

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

**MATTER 5: SITE SELECTION METHODOLOGY  
AND THE VIABILITY OF SITE ALLOCATIONS**

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

**FEBRUARY 2019**

## **INTRODUCTION**

Epping Forest District Council ("the Council") submits this statement in response to the Inspector's Matters, Issues and Questions ("MIQs") (ED5). This statement addresses Matter 5: Site Selection Methodology and the Viability of Site Allocations and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 4 (ED5, pp 11-13).

This statement has been prepared with the assistance of Arup (Issues 1, 2 and 3) and Dixon Searle (Issue 4)

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

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

- [EB 805 Site Selection Report](#)
- [EB805AK Site Selection Methodology \(Appendix A\) and;](#)
- [EB301 Viability Study Stage 2](#)

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

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

**Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?**

**Inspector's Question 1**

- 1. The Council should provide a summary of the process by which the Plan's housing allocations were selected. In particular:**

**Response to Question 1**

1. The Council developed a site selection process to identify the most appropriate residential sites for allocation in the Local Plan Submission Version (LPSV). This is documented in the Site Selection Methodology (SSM) (EB805AK). The Council undertook two rounds of assessment of sites, which are referred to as 'tranches'; 1 paragraph 2.25 of the Site Selection Report (EB805) provides further details.
2. The process applied to the two tranches of sites was generally consistent. Paragraphs 2.14 to 2.19 of the Site Selection Report provide a summary of the process followed, with the detail of the process documented in Section 4 of the SSM.

**In particular:**

- a. How was the initial pool of sites for assessment identified?**

3. The Site Selection Report and SSM sets out the process followed for identifying the initial pool of sites for assessment for Tranche 1 and Tranche 2 sites.
4. In summary:
  - (a) Tranche 1 sites: the starting point for identifying sites was the Council's Strategic Land Availability Assessment (SLAA) (2016) (EB800, paragraph 2.4). Prior to these sites being assessed through the site selection process, they were filtered in accordance with the requirements set out in

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<sup>1</sup> The findings of the Tranche 1 assessment informed the Draft Local Plan subject to Regulation 18 consultation in October to December 2016. The findings of the Tranche 2 assessment informed the LPSV subject to Regulation 19 publicity in December 2017 and January 2018.

paragraph 4.6 of the SSM. Paragraph 2.28 of the Site Selection Report explains that additional sites were identified for assessment through the Council's rolling 'Call for Sites'.

- (b) Tranche 2 sites: additional sites were identified for assessment in accordance with the requirements of paragraph 4.53 of the SSM. Tranche 2 sites were subject to the same filters as Tranche 1 sites (in accordance with paragraph 4.6 of the SSM). Paragraph 2.35 of the Site Selection Report confirms that Tranche 1 sites were also reviewed to determine whether they remained 'live' proposals, which should continue to be considered through the site selection process. The checks undertaken to determine this are set out in paragraph 2.35 of the Site Selection Report; Appendix B1.2.1 Residential and Employment Sites Discounted from the Assessment identifies any sites which were removed from the site selection process at this point.

**b. How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?**

5. The SSM explains how the methodology utilised in the Site Selection Report was established. This can be summarised as follows:
- (a) The SSM was initially drafted in 2016 to inform the proposed site allocations included in the Draft Local Plan. Following the Draft Local Plan consultation and analysis of representations received, the SSM was updated to outline the process that would be followed to identify allocations in the LPSV (see paragraph 1.1 of the SSM for further details). These updates were undertaken in 2017.
- (b) The SSM acknowledges at paragraph 2.8 that the Planning Practice Guidance (PPG) is silent on the issue of site selection methodologies. Paragraph 4.1 of the SSM then goes on to note that the National Planning Policy Framework 2012 ("the NPPF") indicates a range of criteria pertinent to site selection and that the Council needed to establish the principal criteria that will inform appropriate site selection in the District. From a review of the NPPF, a series of criteria were identified for inclusion in the methodology.
- (c) To inform the Council's decision on the stages and criteria pertinent to site selection it reviewed good practice adopted by other local authorities. This identified:

- (i) A staged approach which enabled a proportionate approach to be adopted whereby sites were sifted/filtered out at each stage, with more detailed assessment being undertaken as sites progressed through the process (see paragraph 4.2 of the SSM);
  - (i) That the criteria used for in site selection methodologies are all similar and broadly cover suitability, availability and achievability considerations (see paragraph 4.3 of the SSM).
  - (ii) Some local authorities included local assessment criteria which are justified by reference to local circumstances and policy priorities (see paragraph 4.3 of the SSM). The Council identified a number of local circumstances/policy priorities which are reflected in the SSM. This includes the use of settlement buffer zones and the inclusion of Epping Forest Buffer Lands.
6. The Council considers the SSM to be robust. Paragraph 1.4 of the SSM sets out the 'tests' for an adequate site selection process. For the following reasons, that address the criteria relevant to site selection identified in national policy, the Council contends that these requirements have been met:
- (a) The evidence base must be robust – the Council considers that the evidence produced in support of the Local Plan meets the requirements of national planning policy.
  - (b) Assessments should be founded upon a cogent methodology – the SSM comprises a number of stages. For each stage the SSM provides a clear framework against which assessments were undertaken.
  - (c) Undertaken in a transparent manner and fully documented at key stages – the Site Selection Report and supporting appendices explain in detail how the SSM was applied and document the process followed.
  - (d) Professional judgements require justification and site selection decisions must be clearly explained – the supporting appendices to the Site Selection Report, particularly Appendix B, document the justifications for the professional judgements applied and explain the decision made.

**c. What is the relationship between the SSM and the sequential approach to site selection set out in Policy SP2(A)?**

7. The sequential approach to site selection identified in Policy SP 2A and the SSM are aligned. The SSM established a sequential approach to assessing and allocating sites to provide an effective mechanism to enable the Council to prioritise the allocation of previously developed land within settlements as priority ahead of identifying sites in the Green Belt as well as development located within Flood Zone 1 in accordance with national planning policy. In particular:
- (a) Focusing growth in and around Harlow represents the most sustainable approach to meeting the HMA's housing needs (see Matter 4, Issue 1). This reflects the inclusion of the Garden Communities at point (i) of Policy SP 2A.
  - (b) Points (ii) to (vii) directly relate to the hierarchy identified in paragraph 4.26 of the SSM.
  - (c) Point (viii) was identified to comply with the requirements of national policy regarding meeting the needs of rural communities.

**d. What was the role of the Sustainability Appraisal in selecting between the various sites?**

8. The Sustainability Appraisal (SA) objectives were integrated into the site selection process (refer to paragraph 6.27 (p 23) and Appendix IV of the Sustainability and Equalities Impact Appraisal (EB204)). The findings of the site selection work, representations received to the Draft Local Plan (2016) and wider evidence base informed the site options that were considered in the development of district-wide reasonable alternatives/spatial strategy options. An appraisal of the identified district-wide reasonable alternatives was carried out against the Sustainability Appraisal Framework (refer to paragraph 7.24 (p 35) onwards of the Sustainability and Equalities Impact Appraisal (EB204)). This informed the Council's preferred approach and therefore the selection and rejection of site options.
9. The SA and plan-making process assessed reasonable alternatives for different dispersal patterns. The updated evidence base and responses from the Issues and Options Consultation in 2016, informed five reasonable district-wide alternatives, including the preferred strategy. These are shown in Table 6.2 (p 27) of the SA Report (2017) (EB204), and explored a range of different growth options including higher growth in North Weald Bassett and along the Central

Line. Reasons for rejecting more concentrated patterns of growth were still considered valid. Further details are provided in paragraphs 6.52 to 6.56 (p 30) of the SA Report 2017 (EB204).

10. The reasonable alternatives were further refined in 2017 in finalising the spatial strategy within the LPSV. The Council identified and 'tested' three district-wide reasonable alternatives, informed directly by consideration of the latest available evidence (including transport modelling, the Employment Review (EB603), the Employment Land Supply Assessment (EB602)) and responses received to the Draft Local Plan consultation. The consideration of district-wide reasonable alternatives at this stage focused on exploring variations in terms of distributing the housing and employment needs based on the preferred spatial strategy. The alternatives were:
  - (a) Alternative A - 'Minimising change to the Draft Local Plan' - this considered the potential implications of a lower level of employment growth adjacent to Harlow;
  - (a) Alternative B - 'Exploring alternative travel patterns' - this considered a higher level of employment growth adjacent to Harlow; and
  - (b) Alternative C - 'School variation across the District ' - this considered a high level of employment growth adjacent to Harlow.
11. Technical assessment work was undertaken in order to further understand the potential implications of the three alternatives and inform the finalisation of site allocations in the Local Plan. Further details are provided within the Sustainability Appraisal (EB204) paragraphs 7.27–7.37 (pp 36-42).
12. Sites ultimately identified for allocation within the LPSV represented a hybrid of the three alternatives.

**e. Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account? Have Historic Impact Assessments been undertaken as recommended by Historic England and, if not, is this necessary?**

13. A wide range of evidence taken was taken into account – in addition to the Sustainability Appraisal and considered through the site selection process. This is documented in the Site Selection Report (2018) (EB805) and supporting appendices (see paragraph 16 for further details).

14. The historic environment was taken into account as part of the site selection process. In particular, the impact on heritage assets and archaeology was assessed for each site as part of the suitability assessment (see paragraph 17 below for further details). This assessment informed the Council's decision on which sites to allocate (both in determining whether a site suitable and in coming to a decision on which sites to allocate).
15. Historic Impact Assessments have not been undertaken for individual sites. The Council does not consider that this level of detailed assessment is necessary as part of the plan-making process and is more properly considered at the development management stage. Further details are set out in the Draft Statement of Common Ground with Historic England (Appendix 1 to this Hearing Statement) and amendments have been proposed to SP 4 to take account of the need for Historic Impact Assessments for the Garden Communities allocations.
16. Further information on how the site selection process utilised other evidence can be found in the following documents:
  - (a) Section 3 of the SSM (EB805AK) identifies some of the evidence prepared by the Council that informed the site selection outcomes;
  - (b) Table 1 of the SSM identifies the information sources including evidence utilised for Stage 1 and Stage 6.1 of the site selection process (major policy constraints);
  - (c) Appendix B1.4.1 Detailed Methodology for Stages 2 and 6.2 Assessment (EB805E) provides an explanation of the methodology and evidence used for the suitability assessment;
  - (d) Section 2.8 of Site Selection Report and Appendix B1.5.1 Categorising Sites for Further Assessment (EB805H) sets out the evidence utilised to inform judgements on the suitability of strategic options and individual sites;
  - (e) Appendix B1.5.3 Detailed Methodology for More Detailed Assessment for Housing Sites (EB805J) sets out how evidence informed the assessment of site capacity;
  - (f) Appendix B1.6.2 Detailed Methodology for Deliverability Assessment (EB805L) provides an explanation of the methodology and evidence used for the deliverability assessment.



17. In terms of considering the historic environment through the site selection process, regard should be had to the following:
- (a) Criteria 1.8a and 1.8b of the Stages 2/6.2 assessment considered the impact on heritage assets and archaeology. Appendix B1.4.1 Detailed Methodology for Stages 2 and 6.2 Assessment explains how the methodology adopted draws on the good practice set out in Historic England's Advice Note 3 'The Historic Environment and Site Allocations in Local Plans';
  - (b) The historic environment was considered as part of the Stage 3/6.3 suitability assessment and formed one of a range of criteria which were balanced to determine overall site suitability. Some sites were filtered out at this stage due to their impact on the historic environment;
  - (c) Where a proposed site allocation may have the potential to adversely affect the historic environment (including the setting of a heritage asset) appropriate site specific requirements are included in Appendix 6 to the LPSV (EB114A).

**Inspector's Question 2**

**2. How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desk-top process? What has been done to check the assessments in specific cases where their accuracy has been challenged e.g. Site SR-0596? (Reps 19LAD0012).**

***Response to Question 2***

18. The SSM makes explicit provision for quality assurance processes (see paragraphs 4.17, 4.21, 4.66 and 4.85) to ensure accuracy and consistency of assessments. The Site Selection Report confirms that these checks were undertaken.<sup>2</sup>
19. All sites assessed in the SLAA (EB800) were subject to site visits between 2012 and 2016 (paragraphs 2.9 and 2.10 provide more information). Site assessments were also undertaken in the formulation of evidence which informed the site

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<sup>2</sup> Refer to paragraphs 2.61 and 2.124, of the Site Selection Report 2018 (EB805) and page B190 of Appendix B1.4.1 Detailed Methodology for Stages 2 and 6.2 Assessment (EB805E).

selection assessment. The detailed methodologies for each of the stages of the site selection process (refer to paragraph 16 above, which provides further details of when desk-based and site-based assessment was utilised).

20. Paragraph 4.65 of the SSM explains that Tranche 1 sites were reviewed against representations received to the Regulation 18 Draft Local Plan consultation, some of which challenged the accuracy of the assessments. Appendix B1.2.3 Representations Received to Draft Local Plan consultation (EB805D) comprises a table listing the representations received and confirmation of any updates made to the assessment in response to the comments made.

**Inspector's Question 3**

- 3. 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 fully explained and justified?**

***Response to Question 3***

21. The changes to the proposed site allocations between the Draft Local Plan and LPSV were not due to changes in the site selection process. Additional sites were submitted to the Council (as part of Tranche 2), which were considered in accordance with the requirements of the SSM (paragraph 4.47-4.49).
22. The different conclusions reached about the relevant sites are fully explained and justified. Section 2.9.3 of the Report on Site Selection and Appendix B1.6.6 - Results of Identifying Sites for Allocation (EB805P) provide further details. Paragraph 80 of the judgment in the CK Properties case (EB127) also confirms that the Site Selection Report (EB805) adequately explains the rationale for the conclusions reached.

**Inspector's Question 4**

- 4. Having regard to Question 1c above, is the sequential approach to site allocation set out in Policy SP2(A) justified, particularly in respect of the value placed upon open spaces within settlements? How was the adequacy of remaining open space within a settlement measured (Policy SP2(A)(iv))?**

***Response to Question 4***

23. The Council considers the sequential approach to site allocation set out in Policy SP 2(A) is justified, particularly in respect of the value placed upon open spaces within settlements. The open space element of the sequential approach makes reference to open space within settlements where such selection would maintain adequate open space provision within the settlement. The sequential approach therefore acknowledges the value of open spaces whilst balancing it against other considerations in ensuring sustainable development in accordance with the requirements of national planning policy.
24. The site selection process measured the adequacy of remaining open space within each settlement through a cumulative achievability assessment. This assessed the site allocations proposed in each settlement in combination and looked at the impact of this development on open space provision within the settlement. Paragraph 4.87 of the SSM (EB805AK) and Section 3 of Appendix B1.6.2 Detailed Methodology for Deliverability Assessment (EB805L) explains the purpose of the cumulative achievability assessment and the methodology adopted to measure the adequacy of remaining open space within each settlement, which draws on the findings of the Open Space Strategy (EB703) and the Infrastructure Delivery Plan (EB1101A/B).

**Inspector's Question 5**

- 5. Now that the site selection process is complete for the purpose of making allocations in the Plan, is it necessary to include the sequential approach within Policy SP2(A)?**

***Response to Question 5***

25. The text on the sequential approach to identifying residential site allocations is set out at paragraph 2.66 of the LPSV. On reflection, the Council does not

consider this information should be repeated in Policy SP 2 and therefore proposes an amendment to this policy as follows:

- "A. Within the period 2011-2033 the Local Plan will provide for a minimum of 11,400 new homes. ~~allocated in accordance with the following sequential approach:~~
- ~~(i) The creation of Garden Town Communities around Harlow recognising its strategic economic role and needs;~~
  - ~~(ii) A sequential flood risk assessment — proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;~~
  - ~~(iii) Sites located on previously developed land within settlements;~~
  - ~~(iv) Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;~~
  - ~~(v) Previously developed land within the Green Belt;~~
  - ~~(vi) Greenfield/Green Belt land on the edge of settlements:
    - ~~— Of least value to the Green Belt if the land meets other suitable criteria for development.~~
    - ~~— Of greater value to the Green Belt if the land meets other suitable criteria for development.~~
    - ~~— Of most value to the Green Belt if the land meets other suitable criteria for development.~~~~
  - ~~(vii) Agricultural land:
    - ~~— Of Grade 4-5 if the land meets other suitable criteria for development.~~
    - ~~— Of Grade 1-3 if the land meets other suitable criteria for development.~~~~
  - ~~(viii) Enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well-being of that community.~~

The new homes will be distributed as follows:" [this should form the final sentence of Part A. Paras C onwards to be renumbered].

**Inspector's Question 6**

**6. 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-term disruption to commuter parking during the construction phase be addressed?**

***Response to Question 6***

26. The Council considers that the allocation of station and other car park sites for housing is justified. It accords with national planning policy, in particular: (1) encouraging effective use of land by reusing previously developed land, provided that it is not of high environmental value (para 17, bullet 8 of the NPPF); and (2) makes the fullest possible use of public transport and focuses development in locations which are sustainable (para 17, bullet 11 of the NPPF). The proposed site allocations also accord with the sequential approach set out in the LPSV whereby previously developed land is prioritised over greenfield sites. The detailed justification for why each site has been allocated is provided in Appendix B1.6.6 Results of Identifying Sites for Allocation (EB805P).
27. Adequate parking for both commuters and residents can be provided. The Settlement Capacity Study (EB803) establishes the feasibility of residential-led development above decked, under-croft or basement parking to re-provide (as a minimum) the existing number of commuter parking spaces already on-site and providing additional parking to meet the needs of the development (in accordance with Part F (iv) of Policy T1 in the LPSV). High-level feasibility designs for proposed site allocations EPP.R3, EPP.R6, EPP.R7 and LOU.R2 are included in Appendix 8 of the study (EB803H). This requirement is secured for the relevant sites through Appendix 6 to the LPSV (EB114A).
28. The Council recognises the importance of ensuring that short-term disruption to commuter parking during the construction phase is minimised. This can be addressed through careful development phasing, layout and design which will be agreed with the Council and appropriately secured through the development management process. The Council proposes a modification to the site specific requirements contained in Appendix 6 to the LPSV for each of the car-park sites (EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2, BUCK.R, EPP.R6, EPP.R7) to address this matter, through the insertion of the following text:

"Development proposals should demonstrate how disruption to commuter parking during the construction phase can be minimised. This should include through the submission of Construction Management Statements in accordance with Part D of Policy DM 21."



**Issue 2: Have the Plan's allocations for Gypsies & Travellers and Travelling Showpeople been chosen on the basis of a robust assessment process?**

**Inspector's Question 1**

- 1. The Council should provide a summary of the process by which the Plan's allocations for Gypsies & Travellers and Travelling Showpeople were selected.**

***Response to Question 1***

29. The Council's site selection process to identify the most appropriate sites for allocation in LPSV (EB114A) is documented in the Traveller Site Selection Methodology (TSSM) (EB805AI), which complies with matters outlined in paragraph 10a) and b) of the Planning Policy for Travellers Sites (PPTS), DCLG, 2015. Where possible, the Council has aligned the process for identifying traveller site allocation with that adopted for residential and employment sites. This consistency in approach was adopted to ensure a robust, fair and comprehensive process was undertaken for all types of site allocations, which complied with national policy and guidance.
30. The Council undertook three rounds of assessment of potential sites, which are referred to as 'tranches'.<sup>3</sup> The way the TSSM was applied to the three tranches of sites was generally consistent. Paragraphs 3.24 to 3.29 of the Report on Site Selection (EB805, pages 55 to 57) provide a summary of the process followed, with the detail of the process documented in the Site Selection Methodology section of the TSSM (EB805AI).
31. The TSSM outlines a staged process consisting of Stages 1-7 culminating in the Draft Local Plan sites followed by Stages 8.1-8.6 culminating in the final proposed allocations of the LPSV.

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<sup>3</sup> The findings of the Tranche 1 and 2 assessment informed the Draft Local Plan subject to Regulation 18 consultation in October to December 2016. The findings of the Tranche 3 assessment informed the LPSV subject to Regulation 19 publicity in December 2017 and January 2018.

**In particular:**

**a. How was the initial pool of sites for assessment identified?**

32. The Site Selection Report (EB805) paragraph 3.4 page 57 and TSSM (EB805A) paragraph 16 page D5 set out the process followed for identifying the initial pool of sites for assessment for Tranche 1, 2 and 3 sites.
33. In summary:
- (a) Tranche 1 and 2 sites: The initial pool of sites was identified during Stage 1: Identifying Sites for Consideration divided into two sub stages - Stage 1a: Narrowing Broad Locations to Sites, and Stage 1b: Intensification and/or extension of existing sites of the TSSM. The sources of information used to identify the initial site pool are listed in paragraph 16 of the TSSM, which are in line with PPG (Reference ID: 3-011-20140306). Prior to these sites being assessed through the site selection process, a sieving process using desk-based analysis together with records held by the Council was undertaken in accordance with the requirements of the TSSM. The Site Selection Report (Section 3.4.1) and Appendix E1.3 – Stage 1 Assessment of Travellers Sites (EB805T) document the findings of the sift.
  - (b) Tranche 3 sites: The pool of sites was supplemented at Stage 8: Review of Candidate Preferred Traveller Sites of the TSSM following the Regulation 18 consultation on the Local Plan.
    - (i) Stage 8.1: Identifying sites for Consideration sets out the sources of information used to identify this pool of sites in paragraph 71 of the TSSM. These sources incorporated updates to technical information received by the Council and a review of the representations received on the Regulation 18 Plan.
    - (ii) Paragraph 76 of the TSSM explains that Tranche 1 and 2 sites that had been previously filtered out at Stage 3 due to their location outside of settlement buffer zones should also be reintroduced. The Tranche 3 sites were identified for assessment in 2017. Paragraph 3.39 of the Site Selection Report confirms that Tranche 1 and 2 sites were also reviewed to determine whether they remained 'live' proposals, which should continue to be considered through the site selection process. The checks undertaken to determine this are set out in paragraph 3.39 of the Site Selection Report; Appendix E1.2 Traveller Sites Withdrawn from the Assessment after Stage 1 and Stage 2 (EB805S) identifies any sites which were removed from the site selection process at this point.



**b. How was the Traveller Site Selection Methodology (TSSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust? Is it consistent with national policy in the Planning Policy for Traveller Sites?**

34. The TSSM was initially drafted in 2016 (EB801P) to inform the proposed site allocations included in the Draft Local Plan. Following the Draft Local Plan consultation and analysis of representations received, the TSSM was updated to outline the process that would be followed to identify allocations in the LPSV (see paragraph 3.27 for further details). These updates were undertaken in 2017.
35. The TSSM explains how the methodology utilised in the Site Selection Report was established and how it is consistent with the national policy in the NPPF, PPTS and PPG. Paragraph 14 of the TSSM (page D5) highlights the factors taken into account when developing the TSSM. Further specific references within the TSSM set out the relevance of the PPTS at that point in the process (paragraphs 13-15,19-20, Table 1 - page D8, paragraphs 25, 40 and 49-50).
36. Paragraphs 4 to 11 of the TSSM (pages D1 – D4) set out the key aims and requirements of the PPTS. The Council considers that these requirements have been met and, therefore, the TSSM is consistent with national policy, and that the staged process and criteria used within the TSSM are robust.

**c. What is the relationship between the TSSM and the sequential approach to site selection set out in Policy SP2(D)?**

37. The sequential approach to site selection in Policy SP 2(D) and the TSSM (are aligned. The TSSM established a sequential approach to assessing and allocating sites to provide an effective mechanism to enable the Council to prioritise the regularisation of sites with temporary permissions or unauthorised sites as well as development located within Flood Zone 1 in accordance with national planning policy.
38. Having identified the site pool and taken sites through the consequent Stages 2-4/8.3 – 8.4 of the TSSM the Council reached Stages 5/8.5: Identify candidate preferred traveller sites. The first step in the sequence of Stage 5/8.5 was a sequential flood risk assessment. This was then followed by the application of the sequential approach set down in SP 2 (D) to identify the candidate preferred traveller sites as described at page D16 paragraphs 48-55 of the TSSM. The considerations at this stage focussed on points (i) – (iv) of Policy SP 2 (D) as explained at pages D17-D18, paragraphs 51-55 of the TSSM. The outcomes of

Stages 5/8.5 are presented in Appendix E1.7 Results of Stage 5 and Stage 8.5 Results of Identifying Sites for Further Testing (EB805X).

**d. What was the role of the Sustainability Appraisal in selecting between the various sites?**

39. The role of the sustainability appraisal in selecting between the various sites was twofold:
- (a) The strategic sustainability appraisal was undertaken at Stage 7: Sustainability Appraisal/Habitats Regulation Assessment of candidate Preferred Travellers Sites of the TSSM during the production of the Draft Local Plan and again post completion of Stages 8.1 - 8.6. The strategic choices made regarding the options for the spatial strategy in terms of the distribution of allocated sites in the District and size of sites for Travellers and Travelling Showpeople were subject to the sustainability appraisal. The Interim Sustainability Appraisal Report for the Epping Forest District Local Plan (EB202) identified that the approach performed well (page 36, paragraph 10.8.6). The full results of that assessment are set out in Sustainability and Equalities Impact Appraisal 2017 (EB204) at page 95, Appendix III. They identify that the site size choices and distribution choices made are favourable. These strategic choices influenced the final selection of sites for the LPSV (EB114A). This is also recorded in detail in the Site Selection Report at paragraphs 3.57- 3.68.
  - (b) The TSSM and site selection process explicitly integrated the sustainability appraisal through the chosen site assessment criteria. These were developed with the explicit purpose of reflecting the sustainability appraisal framework. The criteria used in the quantitative and qualitative assessment at Stages 4 and 8.4 Quantitative and Qualitative Assessment are found in the TSSM (pages D27 – D48). These can be compared to the sustainability appraisal framework contained in Interim Sustainability Appraisal Report for the Epping Forest District Local Plan (EB202) at page 6 in Table 4.1. The performance of sites against these criteria was fundamental to the selection of sites from the pool available as written up in the Site Selection Report (page 63 section 3.7).

**e. Was any other evidence/factors taken into account in the site selection process?**

40. A wide range of evidence was considered throughout the site selection process, in addition to the Sustainability Appraisal, which is documented in the TSSM and Site Selection Report and supporting appendices. Further information on how the site selection process utilised other evidence can be found in the following documents:

- (a) Paragraphs 40-41 of the TSSM refer to the information sources including evidence utilised for Stage 3 and Stage 8.3 of the site selection process (major policy constraints) (Section 3.47 of the Site Selection Report.<sup>4</sup>
- (b) Paragraphs 43-45 of the TSSM provide an explanation of the methodology and evidence used for the suitability assessment. The assessment was undertaken using the same approach as for residential and employment sites; further detail can be found in Section 3.7 of the Site Selection Report and Appendix B1.4.1 Detailed Methodology for Stages 2 and 6.2 Assessment.
- (c) Paragraphs 48-55 of the TSSM set out the methodology and evidence utilised to inform judgements on identifying candidate preferred traveller sites, to include:
  - (i) identifying suitable spatial options to accommodate growth,
  - (ii) defining optimal site sizes,
  - (iii) assessing site suitability,
  - (iv) assigning sites against the land preference hierarchy and identifying sites for further testing; and
  - (v) checking site capacities.

Further detail can be found in Section 3.8 of the Site Selection Report (EB805)

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<sup>4</sup> As referenced on Page 62 of the Report on Site Selection (EB805) it should be noted that there is an error in paragraphs 40 and 41 of the TSSM. The references made to Table 1 should refer to Table 1 in the SSM.

- (d) Paragraphs 57 to 64 of the TSSM provide a full explanation of the methodology and evidence used for the deliverability assessment. The assessment was undertaken using similar criteria as for residential and employment sites, except for marketability and viability which were less relevant to traveller sites; further detail can be found in Section 3.9 of the Site Selection Report and Appendix B1.6.2 Detailed Methodology for Deliverability Assessment (EB805L).
- (e) Paragraphs 3.100 and 3.101 of the Site Selection Report highlight the factors used in coming to a final view on site allocations as noted at paragraphs 86 – 95 of the TSSM

**Inspector's Question 2**

**2. Is the sequential approach to delivering accommodation for Gypsies & Travellers and Travelling Showpeople justified in respect of the following issues in particular:**

***Response to Question 2***

- 41. For the reasons set out below, the Council considers the sequential approach to delivering accommodation for Travellers and Travelling Showpeople to be justified.

**a. How have the benefits of seeking to regularise existing unauthorised sites and sites with temporary permission been weighed against the potential harms, including to the countryside and Green Belt? Will this lead to the concentration of Traveller sites in certain areas, such as Roydon**

- 42. The overall methodology for site selection supported the balancing of a wide range of factors to reach decisions on proposed site allocations for the LPSV (EB114A). The potential harm to the Green Belt, judged through the quantitative and qualitative criteria in the TSSM at Stage 4 and 8.4: Quantitative and Qualitative Assessment, was balanced in the final decision-making process on a site by site basis against the benefits arising from a site already in use as a traveller site. Local knowledge was included as a consideration in this process (paragraph 3.101 of the Site Selection Report) and instances were acknowledged when on the whole there is a harmonious relationship between the existing travelling and settled communities.

43. The status of a site already in use as a Travellers' site was a consideration in identifying the initial site pool at Stage 1: Identifying Sites for Consideration of TSSM and was a favourable consideration, subject to other constraints at Stage 5 and 8.5: Identify Candidate Preferred Sites. It was recognised that the practical solution of enabling the extension or intensification of existing sites could bias the allocation process toward further concentrations of sites in areas where sites already existed, including in favour of sites in the Green Belt. This was a key reason for applying the spatial choice of distributing sites throughout the District (Table 3.76: Spatial options assessment in the Site Selection Report).
44. The site selection process sought to avoid over-concentration of traveller site development in certain areas, such as Roydon, by explicitly making this a consideration in the decision-making on the final site allocations as documented in Appendix E1.8.3 Results of Identifying Sites for Allocation (EB805AA).

**b. Is it justified to prioritise the provision of new sites in the countryside and Green Belt over making provision as part of the development of other allocated sites?**

45. The Council has not prioritised the provision of new sites in the countryside and Green Belt over provision as part of other allocated sites. Rather it has applied a sequential approach as outlined in Policy SP 2 Part D of the LPSV [p31-32] and paragraph 51 of the TSSM [p D17], recognising that it is unrealistic to provide for the needs of Travellers without searching in the Green Belt given that over 92% of the District is designated as Green Belt and all of the land designated as countryside is Green Belt.
46. As set out in paragraphs 3 – 11, the TSSM aims to meet the provisions of national policy within the PPTS [pp D1 – D4]. Specifically:
- (a) to ensure that more private traveller site provision is promoted (paragraph 4 of the PPTS);
  - (b) to reduce tension between settled and traveller communities in plan-making and planning decisions (paragraph 4 of the PPTS);
  - (c) the importance of ensuring a supply that is deliverable hence supported by available sites (paragraph 10 of the PPTS).
  - (d) to require the land supply allocations to be guided to where there is identified need (paragraph 11 of the PPTS). It should be noted that over half the need arising from Travellers and Travelling Showpeople in the District comes from household formation (page 16, Figure 13, Epping Forest District Council: Gypsy, Traveller and Travelling Showpeople

Accommodation Assessment Need Summary Report (Final Version) September 2017 (EB402E2). Stages 6/8.6 of the TSSM requires that in identifying sites for allocation, the need arising from specific households and the extent to which such needs can be met on sites currently occupied by the household, should be taken into account.

47. The sequential approach adopted by the Council guides development first towards existing sites, which historically have been located in the Green Belt. Thereafter the search for new sites looks to areas which are not in the Green Belt before the Green Belt. Whilst it is the case that the allocation of sites as part of the new strategic housing site allocations currently involves land within the Green Belt, this will not be the case upon the adoption of the LPSV as a consequence of the amended Green Belt boundary. The Council therefore considers that it has adopted a justified and effective approach which is consistent with national policy.

**Issue 3: Have the Plan's new employment allocations been chosen on the basis of a robust assessment process?**

**Inspector's Question 1**

**1. How were the five new employment site allocations chosen from the alternatives indicated to be suitable in the Employment Land Supply Assessment?**

***Response to Question 1***

48. The Council utilised a site selection process to identify the most appropriate employment sites for allocation in the LPSV. Broadly, the same approach was adopted for residential and employment sites; where any differences in approach were taken this is documented in Section 4 of the Site Selection Methodology ("SSM"). This consistency in approach was adopted to ensure a robust, fair and comprehensive process was undertaken, which complied with national policy and guidance.
49. The Council undertook two rounds of site assessment; Section 4.3 of the Site Selection Report explains how the Tranche 1 and Tranche 2 sites were identified and assessed. For Tranche 2 sites this included, but was not limited to, sites recommended for inclusion in the site selection process in Table 17 of the Employment Land Supply Assessment (EB602).
50. The Council selected the five new employment site allocations based on the assessment outcomes of the site selection process. Paragraphs 4.12 to 4.18 of the Site Selection Report provide a summary of the site selection process followed to identify the employment allocations in the LPSV, with the detail of the process documented in Section 4 of the SSM. The results from each stage of the employment site selection process can be found in the following documents:
- (a) An overview of the results of the employment site selection including the stage at which sites were filtered out is provided at Appendix F1.1 Overview Assessment of Employment Sites (EB805AB).
  - (b) The results of Stage 1 and Stage 6.1 (Major Policy Constraints) are provided in Appendix F1.2 [Results of Stage 1 and Stage 6.1 Assessment](#) (EB805AC).
  - (c) The results of Stage 2 and Stage 6.2 (Qualitative and Quantitative Assessment) are provided in Appendix F1.3 Results of Stage 2 and Stage 6.2 Assessment (EB805AD).

- (d) The results of Stage 6.3 (Identify Candidate Preferred Sites) are provided in Appendix F1.4 Results of Identifying Further Sites for Testing (EB805AE).
- (e) The results of Stage 6.4 (Deliverability Assessment) are provided in Appendix F1.5.2 Results of Stage 6.4 Deliverability Assessment (EB805AG).
- (f) The justification for the selection of the five new employment site allocations is provided in Appendix F1.5.3 Results of Identifying Sites for Allocation (EB805AH).



**Issue 4: At the broad strategic level, are the Plan's allocations financially viable?**

**Inspector's Question 1**

- 1. Having regard to paragraph 173 of the NPPF, are the Plan's allocations for housing (including for Travellers) and employment financially viable, having regard to the normal cost of development and mitigation; and all relevant policy costs, including for affordable housing, space standards, building requirements, design and potential infrastructure contributions?**

***Response to Question 1***

51. The LPSV has been prepared in accordance with paragraph 173 of the NPPF, and the Council is satisfied that the sites and the scale of development identified in the Plan will not be subject to such a scale of obligations and policy burdens that the ability for sites to be developed viably will be threatened. The Council has considered development viability throughout the LPSV's preparation.
52. The LPSV has been informed and is supported by two stages of viability assessment. The Stage 1 Assessment of the Viability of Affordable Housing, Community Infrastructure Levy and Local Plan (EB300) reviewed viability at a high level and considered potential options for policy development. The Viability Study Stage 2 (EB301) tested the emerging policy position and provided up to date recommendations taking into account regular development costs and policy costs.
53. Accordingly, the Council has taken fully into account matters over which it has a level of control or influence (such as the policy requirements within the LPSV which can impact on viability) and set out an appropriate approach as a result of assessing this, so that this ability to develop viably is not unduly affected.
54. There are, however, a range of key factors outside the Council's scope of influence, relating to the market and the inherently variable strength of relationships between general development values and costs. It follows that, viewed currently, there are some types of development, such as at least some forms of speculative development, that are indicated through the viability assessment to have at best mixed prospects of coming forward, as opposed to the generally good prospects for delivery found across the review of residential development. Where types of development have been found to have poor or mixed viability prospects this is not as a result of the LPSV policy requirements. It is appropriate to recognise these dynamics.
55. The assessments have considered the viability of both residential and commercial (including employment) development. Section 3.3 of EB301 (pp 79 –

80) considers the viability of commercial / non-residential development. The viability of traveller allocations has not been specifically assessed throughout the plan preparation process. However, there is no indication that the sites and pitches cannot be delivered viably given that the sites are predominantly . sites are currently on Greenfield / Green Belt land and will therefore have a relatively low existing use value and given the absence of any specific . policy requirements within the LPSV that would threaten the viable delivery of these sites.

56. Appendix 1 of the Stage 2 viability assessment (EB301A) sets out the assumptions that have informed the modelling and assessment process. This includes details of how relevant policy costs have been applied (p.6-8), including costs for affordable housing, space standards, building requirements, design and potential infrastructure contributions.
57. Given the iterative nature of viability assessment, and the quantity and scale of Local Plan allocations, the viability assessments have not considered specific individual infrastructure costs. However, the Council will continue to assess and consider the viability of proposals relating to the Local Plan, taking into account any changes to the CIL Regulations and proposed arrangements for S106 pooling and CIL. In this regard, further work is currently being undertaken on behalf of the Garden Town local authorities (East Herts District Council, Harlow District Council, Epping Forest District Council, Essex County Council and Herts County Council) through the production of the Harlow and Gilston Garden Town Viability Study in order to assess the viability of the strategic sites within the Garden Town. This Viability Study will take into account the site-specific infrastructure requirements and contributions established by the emerging Garden Town Infrastructure Delivery Plan. Both the IDP and Strategic Viability Study are being informed by an ongoing process of engagement with stakeholders, including infrastructure providers and developers. This accords with national planning policy and best practice. The findings of the Studies will be reported to the Garden Town Developer Forum and endorsed by the Garden Town Member Board in Spring 2019.
58. Section 3.4.2 of the Stage 2 viability assessment (EB301A) finds the Local Plan to have "good prospects of delivery – i.e., to be capable of meeting the requirements of NPPF 173 and 174, the cumulative impacts of which are unlikely to unduly undermine viability at the overall ... delivery level".

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

<b>Reference</b>	<b>Name</b>	<b>Author</b>	<b>Date</b>
EB1101A/B	<a href="#">Infrastructure Delivery Report: Part A Part B</a>	Arup	2017
EB114A	<a href="#">Local Plan Submission Version - Appendix 6 Site Specific Requirements</a>	EFDC	2017
EB127	<a href="#">Approved Judgment - CK properties v Epping Forest District Council</a>	High Court of Justice	2018
EB202	<a href="#">Interim Sustainability Appraisal Report for the Epping Forest District Local Plan</a>	AECOM	2016
EB204	<a href="#">Sustainability and Equalities Impact Appraisal</a>	AECOM	2017
EB300	<a href="#">Stage 1 Assessment of the Viability of Affordable Housing Community Infrastructure Levy and Local Plan</a>	Dixon Searle Partnership	2015
EB301	<a href="#">Viability Study Stage 2</a>	Dixon Searle Partnership	2017
EB301A	<a href="#">Appendix I – Assumptions Summary</a>	Dixon Searle Partnership	2017
EB402	<a href="#">Epping Forest District Council: Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Summary Report</a>	Opinion Research Services	2017

**Matter 5: Site Selection Methodology and the Viability of Site Allocations**  
**Statement by Epping Forest District Council**  
**February 2019**

<b>Reference</b>	<b>Name</b>	<b>Author</b>	<b>Date</b>
EB602	<a href="#">Employment Land Supply Assessment</a>	Arup	2017
EB703	<a href="#">Open Space Strategy</a>	4global	2017
EB800	<a href="#">Strategic Land Availability Assessment</a>	Nathaniel Linchfield & Partners	2016
EB801P	<a href="#">Appendix D – Traveller Site Selection Methodology</a>	Arup	2016
EB803	<a href="#">Settlement Capacity Study Epping Forest District Council</a>	Fregonese Associates	2016
EB805	<a href="#">Site Selection Report</a>	Arup	2018
EB805AB	<a href="#">Appendix F1.1 - Overview Assessment of Employment Sites</a>	Arup	2018
EB805AC	<a href="#">Appendix F1.2- Results of Stage 1 and Stage 6.1 Assessment</a>	Arup	2018
EB805AE	<a href="#">Appendix F1.4 - Results of Identifying Sites for Further Testing</a>	Arup	2018
EB805AG	<a href="#">Appendix F1.5.2 - Results of Stage 6.4 Deliverability Assessments</a>	Arup	2018
EB805AH	<a href="#">Appendix F1.5.3 - Results of Identifying Sites for Allocation</a>	Arup	2018
EB805AI	<a href="#">Appendix D Traveller Site Selection Methodology</a>	Arup	2018
EB805AK	<a href="#">Appendix A – Site Selection Methodology</a>	Arup	2018

**Matter 5: Site Selection Methodology and the Viability of Site Allocations**  
**Statement by Epping Forest District Council**  
**February 2019**

<b>Reference</b>	<b>Name</b>	<b>Author</b>	<b>Date</b>
EB805B	<a href="#">Appendix B1.2.1 - Residential and Employment Sites Discounted from the Assessment</a>	Arup	2018
EB805D	<a href="#">Appendix B1.2.3 - Representations received to Draft Local Plan consultation</a>	Arup	2018
EB805E	<a href="#">Appendix B1.4.1 Detailed Methodology for Stages 2 and 6.2 Assessment</a>	Arup	2018
EB805H	<a href="#">Appendix B1.5.1 - Ranking Sites for Further Assessment</a>	Arup	2018
EB805J	<a href="#">Appendix B1.5.3 - Detailed Methodology Capacity Assessment</a>	Arup	2018
EB805L	<a href="#">Appendix B1.6.2 Detailed Methodology for Deliverability Assessment</a>	Arup	2018
EB805P	<a href="#">Appendix B1.6.6 - Results of Identifying Sites for Allocation</a>	Arup	2018
EB805S	<a href="#">Appendix E1.2 Traveller Sites Withdrawn from the Assessment after Stage 1 and Stage 2</a>	Arup	2018
EB805T	<a href="#">Appendix E1.3 – Stage 1 Assessment of Travellers Sites</a>	Arup	2018
EB805X	<a href="#">Appendix E1.7 Results of Stage 5 and Stage 8.5 Results of Identifying Sites for Further Testing</a>	Arup	2018

# Appendix 1

# **Epping Forest District Local Plan Submission Version 2017**

## **Statement of Common Ground between Epping Forest District Council and Historic England**

**February 2019**

### **Summary**

This Statement of Common Ground (SoCG) has been prepared by Epping Forest District Council (the Council) and Historic England (HE) to inform the Inspector and other interested parties about the areas of agreement and matters not yet agreed between the two parties for the purpose of the examination of the Epping Forest District Local Plan Submission Version 2011 - 2033 (referred to hereafter as the Local Plan Submission Version or LPSV).

### **1.0 Background**

- 1.1 The Council is the Local Planning Authority responsible for the production of the Local Plan for Epping Forest District. HE is the public body that protects historic places in England. This SoCG focuses on the matters which are relevant to the two parties and is provided without prejudice to other matters of detail that the parties may wish to raise during the examination.
- 1.2 The Council has engaged with HE through official Local Plan stages and separate consultations such as ad hoc presentations to the Co-operation for Sustainable Development Officers Group.
- 1.3 Historic England submitted representations to both the Regulation 18 consultation and the Regulation 19 publication. The Draft Local Plan was consulted on in October to December 2016. The Regulation 18 response from HE gave some general comments on individual policies and more detailed comments on the draft allocations included in the Draft Local Plan. The Council reviewed the comments made at Regulation 18 and incorporated any comments made specifically on draft allocations into the second round of the site selection process.
- 1.4 The Regulation 19 Local Plan Submission Version (LPSV) was published and representations sought in December 2017 to January 2018. The representation submitted to the Council dated 29 January 2018 covered the following main comments:
  - i. The use of wording in the Local Plan vision and other key policies and whether it best reflected national guidance.
  - ii. HE requested a change to the wording of the vision for the London Stansted Cambridge Core Area.

- iii. The need to carry out Heritage Impact Assessments for the Garden Town Communities to discern the level of impact on the historic environment and any potential mitigation measures necessary.
- iv. HE expressed concern that there were no references to known heritage assets within or in close proximity to the Garden Communities in the policy.
- v. HE questioned the wording and evidence for Policy DM 12 on Subterranean, base development and lightwells.
- vi. The weight of Appendix 6 to the Plan was questioned, with HE expressing that inclusion of heritage assets in the policy text would ensure that they were given greater significance.
- vii. Site or area specific comments relating to the relationship to key heritage assets.

## **2.0 Areas of Common Ground**

- 2.1 The Council and HE have agreed a number of areas of common ground which will require modifications to the Plan. The Council will propose modifications to the Inspector for incorporation in the Local Plan in line with the modifications set out in Appendix 1 (Resolved Objections) of this document. If the Inspector is minded to accept these proposed modifications, these modifications will address the issues raised by HE.
- 2.2 The Council and HE have also agreed a number of representations which HE notes the Council's position on and will therefore be making no further comments to their submitted representations. These are incorporated in Appendix 1.

## **3.0 Areas of Uncommon Common Ground**

- 3.1 All outstanding objections are detailed in Appendix 2 with a summary of each parties' position on the respective objections. These issues relate to the Vision, strategic policy SP5 (Garden Town Communities) and site allocations SP5.1 (Latton Priory), SP5.2 (Water Lane Area) and SP5.3 (East of Harlow). Supplementary information on heritage matters relating to the strategic site allocations is provided in appendix 3.
- 3.2 Both parties acknowledge that this SoCG does not preclude any further written or verbal representations that EFDC or HE may wish to make as part of the Local Plan Examination, in relation to any other matters which may not have been agreed and/or which do not form part of this SoCG.

## **4.0 Legal Compliance and Duty to Co-operate**

- 4.1 All the representations HE made to the LPSV are in relation to soundness matters as defined under paragraph 182 of the 2012 NPPF. Both EFDC and HE have complied with their Duty to Co-operate to date and continue to engage proactively with each other.



## 5.0 Signatures

Name	
Position	
Signature	
Organisation	Epping Forest District Council
Date:	

Name	
Position	
Signature	
Organisation	Historic England
Date:	

## Appendix 1 – Resolved Objections

For proposed modifications, underlined text = new text suggested, and ~~Strikethrough text~~ = text proposed for removal

### Objections in relation to heritage matters

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
1	Chapter 1: Introduction. Paragraph 1.44	4 - Consistent with National Policy Recommend that the wording referring to “historical artefacts and buildings” be amended to better reflect national policy and improve soundness of the plan	Revise wording of Paragraph 1.44 to refer to “historic environment” rather than “historical artefacts and buildings”. This will better reflect national policy and improve the soundness of the plan	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 1.44  <u>Protecting and enhancing the historic environment</u> <del>historical artefacts and buildings</del> , protected trees, hedgerows and landscape.
2	Paragraph 2.26	3 – Effectiveness Although welcome recognition of character as a contributor to creation of locally distinct places, the Vision should be strengthened to better emphasise the aspiration of conserving or enhancing the historic environment.	Revise wording of Paragraph 2.26 to change “maintain and enhance the special character of the area” to “maintain or enhance” in point A(i). Amend A(iv) to include reference to “high quality built, natural and historic environment, unique landscapes”.	HE notes the Council’s position and will be making no further comments on this representation.  The Vision for the LSCC Core Area was agreed in the Memorandum of Understanding for the Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area to which EFDC are a signatory to. The specific wording for the vision was included as an appendix to the MoU and all signatory authorities agreed to include it in their Local Plans. The Council therefore cannot make any changes to this section of the LPSV.
3	Paragraph 2.27 – Vision for the District	4 - Consistent with National Policy The Plan’s strategic policies will derive from the Vision so there needs to be sufficient aspirations in the Vision for the maintenance and enhancement of the historic environment as a strand in the pursuit of sustainable development as defined by paragraph 14 of the NPPF. This will help to ensure that associated strategic policies incorporate a positive and clear strategy to deliver the conservation and enjoyment of the historic environment (linked to paragraphs 126 and 157 of the NPPF)	Revise wording of Paragraph 2.27 (Vision for the District) to include bullet point (vi)  Vision should be locally specific to Epping Forest District and reference types of heritage assets / character of settlements found in the district. Should refer explicitly to ‘conserving and enhancing’ the historic environment. Add bullet point which reads “the historic environment will be conserved and enhanced”.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 2.27 - Vision for the District  <u>‘(vi) the historic environment will be conserved or enhanced’</u>

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
			Vision should refer to Heritage at Risk register.	
4	Paragraph 2.27 – Local Plan Objectives	3 – Effectiveness Recommend point A (iv) is amended to replace term “heritage resources” with “historic environment”	Revise wording of Paragraph 2.27 (Local Plan Objectives) to change point A(iv) from “heritage resources” to “historic environment” before going on to list types of heritage assets.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 2.27 – Local Plan Objectives  ‘A(iv) to protect and encourage the enhancement of <u>heritage resources</u> <u>the historic environment</u> including Scheduled Monuments, statutorily and locally listed buildings, Registered Parks and Gardens, and Conservation Areas’
5	Policy SP4 – Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town	3 – Effectiveness Reference to the Garden City principles should refer to the historic environment. The current wording of Point C(xvi) is insufficient alone to secure the conservation and enhancement of the historic environment. The current policy does not cover aspects of built heritage, townscape, archaeology or designed landscapes. Lack of consideration for heritage at this strategic level is concerning. An additional criterion should be added which relates to the historic environment.	Reference to the Garden City principles should refer to the wider historic environment. It is recommended that an additional criterion should be added to SP4 which solely relates to the historic environment.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy SP4 – Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town  C(xvi) ‘Create distinctive environments which relate to the surrounding area, <u>protect or enhance</u> the natural and historic landscapes, systems <u>and wider historic environment</u> , provide a multi-functional green-grid which creates significant networks of new green infrastructure and which provides a high degree of connectivity to existing corridors and networks, and enhances biodiversity’
6	Policy T1 – Sustainable Transport Choices	3 – Effectiveness Design of transport modes (e.g. highways design, cycle paths, hardstanding, signage) should consider the historic environment of the area need to assess their impacts upon townscape, historic landscape and heritage assets and design accordingly.	The policy should include a criterion which will ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail.	HE notes the Council’s position and will be making no further comments on this representation.  The LPSV should be read as a complete document which means that Policy DM 7 and Policy DM 9 will apply when reviewing the design of highways.

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
7	Policy DM 7 – Heritage Assets	3 – Effectiveness No objection – See proposed modifications	<p>Revise title of Policy DM7 Policy to “Historic Environment”. Point A should be reworded to read “development proposals should seek to conserve or enhance the character or appearance”. Enhancement could be further emphasised in the supporting text.</p> <p>The requirement for a heritage statement (para 4.60) and the need for an archaeological evaluation (para 4.63) should be reflected in the policy as a criterion as well.</p>	<p>HE agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy DM 7 - <del>Heritage Assets</del> ‘<u>Historic Environment</u>’</p> <p>Part A: ....Development proposals should seek to conserve <del>and</del> <u>or</u> enhance the character <u>or</u> appearance and function of heritage assets...</p> <p>Part B: ‘Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset (whether designated or non-designated) or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question. <u>A heritage statement will be required for any application that may affect heritage assets (both designated and non-designated). Where development proposals may affect heritage assets of archaeological interest, an archaeological evaluation will be required.</u>’</p>
8	Policy DM 9 - High quality design	3 – Effectiveness Need for design to respond to and have regard to the historic environment.	Revise wording of Policy DM9 to include a bullet point referring to the need for design to respond to and have regard to the historic environment.	<p>HE agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy DM9 - A(i)</p> <p>‘<u>Relate positively to their context, drawing on the local character and historic environment</u>’</p>
9	Policy DM 12 – Subterranean, basement development and lightwells	<p>3 – Effectiveness The implications for basement development on the historic environment should be better articulated and considered in the supporting text and policy.</p> <p>Recognition of the historic environment in Point A(v) needs to be strengthened in the policy and supporting text.</p> <p>It is not clear how the historic environment has been considered when</p>	<p>Revise wording of Policy DM12 to change point A(v) from “will not adversely impact” to “will conserve or enhance”.</p> <p>Additional supporting text (as a minimum) signposting relevant considerations or policy for householders to consider the historic environment is needed.</p>	<p>HE agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy DM12 - A(v)</p> <p>‘...<del>will not adversely impact</del> <u>will conserve or enhance</u> the local natural and historic environment, <u>in line with the considerations set out in Policy DM 7.</u>’</p> <p>Paragraph 4.83</p>

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
		<p>developing this policy. Key related issues such as archaeology, disturbance to/loss of historic fabric and impact to character. Specific reference to these elements should be made to support applications.</p> <p>Questions referral to permitted development rights and why this hasn't been included elsewhere in relation to above ground extensions, change of uses or other works.</p> <p>There is limited detail provided as to how applicants should interpret the policy, lack of evidence to support and demonstrate how the historic environment has been considered. There is not enough detail given about what information will need to be provided about construction etc.</p>	<p>Historic environment should be listed alongside natural environments in paragraph 4.83.</p>	<p>'It is important that basement development is carried out in a way that does not harm the amenity of neighbours, compromise the structural stability of adjoining properties, increase flood risk or damage the character of the area, <u>historic or</u> natural environments in line with national planning policy.'</p> <p>See 'Glossary' modification which includes the mention of archaeological remains.</p>
10	Policy DM 14 – Shopfronts and on street dining	<p>3 – Effectiveness Suggest that “historic features” rather than “original features” is used.</p>	<p>Revise wording of Policy DM14 (Shopfronts) to change point A(ii) to “historic features” rather than “original features”.</p>	<p>HE agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy DM14 - A(ii)</p> <p>'replacement shopfronts should relate to the host building and conserve <u>original historic</u> materials and features as far as possible'</p>
11	Policy DM 20 – Low carbon and renewable energy	<p>3 – Effectiveness Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirement of the Building Regulations where compliance would unacceptably alter their character or appearance. Part L of the Building Regulations outlines further special considerations given to heritage assets.</p> <p>The design and siting of some energy efficient equipment can have a detrimental impact on the character and</p>	<p>Supporting text should make reference to the exemptions of listed buildings, buildings in conservation areas and scheduled monuments to comply with energy efficiency requirements.</p> <p>Reference to the historic environment should be made in relation to the design and siting of energy efficiency equipment.</p>	<p>HE agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Additional paragraph below 4.143</p> <p><u>'The design and siting of energy efficiency equipment should consider the historic environment. Certain classes of historic buildings are exempt from the need to comply with the energy efficiency requirements where compliance would unacceptably alter their character and appearance. In line with Part L of the Building Regulations, special considerations are given to a number of buildings. These include locally listed buildings, buildings of architectural or historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with</u></p>

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
		appearance of a historic places and setting of heritage assets		<u>permeable fabric that both absorbs and readily allows the evaporation of moisture.'</u>
12	Policy DM 21 (Point E) – Local environmental impacts, pollution and land contamination	3 – Effectiveness Some heritage assets, such as listed buildings, may not be compatible with modern construction techniques and it is not clear how this policy will be applied. It is advised that the policy or supporting clarifies the position regarding heritage assets and sustainable construction techniques.	Propose to amend supporting text to ensure construction techniques are appropriate and suitable for listed buildings/heritage assets.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy DM 21 - Point E  In addition, the Council supports the use of sustainable design and construction techniques including where appropriate the local or on-site sourcing of building materials enabling reuse and recycling on site. <u>'For existing buildings which are heritage assets, in considering whether sustainable construction requirements are practical, consideration should be given to policies DM 7 and DM 8. Historic buildings dating pre-1919 are often of a traditional construction which performs differently, and not all types of sustainable construction would be appropriate in alteration and extensions to these buildings.'</u>
13	Policy P 1 – Epping (South Epping Masterplan Area)	3 – Effectiveness The objective to minimise heritage impacts on designated assets of could be strengthened	Revise wording of Policy P1 (South Epping Masterplan Area) – Point K(viii) from “minimising impact” to “conserved or enhanced”.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P1 (South Epping Masterplan Area) – Point K(viii)  <u>Minimising the impact upon 'Conserving or enhancing the setting of the Grade II listed Gardners Farm and Grade II listed Farm Buildings.'</u>
14	Appendix 6, WAL.R4 – Fire Station at Sewardstone Road	3 – Effectiveness Development of these sites has the potential to impact on the setting of designated heritage assets. It should be noted that the Waltham Abbey Conservation Area is on the National Heritage at Risk Register.	WAL.R4 - It is recommended that the policy and supporting text recognise that the conservation area is on the HAR register.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Appendix 6 (Site Specific Requirements), WAL.R4  Add section on heritage: <u>'Heritage'</u> This site is adjacent to the Waltham Abbey Conservation Area, which is on the National Heritage at Risk Register.

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
15	Appendix 6, WAL.R5 – Waltham Abbey Community Centre (Heritage)	3 – Effectiveness Development of these sites has the potential to impact on the setting of designated heritage assets. It should be noted that the Waltham Abbey Conservation Area is on the National Heritage at Risk Register.	WAL.R5 - It is recommended that the policy and supporting text recognise that the conservation area is on the HAR register.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Appendix 6 (Site Specific Requirements), WAL.R5 (Heritage)  The site is adjacent to the Waltham Abbey Conservation Area <u>which is listed on the National Heritage at Risk register.</u>
16	Policy P 6 - North Weald Bassett Masterplan Area (point L)	3 – Effectiveness Harm in the first instance should be avoided before mitigation is considered therefore advise that a policy criterion is added to make provision for the conservation and enhancement of the historic environment and for the setting of the individual heritage assets.	Policy wording for NWB Masterplan Area, point L(vi) changed to read “development should conserve or enhance the setting of the Grade II listed buildings Bluemans Farm and Tyler’s Farmhouse”.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 6 (Point L – (vi))  <del>‘... careful design that mitigates any potential impact upon</del> <u>development should conserve or enhance</u> the Grade II Listed Buildings at Bluemans Farm/Tyler’s Farmhouse.
17	Policy P 10/Appendix 6	3 – Effectiveness NAZE.E6 and NAZE.E7 are adjacent to Nazeing and South Roydon Conservation Area which is listed on the National Heritage at Risk Register. Any development will need to protect and enhance the listed buildings and their settings and should be high design quality.	Policy wording should be updated to ensure development protects and enhances adjacent listed buildings and their settings and should be high design quality.  It is also recommended that the policy and supporting text recognise that the conservation area is on the HAR register	HE notes the Council’s position and will be making no further comments on this representation.  These are existing employment sites, therefore the same level of site guidelines does not apply. Any further applications will be assessed in line with Policy DM 7 and Policy DM 8 which will conserve/enhance the heritage assets in this area.
18	Appendix 6, LSHR.R1 – Land at Lower Sheering (Heritage)	3 – Effectiveness LSHR.R1 – Located adjacent to the Lower Sheering Conservation Area and there is concern the development of this site would adversely impact upon the group of buildings. Development requirements do not reference Grade II* listed lodges.	Request that the policy and supporting text is amended to identify the lodges and that a policy criterion is added to ensure that development conserves or enhances the setting of these buildings.  It is recommended that the policy and supporting text recognise that the conservation area is on the HAR register.	HE agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Appendix 6 (Site Specific Requirements), LSHR.R1 (Heritage)  Development of this site may impact upon the setting of the Grade II listed Little Hyde Hall, <u>and the Grade II* listed Lodges at the south entrance to the Park of Great Hyde Hall.</u>  The site is located adjacent to the Lower Sheering Conservation Area <u>which is listed on the Heritage at Risk register.</u>

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Agreed position
19	Appendix 6	3 – Effectiveness Variety of site allocations where the requirements in Appendix 6 are welcomed but there is concern over the weight of these requirements.	N/A	<p>HE notes the Council’s position and will be making no further comments on this representation.</p> <p>Appendix 6 is still part of the plan and it is stated in the policy text for all Places policies that ‘proposals for development on allocated sites should accord with the site-specific requirements set out in Appendix 6’.</p> <p>Guidance in appendix 6 will have appropriate weight to ensure the conservation and enhancement of heritage assets.</p>
20	Appendix 6	3 – Effectiveness Concern raised that the guidance given on heritage will not have appropriate weight if it forms part of an appendix.	HE would prefer the requirements written into the policy, and if this is not possible for appendix 6 to form part of the Places chapter.	<p>HE notes the Council’s position and will be making no further comments on this representation.</p> <p>Appendix 6 is still part of the plan and it is stated in the policy text for all Places policies that ‘proposals for development on allocated sites should accord with the site-specific requirements set out in Appendix 6’.</p> <p>Guidance in appendix 6 will have appropriate weight to ensure the conservation and enhancement of heritage assets.</p>
21	Glossary	3 – Effectiveness Specific reference to archaeology is omitted from policy DM12	N/A	<p>Definition of heritage asset: A building, monument, site, place, area or landscape, <u>or archaeological remains</u>, identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).</p>



## Appendix 2 – Outstanding Objections

For proposed modifications, underlined text = new text suggested, and ~~Strikethrough text~~ = text proposed for removal

### Objections in relation to heritage matters

Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	HE proposed modifications	Current position
1	Paragraph 2.27 – Vision for the District	<p>3 – Effectiveness Vision should be locally specific to Epping Forest District and reference types of heritage assets / character of settlements found in the district. Should refer explicitly to ‘conserving and enhancing’ the historic environment.</p> <p>Epping Forest District contains a number of sites which are on the 2017 National at Risk Register (HAR register). It is advised the Vision contains reference to the need to address HAR. This could also be a useful monitoring indicator.</p>	<p>Revise wording of the Vision to ensure it is locally specific to Epping Forest District and reference types of heritage assets / character of settlements found in the district.</p> <p>Vision should refer to Heritage at Risk register.</p>	<p><b>EFDC position:</b></p> <p>Paragraph 2.27 (Vision for the District) is to be amended to explicitly state that ‘(vi) the historic environment will be conserved and enhanced’ in accordance with HE representations. In addition, paragraph 2.27 (Local Plan Objectives) includes the requirement ‘(iv) to protect and encourage the enhancement of the historic environment including Scheduled Monuments, statutorily and locally listed buildings, Registered Parks and Gardens, and Conservation Areas’.</p> <p>The types of heritage assets/character of settlements are listed in the local plan objectives. The vision contains an overarching commitment to conserve and enhance the historic environment. The Council does not consider that it is necessary to refer to the HAR in the vision, as there is already a dedicated policy to this matter (Policy DM 8).</p> <p>The Local Plan should be read as a complete document as is stated on every page of the LPSV document, therefore the types of heritage assets and heritage at risk is felt to be adequately covered in the Plan as stated above.</p> <p><b>HE position:</b></p> <p>We would reiterate that we encourage all local plans to be locally specific rather than generic in defining their vision for the historic environment. This information can be drawn from or inspired by the Heritage at Risk Register, Conservation Area Appraisals, information on important heritage in the area. It can cover particular types of heritage assets that are more prevalent in Epping Forest and/or the particular character of the settlements and/or particular building materials used etc.</p>
2	Policy SP4 – Development & Delivery of Garden Communities in the Harlow	<p>2 – Justified Historic Impact Assessments should be undertaken for the Garden Town Communities to determine appropriateness of location for development, extent and therefore</p>	<p>Revise wording of Policy SP4 to ensure Heritage Impact Assessments are prepared for the Garden Community sites in advance of the Independent Examination.</p>	<p><b>EFDC position:</b></p> <p>The Council does not consider that it is necessary to undertake Heritage Impact Assessments of sites as part of the evidence base as an initial assessment has been undertaken through the site selection process (see evidence outlined in Appendix 3) and there</p>

	<p>and Gilston Garden Town</p>	<p>potential capacity, the impacts upon the historic environment, impacts of development on the asset and potential mitigation measures. Appropriate criteria for the protection of heritage assets and their settings should be included in policy and supporting text for the Garden Communities.</p>	<p style="text-align: center; opacity: 0.3; font-size: 48px; transform: rotate(-30deg);">DRAFT</p>	<p>are sufficient provisions in the LPSV to ensure the conservation and enhancement of heritage assets in the District. However, the Council are proposing the undertaking of a Heritage Impact Assessment as part of the masterplan process for the allocated Garden Community sites to be included under Policy SP4 C(xvii). There will also be a need to undertake an Environmental Impact Assessment at application stage where any heritage issues will be identified.</p> <p>Proposed LPSV modification: Policy SP4 – Development &amp; Delivery of Garden Communities in the Harlow and Gilston Garden Town</p> <p><u>C(xvii) A Heritage Impact Assessment will be required to inform the design of the Garden Town Communities to ensure heritage assets within and surrounding the sites are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting unless the public benefits of the proposed development considerably outweigh any harm to the significance or special interest of the heritage asset in question.</u></p> <p><b>HE Position</b></p> <p>Heritage Impact Assessments should be prepared prior to allocating sites to test the suitability of these sites in terms of the potential impact on the historic environment.</p> <p>It is important to establish the suitability of the site per se prior to allocation. If the sites are suitable, the measures to avoid harm, or mitigate where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we recommend inclusion of a concept diagram.</p> <p>This is consistent with other similar strategic site allocations across the East of England.</p>
<p>3</p>	<p>Policy SP5 – Garden Town Communities</p>	<p>2 – Justified</p> <p>Heritage Impact Assessments should be undertaken to support the allocations of the Garden Communities and Masterplan Areas across the district, then used as evidence to support the masterplan process. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform policy including development criteria and a strategy diagram expressing</p>	<p>Revise wording of Policy SP5 to ensure Heritage Impact Assessments are prepared for the Garden Community sites in advance of the Independent Examination.</p>	<p><b>EFDC Position:</b></p> <p>The Council does not consider that it is necessary to undertake Heritage Impact Assessments of sites as part of the evidence base as an initial assessment has been undertaken through the site selection process (see evidence outlined in Appendix 3) and there are sufficient provisions in the LPSV to ensure the conservation and enhancement of heritage assets in the District. However, the Council are proposing the undertaking of a Heritage Impact Assessment as part of the masterplan process for the allocated Garden Community sites to be included under Policy SP4 C(xvii) (Please refer to proposed wording above under ref. 2). There will also be a need to undertake an Environmental Impact Assessment at application stage where any heritage issues will be identified.</p>

		development criteria in diagrammatic form		<p><b>HE Position:</b></p> <p>Section 1.8a of Appendix B1.4.1 sets out the assessment criteria. The criteria jump from “(-) Site is located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated.” To “(--) Site would likely result in the loss of a heritage asset or result in significant impact that cannot be mitigated.” There is no assessment criterion of whether changes to the proposed allocation could be made to avoid the impact. There also is a gulf between the two criterion whereby considerable harm could be caused to significance (directly or through development within setting) which either cannot be mitigated or can only partly be mitigated.</p> <p>The assessment criteria used a 1km setting for scheduled monuments, conservation areas, registered parks and gardens and grade I listed buildings. It was 500m for grade II* listed buildings and nothing for grade II and locally listed buildings. Whilst we understand the need to set an initial parameter for assessment, we would note that the grade of building does not necessarily correlate to the size of their setting though the report notes that, “...the setting of these assets would be smaller and less sensitive to change and thus no buffer was applied...”</p> <p>We note that the larger sites will be subject to the Environmental Impact assessment process, however, this places unreasonable uncertainty in the planning process as an EIA should not be identifying why an allocation is unsound unless, exceptionally, nationally significant archaeology is found where there was no indication of archaeology.</p> <p>Heritage Impact Assessments should be prepared prior to allocating sites to test the suitability of these sites in terms of the potential impact on the historic environment.</p> <p>It is important to establish the suitability of the site per se prior to allocation. If the sites are suitable, the measures to avoid harm, or mitigate where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we recommend inclusion of a concept diagram.</p> <p>This is consistent with other similar strategic site allocations across the East of England.</p>
4	Policy SP5.1 – Latton Priory	2 – Justified and 3 – Effectiveness A number of assets to note to the south of the site, such as Grade II Latton Farmhouse, Grade II* listed Latton Priory, and scheduled	Revise wording of Policy SP5.1 (Latton Priory) to ensure Heritage Impact Assessments are prepared for the Garden Community sites in advance of the Independent Examination.	<p><b>EFDC Position:</b></p> <p>Proposed LPSV modification: Policy SP5 - Latton Priory (Point F)</p>

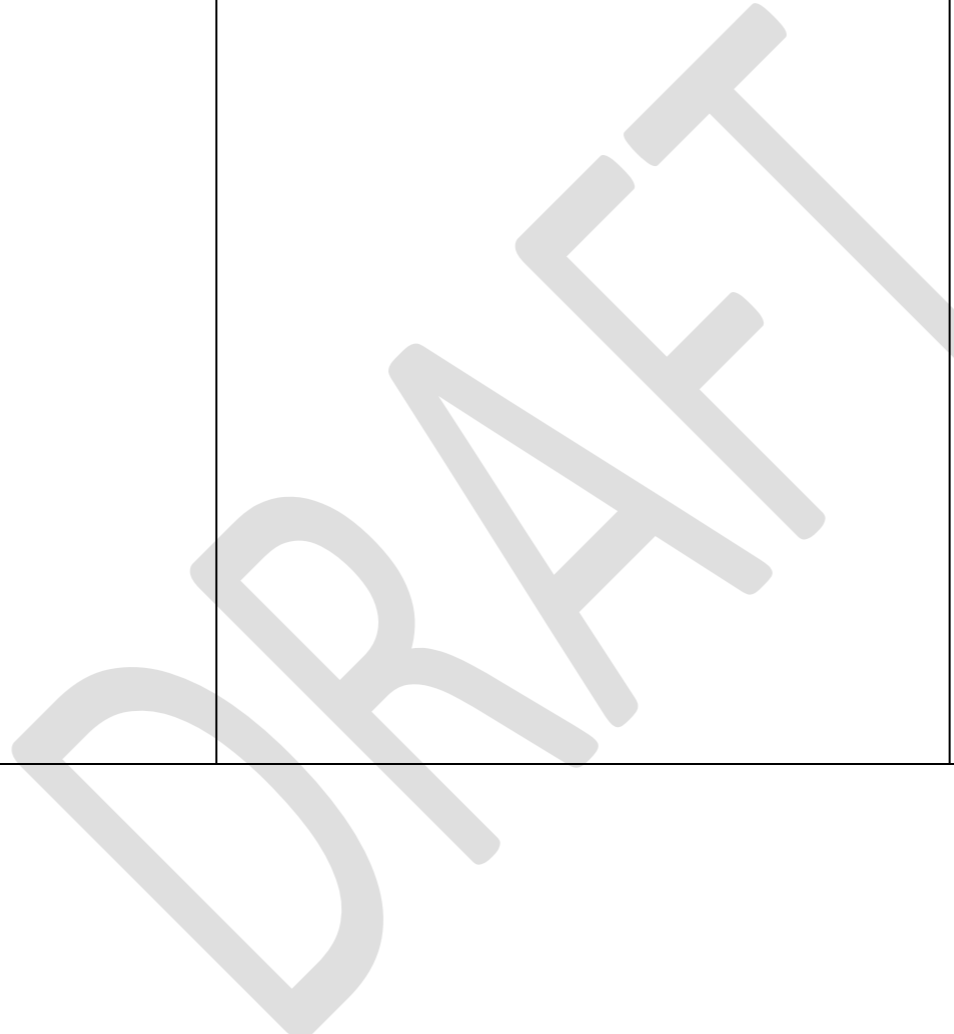
		<p>monuments/moated site south of Dorrington Farm.</p> <p>There is no provision to conserve or enhance the scheduled monument or its setting and policy is silent on the presence of listed buildings and potential presence of non-designated heritage assets.</p> <p>Advise that an assessment of archaeology of the site should be undertaken given proximity to monuments.</p>	<p>Should the Inspector be minded to find the allocations sound in planning terms without a Heritage Impact Assessment forming part of the evidence base, HE advise that additional policy references in respect of the historic environment are required and should include the following:</p> <p><i>“A full Heritage Impact Assessment must be prepared. This assessment should inform the design of the proposed development. Development will need to conserve, and where appropriate enhance, the significance of designated heritage assets, both on site and off site. Harm should be avoided in the first instance. This includes the harm to the significance of heritage assets through development within their settings. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design, as identified through the Heritage Impact Assessment.”</i></p> <p>Revise wording of Policy SP5.1 to make explicit reference to potential discovery of non-designated heritage assets as HE are currently researching this area.</p> <p>Policy for the site should refer to listed buildings etc and require masterplanning process to take these things into account.</p>	<p>(vi) A sympathetic design which responds to the adjacent ancient woodland, <del>and the Scheduled Monuments and listed buildings to the south of the site</del></p> <p>The Council does not consider that it is necessary to undertake Heritage Impact Assessments of sites as part of the evidence base as an initial assessment has been undertaken through the site selection process (see evidence outlined in Appendix 3) and there are sufficient provisions in the LPSV to ensure the conservation and enhancement of heritage assets in the District. However, the Council are proposing the undertaking of a Heritage Impact Assessment as part of the masterplan process for the allocated Garden Community sites to be included under Policy SP4 C(xvii) (Please refer to proposed wording above under ref. 2). There will also be a need to undertake an Environmental Impact Assessment at application stage where any heritage issues will be identified.</p> <p>SP 5.1 Latton Priory is formed of SR-0046A-N and SR-0139. The results of the Stage 2 and Stage 6.2 Assessment can be found in Appendix B1.4.2 - Results of Stage 2 and Stage 6.2 Assessment Part 3 (EB805Fii), on pages B470 and B475. Page F37 of Appendix F1.3 - Stage 2 and Stage 6.2 Assessment (EB805AD) covers the RUR.E19 Dorrington Farm employment site.</p> <p>Policy SP 4 sets out the approach to the development and delivery of the Garden Communities and includes point (xvi) referring to the historic environment.</p> <p>A heritage and archaeology assessment is included as part of the Strategic Masterplan process as noted in the Strategic Masterplanning Briefing Note.</p> <p>The Council's Validation Requirements (EB912) requires that a Heritage Statement is submitted alongside all planning applications and references Historic England guidance.</p> <p>All planning applications (including outline applications for Strategic Masterplan sites) will be assessed against Policy DM 7 and Policy DM 8 of the LPSV.</p> <p><b>HE position:</b></p> <p>SR-0046A-N is classified as 'effects can be mitigated' through sensitive layout locating development away from the scheduled monuments of Latton Priory and the moated site to east and utilising landscape features, good design and good screening. There is no underlying evidence provided (i.e. a Heritage Impact Assessment) to support this conclusion. Neither are the mitigation measures included in the policy.</p> <p>For similar allocations in other authorities, this evidence has been present, the mitigation has been included in the policy and concept</p>
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				<p>diagrams showing buffers and means of mitigation e.g. indicative location of country parks or areas where height / density / massing needs to transition are identified. None of this is present here.</p> <p>There is a need for Heritage Impact Assessments for strategic site allocations, where there are significant impacts on the historic environment, as part of the proportionate evidence base. If the sites are suitable, the measures to avoid harm, or mitigate where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we recommend inclusion of a concept diagram. This is consistent with other similar strategic site allocations across the East of England.</p> <p>There is also a need for detailed historic environment policy references in Strategic Policies, including setting out how harm should be avoided or mitigated for the allocation to be sound.</p>
5	Policy SP5.2 – Water Lane Area	<p>2 – Justified and 3 – Effectiveness Nazeing and South Roydon Conservation Area partially overlaps with the site. Site includes three Grade II listed buildings. There are a number of other designated heritage assets including 11 Grade II listed buildings and 2 scheduled monuments.</p> <p>Policy should refer to listed buildings etc and required that the masterplan process takes these into account.</p>	<p>Revise wording of Policy SP5.2 (Water Lane Area) to include explicit reference to requirement for a Heritage Impact Assessment as follows:</p> <p><i>“A full Heritage Impact Assessment must be prepared. This assessment should inform the design of the proposed development. Development will need to conserve, and where appropriate enhance, the significance of designated heritage assets, both on site and off site. Harm should be avoided in the first instance. This includes the harm to the significance of heritage assets through development within their settings. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design, as identified through the Heritage Impact Assessment.”</i></p>	<p><b>EFDC Position:</b></p> <p>Proposed LPSV modification: Policy SP4 – Development &amp; Delivery of Garden Communities in the Harlow and Gilston Garden Town</p> <p><u>C(xvii) A Heritage Impact Assessment will be required to inform the design of the Garden Town Communities to ensure heritage assets within and surrounding the sites are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting unless the public benefits of the proposed development considerably outweigh any harm to the significance or special interest of the heritage asset in question.</u></p> <p>Proposed LPSV modification: Policy SP5 – Water Lane Area (Point G)</p> <p><u>(vi) A sympathetic design which responds to listed buildings adjacent and within the site, Scheduled Monuments to the north and west and considers the setting of the conservation area</u></p> <p><b>HE Position:</b></p> <p>In respect of Water Lane, HE notes the report commissioned by the developers for part of the proposed site allocation, which now forms part of the Council's evidence base, and the AECOM Strategic Site Assessment.</p> <p>The wording proposed by EFDC does not take into account that in terms of setting it is harm to the significance of the heritage asset through development within its setting. It also does not take account of the varying tests for harm depending on whether that harm is</p>

				<p>substantial or less than substantial harm or whether the asset is designated or non-designated. The proposed wording also accepts harm for public benefit without consideration for how that harm could be avoided or mitigated.</p>
<p>6</p>	<p>Policy SP5.3 – East of Harlow</p>	<p>2 – Justified and 3 – Effectiveness                  Site contains a Grade II* building, 3 Grade II listed buildings. There are two Registered Park and Gardens within close proximity to the site. HE will be a statutory consultee to any proposals and these assets should be identified in the policy and supporting text.</p> <p>Any masterplan needs to take into account the need to protect and enhance the conservation area, scheduled monuments, listed buildings and their settings with the development to be high design quality.</p>	<p>Revise wording of Policy SP5.3 (East of Harlow) to ensure Heritage Impact Assessments are prepared for the Garden Community sites in advance of the Independent Examination.</p> <p>Should the Inspector be minded to find the allocations sound in planning terms without a Heritage Impact Assessment forming part of the evidence base, HE advise that additional policy references in respect of the historic environment are required and should include the following:</p> <p><i>“A full Heritage Impact Assessment must be prepared. This assessment should inform the design of the proposed development. Development will need to conserve, and where appropriate enhance, the significance of designated heritage assets, both on site and off site. Harm should be avoided in the first instance. This includes the harm to the significance of heritage assets through development within their settings. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design, as identified through the Heritage Impact Assessment.”</i></p> <p>Revise wording of Policy SP5.3 to make explicit reference to listed buildings etc and require masterplanning process to take these things into account.</p>	<p><b>EFDC position:</b></p> <p>Proposed LPSV modification:                  Policy SP5 – East of Harlow (Point H)</p> <p><u><i>(vi) A sympathetic design which responds to listed buildings adjacent and within the site, Registered Parks and Garden to the west and Scheduled Monuments in close proximity to the site</i></u></p> <p>The Council does not consider that it is necessary to undertake Heritage Impact Assessments of sites as part of the evidence base as an initial assessment has been undertaken through the site selection process (see evidence outlined in Appendix 3) and there are sufficient provisions in the LPSV to ensure the conservation and enhancement of heritage assets in the District. However, the Council are proposing the undertaking of a Heritage Impact Assessment as part of the masterplan process for the allocated Garden Community sites to be included under Policy SP4 C(xvii) (Please refer to proposed wording above under ref. 2). There will also be a need to undertake an Environmental Impact Assessment at application stage where any heritage issues will be identified.</p> <p>SP 5.3 East of Harlow is comprised of SR-0146C-N. The results of the Stage 2 and Stage 6.2 Assessment can be found in Appendix B1.4.2 - Results of Stage 2 and Stage 6.2 Assessment Part 4 (EB805Div)1, on page B590.</p> <p>Policy SP 4 sets out the approach to the development and delivery of the Garden Communities and includes point (xvi) referring to the historic environment.</p> <p>A heritage and archaeology assessment is included as part of the Strategic Masterplan process as noted in the Strategic Masterplanning Briefing Note.</p> <p>The Council’s Validation Requirements (EB912) requires that a Heritage Statement is submitted alongside all planning applications and references Historic England guidance.</p> <p>All planning applications (including outline applications for Strategic Masterplan sites) will be assessed against Policy DM 7 and Policy DM 8 of the LPSV.</p> <p>The site will need to undertake an Environmental Impact Assessment where any heritage issues will be identified.</p>

<sup>1</sup> <http://www.efdclocalplan.org/wp-content/uploads/2018/03/EB805Fiv-Appendix-B1.4.2-Results-of-Stage-2-and-Stage-6.2-Assessment-Part-4.pdf>

				<p><b>HE position:</b></p> <p>The site assessment does note that given the scale, further assessment is required on landscape impact (possible setting impact of RPGs and SM), although not on the setting of GII* Sheering Hall and other GII listed buildings within the site. The mitigation proposed, reducing density and an appropriate layout, is without evidence as to whether it is appropriate and there is no evidence of avoidance of harm. This could have been explored though a Heritage Impact Assessment.</p> <p>For similar allocations in other authorities, this evidence has been present, the mitigation has been included in the policy and concept diagrams showing buffers and means of mitigation e.g. indicative location of country parks or areas where height / density / massing needs to transition are identified. None of this is present here.</p> <p>There is a need for Heritage Impact Assessments for strategic site allocations, where there are significant impacts on the historic environment, as part of the proportionate evidence base. If the sites are suitable, the measures to avoid harm, or mitigate where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we recommend inclusion of a concept diagram. This is consistent with other similar strategic site allocations across the East of England.</p> <p>There is also a need for detailed historic environment policy references in Strategic Policies, including setting out how harm should be avoided or mitigated for the allocation to be sound.</p>
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## Supplementary Information – Heritage Matters relating to Strategic Site Allocations

### 1.0 Background

This appendix provides supplementary information to support the SoCG between Epping Forest District Council (the Council) and Historic England (HE), and to assist the Inspector during the examination of the Epping Forest District Local Plan Submission Version 2011 - 2033 (referred to hereafter as the Local Plan Submission Version or LPSV).

The representation submitted by HE to the Council in January 2018 set out a number of comments in relation to the policies and evidence underpinning the strategic site allocations within the LPSV. These include:

- i. The need to carry out Heritage Impact Assessments for the Garden Town Communities to discern the level of impact on the historic environment and any potential mitigation measures necessary; and
- ii. Concerns that there were no references to known heritage assets within or in close proximity to the Garden Communities in the policy.

In order to resolve these outstanding concerns, HE requested further information from the Council to demonstrate that impacts on the historic environment arising from the strategic site allocations have been properly evidenced. The Council has therefore prepared this addendum to the SoCG to bring together a range of existing information surrounding the historic environment, specifically for the strategic site allocations.

### 2.0 Additional Evidence

This information and assessment work has been obtained from a range of documents, both published and emerging. These are set out in more detail below:

Strategic Site	Relevant Evidence Base	Specific document reference
North Weald Bassett	<a href="#">North Weald Bassett Masterplanning Study</a> (Allies and Morrison, 2014)	Section 3.3 Landscape, Character and Heritage (Pages 33-40)
Latton Priory	<a href="#">AECOM Strategic Sites Assessment</a> (AECOM, 2016)  Latton Priory Harlow and Gilston Garden Town Strategic Masterplan Framework (Hallam Land Management and ceg, 2018)  <a href="#">Appendix B1.6.6 Results of Identifying Sites for Allocation</a> (EB805G) (Arup, 2018)	Page 44, Figure 5: Heritage Context, Appendix 2: Site M landscape appraisal  Page 34  Page B1094



Water Lane	<a href="#">AECOM Strategic Sites Assessment</a> (AECOM, 2016) Epping Forest District Local Plan 2011-2033 Response to Planning Inspector's Examination Question (Asset Heritage Consulting, 2019)	Page 51 and 55  Whole document.
East of Harlow	<a href="#">AECOM Strategic Sites Assessment</a> (AECOM, 2016)  <a href="#">Appendix B1.4.2 - Results of Stage 2 and Stage 6.2 Assessment Part 4</a> (EB805Div)	Page 40  Page B590

The Council endorses this evidence, and considers that it provides the additional necessary assessment of the strategic sites in relation to heritage assets, and impact on the historic environment more broadly. For ease of presentation and review, the relevant information surrounding the historic environment has been lifted from these documents, and consolidated into the table below. The information has been split out under a series of headings, to summarise content and guide the reader to the relevant topic.

3.0 Additional heritage information underpinning the strategic site allocations

Strategic Site Allocation	Relevant topics
North Weald Bassett	<p><b>Vision<sup>1</sup>:</b>                      The analysis and consultation undertaken during the study indicated that the settlement has potential for some growth that can help to more effectively support the local community in the future, but that this growth must be minded to preserve the existing assets of the settlement and bring about additional benefits for the community. The assets include, but are not limited to, the settlement’s relationship with the surrounding green open space, stand-out historic buildings, a range of housing types which can support a mixed community and the heritage and current economic role of the North Weald Airfield. The vision is to protect these assets, attract investment to strengthen the existing commercial centre and establish North Weald Bassett as a sustainable place in its own right with an active community life.</p> <p><b>Heritage assets:</b>                      North Weald Bassett is a low density ribbon development of mostly 20th century housing. The church (listed) is not on High Road, which suggests a split historic centre (if there was one). The settlement is not in a conservation area. The wider area is characterised as type F5, Ridges and Valleys, in the Epping Forest Landscape Characterisation Study. The M11 to the west was built in the late 1970s, but only fully operational in 1980.</p> <p>To the south is the Former Central Line. The central section of the Central Line was constructed in the 1890s, but it was only extended from Stratford to Epping and Ongar (over the London and North Eastern Railway) in the 1940s. The section between Epping and Ongar was closed in 1994. There have been various train enthusiasts running trains on the tracks since, but it is not a commuter service.</p> <p><b>Key historic features:</b></p>

<sup>1</sup> North Weald Bassett Masterplanning Study (Allies and Morrison, 2014)

<p><u>Roman Road:</u> The course of a Roman Road runs across the east side of the site, although it is unclear how visible this is on the ground. There could be archaeology present, which could be used as a design constraint.</p> <p><u>Estate Lands:</u> The site of two ancient estates, to the west and east of the settlement. Both have listed houses on them: (1) Weald Hall Farm House and Little Weald Hall, to the north and west of the airfield – it is unclear whether there are any landscape features remaining; (2) Ongar Park Hall and Lodge – outside the site, but also unclear as to remains of landscape features. North Weald Redoubt This fort is one of 15 London mobilisation centres constructed during the 1890s to protect London against possible invasion. It is a scheduled ancient monument. It is on higher ground, and its setting will have to be considered. There is no direct connection with the airfield, but it was used in WWI and WWII.</p> <p><u>North Weald Airfield:</u> The airfield opened in 1916 and saw active service in WWI and WWII. The control tower, which was built in 1952, is listed at grade II and the officers mess (Norway House) was built in 1923 and is listed at grade II. The site remained in RAF usage until the 1980s. It is now used for events, shows etc. The airfield is the biggest local feature in the area, there is an active pressure group to keep it open. Much of the development of the settlement is related to the airfield.</p> <p><u>Listed Buildings:</u> There are several listed buildings within the settlement, but, depending on masterplan, of which the most significant are the Ongar Redoubt, the Control Tower, the Officers Mess, Weald Hall and Ongar Park.</p> <p><u>Airfield heritage:</u> North Weald Bassett's aviation heritage is evident throughout the settlement in the form of street and development names. Many of these reflect the names of fighter planes including Hurricane, Blenheim, Tempest, Beaufort and Lancaster. The street names which draw on the aviation heritage of the settlement are highlighted in the plan to the left.</p> <p><b>Constraints to development:</b></p>
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	<p>The 1805 map shows that the historic urban structure is triangular – North Weald (location of the church), Tyler’s Green and Weald Gullet (at base of Church Road) – with Weald Hall to the west and Ongar Park Hall to the east. From this brief desktop review, it would seem that there are likely to be no major heritage constraints to development (other than military history), but that there are several surviving features that could be used to inform the design. The key consideration will be how the airfield is treated, and how a unified settlement is created.</p>
<p>Latton Priory</p>	<p><b>Heritage assets<sup>2</sup>:</b></p> <p><u>Designated Heritage Assets:</u>                  There is one scheduled monument located within the site and one that is sited in close proximity to the site boundary. Within the site is a medieval moated site located on the southern boundary at the west end of the site. The site of Latton Priory is located just outside of the boundary to the south east of the site. This is a scheduled monument and within this, the surviving element of the Priory is a Grade II* listed building. Latton Priory Farmhouse is a Grade II listed building. Webbs Cottage, which is located to the south west of the site is a Grade II listed building.</p> <p><u>Non-Designation Heritage Assets:</u>                  A desk based assessment of the site has been undertaken by Orion Heritage. This established that there is the potential to contain Roman remains associated with a suspected Roman road that crosses the site north-south in the vicinity of Latton Priory. The presence of both Latton Prior and the scheduled moated site indicate that further associated archaeological remains of medieval date could be located within the site. However, following the desk-based assessment, a geophysical survey the whole of the site and the wider area to the east and the south east, was undertaken. While this survey recorded a few features of possible archaeological interest, the survey recorded no signals indicative of significant archaeological remains within the site. Further archaeological research will be undertaken to better understand and inform the design of the proposed development. Further mitigation archaeological investigations will be undertaken as the proposed development progresses.</p>

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<sup>2</sup> Latton Priory Harlow and Gilston Garden Town Strategic Masterplan Framework (Hallam Land Management and ceg, 2018), p. 34

	<p>The moated site will be within the Green Belt area in the southern part of the site and so there will be no impacts upon it. The development provides a unique opportunity to improve the condition of the monument and to provide interpretive material on the moated site and Latton Priory and help promote a greater sense of place and time depth for the residents of the new community.</p> <p><b>Setting<sup>3</sup>:</b></p> <p>The ridge is a prominent feature in the landscape south of Harlow. It is currently largely undeveloped and creates a rural backdrop to the town. The few buildings which are located on the ridge are prominent in views, particularly from Harlow Town Centre. Views south from the town centre and along the Green Wedge currently look out towards open countryside, with the ridge forming a wooded horizon. This is an important part of the character and experience of the area. Any new development proposed on the top of the ridge would alter the setting of the area, as it would be highly visible due to its elevated position within the open landscape.</p> <p>The ridge also preserves the openness of the green belt by forming a natural barrier to the encroachment of urban settlement into the wider countryside. Whilst the extent of development currently proposed for Latton Priory would not result in coalescence with other nearby settlements, it would give the impression of continuous development when viewed from Harlow and from Epping. The site is well served with public rights of way, including a footpath which passes through the area centrally from London Road, and two long distance trails, Forest Way and Stort Valley Way. These footpaths are connected to the Harlow Green Wedge which facilitates ease of access to the countryside from the town centre. From these paths, there are long distance views of the countryside to the south. If these paths were to cross through development, their amenity value could be lessened.</p> <p>Other sensitive features of the site include two Scheduled Ancient Monuments: Rye Hill Moat, near Dorrington Farm in the southwest of the site, and the remains of Latton Priory in the southeast of the site. They are both located on high ground within an open setting, which would be altered greatly if they were to be surrounded by new development.</p> <p>Finally, there are a number of woodland blocks located on the site, running both north-south up the ridge, and east-west at the top of the ridge. The dense vegetation add to the sense of enclosure of Harlow, and enhances its rural setting.</p>
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<sup>3</sup> Harlow Strategic Site Assessment (AECOM, 2016), Appendix 2, p. 72-73

**Mitigation<sup>4</sup>:**

FCPR and Boyer Planning suggest that a combination of existing woodland and advanced woodland planting at the southern edge of the plateau could visually contain built development from East Herts, Epping Forest, Harlow and Uttlesford District Councils Final Report the wider Epping District. They also suggest that views of the Latton Priory development from Harlow would be screened or heavily filtered by intervening buildings and trees. However, initial analysis carried out by AECOM suggests that any development situated at the top of the ridge would be visible from Harlow in the north and Epping in the south because of its open aspect and elevated position. Whilst planting could reduce its impact, it would not be as effective in initial years as the plants establish, nor in the winter when canopy cover is less dense.

The plateau at the top of the ridge should not be developed, as this would have the potential to result in significant effects on the local landscape and views. New development should therefore be set down on the northern side of the ridge, such that the roof line is below the top of the plateau. This would allow space to substantially strengthen the woodland on the southern edge of the ridge in order to lessen the visual impact of the development from Harlow and Epping. This would also create opportunities for further green infrastructure improvements linking the proposed development and Harlow more generally with the wider landscape.

The 2013 study's visual analysis was limited to a comparative assessment of selected viewpoints. For such a sensitive and open landscape, it is recommended that a zone of theoretical influence (ZTV) of the proposal is prepared to more fully understand the extent to which development built on the elevated land would be visible from the wider landscape.

**Opportunities to avoid harm<sup>5</sup>:**

This site was identified as available within the first five years of the Plan period. It has been marketed and there are no identified restrictions that would prevent it coming forward for development. As a result of the landscape sensitivity of the site and the potential for harm to the settlement character, particularly affecting the southern and eastern parts of the site, as well as possible impacts on heritage assets, SSSIs, BAP Habitats and a Local Wildlife Site, it is proposed that development should be limited to the northern part of the site at the edge of Harlow, with development not extending beyond the identified ridgeline to the south. This ridgeline is the historic planned extent of Harlow, the origins of which date back to the original Gibberd plan for the new town. Limiting development to the area north of the ridgeline would prevent visual harm, both to the surrounding countryside and within

<sup>4</sup> See Footnote 3.

<sup>5</sup> Appendix B1.6.6 Results of Identifying Sites for Allocation (EB805P) (Arup, 2018), p. B1094

	<p>Harlow. Such a judgement is consistent with the recommendations made by AECOM in the Harlow Strategic Site Assessment (2016). While it is acknowledged that there are complexities around the deliverability of the site, in part due to infrastructure which needs to be planned and delivered in co-ordination with Harlow District Council and Essex County Council as well as the constraints posed by access (which would need to be provided from London Road), it was considered that these will be resolved through the proposed Latton Priory Strategic Masterplan. It is proposed that the reduced site area should be allocated in combination with SR-0139 consistent with the allocation proposed in the Draft Local Plan (2016).</p>
<p>Water Lane</p>	<p><b>Heritage assets:</b>  <u>West of Katherine<sup>6</sup>:</u>          Brookside Cottage, grade II listed, is located on the site with other Listed buildings adjacent in the west and south of the site. The southern part of site is in the Nazeing and South Roydon Conservation Area. Development will need to consider the setting of Listed buildings and also impact upon Conservation Area. It is likely that impacts can be avoided / mitigated.</p> <p><u>West of Sumners<sup>7</sup>:</u>          Partly within Nazeing and South Roydon Conservation Area to the south. Several grade II listed and local listed buildings just beyond site boundary. There is potential impact upon the Conservation Area and settings of listed buildings. However, it is likely that impacts can be avoided / mitigated.</p> <p><b>Assessment of potential harm<sup>8</sup>:</b>  <u>Black Swan Public House (Grade II)</u>          The Black Swan is located on the north-west side of Common Road at Broadley Common. Its setting is relatively small, being confined by woodlands to the north, industrial warehousing to the west and residential housing to the south and east on both sides of Common Road. The closest part of the West Sumners site allocation to the listed building is some 200m to the east and it is visually separated from it by Common Road, by Epping Road and by woods, fields and by buildings. There is no visual or other connection between the listed building and the site allocation. Consequently, there could be no impact on The Black Swan Public House or its setting. The setting of the listed building would be preserved.</p>

<sup>6</sup> Harlow Strategic Site Assessment (AECOM, 2016), p. 51

<sup>7</sup> Harlow Strategic Site Assessment (AECOM, 2016), p. 55

<sup>8</sup> Epping Forest District Local Plan 2011-2033 Response to Planning Inspector’s Examination Question (Asset Heritage Consulting, 2019), p. 5-8

	<p><u>Fairlawn, Epping Road, Broadley Common (Grade II)</u>  Fairlawn is a house located on the north-east side of Epping Road in Broadley Common. Its setting is relatively small, being confined by houses on Epping Road to the north and south and by mature trees which separate its garden from farmland to the east. The closest part of the West Sumners site allocation to Fairlawn is some 100m to the east but that part of the site is proposed as strategic open space. The closest part of the site allocated for housing development is approximately 300m to the north-east. It is visually separated by fields, by mature trees and by hedgerows. The likelihood of there being any views of built development from the listed building, or of the listed building from the development, is very small. Consequently there would be little or no impact on the setting of Fairlawn arising from the proposed site allocation. As such the setting of the listed building and its significance as a building of special architectural or historic interest would be preserved.</p> <p><u>Richmond Farmhouse, Jacks Hatch, Parsloe Road, Kingsmoor (Grade II)</u>  Richmond Farmhouse is located on the north-west side of Parsloe Road. It still enjoys a rural setting to its south. To the north-west it is separated from the Kingsmoor housing estate by a narrow strip of woodland. To its rear it is separated from the West Sumners site allocation by an extensive area of commercial and industrial buildings, hardstanding and vehicle storage areas. There is no intervisibility between the West Sumners site allocation and the listed building because of the scale of the intervening commercial buildings. As such, its setting and its significance as a building of special architectural or historic interest would be preserved.</p> <p><u>Sumner’s Farmhouse, Parsloe Road, Sumners (Grade II); C17 Barn North-East of Sumner’s Farmhouse (Grade II); C18 Barn North-East of Sumner’s Farmhouse (Grade II)</u>  This complex of three listed buildings at the former Sumner’s Farm are assessed jointly here as, historically and architecturally, they form a coherent group and any heritage conservation issues are common to all three. The former farm complex, now converted to houses, is located within the Kingsmoor estate, a modern housing estate dating from the 1980s and 1990s. Its setting now has a distinctly suburban character as a result of the highway design and character of the surrounding housing estate. The complex of listed buildings is located 150m to the north-east of the West Sumners site allocation but it is separated from it by housing at Manorcourt Care Home, by housing on Archers, Barns Court, Phelps Road and Wellesley. It is also separated from the site allocation by mature trees along the field boundary and by a small area of woodland.</p>
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Consequently, there is no visible or other connection between the listed buildings and the West Sumners site allocation and there would be no potential for development to impact on the setting of the former Sumner's Farm complex. As such, the listed buildings, their settings and their significance as buildings of special architectural or historic interest would be preserved.

Weatherwhites Car Showroom Epping Road, Broadley Common (Locally Listed)

Weatherwhites car showroom is prominently located in the fork between Common Road and Epping Road at Broadley Common. Its immediate setting is characterised by the extensive display of cars for sale. Its wider setting extends to the housing on the east side of Epping Road and the woodlands and the pub car park on the north of Common Road. There is no visual or other connection between the locally listed building and the West Sumners site allocation which is 150m to the east at its closest point.

However, this part of site is allocated for strategic open space in the design concept document with the closest built development being 300m distant. It would have no impact on the locally listed building or its setting. As such, the setting and the architectural and historic interest of the locally listed building would be preserved.

The Nazeing and South Roydon Conservation Area

The Nazeing and South Roydon Conservation Area has not been reviewed since it was designated in 1982. Its boundaries are widely drawn to include Halls Green in the north, areas around Roydon Hamlet, Nazeing, Nazeing Gate, Bumbles Green and Middle Street in the south and Broadley Common in the east. Large tracts of fields and agricultural land are also included within the conservation area.

There is no character appraisal for the conservation area but the Epping Forest District Council website makes brief reference to the importance of "the conservation area's quiet, intimate, small-scale rural qualities characterised by small grassed fields that are dissected by narrow winding lanes and footpaths and bounded by tall hedgerows and mature trees." It also makes reference to the importance of 'closed field patterns' and 'open or common field systems' which give the settlements a distinctive setting. Importantly, there is no built development proposed within the part of the site which falls within the designated conservation area in the Design Concept Document 2018.

In fact, there is typically a buffer of approximately 70m of public open space or strategic open space separating any built development from the conservation area boundary. The site allocation affords the opportunity to preserve or enhance the ecological

	<p>and landscape character of the conservation area as well as the proposed areas of public open space and strategic open space which fall just outside the boundary of the conservation area.</p> <p>There will inevitably be some vantage points where the development can be seen from the conservation area or the conservation area can be seen from the development but the relationship between the built environment and the landscape is an inherent part of the character of the Nazeing and South Roydon Conservation Area. Careful design, particularly in the master planning and landscape design, mean that the statutory duty to preserve or enhance the character or appearance of the conservation area is quite achievable at the West Sumners site allocation. Policy SP5(G) specifically requires the development to include: “Strategic ‘green infrastructure’ comprising natural/semi natural open space, walking and cycling routes, flood mitigation and wildlife space and new Green Belt defensible boundaries as indicated on the map.” The policy will effectively secure appropriate treatment of the part of the West Sumners site allocation which falls within the conservation area.</p> <p>The Nazeing and South Roydon Conservation Area is widely drawn and it overlaps the West Sumners site allocation along part of its eastern boundary. The Design Concept Document 2018 illustrates how the site can be developed without building on land which falls within the conservation area. It also demonstrates how public open space and strategic open space can be used to positively preserve or enhance the character of those parts of the site that fall within the conservation area as well as those areas which fall just outside the conservation area. The consequence is that the West Sumners site allocation, the Design Concept Document 2018 and Policy SP5(G) can all fulfil the statutory duty to have special regard to preserving or enhancing the special character or appearance of the Nazeing and South Roydon Conservation Area.</p>
<p>East of Harlow</p>	<p><b>Heritage assets<sup>9</sup>:</b></p> <p>The site contains some listed buildings including Grade II * Sheering Hall and several grade II listed buildings including two barns at Sheering Hall, a house north west of St Stephen’s cottages, Franklins Farmhouse, a locally listed building and a number of listed buildings just beyond the site boundary. Consideration will need to be given to the potential impact upon the setting of these listed buildings. However, there may be limited scope for development within parts of the site. There is also a Conservation Area in close proximity in Harlow and the site is within 500m of a Registered Park and Garden and archaeological assets. It is likely that impacts can be avoided / mitigated.</p>

<sup>9</sup> Harlow Strategic Site Assessment (AECOM, 2016), p. 40

	<p><b>Mitigation<sup>10</sup>:</b> Given scale, further assessment required on landscape impact (possible impact on setting of RPGs and SM). Impact on setting of GII* Sheering Hall and GII LB to centre, and GII LB within south of site. Mitigation reducing density, appropriate layout.</p>
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<sup>10</sup> Appendix B1.4.2 - Results of Stage 2 and Stage 6.2 Assessment Part 4 (EB805Fiv), p. B590