferable in terms of their overall suitability and if allocated they would provide the desired growth in the settlement. This site is not proposed for allocation.
SR-0026C	Part of the Thrifts Hall Farm, Abridge Road, Theydon Bois	Theydon Bois	7.01	120	On-site restrictions were identified, but it was considered that these could be overcome, and it was considered that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	Although the site was proposed for allocation in the Draft Local Plan (2016) and remains available within the first five years of the Plan period it is not proposed for allocation. Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community as a result of the scale of growth proposed. Additionally, the Conservations of Epping Forest raised concerns around the overall scale of growth proposed in Theydon Bois, which is located in close proximity to the Epping Forest SAC, and the potential effects arising from recreational pressure and air quality. The Conservations identified the need for a SANG to compensate for the scale of growth, which may adversely affect the deliverability of the site. It was considered that other sites in Theydon Bois were more preferable in terms of their overall suitability and if allocated they would provide the desired growth in the settlement. This site is not proposed for allocation.
SR-0070	Land at Forest Drive, Theydon Bois	Theydon Bois	0.89	39	On-site restrictions were identified, but it was considered that these could be overcome, and it was considered that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Proposed for allocation	This site was identified as available within the first five years of the Plan period. It has been marked and has no identified constraints or restrictions which would prevent it coming forward for development. The presence of surface water flooding could be overcome through reducing the capacity for homes on the site. This site is proposed for allocation.
SR-0228i	Theydon Bois London Underground Car Park, Land and commercial yard adjacent to station off Coppice Row, CM16 7	Theydon Bois	0.36	29	On-site restrictions were identified, but it was considered that these could be overcome, and that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	Although the site was proposed for allocation in the Draft Local Plan (2016) and remains available within the first five years of the Plan period, with no identified constraints or restrictions, it is not proposed for allocation. An amended, smaller, site area (SR-0228i-N) was received by the Council, which included part of this site. This site has been assessed separately and is proposed for allocation.
SR-0228ii	Theydon Bois London Underground Car Park, Land and commercial yard adjacent to station off Coppice Row, CM16 7	Theydon Bois	0.23	9	On-site restrictions were identified, but it was considered that these could be overcome, and that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	The site was proposed for allocation in the Draft Local Plan (2016) with SR-0026N and SR-0026C. While the site remains available within the first five years of the Plan period it is not proposed for allocation. As a standalone site, it was considered that the presence of surface water flooding could be overcome, but this would result in a substantial reduction in the site's capacity. This would result in a small, comparably isolated site which was considered to be less preferable since in response to comments received through the Regulation 18 Local Plan consultation SR-0026B and SR-0026C are not proposed for allocation. This site is therefore not proposed for allocation.
SR-0228i-N	Theydon Bois London Underground Car Park, Station Approach, Theydon Bois, Essex, CM16 7HR	Theydon Bois	0.30	12	On-site constraints were identified, but it was considered that these could be overcome, and that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Proposed for allocation	This site was identified as available within the first five years of the Plan period. Although there is no evidence of the site having been marked, it has no identified constraints or restrictions which would prevent it coming forward for development. It was considered that the presence of surface water flooding could be overcome through reducing the capacity of the site. The site is proposed for allocation.
SR-0497	Land to the rear of Monks Hall, Abridge Road, Theydon Bois	Theydon Bois	1.09	27	On-site restrictions were identified, but it was considered that these could be overcome, and that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	The availability of this site is unknown and it is not known when existing on-site uses would cease. This is likely to adversely affect the deliverability of the site. The site is therefore not proposed for allocation.
SR-0585	21/23 Forest Drive, Theydon Bois, Essex, CM16 7HA	Theydon Bois	0.06	2	No on-site restrictions or constraints were identified and it was considered that identified deficiencies in secondary school places would not be an insurmountable constraint that would adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	This site was considered to be available for development during the Plan period, but the indicative capacity assessment suggests that it would not support the minimum six units necessary for allocation. The site could proceed as windfall development but is not proposed for allocation.

Appendix B1.6.6
Decisions on Residential Sites for Allocation in
Theydon Bois

Site Ref	Address	Settlement	Size (Ha)	Capacity (Units)	Assessment of Insurmountable Constraints	Decision	Allocation Justification
SR-0800	Land to the East of Theydon Bois	Theydon Bois	103.26	177	No on-site restrictions or constraints were identified and it was considered that identified deficiencies in primary and secondary school places or GP surgeries would not be an insurmountable constraint that would adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	The landowner was promoting overlapping sites for development (SR-0026B and SR-0026C). It is unlikely that the part of this site outside of these overlapping areas will come forward for development as a standalone site. Furthermore, taking into consideration the area of these overlapping sites and the context of the existing settlement pattern and scale, in 2016 it was considered that a smaller part of the site would provide the desired growth in this settlement. This site is therefore not proposed for allocation. Parts of SR-0026B and SR-0026C were proposed for allocation in the Draft Local Plan (2016). In 2017, the proposed allocations were reviewed as part of Stage 6.4 of the site selection process. The conclusions of this further assessment was that other sites in Theydon Bois were more preferable in terms of their overall suitability than SR-0026B and SR-0026C and it allocated they would provide the desired growth in the settlement. Further details on the rationale for this decision is provided under the allocation justification for sites SR-0026B and SR-0026C.
SR-0849	Teuco Express and Car Park, Coppice Row, Theydon Bois	Theydon Bois	0.12	7	No on-site restrictions or constraints were identified and it was considered that identified deficiencies in secondary school places would not be an insurmountable constraint that would adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	This site was considered to have a complex ownership pattern and its availability is unknown. These factors could impact upon its likely deliverability during the Plan period. It is therefore not proposed for allocation.
SR-1020	Wain, Coppice Row, Theydon Bois, Epping, Essex, CM16 7ER	Theydon Bois	0.15	6	On-site restrictions were identified, but it was considered that these could be overcome, and that identified deficiencies in primary or secondary school places would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Proposed for allocation	This site was identified as available within the first five years of the Plan period. It has been marketed and has no identified constraints or restrictions which would prevent it coming forward for development. Notwithstanding uncertainty around the timescales for existing residential uses to cease, the site is proposed for allocation.



<p>Report on Site Selection</p> <p>ARUP</p> <p>Epping Forest District Council</p>	<p>Drawing No. EFDC-S2-0024-Rev2</p> <p>Date: March 2018</p> <p>Scale: 1:17,500 @A3</p>	<p>Content</p> <p>Residential Sites for Stage 2 and Stage 6.2 Assessment in Theydon Bois</p> <p><small>Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community.</small></p> <p><small>Contains Ordnance Survey & Royal Mail Data (c) Crown Copyright & Database Right 2016 EFDC License No: 100018534 2016</small></p>	<p>Legend</p> <p> Residential sites assessed at Stage 2 and Stage 6.2</p> <p> Parish Boundary</p> <p><small>This legend shows only key map symbology. A full legend can be found at the beginning of the Appendix.</small></p> <div data-bbox="1921 2789 2068 2938"><p>N</p><p>B616</p></div>
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Site Suitability Assessment

Site Reference: SR-0026B

Parish: Theydon Bois

Size (ha): 12.95

Address: Land East of Central Line/North of Abridge Road (Including The Old Foresters Site), Theydon Bois

Primary use: Residential

Site notes:

Baseline yield: 180 - 300 dwellings

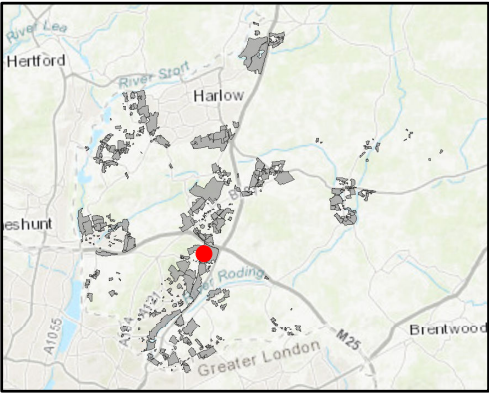
Source for baseline yield: Indicated in Call for Sites (equivalent to 14-23 dph)

Site constraints: Circa 5% reduction in site capacity because of the presence of TPOs. Circa 50% of the site is also covered by SR-0800, as such a reduction in yield is applied to avoid double counting.

Site selection adjustment: Based on supporting material submitted for site.

Community feedback: Feedback was received on THB-C which is within or near to this site. Refer to Appendix B1.4 for further details.

Dwellings: 200



Client
Epping Forest District Council

Job Title
Epping Forest District Local Plan

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Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	(-)	Effects of allocating site for the proposed use are not likely to be significant alone but should be checked for in-combination effects.	Residential development partially located between 400m and 2km from Epping Forest Special Area of Conservation. In-combination effects from recreational pressure and air quality likely.
1.2 Impact on Nationally Protected sites	(-)	Site falls within an Impact Risk Zone and due to the nature and scale of development proposed it is likely to be possible to mitigate the effects of the proposed development.	Due to the development type (over 100 residential dwellings), development of the site is likely to pose a risk and consultation with Natural England is required. However, it is likely that mitigation to reduce the risk would be possible.
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	(-)	Site contains Ancient and/or Veteran trees but at a sufficiently low density across the site that removal could be largely avoided or possible impacts could be mitigated.	There is 1 Ancient tree directly affected by the site. The tree is located in the west of the site and may be affected by development. Impacts may be mitigated by considered masterplanning or translocation.
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	Site is not touching Buffer Land.
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	The site is partially within a Deciduous Woodland buffer zone. The site may indirectly affect the BAP priority habitat, but mitigation can be implemented to address this.
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	
1.8b Impact on archaeology	0	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(-)	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	
3.1 Distance to the nearest rail/tube station	0	Site is between 1000m and 4000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	0	Site between 400m and 1000m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.6 Distance to nearest secondary school	(-)	Site is more than 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	(+)	Site is less than 1000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	100% greenfield site, adjacent to an existing settlement (Theydon Bois).
4.2 Impact on agricultural land	(--)	Development of the site would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	(+)	Development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private.	No public open space is located in the site area. Development will not involve the loss of public open space. An existing site masterplan identifies opportunities to provide new public open spaces in the development proposal.
5.1 Landscape sensitivity	(-)	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	The key characteristics of the adjacent assessed landscape sensitivity zone extend to this site. The form and extent of any development would have to be sensitive to the location to avoid potential adverse impact on adjacent landscape character area.
5.2 Settlement character sensitivity	0	Development is unlikely to have an effect on settlement character.	Site is identified as a potential regeneration area. Proposed masterplan for site responds to landscape setting, and is separated from settlement by railway line. Proposed amount of development and its layout is unlikely to impact settlement character.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	Although protected trees are present on the site, it is likely that they could be incorporated into the proposed layout, subject to reasonable care, without adverse impact on the suitability of the site for development.
6.4 Access to site	(+)	Suitable access to site already exists.	Access off Station Hill.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.	Potential contamination (Station Yard / Made Ground / Landraise / Lorry Park). Potential adverse impact that could be mitigated.
6.6 Traffic impact	0	Area around the site expected to be uncongested at peak time.	B618

Site Suitability Assessment

Site Reference: SR-0070
Parish: Theydon Bois
Size (ha): 0.89
Address: Land at Forest Drive, Theydon Bois

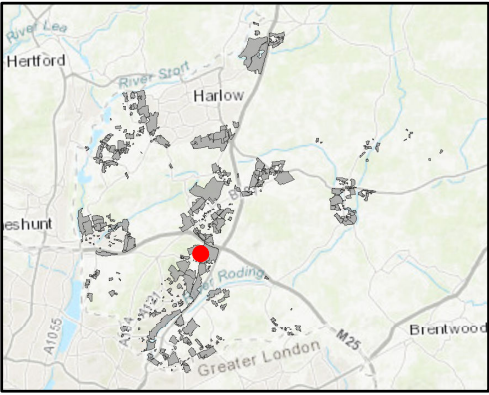
Primary use: Residential
Site notes: Agricultural/Greenfield plot

Baseline yield: 28 dwellings
Source for baseline yield: Assumption based on 30 dph

Site constraints: Site is 100% covered by SR-0479. As such the yield is omitted for this site to avoid double counting.

Site selection adjustment: Full capacity reinstated for site selection assessment (overlapping site).

Community feedback: Feedback was received on THB-A which is within or near to this site. Refer to Appendix B1.4 for further details.
Dwellings: 28



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

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Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	(-)	Effects of allocating site for the proposed use are not likely to be significant alone but should be checked for in-combination effects.	Residential development partially located between 400m and 2km from Epping Forest Special Area of Conservation. In-combination effects from recreational pressure and air quality likely.
1.2 Impact on Nationally Protected sites	0	Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSIs.	
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	
1.8b Impact on archaeology	0	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(-)	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	
3.1 Distance to the nearest rail/tube station	(+)	Site is less than 1000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	0	Site between 400m and 1000m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.6 Distance to nearest secondary school	(-)	Site is more than 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	(+)	Site is less than 1000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	100% greenfield site, adjacent to an existing settlement (Theydon Bois).
4.2 Impact on agricultural land	(--)	Development of the site would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.	
5.1 Landscape sensitivity	(-)	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	The key characteristics of the wider landscape character zone extend across the whole site. The form and extent of any development would have to be sensitive to the location to avoid potential adverse impact on adjacent landscape character area.
5.2 Settlement character sensitivity	0	Development is unlikely to have an effect on settlement character.	Site is identified as a potential regeneration area. Site is enclosed, and adjacent to settlement edge and railway line. Density of development is higher than neighbouring areas, however unlikely to impact settlement character.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exists.	Access off Forest Drive.
6.5 Contamination constraints	0	No contamination issues identified on site to date.	No potential contamination identified.
6.6 Traffic impact	(-)	Low level congestion expected at peak times within the vicinity of the site.	B620

Site Suitability Assessment

Site Reference: SR-0228i
Parish: Theydon Bois
Size (ha): 0.36
Address: Theydon Bois London Underground Car Park, Land and commercial yard adjacent to station off Coppice Row, CM16 7

Primary use: Residential
Site notes:

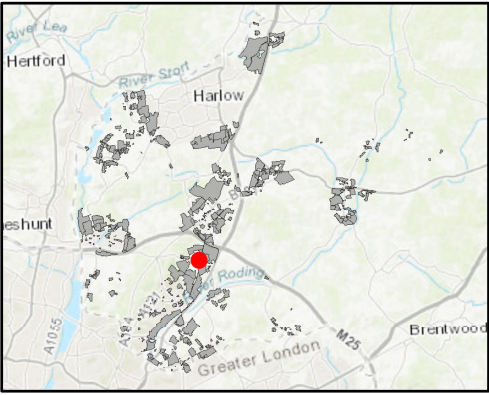
Baseline yield: 43 dwellings

Source for baseline yield: Indicated in Call for Sites

Site constraints: None

Site selection adjustment: Multi-parcel site, which has been split out. Yield based on baseline 43 dwellings, which has been split proportionally across the sites.

Community feedback: The Council did not consult on a growth location which covers or is near to this site.
Dwellings: 25



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

Drawing Status

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SR-0228i

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ARUP

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Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	(-)	Effects of allocating site for the proposed use are not likely to be significant alone but should be checked for in-combination effects.	Residential and employment development partially located between 400m and 2km from Epping Forest Special Area of Conservation. In-combination effects from recreational pressure and air quality likely.
1.2 Impact on Nationally Protected sites	0	Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSIs.	
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	Site is not touching Buffer Land.
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	The site is partially within a Deciduous Woodland buffer zone. The site may indirectly affect the BAP priority habitat, but mitigation can be implemented to address this.
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	Although Historic England have raised comments based on the impact on the G11 The Bull Pub, it should be noted that the pub is located outside of the site and there is no likely effect on the setting of The Bull.
1.8b Impact on archaeology	(+)	There is a low likelihood that further archaeological assets would be discovered on the site.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(+)	Site is not located in the Green Belt.	
3.1 Distance to the nearest rail/tube station	(+)	Site is less than 1000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	(+)	Site is within 400m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.6 Distance to nearest secondary school	0	Site is between 1000m and 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	(+)	Site is less than 1000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(++)	Majority of the site is previously developed land within or adjacent to a settlement.	100% brownfield site, within an existing settlement (Theydon Bois).
4.2 Impact on agricultural land	0	Development of the site would not result in the loss of agricultural land.	
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.	
5.1 Landscape sensitivity	(-)	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	The form and extent of any development would have to be sensitive to the location to avoid potential adverse impact on the adjacent landscape character area.
5.2 Settlement character sensitivity	(+)	Development may improve settlement character through redevelopment of a run-down site or improvement in townscape.	Site is a car park at London Underground Station. Redevelopment could enhance the character of the station arrival area.
6.1 Topography constraints	0	No topography constraints are identified in the site.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exists.	Existing access from Station Approach.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.	Potential contamination (Railway Goods / Coal Yard / Made Ground). Potential adverse impact that could be mitigated.
6.6 Traffic impact	0	Area around the site expected to be uncongested at peak time.	B622

Site Suitability Assessment

Site Reference: SR-1020
Parish: Theydon Bois
Size (ha): 0.15
Address: Wain, Coppice Row, Theydon Bois, Epping, Essex, CM16 7ER

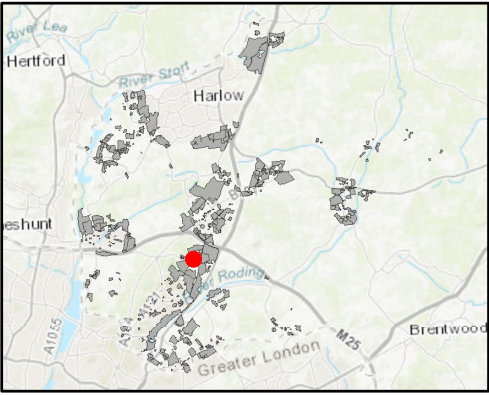
Primary use: Residential
Site notes: Two single dwellings

Baseline yield: 9 dwellings
Source for baseline yield: Indicated in pre-application request

Site constraints: No constraints identified.

Site selection adjustment: None

Community feedback: The Council did not consult on a growth location which covers or is near to this site.
Dwellings: 9



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

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Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	(--)	Effects of allocating site for the proposed use likely to be significant.	Site located within 400m of Epping Forest Special Area of Conservation. Risk of urbanisation (e.g. from fly tipping, fires, invasive species etc.) and runoff.
1.2 Impact on Nationally Protected sites	(-)	Site falls within an Impact Risk Zone and due to the nature and scale of development proposed it is likely to be possible to mitigate the effects of the proposed development.	Due to the development type (all development except householder applications), development of the site is likely to pose a risk and consultation with Natural England is required. However, it is likely that mitigation to reduce the risk would be possible.
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	The site is wholly within Deciduous Woodland and Wood Pasture and Parkland buffer zones. The site may indirectly affect the BAP priority habitats, but mitigation could be implemented to address this.
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	The site is partially within the St Mary's Church LWS 250m buffer zone. The site may indirectly affect the Local Wildlife Site, but mitigation can be implemented to address this.
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	
1.8b Impact on archaeology	(+)	There is a low likelihood that further archaeological assets would be discovered on the site.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(+)	Site is not located in the Green Belt.	
3.1 Distance to the nearest rail/tube station	(+)	Site is less than 1000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	(+)	Site is within 400m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.6 Distance to nearest secondary school	0	Site is between 1000m and 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	(+)	Site is less than 1000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(++)	Majority of the site is previously developed land within or adjacent to a settlement.	60% brownfield site, within an existing settlement (Theydon Bois).
4.2 Impact on agricultural land	0	Development of the site would not result in the loss of agricultural land.	
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.	
5.1 Landscape sensitivity	0	Site falls within an area of low landscape sensitivity - characteristics of the landscape are able to accommodate development without significant character change.	The relevant site character context is urban and development is unlikely to adversely affect the wider landscape character.
5.2 Settlement character sensitivity	0	Development is unlikely to have an effect on settlement character.	Although adjacent to a listed building and fronting Theydon Green, the proposed redevelopment of existing dwellings is of a scale and density that is similar to surrounding development. Development is not likely to affect settlement character.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exists.	Existing access from Orchard Drive.
6.5 Contamination constraints	0	No contamination issues identified on site to date.	No potential contamination identified.
6.6 Traffic impact		Site below site size threshold where it would be expected to significantly affect congestion.	B639

Appendix 5

Local Plan Housing Allocations

Appendix 5 – Local Plan Housing Allocations

Settlement	Consultation Draft 2016	Submission Version 2017	Percentage Change
Sites around Harlow	3,900	3,900	0
Buckhurst Hill (LV)	90	87	-3.3%
Chigwell (LV)	430	376	-12.5%
Chipping Ongar (T)	600	590	-1.6%
Coopersale (SV)	50	*	N/A
Epping (T)	1,640	1,305	-20.4%
Fyfield (SV)	90	*	N/A
High Ongar (SV)	10	*	N/A
Loughton (T)	1,190	1,021	-14.2%
Lower Sheering (SV)	30	*	N/A
Nazeing (SV)	220	122	-44.5%
North Weald Bassett (LV)	1,580	1,050	-33.5%
Roydon (SV)	40	62	+55%
Stapleford Abbots (SV)	10	*	N/A
Sheering (SV)	120	*	N/A
Theydon Bois (LV)	360	57	-84%
Thornwood (SV)	130	172	+32.3%
Waltham Abbey (T)	800	858	+7.2%
Rural East	-	41	N/A
Total	11,290	9,816	

Notes

* Coopersale, Fyfield, High Ongar, Lower Sheering, Sheering and Stapleford Abbots – combined total 175%

Appendix 6

Representation from Conservators of Epping Forest (December 2016)



**COMMENTS by THE CONSERVATORS of EPPING FOREST
on the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION
(December 2016)**

Introduction and context

Epping Forest is owned by the City of London and comprises some 6000 acres (2,500 hectares). It is supported by a further 1,800 acres (730 hectares) of Buffer Lands, acquired by the City to protect the Forest from encroaching development and to maintain the links between the Forest and the wider countryside. The Epping Forest Act 1878 charged the City, as Conservators of Epping Forest, with a duty to conserve varied vegetation and preserve the Forest's *natural aspect*.

The Conservators' comments, in general, are given in response to the Plan in relation to all Forest Land, whether covered by the Epping Forest Act, the Habitats Regulations 2010 or the Wildlife & Countryside Act 1981 or all of these designations. The Conservators consider that the protection and enhancement of the Forest as a whole should be a core aim of the Local Plan.

For example, whilst an assessment of the impacts on the SSSI is not formally part of the Habitats Regulations Assessment (HRA), on which we comment in our 'Additional Comments' to Question 9 below, a consistent approach to both the SAC and SSSI interest features in the Plan is important. In particular, irrespective of any designation, the ancient wood-pasture habitats of the Forest and its network of ancient green lanes are irreplaceable. The European site boundary is clearly part of a wider ecological network and approaches to biodiversity conservation need to be compatible with each other and seek the best outcomes for the natural environment. The ancient green lane network, which is extensive across the District, provides the building block for future, wildlife-rich green infrastructure and green corridors to link other ancient woodlands (e.g. Galleyhill Wood) and other important sites like the Lee Valley. In addition, maintaining the same approach to the Forest as a whole would be beneficial for developers and decision makers as it would avoid confusion, would provide clarity and would reduce the amount of SSSI assessment required at the project level.

QUESTIONS & RESPONSES

1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District? (See paragraph 3.26, Chapter 3).

SIGNIFICANT RESERVATIONS

Environmental enhancement and biodiversity protection at Vision level

Although, Epping Forest is specifically highlighted for protection and enhancement in the Vision statement on page 30 of the Plan (Chapter 3), which the Conservators welcome, the wider environment and green infrastructure are not mentioned. The concern of The Conservators is that the current Plan is being, disproportionately, led by housing targets. Other important strategic planning seems to have been set-aside or delayed, leaving noticeable gaps in the Plan. The amount of development proposed seems to be putting great strain on the other parts of the District's Vision.

This concern was reinforced by the original LSCC Core Strategy and Vision. This LSCC Vision, which now underscores the 4 SHMA local authority plans and features prominently in Chapter 2 of this Plan, was re-drafted only after representations by The Conservators in June 2016. The late inclusion of the environment and biodiversity bullet point in the LSCC Vision (see Chapter 2 of the Plan, page 26, 4th bullet point), seems to be a pointer to a development-led approach which may lead to the overriding of the environmental planning in the Plan. We would request that the EFDC Vision in Chapter 3, now draws on this bullet point and makes explicit reference to the wider environment and biodiversity along similar lines.

Epping Forest's Vision

To inform the District's vision, the Plan draws on the LSCC Vision (Chapter 2 page 26) and also the Lee Valley Park Vision (page 29 of Plan) which are both set out in full. Although currently consulting on a new Management Plan, The Conservators also have a published Vision for Epping Forest contained in their existing Plan. **We would request that this is included and set out in full in the future drafts of the EFDC Local Plan (at Reg 19 and beyond).** We consider that it is most important that this Vision is reflected in the Local Plan Vision, given that it came out of joint working with EFDC and other authorities, both in developing a vision for the Forest (*Quality of Life* Report 2003 – Levett-Therivel) and for the wider strategic **Green Arc**.

The Forest's current Vision is:

- *Epping Forest's position as a unique and ancient landscape for people and wildlife will be strengthened*
- *The Forest will retain its natural aspect with the diversity of wildlife habitats enhanced and the features of international importance, including its veteran pollards, protected*
- *The role of Epping Forest as a special place for recreation and relaxation will increase in importance with improved recreational opportunities*

- *The Forest's historic features and buildings will be retained in good condition and accessibility will be improved for the purposes of education and enjoyment*
- *Epping Forest will be highly valued as part of a larger and fully accessible protected landscape area*

The Green Arc

The last bullet point is of particular importance in the context of the Local Plan. It points clearly to the need for a larger, accessible protected area in which the Forest would be embedded, such as is the objective of the **Green Arc**. It also points the way to the importance of alternative green spaces and corridors (SANGS or SANGSC) which will be the step change required in the Local Plan if it is to provision enough open space in the face of the step change which is being proposed in the number of housing units and residents. These new residents will require both built and natural green infrastructure if the quality of life is to be maintained or improved and if the wildlife and wilderness or semi-natural values of nature conservation sites are to be sustained for the long-term.

The **Green Arc** is referenced in *The London Plan* and we would expect its vision to be set out in this Local Plan, especially given the Council's commitment to the concept from the outset. Such an explicit and integrated approach to the District's Green Infrastructure is fully in accord with the Plan's current wording about the protection of links between the Lee Valley and Epping Forest. Also such a proactive and clear approach to green infrastructure would allow developers to respond positively. It would also allow better planning for the embedding of sustainable transport links (e.g. cycling routes, safe routes to schools, quiet ways) and other constructed infrastructure within the green infrastructure in a way that complements, or at least fits in, rather than erodes or disrupts the most valuable environmental assets.

At this point it is worth reiterating that not only does the Forest and its Buffer Lands cover 7% of the District area (Chapter 2 of the Plan) but together they provide well over 40% of the District's open and accessible green spaces and even more of the vital semi-natural element. It seems timely, given the scale of developments proposed, that this Plan should proactively review the responsibilities for future provision and upkeep of such valuable places.

Other positive planning for green spaces

An examination of the maps with this Regulation 18 Plan makes it clear that housing and employment development dominate at the expense of other planning. The IDP (Arup September 2016) remains incomplete and the scale and funding seem not to have been more than sketched out apart from for the M11 junctions. It is noticeable that the opportunity has not been taken to map the Green Arc or other green infrastructure ambitions of the Council. For example, the links between the Lee Valley and Epping Forest are only briefly mentioned and several other strategic links could have been proposed.

For example, The Conservators would also like to propose that making physical green links and access routes between the Lower Forest and the main body of the Forest should be an aim of the Plan. Such a route is available to the west of Epping town, and could link with Swaines Green, Bolt Cellar Lane and Bury Lane. Given the large changes proposed to the

**RESPONSE of THE CONSERVATORS of EPPING FOREST to
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION**

Green Belt here and the large scale new developments this would seem proportionate and positive planning that should appear on future Plan maps.

Chapter 4 – Policies DM3 and DM4

Policy DM3 – this Policy is welcome given the context (the preamble text in paras 4.110 – 4.114) in which it is presented, the fact that it provides some continuity with the old Policy HC5, and in clearly recognising the importance of Epping Forest to the District. However, in its attempt to reflect the NPPF emphasis on ‘sustainable development’ this policy is also notably weaker than HC5 and its wording seems to imply that protection and enhancement of the Forest are tied to development and possibly even require development. **The Conservators consider that this wording should be improved.** We would like it to reflect that, while development should ensure that it always assists the protection of the Forest, enhancement of the Forest is not linked to development only but to other initiatives for which the Local Authority is responsible, including the planning and promotion of green infrastructure and sustainable transport options.

The Conservators welcome the broad protection given by Policy DM3 through the wording “*biodiversity, character, appearance and landscape setting*” of the Forest. Tranquility and semi-naturalness were the two highest rated features of the Forest from the parish and community stakeholder groups whose opinions were sought for EFDC co-funded Quality of Life Report 2003 (Levett-Therivel). The “*natural aspect*” of the Forest and its links to the surrounding ancient countryside that evolved with it and provided the commoners’ grazing lay-back (support) land are fundamental to the Forest’s value to people and to its future protection. Dark skies are also an important measure of the protection of the Forest and the Conservators look forward to working closely with the Council to continue to protect the whole Forest and not just the SAC from piecemeal, small-scale as well as large developments that might erode these important elements.

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2. Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3).

DISAGREE

Pattern of housing allocations

The Conservators would wish to register a disagreement with the overall approach to the allocation of proposed housing sites across the District. Whilst the Conservators would accept that there are increased housing needs, the scale of the increases would seem to demand a response in which the housing and infrastructure are completely integrated and the latter is **additional** to the existing infrastructure.

There is recognition throughout the Plan and in its supporting technical documents, especially the *Infrastructure Development Plan* (IDP – Arup September 2016) that the current infrastructure is at capacity in critical places or is not adequate. And yet the approach in the draft Regulation 18 Local Plan, certainly away from Harlow with the splitting up of the development into many parcels, seems to be a piecemeal one with only incremental allocations. Many of these are of an individual size that may not be sufficient to

**RESPONSE of THE CONSERVATORS of EPPING FOREST to
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION**

generate the funding for the required large-scale connected infrastructure. The fact that the large developments to the south of Epping, that are likely to have a very adverse impact on congestion and on current infrastructure, are split into smaller parcels suggests that provisioning and integration of new facilities will be difficult to achieve.

The general approach of adding to the housing in the south of the District, around the urban centres and close to existing transport 'nodes' may be appropriate for incremental developments at historic rates. However, the proposed unprecedented and yet predicted 24% increase in residential populations (Chapter 2), over the 17 years remaining of the Plan period, would seem to require something more coherent and integrated.

The situation at Harlow seems to exemplify this issue. Whilst large increases in housing are proposed there is not the concomitant response of infrastructure in this town, especially in public transport provision. The rail network capacity would seem to be entirely inadequate for current needs, not just those of the future (see also our further comments below), and access to the railway would appear to be not to be favourable for these proposed developments at Katherines, West Sumners and Latton Priory.

The proposed distribution of housing is concentrated around Epping Forest with the vast majority being within 6km of the SAC boundaries. **With no clear proposals for an infrastructure to match the projected increase in population to 155,000 (Chapter 2 of the Plan) The Conservators wish to disagree with the pattern of allocations as currently presented.** We await the development of the IDP, further traffic modelling and a full recreational use survey to underpin future decisions but it is difficult to escape the conclusion that the impacts on the District's environment around the Forest, on Epping Forest itself, and on the SAC in particular, are likely to be adverse. In our view, this does not seem to be in accord with the Local Plan Vision in Chapter 3 at 3.26, which the Conservators have broadly welcomed (see above).

Green Belt

The Conservators welcome the continued protection of the Green Belt on the western flank at High Beach and Sewardstone and to the north-west and north of the Forest around the Cobbins Brook Valley and around the Forest's Buffer Lands. Given that Epping Forest and the Epping Forest Act 1878 were important inspirations for the original Metropolitan Green Belt concept and its design, the Green Belt's continuing embrace around the Forest, its ridge and its associated ancient landscapes of the Lee and Roding Valleys is of fundamental importance to The Conservators.

Accepting any of the proposed changes to the Green Belt boundaries, therefore, is very difficult for The Conservators. We reiterate here our profound concerns about the piecemeal pattern of housing allocations and how this is manifested in the eroding of the Green Belt across a wide area. This widespread erosion, unlike the one-off opening of part of the Green Belt for a new settlement, seems to make the boundaries more vulnerable to many more future changes and makes them seem less easy to defend. Furthermore, the proposed extensions of Theydon Bois and Epping to the east, with long, convoluted changes to the Green Belt boundaries, seems to open up the possibility of future infill to a new hard boundary of the M11. The M11 could be seen as a 'de facto' boundary and by-pass to these

towns and the pressure for infill from developers seems likely to follow in a way that would not follow from a single new settlement approach.

District Open Spaces (DOS) – e.g. at Waltham Abbey

On this theme of the weakening of the Green Belt protection for the Forest, the new NPPF designation of District Open Space (DOS) being deployed in this Plan for the first time, seems to pose a similar threat to boundary integrity. The case at Waltham Abbey is ostensibly to resolve the issue of creating “holes” in the Green Belt. However, the decoupling of this area from national Green Belt policies and guidance seems, in our view, to make the area more vulnerable to future Plan reallocations. **To avoid this circumstance, we would seek assurance from the Council that in the next iteration of the Local Plan there would be clear plans for this new Waltham Abbey DOS to become a new SANG with enhanced access and wildlife features for the local communities nearby to enjoy.**

Enforcing and Monitoring Current Green Belt Protections

The Conservators also remain concerned that, even where Green Belt is protected and even “washes over” existing hamlets to ensure its open nature is fully integrated with older settlements, the Green Belt is not well enough safeguarded. And where safeguarding lapses, as recently at High Beach and Gilwell Hill, we are concerned that these do not then become “Trojan Horses” for additional development and Green Belt boundary erosion which might bring its status into question. To illustrate this problem, we attach a map illustrating just some of the approved new developments and potential pressures that have built up at High Beach, the hamlet most intimately associated with the Forest, despite its Green Belt status (see **Land at Lippitt’s Hill map attached**). Further development here could allow the Green Belt and also the Council’s commitment to the protection of the Forest to be undermined inadvertently.

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3. Do you agree with the proposals for development around Harlow? (See Draft Policy SP 3, Chapter 3).

Harlow expansion

It seems logical to concentrate development and housing at Harlow to ensure this town’s economic outlook can be improved but in a manner that will ensure infrastructure is provided to the scale required to ensure sustainable development rather than creating more congestion on the road network (see comments below on the M11). It is not clear from the EFDC Reg 18 Plan alone, separate from the neighbouring Local Plans in the SHMA area, whether the locations and the quantum of housing would achieve this objective. The evidence for new supporting public transport infrastructure (as opposed to more road-building) seems thin.

Another concern of the Conservators is that the original plans and design of Sir Frederick Gibberd for Harlow New Town should be respected and re-invigorated. This would ensure that the ‘green wedges’ should be enhanced by any construction in the Epping District and that the townscape, including any new housing, should remain delimited within the “bowl” or topographical depression that keeps Harlow north of, and hidden from the south by, the Epping Long Green ridge. This would ensure that the ancient landscape to the north and

**RESPONSE of THE CONSERVATORS of EPPING FOREST to
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION**

north-west of the Forest remains intact from a landscape perspective and that the biodiversity and access to green spaces also remain protected.

Latton Priory proposal

Both of these issues have large implications for the viability of any proposed development at **Latton Priory**. The proposed north-south sustainable transport corridor for this development site, which the Conservators would regard as an essential prerequisite to development in order to protect the Forest from increased traffic flows and congestion along the B181 and B1393, seems likely to impact on a Harlow 'green wedge' at this point (see page 21 of the IDP, Arup Sept 2016). It is also unclear to The Conservators at this point whether the number of houses proposed would allow sufficient funding for this sustainable transport link, especially if it were an optional choice alongside an alternative such as a road link to the B1393/M11 J7. The latter would not be acceptable, or at least certainly not without the sustainable transport option.

In addition, to ensure the development did not impact on the Forest's visual landscape amenity there would need to be a green open space protected within the southern section of the Latton Priory development envelope. This latter green space would also be required, in our view, to provide a substantial SANGC for the large number of residents of this site in order to further protect the Forest and the SAC which lies within 5km of this proposed development.

Therefore, given the above potential constraints and pitfalls, the sustainability of this development remains open to question in our view.

Infrastructure concerns in relation to Harlow

The current lack of infrastructure and the limited future funding from the Central Government or County Council for strategic infrastructure, which this scale of development demands, is of considerable concern to the Conservators. With M11 J7A becoming a priority, there seems to be no immediate plans for other infrastructure to cope with the proposed housing south and west of Harlow within the District.

The M11 J7A scheme, either in isolation or even with the limited road improvements planned elsewhere, seems unlikely in the Conservators' view to have a beneficial impact on Epping Forest and the current or predicted levels of traffic congestion, air and noise pollution within the Forest's road network.

This is borne out by the Traffic Forecast Modelling Report (TMF) provided for the 7A Scheme by Jacobs. The 'do minimum' (DM) traffic flow forecasts for 2021 and 2036 under the medium and high growth scenarios in Figures 11.4 and 11.5 (page 118 of the TMF) show very large increases in traffic flow along the A121 and B1393 within the Forest. For congestion, as illustrated by turn delays in Figures 11.9 to 11.12 (pages 128 & 129 of the TMF document), significant increases are also predicted in areas that are already suffering congestion – such as Crown Hill (Junction R in the TMF) and Bell Common (Epping signalised junction B in the TMF). It is also to be noted that the detail of Wake Arms roundabout and the A121 is not illustrated in the TMF report.

Such increases would not be environmentally sustainable for Epping Forest as they would have a detrimental impact on air quality (and thereby the integrity of the Special Area of Conservation(SAC)) and on the Forest's *natural aspect* (to be protected by The Conservators under the Epping Forest Act 1878).

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4. No comments at this stage

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5. Do you agree with the proposals for new employment development? (See Draft Policy E 1, Chapter 4).

The Conservators wish to raise concerns over the proposed development of **SR0061B** at Waltham Abbey. This lies close to J26 of the M25, and the A121 Woodricken Hill route through the Forest. Although the potential future use is not indicated, given the location of this site and probable access to it, there is potential to further add to the problems of congestion and pollution at J26 and along the A121 through the Forest.

6. Do you agree with the proposed sites in your area? (See Chapter 5) Do not feel that you have to comment on all of the areas.

These comments below should be read in the context of the responses to Questions 1 – 3 above and The Conservators have considerable reservations about a number of the proposed allocations for the reasons given. In addition there are some notable concerns:

The “densification” of Epping, whilst seemingly linked to its location on the Central Line, creates a very major cumulative development which the current road infrastructure would not be able to accommodate and which, given the routes to the motorway network is likely to have an adverse impact on pollution in Epping Forest. We await the detailed traffic modelling work which remains to be carried out before making further comments.

The allocation at Theydon Bois is a very large block of housing which would represent over 20% increase in the population of this settlement. This would need a SANG in our view, despite the lower than 400 house threshold (see HRA para 6.4.10).

At Loughton The Conservators would disagree with the proposed loss of green space at Borders Lane and Jessel Green. The latter site in particular, if lost, would place considerable pressure on the nearby Forest and also would seem to be in contradiction to the green infrastructure policies in the draft Plan. Such a large green space is currently valuable and has considerable potential to be developed for both access and for wildlife.

The large scale proposals at North Weald do not seem to have any concomitant infrastructure and this housing development could significantly increase road traffic through Epping Forest. It does not seem sustainable without considerable new transport infrastructure including a new link to the A414.

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7. Do you agree with the approach to infrastructure provision being proposed in the plan? (See Chapter 6).

DISAGREE

The current IDP is still very vague and little work seems to have been done on infrastructure other than the M11 junctions, considering a 21% increase in housing is proposed for the District. It is not at all clear how the required infrastructure will keep up with the pace of the development, as the Plan implies will be possible.

The Conservators would disagree with the seemingly, perhaps inadvertently, complacent statement in relation to the LSCC Core Strategy and Vision that the District is well-served by rail. As the IDP points out people are driving from Harlow to use the Theydon Bois Central Line Station and this situation seems likely to worsen with no clear rail strategy at Harlow. Harlow housing developments in the EFDC area will not be served by any improvements on present evidence.

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8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this. (See Technical Document page).

No comments at this stage

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9. Do you wish to comment on any other policies in the Draft Local Plan?

An important additional document, which we only received in the last two weeks of the consultation period, but which relates specifically to Epping Forest SAC, is the **Habitats Regulation Assessment Screening Report (Nov 2016)** by AECOM ('the HRA'). Additional comments on this document are given below.

ADDITIONAL COMMENTS

Urbanisation

In paragraph 5.2.8 of the HRA (AECOM Nov 2016) it states: *"the fact that urbanisation is not currently considered a significant problem, it is considered that additional development will not materially increase the risk posed to the site and certainly should not be an obstacle to*

***RESPONSE of THE CONSERVATORS of EPPING FOREST to
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION***

allocation". The Conservators disagree with this conclusion.

Although it is the case that the Site Improvement Plan (SIP) for the SAC does not specifically refer to the issues listed in the HRA as resulting from urbanisation, such as fly-tipping, cat predation and light pollution, the absence of a reference to an impact does not mean these are not problems, nor could be issues in the future.

Alien species introductions

Firstly, there is the direct impact of the introduction of alien species through fly-tipping and garden waste, which is exacerbated by urbanisation. One of the greatest current threats to the SAC and its vegetation is *Phytophthora ramorum* or Ramorum disease. This threatens the health of both Beech and the Forest's heathland plants. The fact that the disease has shown up in the Forest some distance from other UK outbreaks suggests that it has been introduced inadvertently at some point; it is relevant here that garden waste and plantings were the main source in the original spread of this disease across the counties of southern England. The HRA suggests that urbanisation impacts may be dealt with at a Project level (para 5.2.8 of the HRA). However, it is hard to see how a developer can mitigate for this adverse impact and we request that this needs to be tackled at Local Plan level with appropriate protective policies towards the Forest environment.

Secondly, recreational disturbance *is* an issue in the SIP and urbanisation of the Forest is likely to increase the adverse effects associated with this factor (e.g. in relation to ground-nesting birds, land management of heaths). Thirdly, it is hard to imagine how issues such as incidental arson can be resolved at project level and such issues are clearly best resolved with a strategic policy, i.e. at Local Plan level. **The Conservators, therefore, request that urbanisation impacts are fully taken into account in Local Plan policies with respect to the Forest.**

Fly-tipping and litter

In addition, there are several other long-standing issues, like fly-tipping, which result from urbanisation that are a considerable cause for concern to the Conservators. For example, the annual cost of dealing with fly-tipping and litter amounts to around £250,000 from the Forest's budget. Therefore, this has a significant indirect impact on the Conservators' ability to sustainably manage and enhance the Forest's environment, including its SAC special features.

400m buffer distance

Although the 400m distance has some precedence in considering the protection of an international site (e.g. SPAs), recent evidence suggests that this distance may not be sufficient for issues like cat predation. In addition, in this current HRA the 400m buffer is being used as a "trigger" threshold for mitigation rather than a buffer zone. Given this approach and the above concerns over urbanisation the Conservators would request that this suggested approach is reviewed and that a justification is given for the adoption of a 400m threshold or any other threshold that relates to the Forest habitats and interests. We would reiterate here that the SSSI habitats and the Forest's "natural aspect" should also be considered by the Local Plan in relation to urbanisation to ensure clarity of purpose in the protection of the irreplaceable.

**RESPONSE of THE CONSERVATORS of EPPING FOREST to
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION**

The threat of urbanisation to the Forest's "natural aspect" was highlighted in the 2003 *Quality of Life* Report (see above comments) of which EFDC were co-funders.

Recreation impacts

The large volumes of housing proposed in the current Plan will generate significant additional recreation pressures on the Forest. Although the 5km zone proposed in the HRA seems likely to be linked to the zone within which 75% of visits may be generated, housing outside this zone, particularly in concentrations such as at Harlow are likely to have a significant impact. It is necessary for the Plan to have regard to this in defining where impacts may arise and what mitigation is required. The HRA needs to recognise this distribution and the Plan needs to ensure that solutions will be in place.

Thresholds

Whilst we welcome the proposals in the HRA to tackle recreational pressures through the levying of a tariff for the Forest and the provision of SANGs it is not clear that the HRA, nor more importantly the Local Plan itself, has fully encompassed this issue of the scale of the proposed developments and the likely cumulative adverse impacts. As the HRA acknowledges on para 6.4.7 further work is needed on recreational pressures and the SAC Site Improvement Plan (SIP) also makes this point about the uncertainties involved.

The Conservators do not consider that setting a threshold of 400 houses in a single development, as recommended in the HRA at 6.4.10, is appropriate therefore. This 400-house threshold does not seem to have been devised on a precautionary basis and it is not clear what is the supporting evidence for such a threshold. In other cases, such as the Thames Basin Heaths, any development of 50 houses or more that is proposed within 5 and 7km needs to be the subject of project level HRA and may require additional mitigation measures. It is yet to be determined through the MoU process what the optimum approach is for Epping Forest SAC.

Any threshold is also susceptible to being circumvented. Instead we consider that the cumulative impacts need to be taken into account across a settlement. For example, there are very significant proposals below 400 houses such as the 360 houses at Theydon Bois or the cumulative total of 804 houses across 3 site allocations in Epping (SR0153, SR0069/33 and SR0113B). In doing so we would suggest that some consideration should be given to a sliding scale in relation to the size of the developments and the contribution of or towards SANGS and recreational provision in the Forest.

SANGS

Currently, in the *Recommendations* in **paragraph 6.4.10 of the HRA** (AECOM November 2016) only the development at Waltham Abbey (**SR0099**) of over 400 houses is listed as requiring a SANG. The Conservators consider that the Plan needs to adopt a much more proportionate requirement for SANGS across this area of the District to ensure the Forest's *natural aspect* and the SAC habitats are protected. This issue of green space and recreation is also tackled at the beginning of this letter in answers to Questions 1 and 2.

In relation to amounts of provision of green space we welcome the setting of a target. However, we consider the HRA should make clear that the 8ha per 1000 threshold is national established practice (not a standard) and, importantly, it should explain why it can be justified as being locally appropriate.

In addition to the overall quantum of SANG provision, consideration needs to be given to the length of walk that a SANG can provide. This requirement is additional consideration to the overall size to be provided; it is not an alternative means of quantifying the size, but can of course influence the size and shape of a SANG. Visitor surveys that incorporate questions relating to the typical walk undertaken are normally used to determine the length of walk required. Experience shows that this can differ in different locations, but in the absence of locally specific information, the distances used elsewhere in similar circumstances could be reviewed. Typical dog walks from other visitor surveys are in the region of 2.5km and so significant green space is necessary to accommodate such routes.

Air pollution

In relation to the Jacobs consultancy's AADT traffic modelling we reiterate our response made to the AECOM assessment of air quality and pollution impacts from traffic that further and better traffic modelling is required for the Forest roads and that congestion and queuing in general must be factored into the analysis. In addition, we reiterate the point that we do not accept that house allocations already made should be considered part of the *Do Minimum* scenario, as has been repeated in the HRA here (Appendix D of the HRA).

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Memorandum of Understanding on Epping Forest

Related to the HRA of the Plan there remains a significant amount of future assessment work to be carried out to ascertain the likely impacts on Epping Forest SAC and what mitigation strategies might need to be put into place. Therefore, in our view, and contrary to the view expressed in the HRA, it is necessary for the Plan to identify that recreational and other pressures need to be dealt with and that the MoU is part of this necessary process of analysis, and that mitigation is currently being progressed through the MoU.

In the light of this, on **page 30 of the Plan in the District Vision** we consider that the MoU should be included specifically in the relevant bullet point about the Forest as a key mechanism by which the Council aims to protect and enhance the Forest. In addition, in relation to the Plan and future developments that might enhance Epping Forest, the status of the MoU should be re-emphasised in **Policy DM3 A** also.

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