



Epping Forest District

Local Plan 2011 - 2033

Part One

Draft Final Version February 2023



**Epping Forest
District Council**

www.eppingforestdc.gov.uk

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

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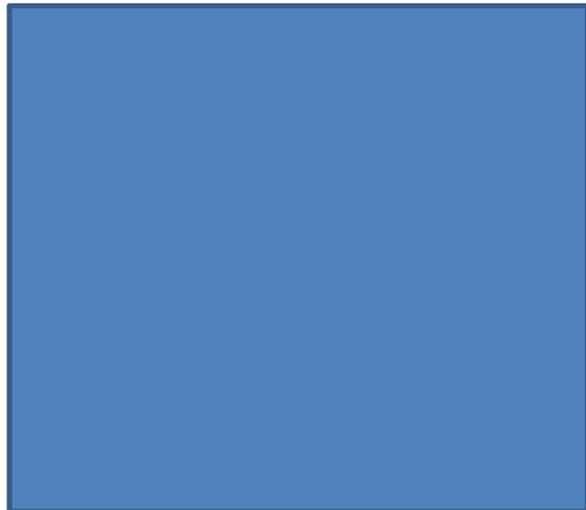
Please note Part Two of the Local Plan is published as a separate document and contains the Site Specific Policy Requirements and Designations. The Local Plan should be read as a whole.

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Foreword

To be inserted in Final Version of
Plan

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Chapter One

Introduction

The Purpose of the Local Plan

- 1.1 The Epping Forest District Local Plan sets out the strategy for meeting the District's needs from 2011 up to 2033. It is based on up-to-date evidence and the results of the previous consultations undertaken in 2010/11, 2012, and 2016.
- 1.2 The Local Plan sets out the approach and detailed policies for the whole District for the period up to 2033. It sets out:
- the Council's vision and objectives for the District's development over the Plan period;
 - policies to ensure that development delivers high quality and sustainable homes, built to a high quality of design and maintains our high quality built and natural environment;
 - the future distribution for housing growth and requirements for affordable homes;
 - policies to build a strong, competitive economy and set out the future distribution for new employment land space and thus new jobs;
 - policies to maintain and enhance the vibrancy and vitality of our town centres;
 - policies to support a sustainable transport and road infrastructure network; and
 - proposals for delivery, including Infrastructure Delivery Plans (IDPs), to demonstrate the infrastructure requirements necessary to support the site allocations and the delivery of the Harlow and Gilston Garden Town.
- 1.3 The Local Plan will shape how the District develops until 2033 attracting and guiding investment in the District from the private sector, the Council itself, and other public bodies. Such investment will include new homes, new offices and employment opportunities, colleges and schools, shops and leisure centres, GPs and clinics, as well as improvements to existing physical and green infrastructure. It will guide decision making on planning proposals to build or change the use of buildings and land. It will also provide the

strategic policies that form the context for any Neighbourhood Plans produced in the District.

- 1.4 The Local Plan includes the policies that the Council considers to be in line with the most suitable way to develop the District in the future. The Epping Forest District Local Plan replaces all of the surviving policies of the Local Plan 1998 and the 2006 Local Plan Alterations (see Appendix 2). Minerals and Waste Policy remains the responsibility of Essex County Council. The current Essex Minerals Local Plan was adopted in July 2014 and the Joint Essex and Southend-on-Sea Waste Local Plan was adopted in 2017. More information on which can be found on the Essex County Council website.

The Requirements of Plan Making

- 1.5 The Epping Forest District Local Plan has been prepared under the legislative provision of the Planning and Compulsory Purchase Act 2004 and appropriate regulations including the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan has taken into account national planning policy set out in the National Planning Policy Framework (NPPF) (DCLG, 2012), Planning Policy for Traveller Sites (DCLG, 2015) and the web based published Planning Practice Guidance. The NPPF sets out a presumption in favour of sustainable development, which is the core aspect of national planning policy.
- 1.6 The Council's policies are backed up by credible, robust and proportionate evidence that supports the approach taken and justifies what is proposed. It is the Council's job to balance all of the evidence and find the most suitable way forward. The evidence base includes research on housing, employment, retail, health and wellbeing, the built and natural environment, accessibility and flooding as well as the views of local people, businesses, landowners and public agencies involved in the District.
- 1.7 The Council has identified need for development in an objective manner and sought to provide for this need. As well as meeting the identified need the proposals in the Local Plan

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are economically viable for delivery by the market and achievable.

- 1.8 In accordance with the 'Duty to Co-operate' set out in the Localism Act 2011 the Local Plan has been produced through close partnership working with the neighbouring authorities to ensure that sub-regional and cross boundary planning issues have been taken into account.
- 1.9 To ensure that the policies of the Local Plan are in line with the objective of sustainable development, a Sustainability Appraisal of the Local Plan has been undertaken. The appraisal assessed the impact of planning policies in terms of their social, economic and environmental impacts. The Sustainability Appraisal addressed the requirements of the European Union Strategic Environmental Assessment Directive (OJEC, 2001) and complied with the Habitats Directive (OJEC, 1992). An Equality Impact Assessment has been undertaken alongside the Sustainability Appraisal. The Equality Impact Assessment considered how the Local Plan impacts upon matters relating to gender, age, ethnicity, religion/belief, disability, sexuality and low disposable income.

The Plan Making Process

- 1.10 The Council consulted throughout the preparation of the Local Plan, and in particular through three formal consultations: Community Visioning in 2010/2011, Community Choices in 2012; and Epping Forest District Draft Local Plan Consultation 2016. There was on-going consultation with Parish and Town Councils through a range of workshops and briefings. The results of the public consultations can be found on the Council's website at the following location: <http://www.efdclocalplan.org/>.
- 1.11 All of the comments received were considered during the production of the Local Plan.

¹ These are Theydon Bois, Debden, Loughton and Buckhurst Hill, together with the stations on the branch line at Roding Valley, Chigwell and Grange Hill.

Neighbourhood Planning

- 1.12 Neighbourhood Plans were introduced through the Localism Act 2011. Communities can shape development in their areas through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders. When made, following an examination and successful referendum, Neighbourhood Plans will become part of the development plan for the area. Locally distinctive Neighbourhood Plan policies must reflect the strategic policies of the Epping Forest District Local Plan. The strategic policies identified for the purpose of Neighbourhood Plan preparation and examination are those within:
- Chapter 2 'Strategic Policies' with the prefix 'SP';
 - Chapter 3 'Housing, Employment and Transport' with the prefix 'H', 'E' or 'T';
 - Chapter 5 'Places' with the prefix 'P'; and
 - Chapter 6 'Infrastructure and Delivery' Policies 'D1 to D5 and D7'.
- 1.13 There are Neighbourhood Plans in various stages of production across the District. The position on progress will change across the life of the Local Plan – details of the up-to-date position can be found on the Epping Forest District Council website.

The Plan Area

- 1.14 Epping Forest District is in the South West of Essex abutting both Greater London and Hertfordshire. The South West of the District is served by the London Underground Central Line (both the main line and the 'Hainault via Newbury Park' loop). Epping Station is the most eastern terminus and there are seven other stations in service in the District¹. There is one national railway station in the District at Roydon on the Liverpool Street to Stansted and Cambridge line, although other railway stations (Broxbourne, Sawbridgeworth, Harlow Town

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and Harlow Mill) are close to, and accessible from, the District. The Central Line previously ran further than Epping, through stations at North Weald and Blake Hall to the end of the line at Ongar. Blake Hall station closed in 1981 with the line closing in 1994. In recent years the 'Epping Ongar Railway' has been established as a heritage line along the former Central Line track. There is currently no operational rail connection between the heritage rail line and the Central Line track at Epping, but the 'Epping Ongar Railway' runs some shuttle bus services locally.

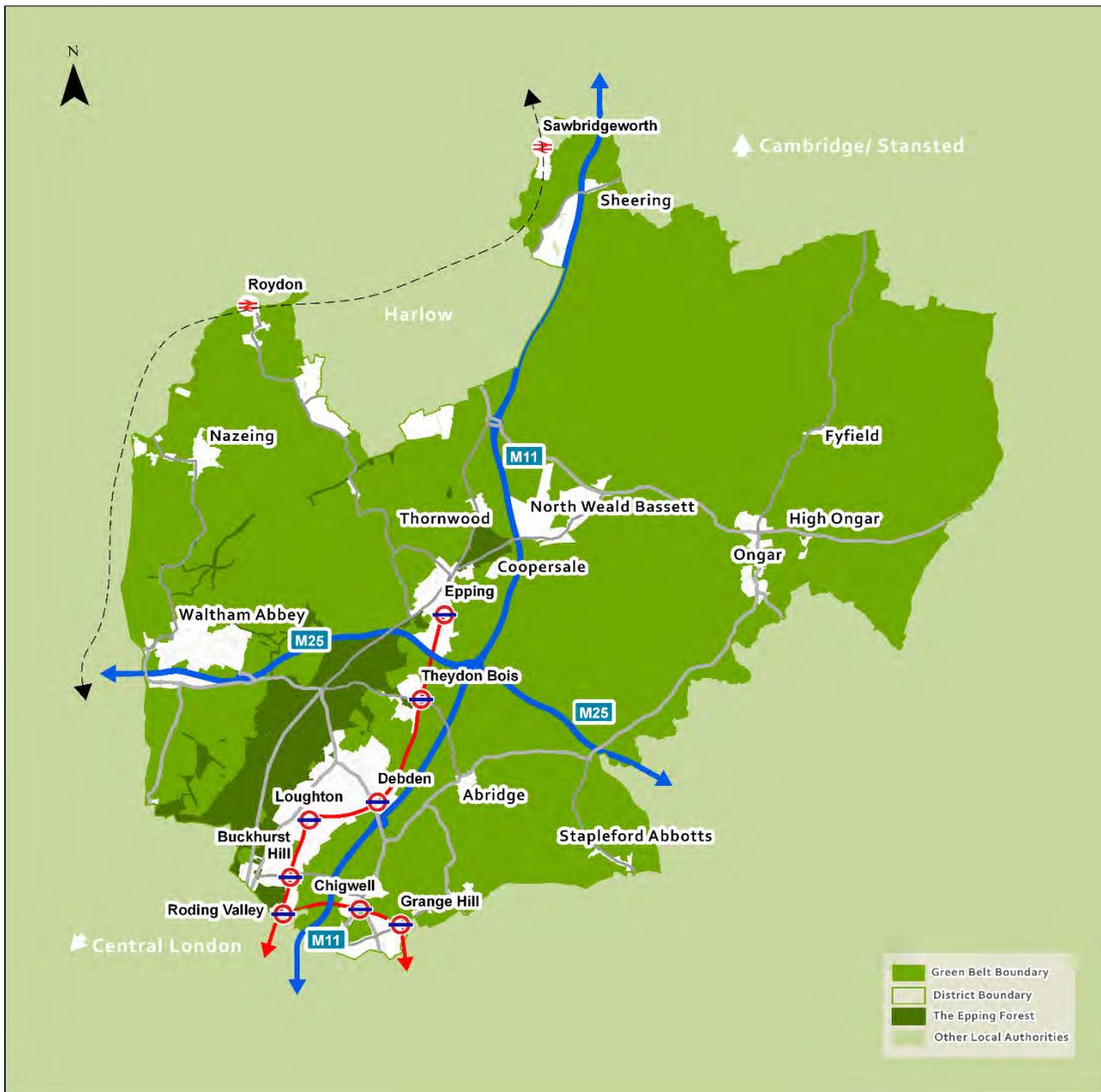
- 1.15 The M25 runs East West through the District, with a local road interchange at Waltham

Abbey. The M11 runs North South, with a full interchange (Junction Seven) at Hastingwood just South of Harlow, and a Northward-off/Southward on interchange (Junction Five) at Loughton. There is also a motorway only interchange with the M25 South East of Epping (Junction Six). The A414 is a key East West route and this crosses the District from Harlow to Ongar on the way to Chelmsford and the Essex coast.

- 1.16 The District has 20 parish councils and town councils and covers an area of approximately 130 square miles.

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Figure 1.1 Epping Forest District

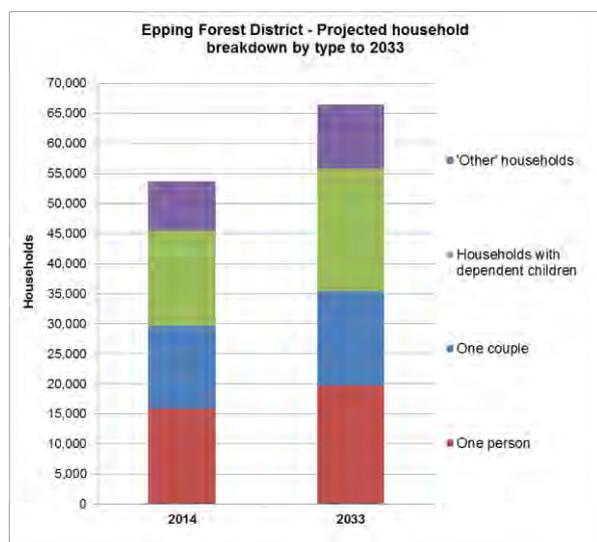


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Population Profile

- 1.17 The 2011 Census recorded a population of about 124,660 people making up 52,083 households.² In the 2016 projections these figures rose to 130,300 and 54,867 respectively.³ The population is therefore estimated to have increased by just over 5,000 over the period 2011 to 2016.
- 1.18 Compared to the rest of England, the District had higher levels of people aged 45–64 and 65 and over in 2011 with the proportion of people aged 65 and over in the District projected to grow substantially by 2033. Alongside this increase, the number of 30–64 year olds is projected to drop, with the number of 15–29 year olds projected to drop slightly and the proportion of people aged 0 to 14 to rise a little.
- 1.19 The number of households is projected to rise to 66,460 by 2033³. The numbers of households consisting of one person or a family with dependent children are expected to increase with fewer households consisting of one couple, as shown in Figure 1.2.

Figure 1.2 Projected household breakdown by type to 2033



- 1.20 Life expectancy both at birth and at age 65 in the District in 2010–12 was higher than the national and Essex averages, and similar to the rest of the East of England region. The District's

life expectancy at birth has risen since 2000 from 76 to 79 for males and from 81 to 83 for females. Births and deaths have remained relatively steady since 2007. There have been more births than deaths, contributing to a rise in population.

- 1.21 The District's population is affected by three main types of population change:
- natural change (the net gain of births minus deaths, of District residents);
 - internal migration (the net gain of people moving to the District from elsewhere in the UK, or vice versa); and
 - international migration (the net gain of people moving to the District from outside the UK, or vice versa).
- 1.22 Internal migration is projected to be the largest contributor of population growth as a result of the District's proximity and connections to London. Natural change has had a smaller but positive impact on population growth. Whilst future migration trends may be affected by the UK leaving the EU, it is currently unclear what the likely implications might be for international migration. However current projections show this element only makes up a small proportion of population change. The ONS 2014–based population data projects that the net international migration will decrease in the period from 2014–2015 to 2020–2021 by roughly 44%, so there is only a need to look at a decrease in housing provision if it exceeds this prediction.

Key Characteristics

- 1.23 The District is largely rural and over 90% of the land is designated as being in the Metropolitan Green Belt. Agriculture is mainly arable, particularly in the North East of the District. There is a significant amount of horse keeping in parts of the south and glasshouse horticulture is a prominent land use in parts of the Lee Valley especially in Roydon and Nazeing. The District has two town centres and four District Centres– Loughton High Road/Loughton Broadway and

² A household is defined as a single person who lives alone or a group of people who live together.

³ ONS population estimates and DCLG household projections

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Buckhurst Hill in the South, Waltham Abbey to the West, Epping in the centre of the District, and Ongar towards the East. Epping, Ongar and Waltham Abbey are market towns of medieval origin. Villages and rural communities are dispersed throughout the rest of the District. Several of these villages are also designated as Conservation Areas. There is a significant concentration of population in the South of the District.

- 1.24 The countryside of the District is gently undulating, dissected by two river valleys (the Lea and the Roding) and their tributaries. The District has an abundance of areas of importance for conservation and leisure for both the local and London's population. The Epping Forest, which is owned and managed by the City of London Corporation is a key natural feature of the District. The main part of the Epping Forest runs from Wanstead (in London) along the North West boundary of Buckhurst Hill, Loughton and Theydon Bois and extends to the Southern end of Epping. A separate area (The Lower Forest) abuts Epping on its North Eastern edge.
- 1.25 The whole of Epping Forest South of Epping in the District is a 'Special Area of Conservation', designated in 2005, and has special protection under the European Habitats Directive (designed to protect a variety of wild animals, plants and habitats). The Lower Forest is one of eight 'Sites of Special Scientific Interest' in the District which also affords a significant degree of protection. Nearby, the Turnford and Cheshunt Pits in the Lee Valley are a 'Special Protection Area' which falls partly within the District. Special Protection Areas are internationally important for birdlife, and in this instance for wetland birds. There is also a designated Lee Valley 'Ramsar' site (a wetland of international importance), covering the part of the Turnford and Cheshunt Pits within the District.
- 1.26 Nine local nature reserves have been designated and the Essex Wildlife Trust has identified over 220 local wildlife sites. In addition to the Epping Forest there are several other Ancient

Woodlands in the District, including remnants of Hainault Forest, together with a significant number of Ancient and Veteran Trees⁴, including hedgerow pollards.

- 1.27 Most of the Western edge of the District (excluding the built-up areas of Waltham Abbey and Nazeing) is included in the Lee Valley Regional Park (LVRP). This is managed by the LVRP Authority as a place for leisure, recreation, sport and nature conservation.
- 1.28 Built and natural heritage features are an important part of the character of the District. 25 Conservation Areas have been designated and there are over 1,300 statutorily Listed Buildings. There are currently a further 300 'Locally Listed' buildings. In addition, there are over 30 Scheduled Monuments ranging from the earthworks of a Norman castle, to a Second World War fortification. There are also several Registered Parks and Gardens.
- 1.29 Construction from the mid to the late 19th century of what is now part of the London Underground Central Line, and the proximity to London, have greatly influenced the scale and location of development in the District. Significant growth of Buckhurst Hill and Loughton/Loughton Broadway and, to a lesser extent, Chigwell, Epping and Theydon Bois, followed the development of the railway. The post-World War II London overspill estates led to considerable expansion of Waltham Abbey and Loughton Broadway (also known as Debden).
- 1.30 The District's two Town Centres: Epping and Loughton High Road and four District Centres: Loughton Broadway, Ongar, Buckhurst Hill and Waltham Abbey are the main retail/service centres. These centres are all fairly small compared with much larger centres nearby – notably Brookfield Shopping Park (in Broxbourne Borough), Chelmsford, Harlow Town, Romford and Westfield Stratford City; this causes significant and growing competition. In common with all other main retail/service centres, the growth of internet shopping is also

⁴ "An ancient tree is in its third or final stage of life.... A veteran tree is usually in its second or mature stage of its

life". (The Woodland Trust, <http://www.woodlandtrust.org.uk/visiting-woods/ancient-treehunt/what-are-ancient-trees/>).

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an increasing threat to the viability and vitality of the District's retail/service centres.

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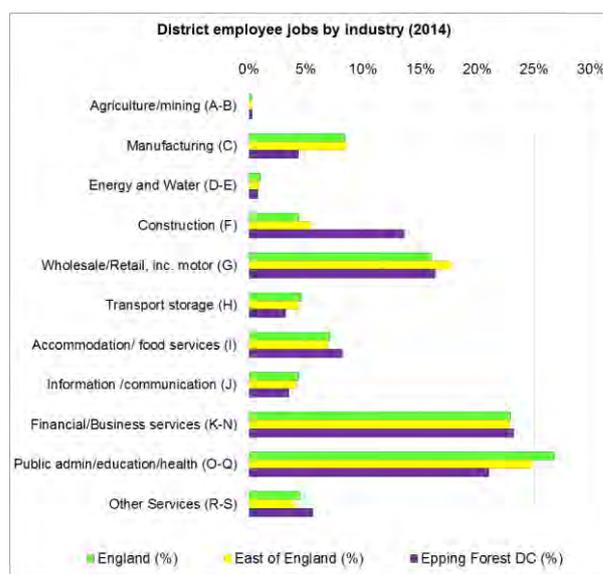
Economic Profile

- 1.31 Economic activity rates in the District are high for both men and women, with 78.5% of 16–64 year olds in employment which is similar to the average for England (78%) and slightly lower than the East of England average (80.2%)⁵. Within this, male employment (81%) is higher than female employment (76.1%). At 17%, self-employment makes up a significant proportion of overall employment and is higher than the East of England and England averages.
- 1.32 There is a large proportion of ‘micro’⁶ and ‘small’⁷ businesses in the District in comparison to the averages for Essex, East of England and whole of England, which shows their importance to the District economy. There is also a high level of business start-ups in the District and this number rose by 11.7% from 2009 to 2014, which is higher than the Essex (7.6%), East of England (6.45%) and England (9.57%) increase over the same time period. In comparison to the East of England, there are more ‘higher’ classification jobs such as managers and professional occupations in the District.
- 1.33 The horticultural glasshouse industry has a long-standing and visible presence in the District, as the larger part of a concentration of activity in the Lee Valley that produce significant crops for the London and UK markets.
- 1.34 In 2015, the proportion of the District’s residents with no qualifications was lower than the average for the East of England and for England as a whole; the level of District residents with NVQ4 and above was higher than the regional and national averages; however qualifications from NVQ1 and above to NVQ3 and above were lower than the averages.
- 1.35 In addition to the main retail/service centres, the main employment sites within the District are in Loughton Broadway, Epping, Nazeing, North Weald Bassett (including the Airfield) and Waltham Abbey, where the larger industrial

estates are located. Around half of the District’s working residents commute out of the District for work, with the largest proportion travelling to London. There is evidence of proportionally high levels of working from home in the District⁸.

- 1.36 The majority of people who commute into the District come from Harlow and the London Borough of Redbridge, and the greatest number of District residents commuting out go to Westminster. In 2014 there were 44,100 employee jobs based in the District, of which approximately 64.8% were full-time and 35.2% part-time. The financial and business services, public administration, education and health, wholesale and retail and construction sectors are the most common in the District, as shown in Figure 1.3

Figure 1.3 District employee jobs by industry



- 1.37 Large employers in the District include: Kier and Higgins (with headquarters in Loughton Broadway); Sainsbury’s (with a distribution centre in Waltham Abbey and stores in Loughton, Loughton Broadway and Ongar), Tesco in Waltham Abbey, Epping Forest District Council, Sports and Leisure Management (Places

⁵ NOMIS, Labour Market Profile for Epping Forest District, downloaded November 2017, data relating to the period of July 2016-July 2017

⁶ 0 to 9 employees – one person who is self-employed and has no employees counts as zero

⁷ 11- 49 employees

⁸ 4.05 percent of employed residents, 2011 Census

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for People, which manages the Council’s leisure centres), Essex County Council, the National Health Service, the Bank of England Printing Works, Epping Forest College and the working glasshouses which form the Epping Forest District part of the Lee Valley glasshouse industry.

1.38 District residents most commonly travel to work using a car or van (or taxi), following the pattern for Essex, the East of England and England as a whole. However, there is far higher use of ‘Underground, metro, light rail or tram’ public transport for commuting from the District than any of those other three areas, due to the proximity of London and the presence of many London Underground Central Line stations in the District.

1.39 Using the Government’s Indices of Deprivation (2015), the majority of the District experiences less ‘deprivation’ than the rest of the country. However, there are pockets of deprivation within the District when looking at factors including access to housing and services, and adult skills. Similarly, when considering health measures overall the indicators are good however there is variation at a more localised level. For instance, life expectancy is higher than the national average when considering the district level; however it varies significantly in different areas within the District– the difference can be up to five point three years lower (males) and four point six years lower (females) in the most deprived areas compared to the least deprived areas in the District.

1.40 Table 1.1 gives an overview of the 78 Lower Super Output Areas (LSOAs) in the District and how they fall into the national categories of deprivation. None of the areas within the District ranked within the ten percent most deprived nationally (also known as the 1st decile). Parts of Loughton Alderton and Waltham Abbey Paternoster wards were ranked within the 20% most deprived (2nd decile), with parts of Grange Hill, Waltham Abbey North East and Waltham Abbey High Beach wards in the 30% most deprived (3rd decile). The District’s pockets of deprivation are found both in urban and rural areas. The rural areas often (but not exclusively) score worse on the Index of

Multiple Deprivation solely due to sub rankings relating to the distance to specific local services and access to affordable homes.

Table 1.1 Rankings of areas within the District by Indices of Deprivation

Category of deprivation	Number of the District’s Lower Super Output Areas in this category
1 st decile (10% most deprived nationally)	0
2 nd decile	2
3 rd decile	3
4 th decile	15
5 th decile	10
6 th decile	8
7 th decile	9
8 th decile	12
9 th decile	14
10 th decile (10% least deprived nationally)	5
Total	78

1.41 Housing affordability in the District has been a significant problem in more recent times. This is the same for similar areas situated on the border of Greater London, which are attractive to city commuters.

1.42 The Council’s own housing waiting list stood at 1,360 households in August 2016. It has in previous years been significantly higher, but it dropped in 2013 when a revised Housing Allocations Scheme was applied, requiring applicants to have lived within the District for at least three years (or two and a half years for current residents).

1.43 There is a significant need for additional affordable homes within the District as set out in the Strategic Housing Market Assessment (SHMA) 2015. Table 1.2 sets out unmet need for affordable homes between 2011 and 2016, and the District’s future need for affordable homes

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for the period 2016–2033 based on the 2017 update of the SHMA.

Table 1.2 Need for Affordable Homes in Epping Forest District 2011-2033

Epping Forest District Need for Affordable Homes (Households)	
Unmet need for affordable homes 2011 – 2016	665
Future need for affordable homes 2016–33	2,186
Total need for affordable homes 2016–33	2,851

Key Issues for the Local Plan to Address

1.44 There are a number of important issues that the Local Plan addresses. More detail about them is found in Chapters 2–6. They include:

- ensuring that sustainable development is achieved, and that climate change is considered in the policies and proposals of the Local Plan;
- how to manage and accommodate the needs of the current and future population and the future economic needs of the District. This will need to be supported by necessary infrastructure;
- there is very little land remaining in the District within the settlements that is not already developed, in order to plan properly for the future, a District-wide review of the Green Belt was undertaken to identify the potential for future development;
- the continued protection of the remaining Green Belt, and in particular preventing the merging of settlements and checking the unrestricted sprawl of large built-up areas;
- a recognised need for significant regeneration of Harlow, including through the delivery of Harlow and Gilston Garden Town;
- the need to ensure a housing stock that matches the needs of the population, including catering for an ageing population and more single person households, providing affordable homes and starter homes for those who cannot afford market prices and providing for the traveller communities;
- providing the right type of sites for jobs in the right locations;
- establishing which existing employment sites should be released for other purposes;
- encouraging new uses and activities to ensure the survival, vitality and viability of the District’s six Town and District Centres, in response to growing competition;
- protecting local services in the District’s rural areas and facilities in villages;
- providing for future rural retail and commercial development, rural employment and supporting agriculture and horticulture whilst ensuring that unused horticultural and other agricultural buildings are reused;
- addressing the transport needs of current and future populations in rural and urban areas along with many other infrastructure needs such as health, education, community spaces and places, faith, culture, sport and leisure opportunities;
- to enable the step change that is required for a modal shift towards more sustainable transport patterns and sustainable travel behaviour;
- the management of congestion, Heavy Goods Vehicles (HGVs) on local roads and provision of opportunities for walking, cycling and public transport, in addition to

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the management of commuter parking around London Underground stations;

- protecting and improving the impressive range and quality of places for enjoyment of the outdoors, sport and nature conservation in the District; and
- protecting and enhancing the historic environment, protected trees, hedgerows and landscape.

1.45 The Council has produced this Plan in close co-operation with partner organisations such as Essex County Council, the Environment Agency, Historic England, National Highways, Natural England, Strategic Housing Market Area partners and adjoining authorities. The successful implementation of the Local Plan depends upon a range of agencies and organisations as well as the private sector and developers. The Epping Forest District Local Plan will provide the future framework for the District up until 2033.

Finding Your Way Around This Document

1.46 The Plan consists of two parts, Part One is structured as follows:

- Chapter Two explains the broader context of the Local Plan, and the overall vision and objectives for the Plan together with the strategic policies which set out:
 - how much development is to be planned for;
 - where that development should be located together with major transport infrastructure;
 - policies for the Garden Town and allocations for Garden Town communities;
 - Green Belt boundaries and policy; and
 - green and blue infrastructure networks.
- Chapter Three contains policies on housing, employment and transport;
- Chapter Four contains development management policies including natural

environment, historic environment, design and environmental policies;

- Chapter Five contains policies that apply to specific places and has a section on each of the main settlements and town centres;
- Chapter Six sets out the infrastructure policies and approach for seeking contributions from developers as well as how the Local Plan will be delivered and monitored;
- the Appendices include a range of key supporting information:
 - Appendix 1: Acronyms and Glossary
 - Appendix 2: List of Plan Policies replacing all policies of the Epping Forest District Local Plan (1998) and Alterations (2006)
 - Appendix 3: List of measures to monitor the effectiveness of policies in the Local Plan
 - Appendix 4: List of Policy Designations
 - Appendix 5: Housing, Employment and Traveller Trajectories.

1.47 Part Two sets out the Site Specific Policy Requirements and Designations:

- Section A – provides site specific policy requirements for the site allocations identified in Chapter Five of Part One of the Local Plan (except for the Strategic Masterplan Areas where the detail is included within Part One of the Local Plan); and
- Section B – presents more detailed mapping of the employment designations identified in Chapter Five of Part One of the Local Plan.

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

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Chapter Two

Strategic Policies

Strategic Context

2.1 This section sets out the strategic context, including the vision and objectives against which the policies of the Local Plan have been developed. It includes the key policies which set the strategic direction of the Local Plan including a positive approach to sustainable development, the amount of development needed in the District and the associated infrastructure requirements, the proposed spatial distribution of this development, policies for the Harlow and Gilston Garden Town and the delivery of new communities in the Garden Town, the approach to the Green Belt and the green and blue infrastructure networks (including the Epping Forest and the Lee Valley Regional Park (LVRP)).

Strategic Planning and Meeting the Duty to Co-operate

2.2 National planning policy requires that public bodies have a Duty to Co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities. Local authorities need to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts. This could be by way of Plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2.3 This Local Plan has taken into account the Duty to Co-operate in section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and national policy on the Duty to Co-operate. Section 33A of the 2004 Act places a legal duty on local planning

authorities, county councils and specified public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in relation to strategic cross boundary matters¹.

2.4 There are ten adjoining local authority neighbours, four in Essex (Brentwood, Chelmsford, Harlow and Uttlesford), two in Hertfordshire (Broxbourne and East Herts), and four London Boroughs (Enfield, Havering, Redbridge and Waltham Forest) together with Essex and Hertfordshire County Councils and the Greater London Authority. There are in addition, a wide range of organisations that have an interest in strategic planning in the District. These organisations include important partners such as Historic England, the Environment Agency, National Highways, Natural England, the LVRP Authority, the City of London Corporation (as the Conservators of Epping Forest) and others.

2.5 The Councils established the Co-operation for Sustainable Development Member Board in October 2014 (the Co-Op Board) in order to take a strategic approach to the delivery of housing, economic development and other cross boundary issues across the area. In January 2017 Epping Forest District, Harlow District and East Herts District Councils were given Garden Town status for the Harlow and Gilston Garden Town. A Garden Town Member Board has been established with representatives from these authorities and the two County Councils to consider issues specifically associated with the Garden Town.

2.6 The District Council is a member of many partnership groups containing different mixes of these partners, and others, depending upon the relevant matters. These groups are working to address the strategic matters set out in this Plan. In brief the matters are:

- the amount, type and distribution of housing across the Strategic Housing Market Area;

¹PPG Ref ID: 61-029-20190315

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- the economic role of Epping Forest District in the Functional Economic Market Area (FEMA) including retail, and the amount and type of development required to meet needs;
- the role of Epping Forest District as a location within the London Stansted Cambridge Corridor (UK Innovation) (LSCC);
- future planning policy for glasshouse food production which extends beyond the District;
- strategic social infrastructure such as secondary and higher education and hospitals;
- the extent of the Green Belt and any alterations through Local Plan processes by Epping Forest District Council and neighbouring authorities;
- the recreation and conservation role of Epping Forest and other green and blue infrastructure in a wider context; and
- strategic transport infrastructure – road, rail, London Underground, bus, and other networks.

2.7 A number of critical pieces of evidence for the Local Plan have been commissioned on a joint basis across administrative boundaries. Key partners such as Essex County Council, National Highways, the City of London Corporation, the LVRP Authority, Historic England, the Environment Agency and Natural England have been engaged in developing the policies in the Local Plan on an ongoing basis. The District surrounds Harlow on three sides and this presents an opportunity to provide development to support the broader regeneration and growth of Harlow Town, and together with East Herts District Council, to create a new Garden Town. This requires a shared commitment with neighbouring authorities, infrastructure providers and national Government to provide a strategic approach.

London Stansted Cambridge Corridor Core Area Strategic Vision

- 2.8 The LSCC covers the area of London from the Royal Docks, Tech City, the City Fringe, Kings Cross, and the Olympic Park, North, through the Lee Valley, the M11, A1 and A10 road, the East Coast and West Anglia mainline rail corridors to Stevenage, Harlow and London Stansted Airport, and through to Cambridge and Peterborough.
- 2.9 The District Councils of Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford form the LSCC Core Area which lies at the heart of the LSCC. This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses.
- 2.10 Over the past five years the Corridor’s dynamic, knowledge-based economy has grown at a rate almost double that of the UK average and as a result rates of population growth have increased. Transport links are excellent; with two major rail routes - the East Coast and West Anglia mainlines - serving the Corridor. The A1(M), A10 and M11 link its towns and cities with the Capital, whilst London Stansted Airport offers international connections.
- 2.11 With a significant number of jobs in knowledge-based industries, the Corridor is a leading knowledge economy and a showcase for tech industries and firms. There is a high rate of innovation.
- 2.12 The Corridor accounts for 24,700 jobs in the life sciences sector comprising 11% of all employment in this sector. This success is built on research institutes and notable firms and organisations, including Amgen and AstraZeneca in Cambridge, GlaxoSmithKline in Stevenage, and Public Health England in Harlow.

Vision for the London Stansted Cambridge Corridor Core Area

The Core Area will build on its key strengths including its skilled workforce in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace, its high quality environment and education opportunities. Together with London Stansted Airport, the local authorities will deliver sustainable growth which supports the economic ambition of the LSCC and the UK through:

- (i) complementing and supporting the economic performance of the Corridor

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whilst maintaining and enhancing the special character of the area, including the locally distinctive historic character of its market towns and rural settlements;

- (ii) the delivery of housing, supported by good access to social, leisure, community and health facilities, education and jobs, that meets the needs of local people and supports sustainable economic growth, whilst ensuring it remains an attractive place for people to live and locate to;
- (iii) capitalising on existing economic sectors and promoting growth of expanding industries including in the food production, life sciences, pharmaceuticals and technology sectors, tourism including hotels, London Stansted Airport's expansion, recreation, green assets including the Lee Valley, Stort Valley, Epping Forest and Hatfield Forest National Nature Reserve;
- (iv) working with partners to protect and enhance the high quality environment, its unique landscapes and places of special wildlife value. This would be achieved by place-shaping initiatives which would include measures to conserve areas of high biodiversity; the provision of new, alternative greenspaces for people and wildlife; and the increase of green and blue infrastructure connections between these areas, to provide greater opportunities for more sustainable access to nature for everyone living in the Corridor;
- (v) working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7A and improvements to Junctions 7 and 8, and to the A414, A120, A10 and M25; and delivery of superfast broadband;
- (vi) supporting the delivery of new jobs in the Harlow Enterprise Zone, and the North side of London Stansted Airport, Broxbourne Park Plaza, Brookfield and Bishop's Stortford – all identified as Strategic Opportunity Sites within the Corridor; and

- (vii) the regeneration of existing urban areas including at Harlow, Waltham Abbey, Loughton and Waltham Cross.

The Core Area supports the development and sustainable growth of Greater Harlow and key growth locations at Broxbourne, Brookfield and Bishop's Stortford together with London Stansted Airport growing to its full permitted capacity and as a business growth hub. These centres, with proportionate growth throughout the wider area, and the right investment, would create an economic powerhouse.

Putting in place these critical building blocks will provide the foundations for looking further ahead to 2050. Certainty through further investment and delivery of key infrastructure, including in the West Anglia mainline, Crossrail 2, the M11 junction, M25 junction, A414, A120 and A10 is a vital component of this.

- 2.13 The Local Plan has taken into account the wider context within which it is located, and therefore the need to reflect the aspirations and opportunities identified in the LSCC Vision.

The West Essex and East Hertfordshire Strategic Housing Market and Functional Economic Market Area

- 2.14 Epping Forest, East Herts, Harlow and Uttlesford District Councils together with the two County Councils have a substantial history of co-ordinated working on strategic planning issues, not least on assessing housing need and planning for future growth.
- 2.15 Three Strategic Housing Market Assessments (SHMAs), published in 2010, 2012 and 2015 have been undertaken for the combined area of East Herts, Epping Forest, Harlow and Uttlesford Districts. The 2015 SHMA gives an up-to-date and policy compliant assessment of housing need over the Housing Market Area (HMA) for the period 2011-2033. Further partial updates were also undertaken in 2016 and 2017.
- 2.16 The four authorities have also commissioned joint economic and employment studies, to consider the Objectively Assessed Economic Need (OAEN) of the FEMA, which has been

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found to be the same as the HMA and inform the future distribution of growth.

- 2.17 A Memorandum of Understanding (MoU) has been agreed by the four District Councils, and supported by Essex County Council, Hertfordshire County Council and Highways England (now National Highways) in respect of the 'Distribution of Objectively Assessed Need across the West Essex/East Herts Housing Market Area' in March 2017. This forms part of the mechanism for delivering the LSCC Vision. Further MoUs were agreed in 2017 by the four authorities, Essex County Council, Hertfordshire County Council and Highways England (now National Highways) in relation to the provision of Strategic Highways and Transport Infrastructure to support the delivery of the strategic housing and economic needs of the wider area, and with Natural England and the Conservators of Epping Forest to ensure that the Epping Forest Special Area of Conservation (SAC) is monitored to ensure that the growth does not adversely affect air quality in the Forest. A fourth MoU in May 2018 agreed the distribution of economic growth across the FEMA. These four MoUs are available as part of the evidence base for the Local Plan

Lee Valley Regional Park

- 2.18 The LVRP was created by a unique Act of Parliament in 1966 as a "green lung" for London, Essex and Hertfordshire. It follows the course of the River Lea for almost 23 miles (37 km) from the Southern edge of Ware in Hertfordshire to the River Thames at East India Dock Basin and comprises some 4,000 hectares of open space interspersed with various leisure facilities with some pockets of residential, industrial or horticultural developments.
- 2.19 The main body of the Regional Park extends from Ware to Leyton, with a substantial area lying within Epping Forest District (1,590 hectares or 39.75%, of which 97.97% is in the Green Belt) including the River Lee Country Park, recreational open space resources at Nazeing, Glen Faba and Roydon, a range of family orientated visitor facilities located at Fishers Green and Hayes Hill Farm, well established sailing facilities at Nazeing lagoons, and angling, walking and cycling facilities throughout. Important ecological resources including parts of the Lee Valley Special Protection Area (SPA) and Ramsar site provide opportunities to enjoy and learn about nature with good access for all abilities. Further visitor and educational opportunities are provided by the key heritage assets at Waltham Abbey Gardens, Royal Gunpowder Mills and Royal Gunpowder Park. The Lee Valley White Water Centre lies just across the District border in Broxbourne.
- 2.20 The Lee Valley Regional Park Act 1966 (the Park Act) defined the boundary of the Park and established the LVRP Authority. It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the 4,000 hectares of the Park. It has an appointed board of 28 Members. The Members are elected and nominated to the LVRP Authority by their own constituent authorities. Epping Forest District Council has two members appointed to the Board.
- 2.21 Section 14 (1) of the Park Act requires the LVRP Authority to prepare a Plan setting out proposals for the future management and development of the Regional Park (the Park Plan). Local planning authorities whose areas are included within the Park are subject to a statutory duty to include those parts of the Park Plan affecting their area within their development plan (Section 14(2) (a)); although inclusion shall not be treated as indicating the approval of the local planning authority to the Park Plan (Section 14 (2) (b)).
- 2.22 The LVRP Authority has adopted a suite of documents, the Park Development Framework (PDF), which sets out its aspirations and specific proposals for the future use and development of the Regional Park. The adopted documents include the Vision, Strategic Aims and Principles (2010), a series of Thematic Proposals, Strategic Policies, a revised Landscape Strategy and a series of more detailed park wide Area Proposals.

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2.23 The LVRP Authority is not a local planning authority for the purposes of either Local Plan preparation or a decision maker for planning applications. Consequently, the Local Plan will be an important document in terms of the protection, enhancement, development and management of the LVRP and the public enjoyment of its leisure, ecological, heritage, and sporting resources. It will need to recognise and support the Regional Park as a key asset for the District, and component of the region's green and blue infrastructure.

Lee Valley Regional Park Vision

A. Lee Valley Regional Park – A world class leisure destination

This is supported by six strategic aims:

- (i) Visitors: A Park that is a high quality and regionally unique visitor destination.
- (ii) Sport and Recreation: A Park that delivers a range of high quality opportunities for sport and recreation.
- (iii) Biodiversity: A Park that delivers a high quality biodiversity resource for the region.
- (iv) Community: A Park that helps people improve their wellbeing.
- (v) Landscape and Heritage: A Park landscape that embraces the physical, cultural and social heritage of the area.
- (vi) Environment: A Park that contributes to the environmental sustainability of the region.

2.24 The Vision for the LVRP is included in the Local Plan under section 14(2)(a) of the Park Act. The delivery of the Vision is supported by the Local Plan through a number of policies including:

- Policy SP5 Green Belt and Local Greenspace;
- Policy SP6 The Natural Environment, Landscape Character and Green and Blue Infrastructure;
- Policy E4 The Visitor Economy;
- Policy DM1 Habitat Protection and Improving Biodiversity;
- Policy DM2 Epping Forest SAC and the Lee Valley SPA;

- Policy DM3 Landscape Character, Ancient Landscapes and Geodiversity; and
- Policy DM9 High Quality Design.

2.25 The LVRP Authority has prepared specific proposals for the future use and development of individual sites and areas that collectively form the totality of the Regional Park. In this respect, the Park is divided into eight areas. Parts of Epping Forest District are included within the adopted Area proposals for Areas Five, Six and Seven. The most up-to-date information on Area Proposals can be found on the LVRP Authority's website.

Conservators of Epping Forest

2.26 The Conservators of Epping Forest are charged with the duties and responsibilities for conserving and protecting Epping Forest under the Epping Forest Act 1878. Epping Forest Land covers 5% of the District, and together with the Buffer Lands, over 7% of the District. It is a major public recreation and tourist destination, which makes a major contribution to the provision of open space within the District. The Forest is protected by Site of Special Scientific Interest (SSSI) status and is designated as a SAC. As the competent authority under the Conservation of Habitats and Species Regulations 2017, the Council is subject to statutory duties to ensure that plans and projects will not adversely affect the integrity of the Epping Forest SAC and the reasons for its designation. There are identified issues in relation to poor air quality in and around the Forest and also pressures as a result of its recreational opportunities. The Council is committed to continuing to work with partners to address these issues.

2.27 The future conservation and enhancement of the Epping Forest through the management of potential impacts as a result of development and potential opportunities to enhance its biodiversity is supported by the Local Plan. A MoU to manage the impacts of growth within the 'West Essex/East Hertfordshire Housing Market Area on Epping Forest SAC' was agreed

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in March 2017. Policies in the Local Plan which support the objectives include:

- Policy SP6 The Natural Environment, Landscape Character and Green and Blue Infrastructure;
- Policy E4 The Visitor Economy;
- Policy T1 Sustainable Transport Choices;
- Policy DM1 Habitat Protection and Improving Biodiversity;
- Policy DM2 Epping Forest SAC and the Lee Valley SPA; and
- Policy DM9 High Quality Design.

Vision and Objectives for Epping Forest District to 2033

2.28 The following section presents the Council's aspirations for the area and forms the vision and objectives for the Local Plan. Individual visions for settlements within the District are contained in the relevant sections in Chapter 5.

Vision for the District

- A. By 2033 Epping Forest District will be a place where:
- (i) residents continue to enjoy a **healthy, happy and good quality of life**;
 - (ii) **new homes of an appropriate mix of sizes, types and tenures** to meet local needs will be provided and well integrated communities created;
 - (iii) development **respects the attributes** of the different towns and villages;
 - (iv) development needs will be met in the most **sustainable locations**;
 - (v) **Epping Forest** will be conserved and enhanced;
 - (vi) The **historic environment** will be preserved or enhanced;
 - (vii) the recreational and nature conservation aims of **Lee Valley Regional Park** will be supported;
 - (viii) a more **sustainable local economy** including tourism, aviation, research and development, construction and food production will be developed;

- (ix) a **distinctive and attractive network** of town and village centres will have been maintained;
- (x) the **natural environment and landscape character** will be protected and opportunities to improve access to the countryside will be taken, including by enhancing the District's green and blue infrastructure networks;
- (xi) **public transport, walking and cycling infrastructure** will be promoted to residents of new and existing developments to encourage **sustainable travel**;
- (xii) **significant residential development** will be located around Harlow to support the economic regeneration of the town; and
- (xiii) **air quality** will be improved.

How we will achieve this?

- 2.29 Development needs including the provision of new homes will be met in the most sustainable locations, balancing the use of existing infrastructure, the ability to deliver new infrastructure, minimising the adverse impact on the natural and historic environment and maintaining the Metropolitan Green Belt where it continues to make a contribution to its nationally defined purposes.
- 2.30 The Epping Forest will be conserved and enhanced and will continue to form a key part of the District's unique and distinctive identity. Residents will have access to open and natural spaces including the Forest, the LVRP and the countryside.
- 2.31 The District's economy will continue to have strong links with London whilst supporting significant economic growth planned for Harlow and London Stansted Airport. This will contribute to the wider economy whilst developing a more sustainable local economy which builds on its strengths and assets including tourism, aviation, research and development, construction and food production, as well as the variety of small businesses and skills of local people.
- 2.32 The District will maintain a distinctive and attractive network of town and village centres

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which can be accessed by public transport, walking and cycling as an alternative to the car, and which support local communities. All new development will be built to a high quality design and development opportunities within existing settlements will be maximised without compromising their distinctiveness and attractiveness. In order to cater for the housing and economic needs of both the District and the wider area, including supporting regeneration and economic growth at Harlow, a significant proportion of new homes will be located around Harlow through the creation of new sustainable communities.

- 2.33 In addition, the settlements within the District will play a role in the delivery of the Spatial Development Strategy by accommodating some development on new sites in order to cater for more local needs, provide choice and support the achievement of mixed and balanced communities.

Local Plan Objectives

A. Environment and Design

- (i) to protect the Metropolitan Green Belt within its revised boundary, and to encourage the re-use of previously developed land;
- (ii) to conserve and enhance the Epping Forest and its setting, including the Buffer Lands;
- (iii) to protect, and encourage appropriate management of other designated wildlife sites in the District, including the Lee Valley Special Protection Area, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites;
- (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;
- (v) to ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area, is of a high quality, incorporates green and blue infrastructure, protects and enhances biodiversity to

deliver a net gain where appropriate, and is designed so as to reduce opportunities for crime and anti-social behaviour;

- (vi) to ensure new development takes full account of, and mitigates or improves, where necessary, or appropriate, potential problems from air pollution, land contamination and noise; and
- (vii) to ensure new development supports healthy living through its design and provides opportunities for physical activity and access to quality open spaces and employment opportunities.

B. Housing

- (i) to make provision for objectively assessed market and need for affordable homes within the District, to the extent that this is compatible with national planning policy;
- (ii) to ensure that new homes provide an appropriate mix of sizes, types, forms and tenures to meet local needs and create balanced, mixed and well-integrated communities. This includes supported housing for elderly people and other groups with special needs; and
- (iii) to make provision for the identified needs of travellers and travelling showpeople.

C. Economic Development

- (i) to make provision for the objectively assessed economic and town centre needs in the District to the extent that this is compatible with national planning policy;
- (ii) to diversify the District's two Town Centres (Epping and Loughton High Road) and four District Centres (Loughton Broadway, Ongar, Waltham Abbey and Buckhurst Hill) to support their future vitality and viability by encouraging other forms of town centre uses including residential, cultural, leisure, tourist and commercial activities appropriate to their roles;
- (iii) to encourage the growth of local businesses and start-ups, through supporting home-working, provision of a range of flexible and affordable business facilities and the provision of high-speed broadband across the District;
- (iv) to support the diversification of the agricultural economy, including the

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expansion of the glasshouse horticulture industry, subject to appropriate environmental considerations; and

- (v) to support tourism in the District through the promotion of, and improving access to, a wide range of existing attractions in the District including Epping Forest, the Lee Valley Regional Park, the Royal Gunpowder Mills site, the historic towns, village centres and countryside, and through the provision of new visitor accommodation.

D. Infrastructure and Movement

- (i) to identify and help fund and facilitate the timely delivery of necessary infrastructure and services through planned and coordinated Infrastructure Delivery Plans working with relevant authorities, agencies, developers and stakeholders;
- (ii) to improve public transport, walking and cycling opportunities with the aim of promoting healthy lifestyles, reducing the effects of traffic congestion and improving accessibility to services and the countryside without requiring the use of the car; and
- (iii) to provide access to greenspaces, leisure, play and sports facilities and to make appropriate provision in new development.

E. Air Quality, Climate Change and Flood Risk

- (i) to locate new development where there are the greatest opportunities for utilising public transport and cycling and walking instead of private car use;
- (ii) to require development to meet high standards of energy efficiency and utilise renewable energy;
- (iii) to ensure new development makes full provision for recycling and, where appropriate, encourages the production of energy from waste; and
- (iv) to ensure that new development is located away from areas at risk of flooding, and that such development will not increase flood risk elsewhere.

allocation of land to provide for new employment floorspace to support its economic role; and facilitating the delivery of new homes and necessary infrastructure and services to support the needs of existing and future residents, which will also support the economic performance of the area. The Council, through the development of this Local Plan has responded to this within the context of a District significantly constrained by Metropolitan Green Belt, and the need to protect the environmental assets within the District, including Epping Forest and the Lee Valley.

2.35 The Council has worked with East Herts, Harlow and Uttlesford District Councils to ensure that the spatial distribution of new homes and employment opportunities across the aligned HMA and FEMA support these strategic priorities through the Co-Op Board established in 2014. Through this Board four MoUs have been agreed relating to the distribution of housing, economic growth, transport infrastructure and the impact on the Epping Forest.

2.36 These strategic priorities have influenced the approach that this Local Plan has taken in both its policy development and site allocations (both in terms of quantum and location) whilst understanding and taking into account the more local needs of the District.

2.37 The Spatial Development Strategy therefore provides for new homes around Harlow recognising its strategic role from an economic perspective and the need to support job creation as a result of the relocation of Public Health England and the establishment of an Enterprise Zone. Such an approach also contributes to creating sufficient new housing that will support the provision of strategic infrastructure (particularly for transport), opportunities for the relocation of Princess Alexandra Hospital, and providing choice in terms of new homes. The growth identified in and around Harlow has provided the right conditions for creating sustainable communities as evidenced through the designation of the Harlow and Gilston Garden Town.

The Strategic Policies

2.34 The Council has a key role to play in supporting the London Stansted Cambridge Corridor Core Area Strategic Vision. This includes the

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2.38 The Council recognises the opportunities that existing employment areas can contribute to jobs growth through regeneration and intensification. A core focus of the Local Plan therefore is to protect and encourage regeneration of existing employment areas through designation to provide market confidence to attract investment, and to minimise the need to take land out of the Green Belt. The scale and location of new employment land has taken account of local market information, the need to ensure flexibility to accommodate a range of uses and sizes of units, the opportunity to maximise accessibility, provide jobs to existing and new homes to support sustainable patterns of movement, provide choice within the market and to complement rather than compete with employment opportunities in adjoining local authority areas.

2.39 The allocation of land for new homes and the opportunities for delivering the associated supporting infrastructure around Harlow is not sufficient to provide the number of new homes required in the District to support the requirements across the HMA. The Spatial Development Strategy underpinning the Local Plan therefore focuses on opportunities for accommodating new homes within existing urban areas. This provides only limited opportunities in terms of overall numbers and so the Council has identified a range of sites to create sustainable communities of different sizes and which can support sustainable transport choices to reduce the need to travel by car, thus reducing impacts on the Epping Forest in particular. The Local Plan has also sought to recognise and reflect the emerging work of a number of Neighbourhood Plans. In doing so the Local Plan provides a balance between supporting the Council's strategic priorities, reducing any likely significant effects on environmental assets, minimising the need as much as possible to develop on Green Belt land whilst supporting local priorities and opportunities.

2.40 The overarching strategy of the Local Plan is contained in the following six policies. These sit

within the context of the Local Plan's vision and objectives. The policies set out the overall approach to facilitating the delivery of development in the District and in particular the amount of new homes and jobs that the Local Plan seeks to achieve, the distribution of that development between settlements, the overall approach to locating new homes and jobs, the development and delivery of Garden Communities around Harlow, the future protection of the Green Belt and the approach to the natural environment and green and blue infrastructure for new development. It also explains the approach of the Local Plan to addressing sustainable development and climate change. These threads of the strategy are viewed as equally important.

Sustainable Development

2.41 The fundamental purpose of the Local Plan is to deliver the vision, objectives and strategy for the District for the Plan period up to 2033 whilst contributing to sustainable development. The Council will take a positive approach to the consideration of development proposals, reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). The Council will work proactively with applicants to find solutions for development proposals that help to improve the economic, social and environmental condition in the District.

2.42 The Council recognises the importance of pursuing sustainable development for the District, as noted in national planning policy. This highlights that sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life including but not limited to: making it easier for jobs to be created in cities, towns and villages; moving from a net loss of biodiversity to achieving net gains for nature; replacing poor design with better design; improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.

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2.43 The Council is committed to help achieve sustainable development and will give favourable consideration to proposals which will contribute towards delivering: a strong, flexible and sustainable economy; the protection and enhancement of the natural, built and historic environment; the prudent use of natural resources; mitigation and adaptation to climate change; and which support strong, vibrant and healthy communities. This approach is reflected in all policies in the Local Plan and planning decisions made by the Council.

The Spatial Development Strategy

2.44 This section looks at the number of new homes and amount of additional employment floorspace that the Council will facilitate delivery of over the Plan period. Other types of development will also be needed in the District over the Plan period. This includes retail growth, as well as the provision of infrastructure, community facilities, and services necessary to support development. These requirements are explored further in the Places chapter (Chapter 5) and the Infrastructure and Delivery chapter (Chapter 6).

Housing

2.45 The Council has worked closely with East Herts, Harlow and Uttlesford District Councils to understand the level of housing need across the local authority areas. This has enabled agreement to be reached on how this would be best distributed in order to meet overall need whilst recognising the differing environmental, policy and infrastructure constraints and support strategic objectives. Part of the evidence to inform this has been through the commissioning of technical work set out in SHMA.

2.46 The purpose of the SHMA is to objectively assess housing need taking into account population and household projections, need for affordable homes, jobs growth and market signals on the cost of new homes. A full review of earlier SHMAs was published in 2015. However, in 2016, following the completion of that work the Office of National Statistics and Department for Communities and Local Government issued further population and household projections. It is important that the authorities use the most up-to-date information available wherever possible in order to ensure that the needs of existing and future residents across the whole of the HMA are met. The local authorities have considered the most recent population and household projections. They have identified the potential to increase the level of housing to be delivered across the HMA but the level of infrastructure constraints, as well as environmental and policy designations

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are such that the full objectively assessed housing need based on the 2016 figures can almost be met whilst also according with other policies set out in national planning policy. Evidence on transport constraints has shown that the maximum amount of growth for the Plan period is around 51,100 homes for the HMA.

- 2.47 The latest updates to the 2015 SHMA were published in July 2017. This assessed the 2016 national population and household projections data together with further sensitivity testing specific to local circumstances, including for migration. This update has indicated that the full objectively assessed need for housing across the HMA amounts to some 51,700 new homes over the period 2011-2033. It then identified that for the District some 12,573 new homes were needed within that period. However, this figure is a 'starting point' and does not take into account environmental, policy and infrastructure constraints. It is for Local Plans to consider the most appropriate spatial distribution for achieving the full objectively assessed need across the HMA. The four local authorities across the HMA have worked together to inform the development of their individual Local Plans within this context.
- 2.48 Taking this into account the agreed distribution in the MoU identified a requirement for the District to accommodate approximately 11,400 homes over the Plan period 2011-2033.

Travellers

- 2.49 Through the Local Plan the Council will plan to meet the future needs of travellers and travelling showpeople in accordance with national planning policy. The Council has assessed the accommodation needs of travellers and travelling showpeople alongside the settled population in order to develop a strategy that addresses future needs. Travelling is an integral part of cultural identity for gypsy and traveller households. Gypsies and travellers are recognised ethnic groups and are entitled to the same access to housing as the settled community.

- 2.50 The Local Plan establishes how the Council will meet traveller and travelling showpeople accommodation needs in the District until 2033 including setting pitch requirements for travellers and travelling showpeople based on local evidence. The most up-to-date local evidence has identified a need for 64 pitches to support the needs of the gypsy and traveller community and one yard to support the needs of travelling showpeople over the period of the Local Plan (2011-2033). This does not include an allowance for those who have a need to live in a caravan whatever their race or origin who do not meet the definition of travellers set out in the national planning policy but who are members of recognised ethnic groups with needs relevant to their ethnicity and culture that must be considered having regard to the statutory duties under the Equality Act 2010. In addition, need is likely to fluctuate over the Plan period. It is for these reasons, and to give flexibility the Plan provides for a higher number of pitches than for those meeting the planning definition. More information in respect of the development of the evidence base can be found in the Epping Forest District Council Gypsy, Traveller and Travelling Showpeople Assessment (September 2017 baseline 2016). This evidence demonstrates that very special circumstances apply such as to require allocations to be made within the Green Belt.
- 2.51 In order to meet this level of need the Local Plan has allocated a number of sites including provision within the strategic sites identified in Policies SP3 and SP4. Sites in other areas of the District are set out in the individual sections in Chapter 5.

The Economy

- 2.52 The Council has worked with its neighbouring authorities in order to understand the strategic employment and economic needs of the wider area. The FEMA aligns with the HMA and so this work has also involved East Herts, Harlow and Uttlesford District Councils. As with housing, work has been commissioned to better understand the level of employment land needed to support jobs growth.

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- 2.53 The latest FEMA assessment has factored in local knowledge regarding the current operation of the economy together with known jobs growth opportunities including the relocation of Public Health England and the establishment of an Enterprise Zone at Harlow, known growth at Stansted Airport and growth in service sector jobs as a result of future population increases. This has identified a need for some 51,000 jobs over the period 2011–2033. Factoring in job changes between 2011-2016 the level from 2016-2033 is some 32,100 jobs.
- 2.54 This equates to a requirement for approximately 465 new jobs per annum for the FEMA. This translates into an employment land requirement between 2016-2033 of 9-22 hectares of new office space and 65 hectares of new industrial space, across the area. These figures take account of the fact that approximately half of the future accommodation needs at the FEMA level will be provided through the regeneration of existing office and industrial sites.
- 2.55 For the District this provides a figure of some 10,800 jobs from 2011 – 2033. This includes 7,900 jobs for the 2016-2033 period. This translates into between 2-5 hectares of land for new office uses and 14 hectares for new industrial uses.
- 2.56 The FEMA authorities are committed to working together to ensure that adequate provision for employment uses is made in Local Plans in order to ensure that economic needs and aspirations are met. The position will be kept under review in the future.

Approach

Housing: The Strategic Spatial Option

- 2.57 In order to develop a robust strategic spatial approach to the distribution of housing across the HMA that is achievable and deliverable a range of technical assessments were undertaken to support the Co-Op Board in agreeing the MoU. This included strategic transport modelling, sustainability appraisal, habitats regulations assessment and strategic site assessment.
- 2.58 The strategic spatial option and distribution to deliver approximately 51,100 net new homes was agreed by the Co-Op Board as the most sustainable choice for the HMA in light of the evidence available. The distribution to achieve this is set out in Table 2.1 below.

Table 2.1 Housing Distribution

Local authority	Net new dwellings 2011-2033
East Herts District Council	~18,000
Epping Forest District Council	~11,400
Harlow District Council	~9,200
Uttlesford District Council	~12,500
Total across the HMA	~51,100
...of which the area in and around Harlow ² will provide	~16,100

- 2.59 The distribution was agreed through the signing of a MoU in March 2017.
- 2.60 The work that underpinned the development of the MoU distribution focused on the housing projections set out in the SHMA 2015 which were lower than the most recent figure identified in the July 2017 update based on the assessment undertaken after the publication of the latest population and household projections in 2016. The number of net new homes proposed in the MoU distribution equates broadly to the full objectively assessed housing need of approximately 51,700 new homes

² 'in and around Harlow' refers to development in Harlow town as well as around Harlow in adjoining Districts

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across the HMA as identified in the July 2017 SHMA Update.

- 2.61 The MoU distribution recognises that Harlow represents the most sustainable location within the HMA at which to focus development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, London Stansted Airport and Cambridge) and deliver North South and East West sustainable transport corridors traversing the town; its important location on the London Stansted Cambridge Corridor; and, above all, the wider economic growth aspirations for the town.
- 2.62 The Council is fully committed to meeting its contribution to the HMA's objectively assessed housing need which has been identified as a requirement for 11,400 net new homes over the Plan period for the District. A key component of this is contributing to the provision of a total of ~16,100 dwellings identified in and around Harlow, of which ~3,900 are allocated in this Local Plan on sites within the District.
- 2.63 The remaining housing requirement identified for the District will be delivered across the rest of the District on a range of sites. In allocating these sites there has been a need to recognise that the overall level of delivery in the early years of the Local Plan period (2011-16) has been less than the 518 new homes per annum needed to meet the housing requirement.
- 2.64 In such cases national planning policy sets out an expectation that this undersupply is taken into account in future years. It is recognised that in order to rectify this undersupply and provide for a five year supply of housing sites moving forward there are greater opportunities to achieve the speedy delivery of the new homes through the identification of smaller sites across the District. These smaller sites are less reliant on the provision of strategic infrastructure (for example, with respect to the delivery of highway improvements) and provide choice within the market.
- 2.65 This approach has a further benefit in that it provides the opportunity for much needed homes to be delivered as early as possible rather than being dependent on a small number of strategic sites which will not begin delivering new homes until later in the Plan period. The Council has also sought to reflect the reality that some of these sites, both large and small, may not come forward as anticipated.
- 2.66 The level of housing that the Council is planning to deliver through this Plan represents a step change from both that identified through previous plans and strategies and previous rates of delivery achieved. The planned Garden Communities will make a significant contribution over the Plan period but will not supply much over the first five years of the Local Plan. Seeking to address the undersupply that has occurred in the first five years of the Plan period would result in a potentially significant increase in the level of homes built in the District. This could not be supported by the necessary infrastructure and services and could have significant impacts on vulnerable environmental designations including the Epping Forest SAC and undermine the strategic objectives of the Metropolitan Green Belt.
- 2.67 There is a need to be realistic in terms of when landowners and developers have said that sites are capable of being delivered. It is vital that these matters are taken into consideration in determining the approach to addressing the identified undersupply. The Council has therefore adopted a smoother and more realistic approach by addressing this over a longer period. The detailed approach is set out in the Housing Trajectory set out in Appendix 5 and the Housing Implementation Strategy.

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2.68 The ~16,100 dwellings identified in and around Harlow comprise the following sites identified in the Strategic Sites Assessment as the preferred locations for development:

Table 2.2 Proposed sites in and around Harlow

Epping Forest District	Latton Priory	~ 1,050
	Water Lane Area	~ 2,100
	East of Harlow *	~ 750
	Total	~ 3,900
East Herts District	Gilston	~ 3,050
Harlow District	East of Harlow*	~ 2,600
	Total in proposed sites	~ 9,550

*In addition Harlow District will deliver ~ 6,600 units on sites not included in the strategic sites assessment

* The East of Harlow area is split between Harlow and Epping Forest Districts.

2.69 The commitments within Harlow District including completions/permissions, urban brownfield and the redevelopment of the Princess Alexandra Hospital site provide for some 6,600 new homes. This Local Plan allocates sites around Harlow as identified through the outcome of this work with our HMA partners (including making provision for travellers) to support the vision for the London Stansted Cambridge Corridor.

2.70 The Local Plan allocates the remaining housing requirement identified for the District by taking a sequential approach to where new homes will be provided. In determining the appropriate sites for allocation, the Council has taken account of the previous consultation responses which considered that new housing should be distributed across the District, together with the evidence on sites put forward and the policy and environmental constraints in the District. The approach to the allocation of sites has been to take each settlement and consider the most appropriate sites in accordance with the following order of priority:

- 1 A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
 - 2 Sites located on previously developed land within settlements;
 - 3 Sites located on greenfield land within settlements where such selection would maintain adequate open space provision within the settlement;
 - 4 Previously developed land within the Green Belt;
 - 5 Greenfield/Green Belt land on the edge of settlements:
 - a. Of least value to the Green Belt if the land is otherwise suitable for development.
 - b. Of greater value to the Green Belt if the land is otherwise suitable for development.
 - c. Of most value to the Green Belt if the land is otherwise suitable for development.
 - 6 Agricultural land:
 - a. Of Grade 4-5 if the land meets other suitable criteria for development.
 - b. Of Grade 1-3 if the land meets other suitable criteria for development.
 - 7 Enable small-scale sites in rural communities to come forward where there is a demonstrable local need which supports the social and economic well being of that community.
- 2.71 The Council will resist the net loss of existing homes unless they are part of a wider scheme where there is an overall gain in the number of homes provided.

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Table 2.3 Housing land supply: 2011-2033³

The components of housing land supply over the period 2011-2033 are as follows:	
Minimum number of homes required to be built 2011-2033: 518 x 22 years	~11,400
Homes Built (Completions) 2011-2022 up to 31 March 2022	3,023
What is available in the future (supply)	
Sites with planning permission up to 31 March 2022 + 10% non-delivery rate	1,665
Windfalls 35 x 6 years	210
Requirement met through Garden Communities around Harlow within the District	3,400*
Requirement met through allocations outside the Garden Communities within the District	3,901
Total Supply	12,199
*Note: The Plan allocates ~3,900 homes in the Garden Communities around Harlow within the District. For the purposes of determining housing land supply it is considered that 3,400 homes will be delivered within the Plan period to 2033.	

2.72 The Council recognises that land is a finite resource, and that the District is subject to policy and environmental constraints. It is therefore critical that land for development is used in an efficient and effective way as set out in Policy SP1. Consequently, it is expected that all new development will maximise densities on housing sites, whilst recognising that different density levels will be appropriate for different sites in different locations as set out in Policy SP2.

2.73 The identified housing supply to 2033 exceeds the requirement. This provides a contingency to allow for flexibility. Contingency planning is necessary to allow for eventualities beyond the Council’s control, including the economic cycle and factors relating to specific sites or developers, which could result in stalled sites. New homes will be delivered in accordance with the stepped trajectory as set out in this Policy. A breakdown of the housing supply is included at Appendix 5.

2.74 The Council’s positive approach to housing delivery may require it to use its compulsory purchase powers under section 226 of the Town and Country Planning Act 1990. That power gives the Council a positive tool to help to assemble land where this is necessary to implement proposals in the Local Plan or where strong planning justifications for their use exist. For the circumstances in which those powers may be exercised, see the Department for Communities and Local Government’s Compulsory purchase process and the Crichel Down Rules: guidance.

2.75 The Council recognises the importance of delivering housing to meet the requirements set out in this Policy and ensuring that the Local Plan includes sufficient flexibility to respond to unanticipated changes in circumstances including the unforeseen failure of site(s) to deliver as planned. As a result, the Council is committed to monitoring and reviewing the Local Plan following adoption.

2.76 The Council will monitor housing delivery against the housing trajectory (Appendix 5 and Housing Implementation Strategy) for the District using the indicators specified in the Monitoring Framework set out in the Local Plan. If the Authority Monitoring Report demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is the lower) for three consecutive years, the Council will undertake a partial review of this Plan. In

³ Please note that the figures may not add up due to rounding. A 10% non-implementation rate has been applied to sites with planning permission.

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undertaking this review, the Council will ensure that sufficient infrastructure capacity is available and that the potential allocation of additional housing sites will not prejudice delivery of the infrastructure required by the Local Plan.

Travellers

2.77 The Local Plan allocates sufficient sites for the traveller and travelling showpeople communities in order to meet the identified need for additional provision over the Local Plan period. Taking this approach will help to minimise the number of unauthorised sites within the District. Taking into account the Planning policy for traveller sites published by DCLG in August 2015 the Council has taken a proactive and sequential approach in selecting sites for traveller accommodation:

- 1 the sequential flood risk assessment – prioritising allocation of sites in Flood Zone 1 and proposing land in Flood Zone 2 where need cannot be met in Flood Zone 1;
- 2 sites with temporary permissions or unauthorised sites suitable for regularisation;
- 3 intensification of existing traveller sites and/or sites which could be regularised (unauthorised sites or sites with temporary permission);
- 4 extension of existing traveller sites and/or sites which could be regularised (unauthorised sites or sites with temporary permission);
- 5 new traveller sites in non-Green Belt areas;
- 6 new traveller sites in Green Belt areas;
- 7 where sufficient provision to meet identified need for additional pitches could not be found from the above sources, provision has been made by allocating traveller pitches within Garden Communities around Harlow or on other residential allocations.

Table 2.4 Traveller and travelling showpeople requirement: 2011-2033

The components of traveller and travelling showpeople requirement over the period 2011-2033 are as follows:	
Number of pitches required 2011-2033 based on 2016 Gypsy and Traveller Accommodation Assessment	64 pitches and 1 yard
No of pitches completed 2011 - 2022	46
Remaining requirement to be provided	18 pitches and 1 yard (identified in Policy SP4 and Chapter 5 of the Plan)
See paragraph 2.78 regarding the Council’s approach to ethnic travellers who do not meet the PPTS definition of traveller.	

2.78 The approach to traveller site provision for those travellers who meet the definition including size, number of pitches and location is set out in the Report on Site Selection (2018). Additionally, the Council is aware of its duties under Section 8 of the Housing Act 1985 (as amended). As such the Council is committed to providing pitches to meet the need identified in the Gypsy Traveller Accommodation Assessment for those ethnic travellers who do not meet the definition, in accordance with all relevant policies in this Local Plan, including policy H1.

The approach to accommodating traveller needs is that sites of no more than five pitches provide the most appropriate approach for new sites. Intensification or extension of existing sites should not normally exceed ten pitches subject to detailed consideration of the suitability of each site and site specific justification, where, for example it supports a known need arising from the site.

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The Economy

- 2.79 The Council’s approach to supporting the economy is to plan to provide a marginally higher amount of employment land than that identified in the District in the 2017 West Essex and East Hertfordshire Assessment of Employment Needs. The Council is keen to ensure through this Plan that there is sufficient flexibility to respond to unforeseen demands and to provide for a range and choice of sites in terms of typology, location, mix and phasing. Table 2.5 sets out the employment land requirements for the District as reported in the 2017 West Essex and East Hertfordshire Assessment of Employment Needs. These requirements take into account delivery in the early part of the Plan period between 2011 and 2016.
- 2.80 The sites allocated provide for this need and are capable of accommodating a range of office, light industrial and research and development (within Use Class E) and Use Class B2/B8 uses, but with a focus on light industrial (within Use Class E)/B2 and B8 activities to reflect the location of the sites in relation to the strategic road network. The sites also provide sufficient flexibility to accommodate a range of unit sizes, including for ‘grow-on’ accommodation to support developing companies that need room to expand.
- 2.81 The spatial distribution of the sites has also sought to reflect the employment needs identified across the District, particularly taking into account the need for additional space to serve employment markets in the South of the District, including at Loughton and Waltham Abbey. Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Enterprise Zone, and further small-scale employment uses will be provided within the Garden Communities to promote the sustainable growth of Harlow and reduce out-commuting.
- 2.82 It is important that the District makes provision for employment in other areas where new homes are to be provided, where there is

market appetite to develop and to manage the level of traffic growth generated in order to minimise pressure on the roads through the Epping Forest. Taking this approach makes a positive contribution toward the delivery of the LSCC Vision, the employment needs across the FEMA, and the needs of the District.

- 2.83 The Council also recognises that a significant proportion of new floorspace is capable of coming forward through the regeneration and/or intensification of existing employment sites. Therefore in order to both protect existing stock wherever possible and provide certainty for future investors, the Plan designates existing employment sites where it has been appropriate to do so.

Table 2.5 Employment Land Requirements: 2016-2033

The components of employment land requirement over the period 2016-2033 are as follows:	
Employment land required 2016-2033 for offices (within Use Class E)	2-5 hectares
Employment land required 2016-2033 for industrial (within Use Classes E, B2 and B8).	14 hectares
Residual requirement to be provided	16-19 hectares

Infrastructure and Delivery

- 2.84 When development occurs, it places additional demands on infrastructure, including on utilities, roads and public transport, education and healthcare as well as open space and green and blue infrastructure. The delivery of key infrastructure will be vital to support the number of homes and jobs required over the Plan period. The sequential approach for their delivery seeks to make the best use of existing infrastructure as well as the best possible opportunity to provide additional infrastructure capacity. The provision of infrastructure together with the timing of its delivery is considered in more detail in Chapter 6.

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Policy SP1 Spatial Development Strategy 2011-2033

- A. Within the period 2011-2033 the Local Plan will provide for a minimum of 11,400 new homes, including a minimum of 2,851 new affordable homes between 2016 – 2033.
- B. New homes will also be delivered in accordance with Part D of this Policy and the following stepped trajectory:

Period	Projected housing requirement
2011/12 – 2021/22	3,023 (275 per annum)
2022/23 – 2026/27	2,500 (500 per annum)
2027/28 – 2032/33	5,880 (980 per annum)
Total	11,400 (518 per annum)

Note: Totals do not sum due to rounding

- D. The new homes will be distributed across the District as follows:

Settlement	Allocated Housing
Sites around Harlow	~ 3,900
Epping	~ 709
Loughton	~ 455
Waltham Abbey	~ 836
Ongar	~ 590
Buckhurst Hill	~ 87
North Weald Bassett	~ 1,050
Chigwell	~ 206
Theydon Bois	~ 57
Roydon	~ 48
Nazeing	~ 118
Thornwood	~ 172
Coopersale, Fyfield, High Ongar, Lower Sheering, Sheering and Stapleford Abbots	~ 161

- E. The new homes will be delivered by:

- (i) permitting development proposals within the defined settlement boundaries where they comply with all other relevant policies of the Local Plan;
- (ii) the development of Garden Communities around Harlow and at other settlements as allocated through this Local Plan (as identified in Policy SP4 and Chapter 5);
- (iii) permitting rural exception sites in accordance with Policy H3 and all other relevant policies of the Local Plan;
- (iv) the delivery of sites identified in made Neighbourhood Plans;
- (v) making the best use of land by ensuring that development densities are appropriate to the location and size of the site in accordance with Policy SP2; and
- (vi) resisting developments which would result in a net loss of homes, unless it can be demonstrated that the benefits of doing so will materially outweigh the harm.

- F. The Council will demonstrate a rolling five-year supply of deliverable housing land, in accordance with national planning policy throughout the Plan period. The Council will monitor this through its Authority Monitoring Report which is published annually.

- G. Within the period 2011-2033 the Local Plan will provide for a minimum of 64 pitches and one yard to accommodate the needs of travellers and travelling showpeople as identified in Policy SP4 and Chapter 5. This provision will be delivered through the following sequential approach:

- (i) the regularisation of existing sites with temporary permissions or other unauthorised sites where appropriate;
- (i) making the best use of existing traveller sites through intensification and/or extension, and the review of personal permissions where appropriate;
- (ii) new sites in locations outside the Green Belt which are appropriately located in terms of access to healthcare, education and other services;
- (iii) new traveller sites in the Green Belt which are appropriately located in terms of access to healthcare, education and other services;

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(iv) the provision of land as part of the development of the Garden Communities around Harlow and other allocated sites in this Local Plan; and

(v) permitting additional traveller sites in accordance with Policy H4.

H. Within the period 2011-2033 the Local Plan will maximise opportunities for jobs growth, with the aim of achieving a minimum of 10,800 new jobs in the District up to 2033. This includes making provision for:

(i) retaining and enhancing existing employment sites and premises where appropriate;

(i) allocating 23 hectares of new employment land at appropriate locations across the District as set out in Policy E1 to provide a flexible supply of future sites to cater for the District's needs, to meet the economic needs of the wider sub-region, and complement Harlow Enterprise Zone; and

(ii) promoting new small-scale employment opportunities within mixed-use developments, including at the Garden Communities.

I. In addition, the Council will:

(i) promote and support Town and District Centre development and regeneration;

(i) encourage Town and District Centres to complement other larger sub-regional and regional comparison retail destinations outside of the District;

(ii) support growth in the food production and glasshouse industry;

(iii) support growth in the tourism industry and visitor economy;

(iv) seek to provide suitable training and skills development for local residents, to provide them with the skills needed to access future employment opportunities both within and outside the District;

(v) seek to increase workforce participation and encourage older workers to continue to work; and

(vi) attract new businesses, encourage start-ups, and help growing businesses.

J. Development proposals will be required to demonstrate that they accord with the infrastructure requirements established

through the Infrastructure Delivery Plans and all other policies of the Local Plan.

Place Shaping

2.85 Place shaping aims to bring together all the component parts of a successful place. It encourages an integrated approach to development by focusing on, and creating better social, physical, economic and natural environments.

2.86 National planning policy emphasises the importance of high quality design and place shaping. Well designed places exhibit qualities that benefit occupiers, users and the wider area. Development should ensure that new or changing places:

- function well;
- support mixed uses and tenures;
- include successful public spaces;
- are adaptable and resilient;
- have a distinctive character;
- are attractive;
- and encourage ease of movement by active and sustainable modes.

2.87 Allocations in the Local Plan (as identified in Policy SP4 and Chapter 5) need to be planned carefully to ensure that they become successful places. The Local Plan has an important role to play in the creation of sustainable communities. It is important that areas work as places and are attractive, prosperous and encourage safe communities where people want to live, work or visit.

Approach

2.88 The Council's approach to place shaping seeks to achieve successful and desirable developments. This Policy sets out the framework and key principles that will guide future development within the District, including the site allocations in the Local Plan (as identified in Policy SP4 and Chapter 5).

2.89 Development proposals will be required to accord with a range of place shaping principles, and where applicable, it will be necessary to

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demonstrate compliance through the production of Strategic Masterplans.

2.90 The Council is committed to working with Harlow District Council, Uttlesford District Council and East Herts District Council, Hertfordshire County Council and Essex County Council, in partnership with relevant Local Enterprise Partnerships to bring forward transformational growth in and around Harlow. The Councils have a strong collective commitment to achieving Garden City principles in strategically planned development. The partners understand and recognise the need to promote high quality, cohesive growth, supporting the core ethos and objectives set out in the Town and Country Planning Association's key guiding principles. Policy SP3 seeks to ensure that these aspirations are achieved.

2.91 Housing density is crucial to realising the optimum potential of sites. It is not appropriate to apply density ranges set out in Policy SP2 mechanically. Development density should be appropriate to the location taking account of relevant factors to optimise potential including the local context, design, transport and social infrastructure.

2.92 In order to promote sport and encourage active lifestyles, development proposals should have regard to the ten principles of Active Design developed by Sport England in partnership with Public Health England.

Policy SP2 Place Shaping

A. Strategic Masterplans, Concept Framework Plans and all development proposals must reflect and demonstrate that the following place shaping principles have been adhered to having had regard to their relevance within the context of the scale and nature of the development proposed:

- (i) strong vision, leadership and community engagement;
- (ii) provide for the long term stewardship of assets;
- (iii) provide mixed tenure homes and a range of housing types and sizes;
- (iv) ensure a robust range of employment opportunities are provided with a variety

of jobs within easy commuting distance of homes by sustainable or active transport modes in preference to single occupancy car use;

- (v) provide high quality and imaginatively designed homes with gardens or access to usable and accessible amenity space, combining the very best of urban and rural living to promote healthy and active lifestyles and vibrant communities;
- (vi) ensure generous, well connected and biodiverse rich green and open space provision;
- (vii) extend, enhance and reinforce strategic green and blue infrastructure assets and the public realm;
- (viii) ensure that development enhances the natural environment;
- (ix) deliver strong local cultural, recreational, social (including health and education where required) and retail facilities to support day-to-day needs in walkable neighbourhoods;
- (x) ensure positive integration and connection with adjacent rural and urban communities thereby contributing to the revitalisation of existing neighbourhoods;
- (xi) maintain and enhance the important features, character and assets of existing settlements;
- (xii) conserve and positively enhance key landscapes, habitats and biodiversity;
- (xiii) provide for sustainable movement and access to local and strategic destinations (including rail, bus, walking and cycling);
- (xiv) positively respond to sustainable water management; and
- (xv) have regard to the Active Design principles and supports healthy living through their design by providing opportunities for physical activity and sport, access to quality open spaces, and employment opportunities.

To ensure the best and most efficient use of land as a guide the Council will normally expect:

- (i) a greater density of development at places with good public transport accessibility;
- (ii) densities above 50 dwellings per hectare in towns and large village centres, and along

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main transport routes and/or close to transport nodes;

- (iii) in areas outside town and large village centres, new residential development should achieve densities of between 30 and 50 dwellings per hectare, and should enhance the distinctive character and identity of the area;
- (iv) notwithstanding Part B(ii) and (iii) above, lower density developments may be appropriate in urban areas, villages and rural communities where they are particularly sensitive to the impact of intensification and redevelopment because of the prevailing character of the area and the sensitive nature of the surrounding countryside or built form. Where lower densities than those at Part B(ii) and (iii) above are proposed, suitable justification needs to be provided.

Strategic Masterplans

- 2.93 The Council requires a joined-up, collaborative, cohesive and proactive approach to be taken to the planning and implementation of key strategic sites across the District.
- 2.94 The following Strategic Masterplans will be required to guide the planning, design and implementation of the Garden Communities (as specified in Policies SP3 and SP4 below):
- East of Harlow Masterplan;
 - Latton Priory Masterplan; and
 - Water Lane Area Masterplan.
- 2.95 The following Strategic Masterplans will be required to guide the planning, design and implementation of development in other areas of the District (as specified in the Places policies of the Local Plan in Chapter 5)
- South Epping Masterplan;
 - Waltham Abbey North Masterplan;
 - North Weald Bassett Masterplan; and
 - North Weald Airfield Masterplan.

- 2.96 Strategic Masterplan Areas are defined on the maps included in this Chapter, Chapter 5, and the Policies Map. The precise nature and detail of each Strategic Masterplan will vary depending upon the context, including the complexity of the sites, the scale of development proposed, as well as constraints and infrastructure requirements.
- 2.97 The production of Strategic Masterplans will ensure that development proposals are front-loaded and where possible accelerated, recognising the scale and complexity of delivering development and infrastructure at these locations. The Council has developed a Strategic Masterplanning Briefing Note (2018) which provides guidance on how to approach the development of a Strategic Masterplan.
- 2.98 Epping Forest District Council (and Harlow District Council for the Garden Communities) will oversee the production of Strategic Masterplans. Planning applications and any other consenting mechanisms for development located within a Strategic Masterplan Area should be accompanied by a Strategic Masterplan which demonstrates that the development requirements set out in the policy have been accommodated and which has been endorsed by the Council (and where appropriate Harlow District Council). The endorsed Strategic Masterplan will be taken into account as an important material consideration in the determination of any planning applications.

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- 2.99 Strategic Masterplans will be produced by the landowners/promoters of identified sites, in partnership with the Council and relevant stakeholders (including adjacent landowners, relevant Town and Parish Councils, infrastructure providers and statutory consultees).
- 2.100 In producing Strategic Masterplans, the Council requires ongoing and widespread engagement to be undertaken with the local community (including Town and Parish Councils) and stakeholders. The Strategic Masterplan and subsequent applications should be considered and informed by the Quality Review Panel and be subject to public consultation, including in respect of Masterplans, consultation with all those with a development interest in the defined area.
- 2.101 This should include an early engagement event to inform option development, and public consultation on the draft Strategic Masterplan prior to finalisation. Strategic Masterplans must be prepared in a form and manner which means that they are capable of adoption as Supplementary Planning Documents.
- 2.102 Strategic Masterplans should be produced to accord with Policy SP2 (Place Shaping) and all other relevant policies of the Local Plan. Specific requirements for the Garden Communities Strategic Masterplans are set out in Policies SP3 and SP4. Specific requirements for the Strategic Masterplans in other areas of the District are set out within relevant policies in Chapter 5 of the Local Plan.

Design Codes

- 2.103 The Council requires Design Codes to be produced which accord with the principles established by the endorsed Strategic Masterplans. The Design Codes must be approved by the Council and inform detailed proposals for individual sites. Design Codes may be required on other sites in consultation with the Council.

Concept Framework Plans

- 2.104 The Council recognises that in some cases the production of Concept Framework Plans provides a more proportionate and pragmatic

approach, whilst still ensuring that a comprehensive and cohesive approach is taken to the planning, design and implementation of development. Concept Framework Plans will be required for:

- West Ongar; and
- South Nazeing.

- 2.105 Concept Framework Plans will be produced by the landowners/promoters of relevant allocated sites. Planning applications and any other consenting mechanisms for development located within a Concept Framework Plan Area should be accompanied by and have regard to a Concept Framework Plan which has been endorsed by the Council. The endorsed Concept Framework Plan will be taken into account as an important material consideration in the determination of any planning applications. Detailed design proposals must be reviewed and informed by the Quality Review Panel (QRP). Concept Framework Plans will relate to multiple allocation sites, whereby it is expected that these are undertaken jointly with all applicants of the site allocations subject to the Concept Framework Plan. Details of the specific requirements of each Concept Framework Plan can be found within the site specific requirements set out in Part Two of the Local Plan.

Quality Review Panel

- 2.106 The production of Strategic Masterplans, Concept Framework Plans, Design Codes and where appropriate other proposals should be informed through early review at appropriate stages by the Harlow and Gilston Garden Town or the Council's Quality Review Panel (QRP). The Council will require schemes of more than 50 homes or 5,000 square metres of employment/other floorspace to be informed by review. Other smaller schemes which are complex or locally sensitive may also be appropriate for review.
- 2.107 The Terms of Reference for the Harlow and Gilston Garden Town and the Council's QRP each note the principles of quality review, panel remit and role, details of different review formats, panel membership and QRP dates. The

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Panels are agile to best meet the needs of the wide range of proposals coming forward in terms of both timing of review and format of review that is proportionate to the scale and nature of the proposed scheme. A schedule of QRP reviews is coordinated to ensure that schemes are seen at the appropriate stage. For key schemes, such as Strategic Masterplans, Concept Framework Plans and large scale development, the early establishment of a Planning Performance Agreement (PPA) enables such schemes to be given priority for confirmed QRP dates. The Panels will be monitored and evaluated on a regular basis to ensure that they remain effective and to instigate any necessary revisions such as an increase in scheduled review dates to meet demand.

Planning Performance Agreements

2.108 To promote efficient and effective joint working and to front-load the planning process, the use of PPAs will be strongly encouraged for large scale development (schemes of more than 50 homes or 5,000 square metres of employment/other floorspace), particularly for sites located within a Strategic Masterplan Area. This will promote joint working between all parties, including statutory consultees, and will assist in identifying the issues that will need to be addressed prior to the submission of planning applications.

Harlow and Gilston Garden Town

2.109 Epping Forest District Council, Harlow District Council and East Herts District Council are working in partnership together with Hertfordshire County Council, Essex County Council, relevant Local Enterprise Partnerships, landowners and promoters to bring forward transformational growth in the form of the Harlow and Gilston Garden Town.

2.110 On 2 January 2017 the Government announced its support for the Expression of Interest submitted to the locally-led Garden Towns prospectus on behalf of the Councils. The Councils share a bold vision and set of

objectives for the area in and around Harlow, recognising that it presents a number of opportunities to deliver growth of considerable scale and significance. Such growth is key not only to meet growing pressures of housing and infrastructure need locally, but also in delivering broader regeneration and change for Harlow.

- 2.111** The Garden Town lies in the LSCC Core Area—one of the most important and fastest growing economic regions in the country.
- 2.112** The Garden Town represents a major opportunity to accommodate around 16,000 homes up to 2033 between the global centres of London and Cambridge. The Garden Town will also provide a mix of development, including employment, schools and community facilities.
- 2.113** Harlow and Gilston Garden Town comprises the whole of Harlow together with four new Garden Communities:
- East of Harlow;
 - Latton Priory;
 - Water Lane Area; and
 - Gilston.
- 2.114** Three of these Communities (East Harlow, Latton Priory and Water Lane Area) lie within or partially within Epping Forest District and are central to the Spatial Development Strategy for this Local Plan.

Approach

- 2.115** The planning and delivery of the Garden Communities will be framed by the objectives set out in the Town and Country Planning Association's (TCPA) nine Garden City principles.
- 2.116** The level of strategic growth proposed across the Garden Communities, and the holistic, comprehensive approach to planning and delivery will enable the development proposals to achieve 'Garden City' ambitions, whilst delivering development in an efficient and timely manner.
- 2.117** The approach to delivery of the Garden Town means that the Garden Communities will not only provide a long term supply of new homes, but will also deliver a quality of development, environment, infrastructure, services and

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community that would not otherwise be possible. In line with the TCPA's principles, the planned development will enhance the natural environment and offer high quality affordable homes and locally accessible work in beautiful, healthy and sociable communities.

- 2.118 Alongside the new homes that will be provided, the Garden Town will deliver a range of new community facilities, employment opportunities, schools and healthcare facilities. This includes provision made for the potential relocation of the Princess Alexandra Hospital from its current site in Harlow to land within the East of Harlow Garden Community.
- 2.119 The Garden Communities will benefit from access to sub-regional retail services at Harlow Town Centre and local employment opportunities helping to create a sustainable and self-supporting Garden Town.
- 2.120 To facilitate the delivery of the Garden Communities the Councils have prepared a Garden Town Spatial Vision and Garden Town Design Guide. They identify a clear set of high-level design principles, which incorporate and interpret the TCPA's Garden City principles specifically for the Harlow and Gilston Garden Town and set out how design principles will be applied. The Garden Town Vision and Garden Town Design Guide Charter will be implemented and secured through Strategic Masterplans, Design Codes and planning applications.
- 2.121 The Harlow and Gilston Garden Town QRP will guide development proposals across the Garden Town, to help secure the exceptional development quality standards that are required. The recommendations of the Panel will be a key material planning consideration in the production of Strategic Masterplans, Design Codes and planning applications. They will also ensure that the principles and requirements of the Garden Town are upheld.
- 2.122 The Councils have prepared a Sustainable Transport Corridor Study for the Garden Town and endorsed the Harlow & Gilston Garden Town Transport Strategy. The provision of sustainable transport options together with a significant modal shift from car to non-car use (including walking, cycling and public transport)

are central to the successful growth of the Garden Town. The Councils share an ambition to enhance established transport corridors and to create new travel corridors, in order to help manage overall travel demand and to help integrate the new Garden Town Communities into the existing built-up Harlow area. Provision of access to employment opportunities via non-car modes is critical to this. The Councils aspire to see 60% of journeys to and from the Garden Communities to be made by non-car modes.

- 2.123 The growth plans for the Garden Town require the implementation of a new junction (Junction 7A) on the M11, which was completed in June 2022. In order to maximise the promotion and use of active and sustainable transport modes, it will be necessary for sustainable transport provision, including, as appropriate, connection into and contributions towards the Sustainable Transport Corridor network, to be commensurate with the phasing of development of Garden Communities. This is required to prevent the establishment of unsustainable travel behaviour, and to provide viable alternatives to private car use. The Council will secure the necessary measures through the use of planning obligations or other relevant mechanisms as appropriate.
- 2.124 The planning and delivery of the Garden Communities requires a coordinated approach across local authority boundaries, necessitating the involvement of a range of partners, including the site owners/promoters, local communities, infrastructure providers and other stakeholders. A number of delivery models are being considered, and an appropriate tailored approach will be established for each of the Garden Communities. This approach will help the Councils to secure the Garden Town place shaping objectives, whilst ensuring the coordinated and timely delivery of development and infrastructure.
- 2.125 To provide this coordinated approach, Harlow District Council, East Herts District Council, Epping Forest District Council, Hertfordshire County Council and Essex Country Council commissioned a Harlow and Gilston Garden Town Infrastructure Delivery Plan (HGGT IDP) to set out the infrastructure required to deliver the

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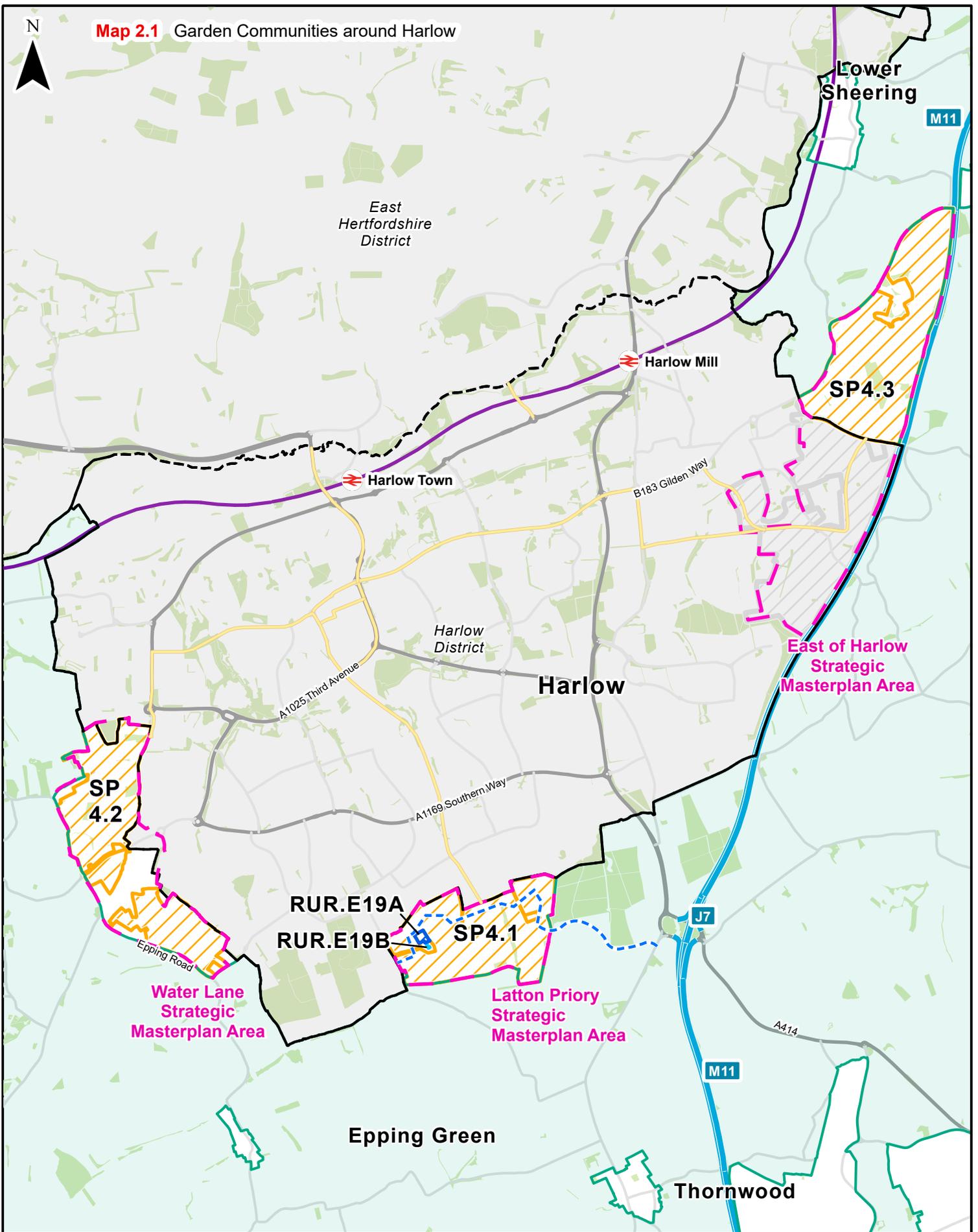
planned level of housing and employment growth for the Garden Town. The HGGT IDP drew on previous work undertaken by the Councils, in particular, the District-level IDPs produced to support the respective local plans. The HGGT IDP also identifies how expected developer contributions from the Garden Communities are expected to be apportioned to the different Garden Communities, and what collection mechanisms can be utilised by the Councils to assist in funding the infrastructure items which serve more than one Garden Community. IDPs are 'live documents' updated regularly to ensure they reflect current infrastructure requirements. Updates made at the District-level will be cognisant of the Garden Town and vice versa.

2.126 Policy SP3 sets out the overarching requirements for the three Garden Communities located, or part located, within Epping Forest District. A similar Garden Town policy is contained within Harlow District Council's Local Development Plan, which will ensure a consistent approach across the Garden Town, and particularly the East of Harlow Garden Community which straddles the two administrative areas.

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

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Map 2.1 Garden Communities around Harlow



Epping Forest District
Local Plan
2011-2033

Map 2.1

Date: February 2023

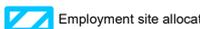
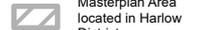
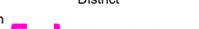
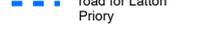
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Map 2.1
Garden Town Communities
around Harlow

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

Legend

-  Residential site allocation
-  Employment site allocation
-  Employment site allocation
-  Traveller site allocation
-  Sustainable Transport Corridors
-  Masterplan Area located in Harlow District
-  Masterplan Area
-  Concept Framework Plan Area
-  Green Belt Boundary
-  Indicative access road for Latton Priors
-  Local Authority boundary

This legend shows only the key Local Plan policy designations.
A full legend can be found in Appendix 6: Site Specific Requirements for Site Allocations.



Policy SP3 Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town

A. The following three Garden Communities are planned in the Harlow and Gilston Garden Town within Epping Forest District:

- (i) **Latton Priory;**
- (ii) **Water Lane Area; and**
- (iii) **East of Harlow**

Development within the Garden Communities will be holistically and comprehensively planned with a distinct identity that responds directly to its context and is of sufficient scale to incorporate a range of homes, employment, education and community facilities, greenspace and other uses to enable residents to meet the majority of their day-to-day needs. Delivery of each new Garden Community will be phased and underpinned by a comprehensive package of infrastructure as set out within the Infrastructure Delivery Plan Schedules.

C. The design, development and phased delivery of each Garden Community must accord with the following principles:

- (i) The public sector will work pro-actively and collaboratively with the private sector to design, and bring forward the Garden Communities to: (a) secure a high quality of place shaping; (b) ensure the timely delivery of both the on-site and off-site infrastructure required to address the impact of these new communities; and (c) provide and fund a mechanism for future stewardship, management, maintenance and renewal of community infrastructure and assets;
- (ii) Community and stakeholder empowerment will be embedded in the design and delivery of each Garden Community from the outset and include a long term community engagement strategy;
- (iii) Inclusion of opportunities for community-led housing development and a requirement to deliver a mixture of tenures for new dwellings;
- (iv) Agreeing appropriate and sustainable long term governance and stewardship arrangements for community assets including heritage assets, greenspace, the

public realm areas and community and other relevant facilities prior to the determination of outline planning applications. Such arrangements will be funded by the development and include community representation to ensure residents have a stake in long term development, stewardship and management of their community;

- (v) A Strategic Masterplan will be developed for each of the Garden Communities setting out the key development, design and delivery principles and to guide proposals. Planning applications and any other consenting mechanisms for the Garden Communities should be accompanied by Strategic Masterplans which demonstrate that the development requirements set out in the policy have been accommodated and which have been endorsed by the Council and where appropriate Harlow District Council. Endorsed Strategic Masterplans will be taken into account as an important material consideration in the determination of any planning applications;
- (vi) Be consistent with and adhere to any relevant Design Code(s) which has been approved by Epping Forest District Council and where appropriate Harlow District Council;
- (vii) Strategic Masterplans and subsequent applications should be considered and informed by the Quality Review Panel for the Harlow and Gilston Garden Town and be subject to public consultation, including in respect of Masterplans, consultation with all those with a development interest in the defined area;
- (viii) Promotion and execution of the highest quality of planning, design and management of the built and public realm so that the Garden Communities are characterised as distinctive places that capitalise on local assets and establish environments that promote health, happiness and well being. Proposals should have regard to the Harlow and Gilston Garden Town Vision and Design Guide, and have regard to the

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original guiding principles established by Sir Frederick Gibberd's masterplan for Harlow, including the Green Wedge network;

- (ix) Ensure that on-site and off-site infrastructure is provided in a timely manner, subject to viability considerations, ahead of or in tandem with the development it supports to mitigate any impacts, meet the needs of residents and establish sustainable travel patterns;
- (x) Provide for balanced and inclusive communities through a mix of homes of different sizes, tenures and types. Provision should be made for self and custom-built homes and the needs of an ageing population;
- (xi) Provide and promote appropriate opportunities for small-scale employment generating uses;
- (xii) Ensure the provision of integrated and sustainable transport systems for Harlow and Gilston Garden Town that put walking, cycling and public transport networks and connections at the heart of growth in the area, to create a step change in modal shift through providing for, encouraging and actively promoting more sustainable travel patterns;
- (xiii) Contribute to the delivery of the Sustainable Transport Corridors and the establishment of an integrated, accessible and safe transport system which maximises the use of the sustainable transport modes of walking, cycling and public/community transport, and reduces single occupancy car use, in order to improve air quality, reduce emissions and promote healthy lifestyles. Development must provide high quality, safe and direct walking and cycling routes and linkages to and from Harlow which give priority over vehicular traffic;
- (xiv) Create sociable, vibrant, healthy and walkable neighbourhoods with access for all to local employment opportunities, a range of community services and facilities including health, education, retail, culture, community meeting spaces, multi-functional open space, the Green Wedge Network, sports and leisure facilities and to high quality digital

infrastructure;

- (xv) Develop and comply with specific Garden Town parking approaches and standards recognising that car ownership will need to be accommodated without impacting on the quality of place, and sustainable transport objectives whilst making the best use of land;
- (xvi) Create distinctive environments which relate to the surrounding area, take full account of topography and landform, protect or enhance the natural and historic landscapes and systems and wider historic environment, provide a multi-functional green and blue infrastructure network to support habitat protection, improve biodiversity, and connect to existing corridors and networks;
- (xvii) Develop a positive and coordinated approach towards the conservation and enhancement of heritage assets and their settings in accordance with national policy;
- (xviii) Integrate a sustainable approach to design and construction that secures net gains in biodiversity and the highest standards of energy efficiency and innovation in technology;
- (xix) Ensure that appropriate measures are put in place to equalise and apportion the cost of shared infrastructure and associated land contributions; and
- (xx) Ensure key transport interventions (such as highway improvements and provision of sustainable transport providing viable alternatives to the private car) are provided commensurate with the phasing of development; and as a prerequisite of the occupation of development, where this is necessary to avoid significant harm. Measures to ensure future upkeep/maintenance of sustainable transport provision will be required.

2.127 In addition to the overarching requirements set out in Policy SP3, Policy SP4 sets out more detailed on-site requirements for each of the three Garden Communities that lie within Epping Forest District. The requirements have been identified in close consultation with Harlow District Council and other local authorities within

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the Harlow and Gilston Garden Town in order to ensure coordination and compatibility with other emerging Local Plans and workstreams.

- 2.128 The Garden Communities will provide flagship development, and Epping Forest District will work jointly with Harlow District Council to resolve any cross-boundary issues in delivery. The development will also provide opportunities to promote high environmental standards in terms of energy efficiency, design and low carbon technologies, and set an example for future major developments in Epping Forest District.
- 2.129 All sites will provide a significant amount of multi-functional green and blue infrastructure, serving strategic and local purposes. Green and blue infrastructure will be required to provide a high quality context for the development and provide mitigation towards impacts arising from growth in relation to the Epping Forest SAC. It will retain and improve habitats for wildlife, including the safeguarding of protected species in line with statutory requirements, and provide good recreational opportunities for local people. There will be connections for walking and cycling to other recreational opportunities in Harlow and Epping Forest District.
- 2.130 Details of site specific infrastructure requirements are provided within the Infrastructure Delivery Plan Schedules.

Latton Priory

- 2.131 The Latton Priory allocation provides capacity for a minimum of 1,050 homes, alongside community facilities, early years provision, a new primary school (including provision of land) and appropriate contributions towards a secondary school (including the provision of land) to serve the needs arising from new development. In addition five traveller pitches will be provided.
- 2.132 Approximately one hectare of employment land for office and research and development uses (within Use Class E) will be provided at Dorrington Farm (at site allocation RUR.E19A). Alongside the existing one hectare of designated Use Class B2 and B8 employment land (site RUR.E19B), this will provide opportunities for comprehensive redevelopment and the provision of high quality employment uses to be incorporated within the

Garden Town, helping to promote sustainability whilst also linking to Harlow Town Centre. The Council recognises that through the detailed masterplanning process at Latton Priory it may become apparent that the required employment uses may be better located elsewhere in the masterplan area to deliver a comprehensively planned development.

Water Lane Area

- 2.133 The Water Lane Area allocation provides capacity for a minimum of 2,100 homes, alongside community facilities, early years provision, a new primary school (including provision of land) and appropriate contributions towards a secondary school to serve the needs arising from new development. In addition five traveller pitches will be provided.

East of Harlow

- 2.134 The East of Harlow allocation is located across the administrative boundaries of Harlow and Epping Forest District Councils. The land within Epping Forest District provides capacity for a minimum of 750 homes. Development is required to provide community facilities, early years provision, a new primary school (including provision of land) and appropriate contributions towards a new secondary school (including provision of land) to serve the needs arising from new development. In addition five traveller pitches will be provided.
- 2.135 The development of the site also provides the opportunity to resolve flood risk issues, both on-site and off-site, downstream and upstream. The masterplan and design of the site should be informed by the recommendations of the latest Strategic Flood Risk Assessment report to address flood risk.
- 2.136 The allocation provides an opportunity to accommodate the relocation of the Princess Alexandra Hospital, subject to the completion of further technical assessment work. In this context, the District Council will work cooperatively with all relevant stakeholders to ensure the future provision of high quality healthcare facilities and services to serve the wider area. These facilities will respond effectively to planned and sustained growth.

[The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.](#)

2.137 Development will be required to make provision for on-site requirements as set out in Policy SP4.

Policy SP4 Garden Communities

A. The following sites are allocated to support the delivery of the Spatial Development Strategy set out in Policies SP1 and SP3.

Allocation Reference	Garden Community	Development to be delivered
SP4.1	Latton Priory	A minimum of 1,050 homes, one hectare of employment land and five traveller pitches
SP4.2	Water Lane Area	A minimum of 2,100 homes and five traveller pitches
SP4.3	East of Harlow	A minimum of 750 homes, potential relocation of Princess Alexandra Hospital and five traveller pitches

B. As well as the delivery of new homes, sites SP4.1-4.3 will be expected to make provision for appropriate small-scale employment, retail and community uses in accordance with other policies within this Plan. The Garden Communities must be planned and delivered as high quality, integrated, sustainable and distinctive developments supported by necessary infrastructure, services and facilities.

C. New development must be served and supported by appropriate on and off-site infrastructure and services. Development should deliver and/or contribute towards the delivery of infrastructure where this is necessary and fairly and reasonably related to the development having full regard to the Infrastructure Delivery Plan Schedules and their wider infrastructure objectives. Development identified in this Policy will be expected to make a contribution proportionate to its scale

and impact for the delivery of improvements to Junction 7 and other strategic infrastructure requirements.

- D. Planning applications for sites SP4.1-4.3 should be accompanied by a Strategic Masterplan which demonstrates that the development requirements set out in this Policy have been accommodated and which has been endorsed by the Council. The endorsed Strategic Masterplan will be taken into account as an important material consideration in the determination of any planning applications.
- E. Development proposals for the Garden Communities (and where applicable Strategic Masterplans) must reflect and demonstrate that the principles set out in Policy SP2 and SP3 have been adhered to.
- F. Land will be safeguarded for the Sustainable Transport Corridors in accordance with Map 2.2 and the Policies Map. Development proposals and Strategic Masterplans will be required to safeguard land accordingly.

Latton Priory

- G. Land allocated at Latton Priory (SP4.1) will be brought forward on a phased basis for a comprehensive high quality development to include:
 - (i) a minimum of 1,050 homes up to 2033;
 - (ii) one hectare of employment land for office/research and development uses (within Use Class E) to be provided at site allocation RUR.E19A in addition to the one hectare of existing employment land within Use Classes B2 and B8 at Dorrington Farm (site RUR.E19B). The Council recognises that through the detailed masterplanning process it may become apparent that the required employment uses may be better located elsewhere in the Masterplan Area to deliver a comprehensively planned development;
 - (iii) five traveller pitches;
 - (iv) strategic natural greenspace of a sufficient size and quality (as detailed in the relevant Mitigation Strategy for the Epping Forest Special Area of Conservation) to support biodiversity and to avoid placing pressure on existing sites of international and national importance. Such space should include opportunities walking and cycling,

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flood mitigation and a new Green Belt defensible boundary to the South of the site as indicated on the map. Proposals will also be required to incorporate avoidance and mitigation measures to address any impacts of development on the Harlow Woods Site of Special Scientific Interest;

- (v) land to the South of the 'build to' line within the Masterplan Area must be retained for public open space or for other appropriate uses as agreed through the masterplanning process;
- (vi) a sympathetic design which preserves or enhances the adjacent Ancient Woodland, Scheduled Monuments and Listed Buildings and their settings within and to the South of the site;
- (vii) a local centre;
- (viii) a new primary school with early years and childcare provision on an education site of at least 2.1 hectares;
- (ix) at least ten hectares of land to accommodate a secondary school in addition to any necessary contributions;
- (x) the provision of appropriate community and health facilities;
- (xi) highway and transport improvements including to the North South sustainable transport corridor, works to Southern Way and Second Avenue corridor, and upgrades to Junction 7 of the M11;
- (xii) satisfactory utility infrastructure including water, waste water, solid waste, gas, electricity and telecommunications for occupants; and
- (xiii) bus services and direct pedestrian and cycle links between homes, the facilities that serve them and other key destinations.

Water Lane Area

H. Land allocated in the Water Lane Area (SP4.2) will be brought forward on a phased basis for a comprehensive high quality development to include:

- (i) a minimum of 2,100 homes up to 2033;
- (ii) five traveller pitches;
- (iii) strategic natural greenspace of a sufficient size and quality (as detailed in the relevant Mitigation Strategy for the Epping Forest

Special Area of Conservation) to support biodiversity and to avoid placing pressure on existing sites of international and national importance. Such space should include opportunities for walking and cycling, flood mitigation and new Green Belt defensible boundaries as indicated on the map. Proposals will also be required to incorporate avoidance and mitigation measures to address any impacts of development on the Harlow Woods Site of Special Scientific Interest;

- (iv) a sympathetic design which preserves or enhances Listed Buildings adjacent and within the site, Scheduled Monuments to the North and West and the Conservation Area adjacent and within the site and their settings;
- (v) a local centre;
- (vi) except for essential infrastructure and water compatible developments, no built development will be permitted on land within Flood Zone 2 and 3 in the Council's latest Strategic Flood Risk Assessment, including the appropriate allowance for climate change;
- (vii) a new primary school with early years and childcare provision on an education site of at least 2.5 hectares;
- (viii) contributions towards new secondary school provision within the Garden Town;
- (ix) the provision of appropriate community and health facilities;
- (x) highway and transport improvements including contributions towards Sustainable Transport Corridors; works to Water Lane/A1169 roundabout; A1025/Abercrombie Way signals and traffic calming along the Southern Way corridor;
- (xi) satisfactory utility infrastructure including water, waste water, solid waste, gas, electricity and telecommunications for occupants;
- (xii) bus services and direct pedestrian and cycle links between homes, the facilities that serve them and other key destinations; and
- (xiii) The Council recognises that to facilitate a better position and alignment of the

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Sustainable Transport Corridor in the masterplan area some limited residential development may be better located elsewhere in the masterplan area to deliver a comprehensively planned development.

East of Harlow

I. Land allocated at East of Harlow (SP4.3) will be brought forward on a phased basis for a comprehensive high quality development to include:

- (i) a minimum of 750 homes up to 2033;
- (ii) five traveller pitches;
- (iii) strategic green and blue infrastructure comprising natural/semi natural open space, walking and cycling routes, flood mitigation and wildlife space;
- (iv) a sympathetic design which preserves or enhances Listed Buildings adjacent and within the site, Registered Park and Garden to the West and nearby Scheduled Monuments;
- (v) except for essential infrastructure and water compatible development, no built development will be permitted on land within Flood Zone 2 and 3 in the Council's latest Strategic Flood Risk Assessment, including appropriate allowance for climate change;
- (vi) a local centre;
- (vii) the provision of appropriate community and health facilities including approximately 14 hectares of land for a health and wellbeing hospital campus;
- (viii) a new primary school with early years and childcare provision on an education site of at least 2.1 hectares;
- (ix) at least ten hectares of land to accommodate a new secondary school in addition to any necessary contributions;
- (x) suitable highway and transport improvements to be agreed with the Highway Authority, including linkages into off-road cycle and walking networks;
- (xi) satisfactory utility infrastructure including water, waste water, solid waste, gas, electricity and telecommunications for occupants;

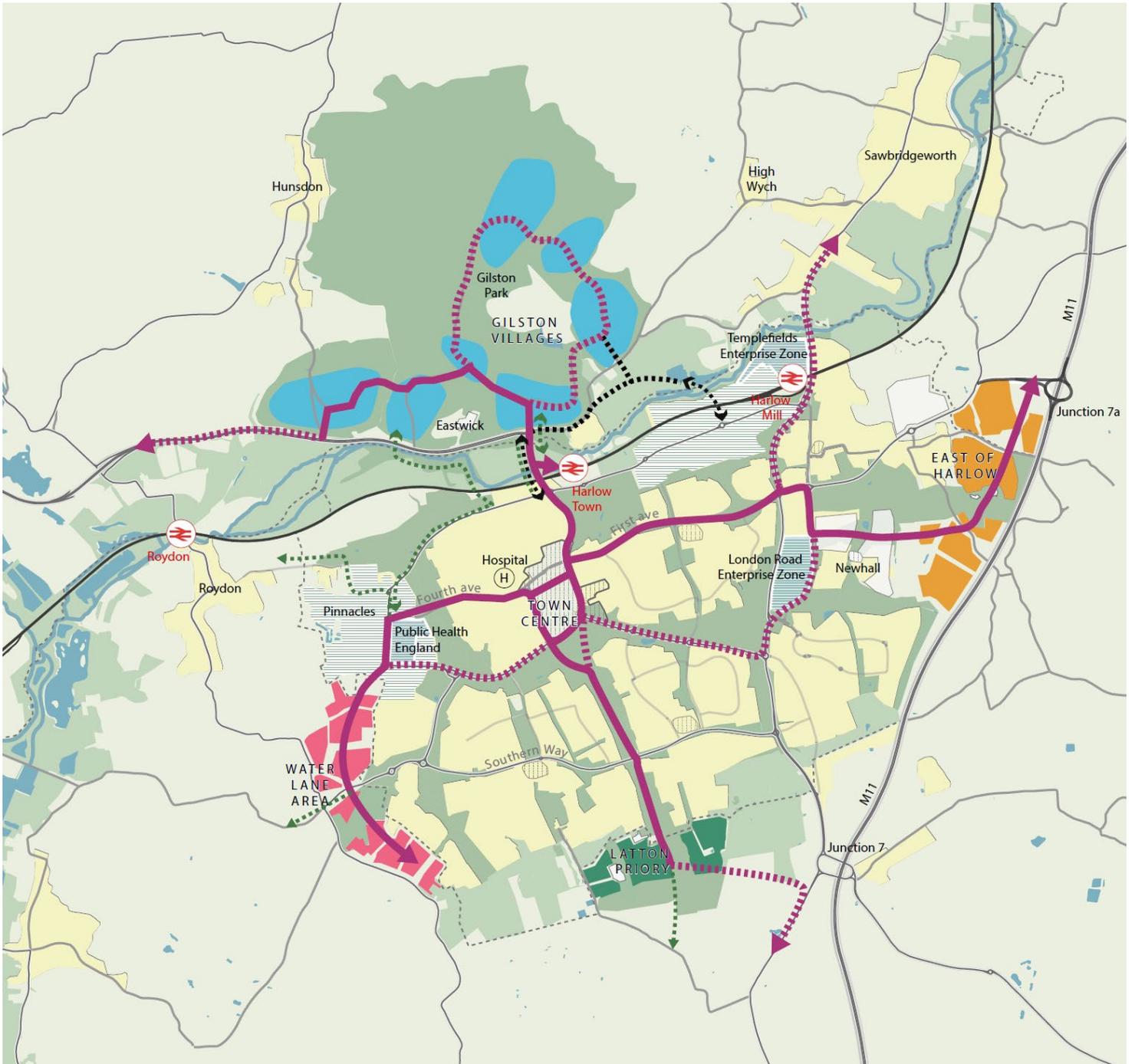
(xii) bus services and direct pedestrian and cycle links between homes, the facilities that serve them and other key destinations;

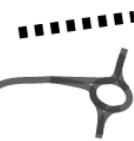
(xiii) integration with the National Cycle Network Route 1; and

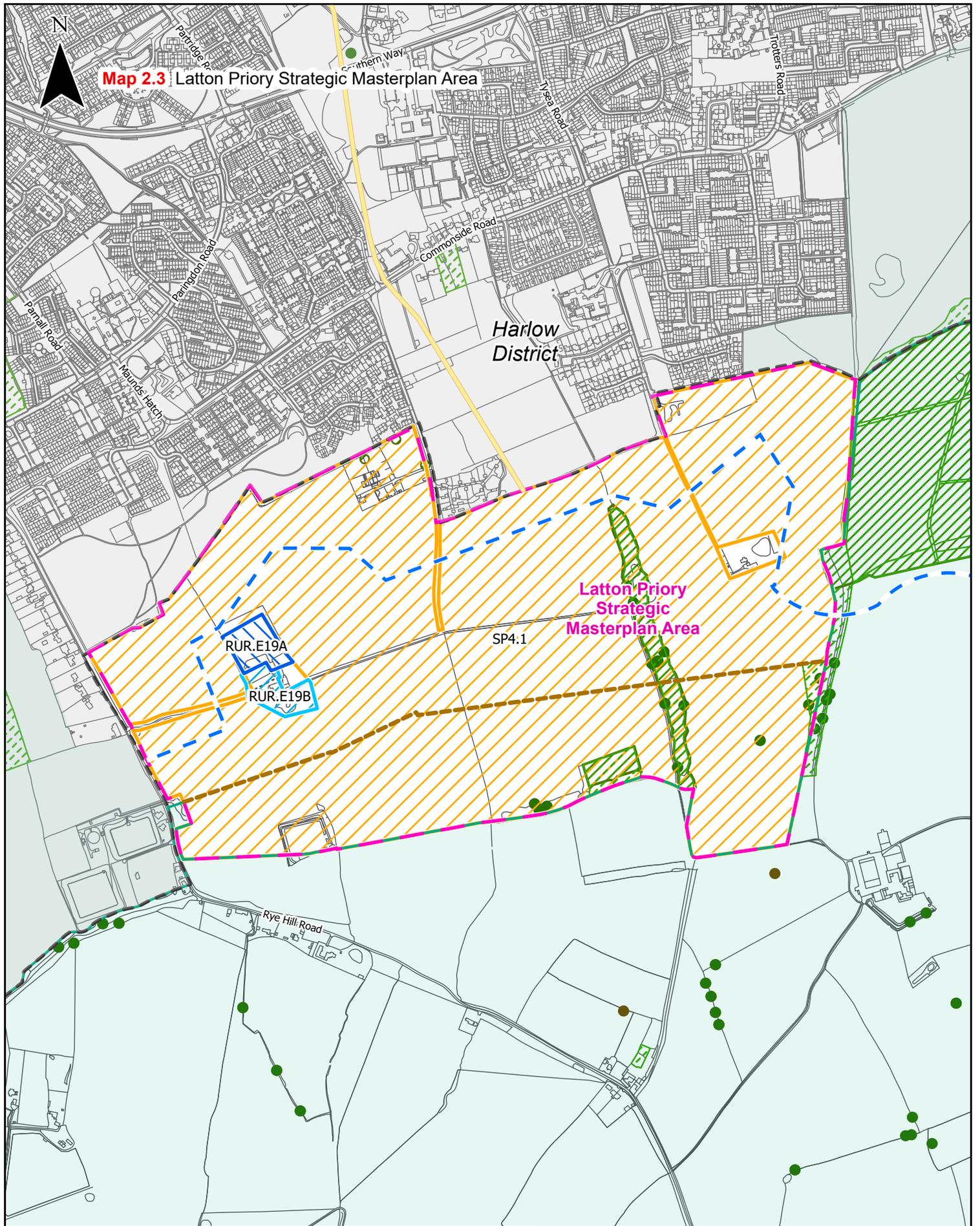
(xiv) measures to ensure the protection of the functional flood plain and restriction of surface water run-off from the site into Pincey Brook to no more than existing rates and where possible existing volumes. In order to mitigate any increased volumes, discharge rates should either be limited to the 1 in 1 greenfield run-off rate or provide long term storage.

J. The East of Harlow strategic site allocation (SP4.3) forms part of a wider Garden Community, the Southern part of which has been allocated in the Harlow Local Development Plan (under Policy HGT 1). The Garden Community will be subject to the preparation of a single Strategic Masterplan. Through the preparation of the Strategic Masterplan, the extent of development across the masterplan area and the position of a build-to line will need to be agreed in order to appropriately safeguard the settlement edge of Sheering. If it is concluded through the preparation of the Strategic Masterplan that the proposed secondary school and/or community and health facilities are to be delivered within that part of the Garden Community in Harlow District, consideration will be given to the appropriate alternative mix and balance of land uses and the associated infrastructure that should be delivered within the strategic site allocation SP4.3. In determining the appropriate mix and balance of land uses, the Council will have regard to relevant policies within this Plan, in particular: Parts A. to F. of this Policy; Policies SP2 and SP3; the identified need for the types of development proposed within the wider Garden Community; and relevant environmental, heritage, transport, infrastructure and other planning opportunities and constraints.

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



-  District boundaries
-  Train stations
-  Garden Communities:
New neighbourhoods and villages
-  Harlow Town Centre and local centres
-  Industrial areas
-  Enterprise Zones / Public Health England
-  Existing neighbourhoods and villages
-  Sustainable Transport Corridor
(incl. walking and cycling)
-  Sustainable Transport Corridor potential
extension (incl. walking and cycling)
-  New / improved road river crossing
-  New / improved pedestrian and cycle link
-  Potential road extension
-  Junction 7a
-  Potential redevelopment of existing hospital



Map 2.3 Latton Priory Strategic Masterplan Area

Epping Forest District
Local Plan
2011-2033

Map 2.3

Latton Priory

Legend

Date: February 2023

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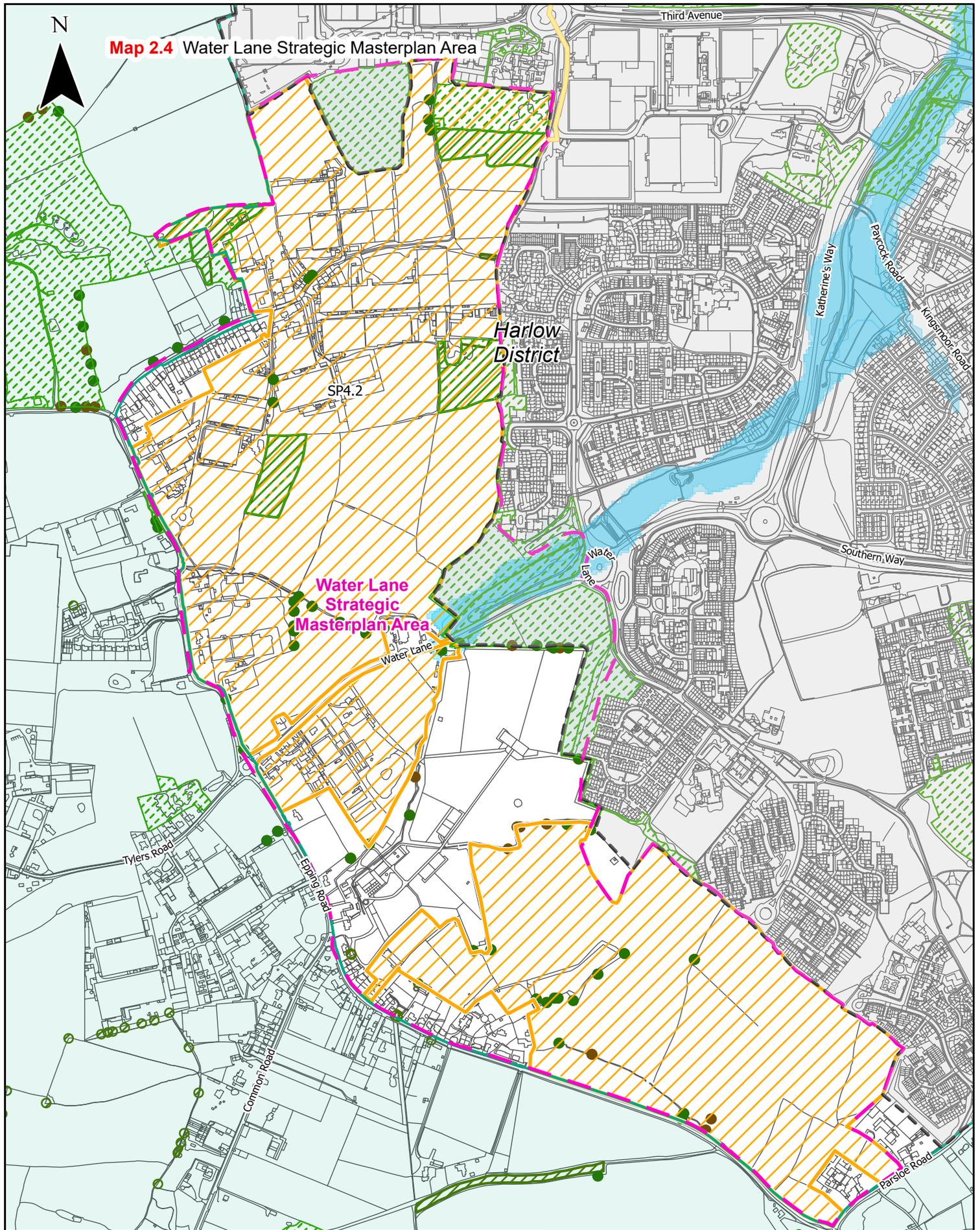
The Local Plan should be read as a whole.
Proposals will be judged against all relevant policies.

- Residential site allocation
 - Employment site designation
 - Employment site allocation
 - Traveller site allocation
 - Residential and traveller site allocation
 - Strategic Masterplan Area
 - Concept Framework Plan Area
 - Green Belt Boundary
 - Local Green Space
 - Local Authority boundary
 - Build to line
 - Indicative Access Road
 - Sustainable Transport Corridors
- This legend shows only the key Local Plan policy designations.
A full legend can be found in Part Two: Site Specific Policy Requirements and Designations.



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Map 2.4 Water Lane Strategic Masterplan Area



Epping Forest District
Local Plan
2011-2033

Map 2.4

Water Lane

Legend

Date: February 2023

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Residential site allocation
Employment site designation
Employment site allocation
Traveller site allocation
Residential and traveller site allocation
Strategic Masterplan Area
Concept Framework Plan Area
Green Belt Boundary
Local Green Space
Local Authority boundary
Build to line
Indicative Access Road
Sustainable Transport Corridors

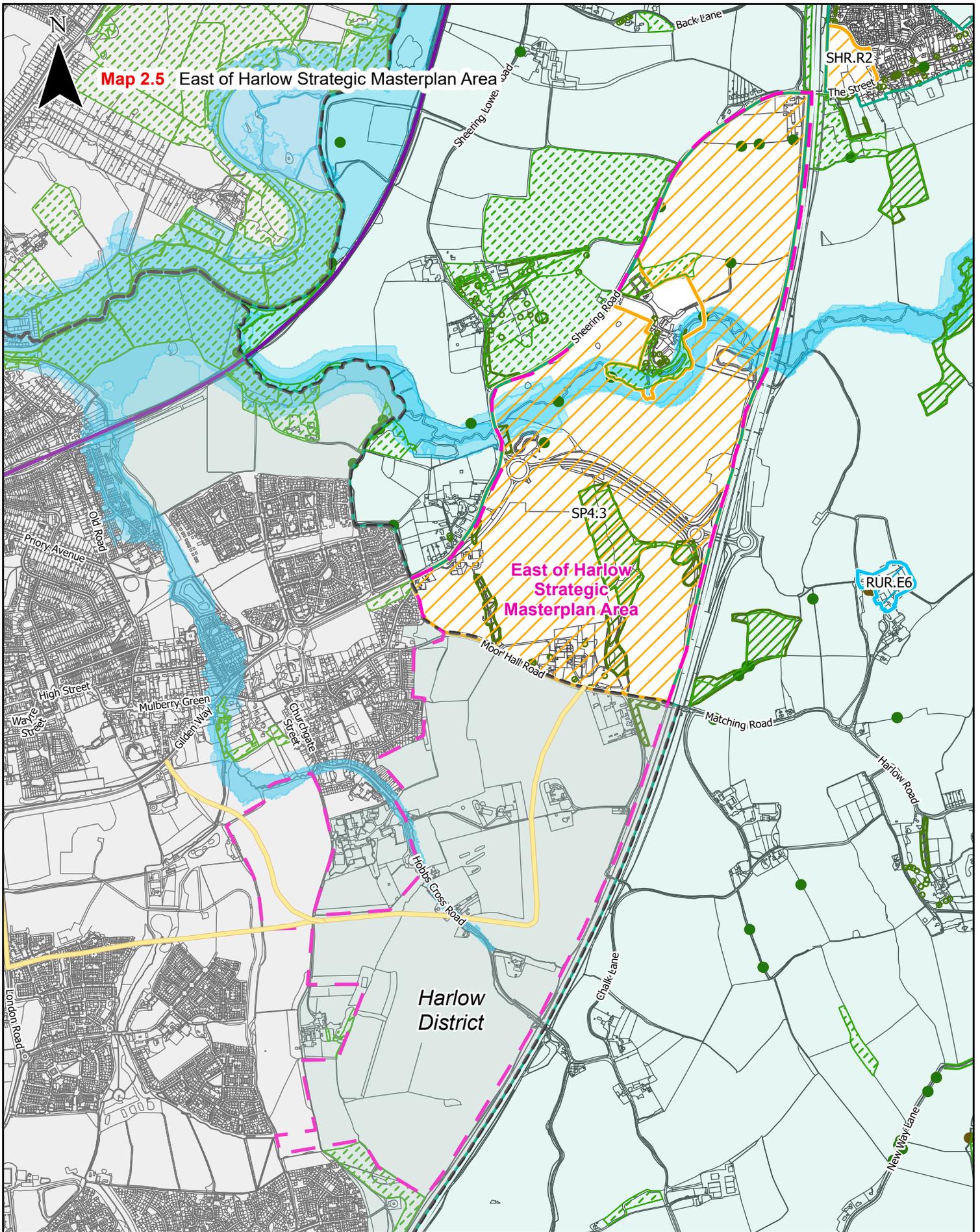


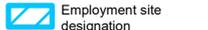
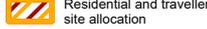
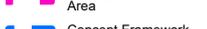
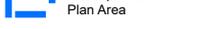
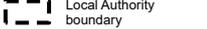
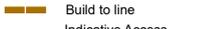
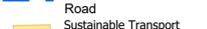
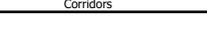
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The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.

This legend shows only the key Local Plan policy designations. A full legend can be found in Part Two: Site Specific Policy Requirements and Designations.

Map 2.5 East of Harlow Strategic Masterplan Area



<p>Epping Forest District Local Plan 2011-2033</p> 	<p>Map 2.5</p>	<p>East of Harlow</p>	<p>Legend</p> <ul style="list-style-type: none">  Residential site allocation  Employment site designation  Employment site allocation  Traveller site allocation  Residential and traveller site allocation  Strategic Masterplan Area  Concept Framework Plan Area  Green Belt Boundary  Local Green Space  Local Authority boundary  Build to line  Indicative Access Road  Sustainable Transport Corridors <p><small>This legend shows only the key Local Plan policy designations. A full legend can be found in Part Two: Site Specific Policy Requirements and Designations.</small></p>
	<p>Date: February 2023</p>	<p>1:17,500@ A4</p>	
<p><small>Contains Ordnance Survey & Royal Mail Data © Crown Copyright & Database Right 2020 EFDC Licence No: 100018534 2020 © Environment Agency, © Natural England 2020</small></p> <p>The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.</p>			

Green Belt and Local Greenspace

2.138 The Council recognises the important role of the Green Belt in the District. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The Green Belt in the District forms part of the Metropolitan Green Belt surrounding London. Over 90% of the District is designated as Green Belt.

2.139 The general extent of the existing Green Belt will be maintained, but to achieve sustainable development patterns and meet development needs for the Plan period, alterations to the detailed boundaries around settlements have been necessary. This has been undertaken in line with the national planning policy regarding the definition of boundaries and purposes of the Green Belt. The Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Approach

2.140 National planning policy requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary. There is no clear definition of what amounts to exceptional circumstances, but case law is clear that any justification must be responsive to local conditions and take into account a range of factors.

2.141 The justification for altering the Green Belt boundaries in this Plan arose from local circumstances:

- the extent of the Green Belt and subsequent deficiency of land within the

existing settlements to accommodate identified development needs;

- the requirement to deliver sustainable patterns of development; and
- the inability of neighbouring authorities to meet the needs of the District.

2.142 As set out in the Spatial Development Strategy, the Council has worked in partnership with neighbouring authorities within the defined HMA to identify the Objectively Assessed Development Needs for the Plan period. For the District, the identified housing requirement represents a considerable increase over previous development rates. It is clear from the evidence base for this Plan that there is insufficient land outside of the Green Belt to meet development needs within the Plan period.

2.143 This Local Plan pursues a strategy, as set out in Policy SP1, which seeks to minimise the loss of Green Belt land for development. It maximises sites within existing settlements and focuses development in the most sustainable locations.

2.144 Successive studies have demonstrated that Harlow is a suitable location for growth, and that an element of this growth would need to be outside of the administrative boundaries of Harlow within Epping Forest and East Herts Districts. This has required alterations to the District's Green Belt to facilitate this development.

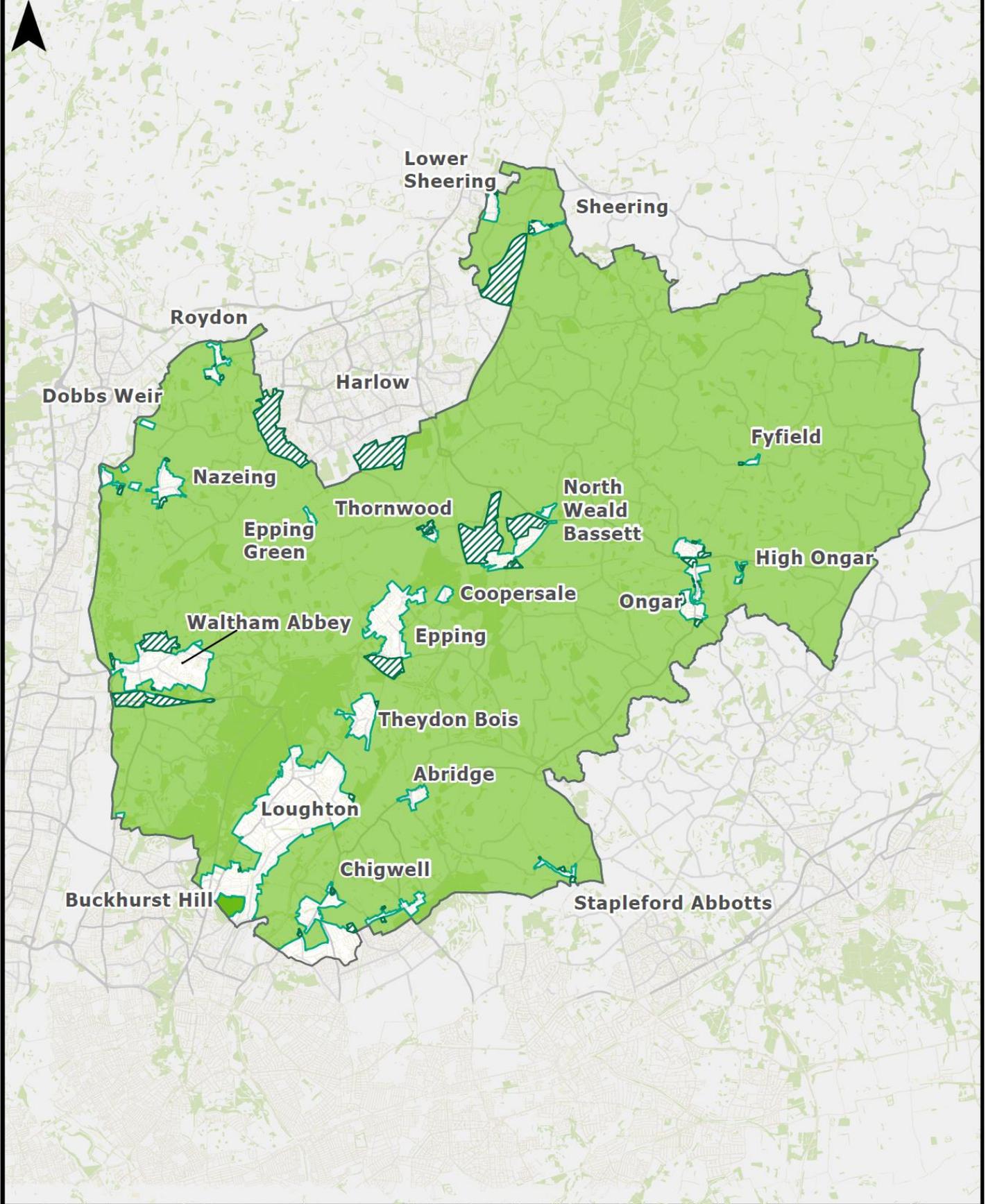
2.145 Beyond Harlow, the identification of locations for development has followed the sequential approach as set out in the supporting text to Policy SP1 in which non-Green Belt land is prioritised for development over land within the Green Belt. The evidence base of sites from which the allocations have been drawn has included a comprehensive search within the settlements for land. The Council has therefore sought to ensure that potential opportunities to redevelop existing brownfield sites outside of the Green Belt were identified wherever possible.

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

- 2.146 The selection of locations for development has been informed by a Green Belt Review that identified the performance of parcels of land in relation to the purposes of the Green Belt. The final selection of sites for release from the Green Belt has been informed by their suitability and their deliverability. The filtering and assessment of sites that has led to alterations to the Green Belt boundaries has been comprehensive. The Report on Site Selection (2019) sets out the approach which seeks to protect high value Green Belt land wherever possible.
- 2.147 Evidence contained within the Green Belt Review: Stage 2 identified a number of areas in the District where development has already taken place within the Green Belt. These have been reviewed to consider whether it is appropriate for these developed areas to remain within the Green Belt, or if a more defensible boundary is appropriate in the long term. The selection of sites has also led to the identification of some anomalies and where appropriate the boundaries have been altered.
- 2.148 Map 2.6 shows the Green Belt boundary for the District.

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

N **Map 2.6** Green Belt Boundary Alterations



Epping Forest District
Local Plan
2011-2033

Drawing No.
EFDC-SP-0000-Rev3

Date: February 2023

Scale: 1:150,000 @A4

Map 2.6

Green Belt Boundary Alterations
in Epping Forest District

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

Legend

- Green Belt boundary
- Green Belt boundary alterations
- Epping Forest District boundary
- Neighbouring Local Authorities



Designation of Local Greenspace

- 2.149 In some locations the alteration to the Green Belt boundary removes areas of land that are locally important greenspaces which are not proposed for change, and which should benefit from continued protection from inappropriate development. These areas of greenspace are located at Thornwood Common, Chigwell Village Green and Land at Tempest Mead North Weald Bassett and meet the criteria for designation as local greenspace. They are locally important due to: their beauty, wildlife value, historic significance and/or recreational value; are closely connected to the community they serve; and are local in character and scale. In accordance with the national planning policy these areas are designated as local greenspaces to ensure their continued protection. Opportunities will be sought to improve and enhance the designated local greenspaces. The areas are shown on the policies map.
- 2.150 National planning policy sets out the approach to planning applications for development proposals within the Green Belt. This Policy outlines the strategic approach whilst Policy DM4 provides more detail.

Policy SP5 Green Belt and Local Greenspace

A. Green Belt

The general extent of the Green Belt is set out in Map 2.6. The detailed boundaries are shown on the Policies Map. The openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy and Policy DM4.

B. Local Greenspace

The same level of protection will be applied to areas of local greenspaces as is applied to Green Belt. The key characteristics of local greenspace are their beauty, wildlife value, historic significance and/or recreational value. It is not necessary for each of these characteristics to be present to be designated or retained as local greenspace.

The Natural Environment, Landscape Character and Green and Blue Infrastructure

- 2.151 The District contains significant natural resources, reflected in the extensive landscapes of the Epping Forest and LVRP through to individual Veteran Trees. The countryside, woodland, trees, green lanes, rivers and water meadows, and rural and urban open spaces are important culturally and for good health. These are valued for their modern and ancient landscapes, enjoyment, recreation and the plants and animals they support. These spaces include elements such as allotments, cemeteries, ponds, streams, river towpaths and roadside verges.
- 2.152 A key characteristic of the landscape in the District is its trees (including Veteran Trees) as they are the key component of the ancient forests of Epping and Hainault, many woods and miles of ancient hedgerow as well as the dominant asset in urban areas.
- 2.153 The Plan provides a positive strategy for the protection and enhancement of the natural environment and recognises its role in adapting to climate change. National planning policy and legislation supports measures including the development of linked, multifunctional spaces networks, and habitat and species protection which seek to achieve net gains in biodiversity. This is commonly known as green and blue infrastructure (the blue referring to the water environment) whilst any component can be termed an 'asset'.

Approach

- 2.154 The continued improvement of the District's green and blue infrastructure assets into networks is an important part of the strategy of the Plan. It is also a key aspect of the Council's response to climate change, providing opportunities to mitigate against the impacts of climate change and adapt to the changing climate.
- 2.155 The Plan seeks to protect and improve the quality of the natural environment in the District, in tandem with providing for the

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

necessary new development, through the continued development of green and blue infrastructure networks. These provide for multipurpose open space and improve access to the natural environment for residents and visitors. Uses of the District wide green and blue infrastructure network include recreation, flood water storage, nature conservation, active travel, provision of shade in urban areas, use of trees to alleviate air pollution, sustainable drainage and food production.

2.156 The Council will work with new as well as existing initiatives such as the Living Landscapes of the Epping Forest, and the Lee Catchment Nature Improvement Area. These are partnerships for the improvement of habitat at landscape scale. For example the Lee Catchment Nature Improvement Area initiative seeks to establish a joined up and resilient ecological network at a landscape scale through the Lee Valley.

2.157 The Council seeks to ensure that development contributes to accessible networks of green and blue infrastructure. With careful design even the smallest site can provide for vegetation, trees or green roofs or walls. Large scale development can be designed to capitalise on the existing green and blue infrastructure assets by incorporating them into layouts and enriching provision, whilst improving links, and the quality of the living environment for occupants. The Council's Green Infrastructure Strategy will assist with the implementation of a comprehensive network of multifunctional spaces across and beyond the District.

Policy SP6 The Natural Environment, Landscape Character and Green and Blue Infrastructure

A. Development proposals will ensure that the natural environment will be protected, its quality enhanced and access to it extended. In considering proposals for development the aim is to create a comprehensive network of green and blue corridors and places, appropriate to the specific rural or urban setting. In so doing, biodiversity will be enriched through habitat connection, improvement and protection at all

scales, including priority habitats. Access will be extended and the recreational opportunities of the countryside and urban open spaces will be maximised.

B. The Countryside

- (i) The character and appearance of the countryside will be conserved and enhanced. Landscape character assessments will be used to assist in judgements on the suitability of new development.
- (ii) A multifunctional countryside will be supported, which is productive, rich in biodiversity, with a well connected green and blue infrastructure network that is accessible for quiet enjoyment, recreation and exercise.

C. Towns, Villages and Rural Communities

- (iii) The green and blue infrastructure assets of the towns, villages and rural communities will be protected and the quality of existing greenspace will be improved.
- (iv) Development will be designed to protect existing green and blue infrastructure assets, enhance networks, secure better provision where deficiencies have been identified and deliver green and blue assets to link to local or wider green and blue infrastructure networks; and
- (v) Quality greenspace appropriate to the scale of the development will be sought.

D. Green and Blue Infrastructure

The District's green and blue infrastructure network (including priority habitats) will be preserved, restored, extended, maintained and enhanced, and priority species protected, as appropriate, through the policies in this Plan including:

- (i) The location of development (Policy SP1 and Chapter 5);
- (ii) Habitat Protection And Improving Biodiversity (Policy DM1);
- (iii) Epping Forest SAC and the Lee Valley SPA (Policy DM2);
- (iv) Landscape Character, Ancient Landscapes and Geodiversity (Policy DM3);
- (v) Green and Blue Infrastructure (Policy DM5);

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- (vi) Sustainable Drainage Systems (Policy DM16);
- (vii) Supporting Sustainable Transport Choices (Policy T1); and
- (viii) Designated and Undesignated Open Spaces (Policy DM6)

E. Development proposals, where appropriate, should contribute towards the delivery of green and blue assets which develop and enhance a network of multifunctional green and blue infrastructure. Contributions will be proportionate to the scale of the proposed development and the rural or urban context. Development which improves the existing green and blue infrastructure and where possible, enhances and protects networks will be supported. Additional provision will be required where deficiencies have been identified through the Infrastructure Delivery Plans Schedules, Green Infrastructure Strategy and other appropriate evidence base documents. Where on-site provision is not feasible financial contributions will be sought.

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

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

Chapter Three

Housing, Economic and Transport Policies

Housing

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

Housing Mix and Accommodation Types

- 3.2 The Council, in its role as local housing authority, has a duty under Section 8 of the Housing Act 1985 (as amended) to consider the needs of people residing in, or resorting to the District, with respect to the provision of sites on which caravans can be stationed or places on inland waterways where houseboats can be moored. It is also important to consider, as set out in national planning policy, the housing needs of other sections of the community. This is to ensure that the right size and type of new homes is provided across the District to meet the needs of existing and future residents and to ensure the creation of mixed and balanced communities. This includes those with specialist housing requirements or who have a desire to build their own homes.

Approach

- 3.3 The 2015 Strategic Housing Market Assessment (SHMA) and updates undertaken in 2017 provide the latest published housing needs evidence in relation to the quantum, type, size and tenure of new homes needed both across the Housing Market Area and within the District over the Plan period. However, there is also a need to consider the most appropriate location for new homes, and the type and size of properties to be provided in different areas. This must take into account the desire for some to build their own homes and to address specialist housing needs where the evidence exists to support this. The Council will seek to make the

best use of land and take account of the existing stock of homes within the locality to achieve the objective of creating mixed and balanced communities. Information regarding the profile of housing and population characteristics in a local area can be found by using the Local Area Reports facility on the Office of National Statistics 'nomis official labour market statistics' website, or such other replacement source.

- 3.4 It is important that a proportion of new homes can provide for the needs of those with, or who may develop, accessibility requirements through the design of those homes. This reflects the evidence set out in the SHMA and the 2017 updates that there is an existing need for accessible housing in the District. That need will continue taking into account the ageing profile of the District's population over the Plan period. Improving housing standards to strengthen local communities and reduce the need for residential care by enabling vulnerable people to remain in their homes, or be able to have the choice to be able to move into a new home, is an important element of securing an improvement to the overall housing mix within the District.
- 3.5 Consequently, the Council's approach is that all new homes should be built to Building Regulations Requirement M4 (2) Accessible and Adaptable Dwellings standards, in order to maximise choice. The Building Regulations M4 (2) require, amongst other things, step free access. In non-lift serviced multi-storey development where step free access is not viable, assessments should be submitted to demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents. If this is satisfactorily evidenced, then the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4 (1) of the Building Regulations.
- 3.6 The needs of those with accessibility requirements, including older people, can be supported by bungalow accommodation. Information contained in the Council's Authority Monitoring Reports show that there has been a gradual erosion of the District's existing stock of

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

bungalows. The Council considers that bungalows can play an important role because of their potential ease of adaptation such that they can provide choice for people with accessibility requirements, including the current and future needs of older people.

- 3.7 Specialist accommodation for those with support needs will continue to play an important role in providing for those residents who currently, or will, require assistance. The term "specialist accommodation" is defined in the Glossary (Appendix 1). Consequently, the loss of existing specialist accommodation will be resisted and new provision will normally be supported where appropriately located and designed. The management of any specialist accommodation proposed will be required, where possible, to be undertaken by a provider registered with the Care Quality Commission (or any subsequent national registration authority) and the proposed provider should be identified as part of any planning application.
- 3.8 The Self-build and Custom Housebuilding Act 2015 places an obligation on local authorities to maintain a register of people and groups interested in building their own homes. A definition of self-build and custom housebuilding is set out in the Housing and Planning Act 2016. The Council will work with landowners and developers to deliver its obligations with respect to self-build and custom housebuilding.
- 3.9 The Council is also supportive of community-led housing. Community-led schemes are those that are driven by local communities, rather than local authorities or developers.

Policy H1 Housing Mix and Accommodation Types

- A. Development will be permitted where the mix of new homes:
- (i) includes a range of types, tenures and sizes to address local need including for 'down-sizing', housing for older people, and specialist housing as appropriate;

- (ii) is appropriate to the size, location and characteristics of the site and its surroundings;
- (iii) takes into account the existing housing stock in the settlement, rural community or neighbourhood in order to avoid any over-concentration of a single type or size of home, or specialist accommodation, where this would undermine the achievement of creating mixed and balanced communities;
- (iv) allows for community-led approaches such as co-housing and co-operatives where appropriate; and
- (v) provides for all new homes to be built in accordance with Building Regulations Requirement M4 (2) Accessible and Adaptable Dwelling standards.

- B. Planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new homes to be provided. Such evidence must reflect the latest housing needs evidence published by the Council.
- C. Proposals for new homes comprising:
- specialist accommodation;
 - self-build/custom housebuilding;
 - community-led schemes;
 - sites upon which caravans can be stationed; or
 - locations for mooring houseboats.

will be supported where:

- (i) the location is appropriate in terms of access to facilities, services and public transport; and
 - (ii) it can be demonstrated, where relevant, that the development is designed and managed to provide the most appropriate types and levels of support to the proposed occupier and adequately caters for the needs of support staff.
- D. Where there is evidence of an identified unmet need in the local area and the location is appropriate in terms of access to existing or proposed facilities, services and public transport, larger scale new residential developments should incorporate specially designed housing/specialist accommodation for

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people with support needs (including for older people and housing with care).

- E. The loss of bungalows and specialist accommodation will be resisted.
- F. The Council will support the development of self-build and custom build homes on appropriately sized, serviced sites in the first instance or on appropriately sized sites that are capable of being serviced. The provision of such homes will be encouraged as part of larger development schemes.

Affordable Homes

- 3.10 The evidence presented in the SHMA and 2017 updates demonstrates that the provision of affordable homes is a key issue for the District. The 2017 SHMA Affordable Housing update sets out that, having taken into account the number of affordable homes provided in the first five years of the Plan period, the number of new affordable homes required for the period 2016-2033 in the District is 2,851 homes. For the period 2017-2033 this equates to some 178 homes per annum.
- 3.11 The primary opportunity to address this issue is through on-site provision as part of new residential developments, taking into account the limited supply of land and to ensure the creation of mixed and balanced communities. In doing so there needs to be a balance between securing the maximum level of affordable homes on those sites whilst ensuring that this does not impact on their viability and prevent the overall delivery of homes and infrastructure.
- 3.12 In order to understand what would be considered a proportionate and reasonable level of affordable homes to be sought, without impacting on the overall delivery of homes, the Council has undertaken an assessment of viability to inform the requirements set out in this Plan.
- 3.13 The Housing and Planning Act (2016) introduced a general duty on local authorities to promote the provision of Starter Homes. Subsequent to the Act gaining Royal Assent the Government published its Housing White Paper (2017). This set out that the Government would commence the general duty on local authorities to promote

the supply of Starter Homes but that it would not implement a statutory Starter Home requirement at this point in time.

- 3.14 National planning policy sets out an expectation that residential sites of ten or more dwellings would deliver a minimum of 10% affordable home ownership products. The type of homes considered to comprise affordable homes is set out in national planning policy. This Policy provides sufficient flexibility to accommodate any future changes in national planning policy.
- 3.15 Current evidence shows that there is a significant need for homes for affordable rent and such provision will be the Council's priority. This would not preclude the opportunity to provide the indicative levels of affordable home ownership products set out in national planning policy.

Approach

- 3.16 The evidence suggests that the provision of 40% of affordable homes on sites of 11 or more homes (including self-contained units in specialist accommodation) would provide the most appropriate balance between achieving a meaningful proportion of affordable homes, as well as accommodating any financial contributions, to support both the delivery of affordable homes and the necessary strategic infrastructure subject to individual site viability. The Council recognises that the provision of affordable homes in accordance with this Policy may render some development proposals unviable at the time of submitting a planning application. Where the Council is satisfied that the independently verified viability assessment submitted justifies the provision of affordable homes below the level required by Policy H2, the Council will expect provision of additional affordable homes to be made if viability improves before full completion of the development permitted. For new larger-scale residential development that will be delivered on a phased basis, the Council will require planning obligations to include mechanisms for viability reviews and 'clawback' clauses (or similar). This is to ensure the fullest possible compliance with this Policy is achieved where

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the viability of the scheme improves before completion.

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

- that the site is too small;
- that there are site specific factors which mean that the provision of on-site affordable homes may not be desirable in terms of the form and location of development;
- that site specific complexities and costs would not generate sufficient 'value' to be viable if the proportion of affordable homes sought were to be provided; or
- that some developments, such as those brought forward through the 'office to residential' and other permitted development rights, are currently exempted by national legislation from having to make a contribution towards the provision of affordable homes.

3.18 In addition, there will continue to be a loss of existing affordable homes through 'Right to Buy'.

3.19 The 2015 SHMA and 2017 updates provide information about the potential type and tenure of affordable homes to be provided across the District. This evidence indicates the need for the provision of 81% of new affordable homes to be for affordable rent and 19% to be for intermediate housing products. This provides a useful starting point but, as with the delivery of market homes, there is a need to consider the most appropriate location, type, size and tenure of properties to be provided in different areas of the District. Applicants are therefore advised to contact the Council's Housing Service for the most up-to-date information with respect to the provision of affordable homes. Different locations will have different characteristics, and different sizes of site will provide varying opportunities for achieving a mix in line with the District wide evidence. There is also a need to make best use of land, and to take account of

the existing stock of affordable homes within the locality to support the objective of creating mixed and balanced communities. In relation to this latter point, it is important to ensure that affordable homes are designed to ensure that they are visually integrated as part of any wider development i.e. that schemes are designed in such a way as to be 'tenure blind'. Similarly, it is important that new homes provide for the needs of those with, or who may develop, accessibility requirements through their design.

Policy H2 Affordable Homes

- A. On development sites which provide for 11 or more homes, or residential floorspace of more than 1,000 square metres (combined gross internal area), the Council will require 40% of those homes to be affordable and provided on-site. The tenure mix of affordable homes will be required to reflect the latest available housing need. All new homes will be required to meet Building Regulations Requirement M4(2) Accessible and Adaptable Dwelling standards.
- B. The management of the affordable homes provided will be undertaken by a Registered Provider which is a Preferred Partner of the Council unless otherwise agreed by the Council. Any relevant scheme will need to demonstrate that the design, siting and phasing of affordable homes provides for its proper integration and timely provision as part of the wider development.
- C. The mix of units in respect of size will be determined on a site by site basis dependent on the overall needs for the local area and on the specific characteristics of the individual site. The Council will expect the design, type, size and mix of the affordable homes to be such that the development is 'tenure blind' in respect of its character and appearance.
- D. Proposals that do not accord with the requirements of Part A (above) must be accompanied by a viability assessment (with supporting evidence), which is transparent and complies with relevant national or local planning policy and guidance applicable at the time.
- E. Where it has been demonstrated to the Council's satisfaction that the provision of affordable homes in accordance with the above

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levels and the preferred tenure mix as indicated by the most up-to-date evidence would render the scheme unviable, the Council will determine the approach to be taken to achieving viability, where appropriate, having regard to the following available options:

- reviewing the tenure mix;
- reviewing the extent of other site specific planning obligations; and
- reviewing the proportion of affordable homes.

- F. In exceptional circumstances, where the Council agrees that it would be inappropriate for the required affordable homes to be provided on-site as part of the development, the Council will accept a financial contribution to fund the provision of affordable homes on another site in the District, provided that the Council is satisfied that:
- the financial contribution is at least equivalent to the increased development value if affordable homes are not provided on-site, subject to such a contribution being viable; and
 - a viability assessment has been provided (with supporting evidence) in accordance with Part D (above) which is transparent and complies with relevant national and local planning policy and guidance applicable at the time, properly assessing the level of financial contribution to be provided.
- G. Where a viability assessment has been submitted in accordance with Part D (above) the Council will undertake an independent review of that assessment for which the applicant will bear the cost.

Rural Exception Sites

- 3.20 A significant part of the District is rural in nature and designated as Green Belt. In accordance with Policy SP1 D(i), development in such areas, if not specifically allocated for residential development within this Plan, would not normally be granted planning permission. Where sites have been allocated within or adjacent to Small Villages many are below the threshold for which affordable homes would be

sought. Consequently, there is still likely to be a need for affordable homes in Small Villages and rural communities and those areas should have the ability to benefit from the provision of affordable homes on suitable small-scale sites.

Approach

- 3.21 In order to be able to accommodate the need for affordable homes in Small Villages and rural communities where it has been clearly identified and evidenced, and where it accords with other relevant policies of the Plan, the Council may grant planning permission for small-scale schemes for affordable homes. In accordance with national planning policy, there is also a need to provide some flexibility to enable the opportunity for some cross-subsidy through the provision of a small proportion of market homes should viability evidence clearly demonstrate that such cross-subsidy is justified.

Policy H3 Rural Exceptions

- A. Planning permission may be granted for small-scale schemes for affordable homes on sites where planning permission would not normally be granted, where those sites are related to Small Villages and rural communities, where there are no residential allocations proposed of a sufficient size to make provision for affordable homes, or where such sites do not, in accordance with the provisions of Policy H2, provide for sufficient affordable homes when granted planning permission to address the full need for that Small Village or rural community. Such schemes will need to satisfy the Council that:
- (i) there is a demonstrable social or economic need for affordable homes for local residents which cannot be met in any other way and which can reasonably be expected to persist in the long term. Planning applications will be expected to be supported by a local housing needs assessment;
 - (ii) the development is well-related to the existing Small Village or rural community and there is no significant detrimental impact to the character of that Small Village or rural community and the surrounding countryside, or would cause

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significant harm to the purposes of the Green Belt. Proposals involving extensions into the open countryside or the creation of ribbons or isolated pockets of development are unlikely to be considered acceptable and should be avoided. There should be no significant material grounds for objection including on highways, infrastructure, environmental or amenity matters; and

- (iii) suitable arrangements have been secured to ensure that all of the affordable homes built are available only for initial and subsequent qualifying occupiers (see Part C) whose total income is insufficient to enable them to afford to rent or buy a home of a sufficient size on the open market in the specified parish.
- B. The management of the affordable homes provided will be undertaken by a Registered Provider which is a Preferred Partner of the Council unless otherwise agreed by the Council.
- C. For the purpose of this Policy 'local resident' is defined as:
 - (i) persons who have permanently resided in the specified parish for at least two years; or
 - (ii) persons who are no longer a resident in the specified parish but who have been a resident there for at least three years during the last five years; or
 - (iii) persons who are in permanent employment in the specified parish and have been for a minimum of two years and are working at least an average of 24 hours per week; or
 - (iv) persons who have close relatives (i.e. parents, grandparents, children, brother or sister) living in the specified parish who have lived there for at least five years.
- D. Should there be insufficient applicants from the specified parish when the homes become available for occupation, then applicants from neighbouring parishes within the District who comply with the eligibility criteria set out above will be considered.
- E. The Council will consider the provision of a small proportion of market homes within the proposal site if it can be demonstrated through a viability assessment (with supporting

evidence), which is transparent and complies with relevant national or local planning policy and guidance applicable at the time, that such housing is financially necessary to ensure the delivery of the affordable homes.

- F. Where a viability assessment has been submitted in accordance with Part E above the Council will undertake an independent review of that appraisal for which the applicant will bear the cost.

Traveller Site Development

- 3.22 As set out in national planning policy "travellers" means "gypsies and travellers" and "travelling showpeople". Therefore, when referring to travellers in this Plan, the term incorporates gypsies and travellers, and travelling showpeople.
- 3.23 There are distinct differences in the culture and way of life of gypsies and travellers, and travelling showpeople. For this reason, Planning Policy for Traveller Sites 2015 provides two separate definitions as follows:
 - Gypsies and travellers are defined as: "persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such".
 - Travelling showpeople are defined as: "members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes gypsies and travellers as defined above".
- 3.24 The Council is required to plan for the future needs of travellers in the District up to 2033. Chapter 2 and Policy SP1 set out the context in relation to the future needs of travellers in the

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District over the Plan period and the sequential approach to meeting those needs over this period. The proposed allocation of sites to meet the identified need for travellers and travelling showpeople are set out in Policies SP1 and SP4, and Chapter 5.

3.25 National planning policy sets out a range of issues for local planning authorities to consider when assessing planning applications for traveller site development. It makes clear that local planning authorities should consider matters including:

- the effective use of brownfield or derelict land;
- landscaping and the positive enhancement of the environment;
- promoting opportunities for healthy lifestyles; and
- avoiding isolation from the rest of the community.

The Council should also consider any locally specific criteria to assess planning applications that may come forward on unallocated sites.

3.26 The District's traveller communities live mostly on privately owned sites containing a small number of pitches. There are some larger sites in the District but consultation with both travelling and settled communities has indicated a strong preference for smaller sites for travellers in locations with a degree of separation from settled communities.

3.27 Travelling showpeople occupy a single site in the District which is allocated for intensification in this Plan at Policy P13.

Approach

3.28 The Council will ensure that any proposals for traveller site development outside of allocated sites are assessed in accordance with national planning policy to ensure that they are located in suitable locations and meet the future needs of the traveller community.

3.29 The criteria in the policy responds to the need to ensure that sites for travellers are accessible and that there is convenient access to local services and facilities, specifically educational, medical and welfare services. The available

provision of local services, especially schools, to meet the needs of the occupiers must also be reviewed and appropriately addressed.

3.30 When considering planning proposals for traveller site development, the Council will take into account the suitability of the site and the sustainability of the location, having regard to national planning policy.

3.31 Proposals for traveller site development is inappropriate development in the Green Belt and will only be approved when very special circumstances have been demonstrated in line with national planning policy.

3.32 The Council will resist the loss of existing traveller sites, and particularly the conversion to permanent dwellings unless it can be clearly demonstrated that there is no genuine need or likely future need for traveller sites in the locality and other planning policy requirements are met including those identified in national planning policy.

Policy H4 Traveller Site Development

- A. The Council will meet the identified need for travellers through the provision of yards and/or pitches as part of site allocations as set out in Policies SP1 and SP4 and Chapter 5.
- B. If planning applications for traveller site development are received for sites other than those allocated in this Plan they will be determined taking into account the following considerations:
 - (i) the impact on local amenity and the natural and historic environment;
 - (ii) the relationship to local services with capacity, including education establishments, health and welfare services, shops and community facilities;
 - (iii) access to the highway, public transport services and sustainable transport options;
 - (iv) the provision of on-site facilities for parking, storage, play and residential amenity and appropriate essential services;
 - (v) whether the site is located outside of areas at risk of flooding;

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- (vi) the compatibility of the proposed use with surrounding land uses including potential disturbance from vehicular movements, and on-site business activities;
- (vii) the impact on the physical and visual character of the area;
- (viii) the potential for successful integration between travelling and settled communities; and
- (ix) any impact on the Green Belt. Openness will need to be preserved and very special circumstances demonstrated.

- C. Proposals for new sites under Part B of this Policy should not exceed five pitches unless a specific justification is provided for a greater number of pitches up to a maximum of 10 pitches.
- D. Planning permission will not be granted for the replacement of lawful traveller sites by permanent dwellings or other uses unless it can be clearly demonstrated to the satisfaction of the Council that there is no genuine need or likely future need for traveller sites in the locality and other planning policy requirements are met.

land supply for employment development. Local planning authorities should also have specific regard to the role and function of their town centres, assess locations of deficiency and determine the needs of the food production and tourism industries.

- 3.35 In terms of town centres, local plans should define a resilient network and hierarchy and the extent of Primary Shopping Areas. Plans should promote competitive town centres that provide choice, a diverse offer and reflect individuality; they should support existing, and create new, markets and allocate sites to meet the needs of a range of uses, including edge of centre sites.
- 3.36 National planning policy promotes the sustainable growth of all types of businesses in rural areas, including facilitating the conversion of existing buildings and provision of new buildings. It also promotes the development and diversification of agricultural and other land-based businesses, supports sustainable rural tourism activities and encourages the retention and development of local services.
- 3.37 The strategy for the economy and town centres is closely linked to the strategic policies of the Local Plan, particularly in relation to the quantum and location of future planned development. The Plan incorporates policies to plan for future jobs growth, and the identification of sites and areas to meet future employment land requirements and needs. In addition, policies establish a Town and District Centre hierarchy and plan for the retail needs of the District. Further policies relate to the food production industry focussed on glasshouses, and the visitor economy.

The Economy and Town Centres

- 3.33 This section sets out the future plan for the economy and town centres within the District up until 2033.
- 3.34 National planning policy requires the planning system to place a considerable emphasis on supporting economic growth. Local Plan policies for the economy and town centres should be based on adequate, up-to-date and relevant evidence and integrated with other policy elements, particularly housing. It further reinforces the requirement for co-operation with partners and across local authority boundaries in maintaining a robust evidence base to understand current needs and likely changes. National planning policy also sets the requirement for Local Plans to address barriers to investment, holistically assess needs for employment land or floorspace as well as the sufficiency and suitability of existing and future

Employment Sites

- 3.38 The District is an area of contrasts. More urban in the South abutting London but in stepping beyond the M25 the District becomes more rural in nature. The area has a number of smaller town and population centres with no single higher order conurbation. Unsurprisingly, given its position, the District has very high levels of out-commuting with around half of working residents commuting into London. Consequently, the District is not a self-contained

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economy, but an integral part of a functional economic geography that extends well beyond its boundaries.

- 3.39 The District has key strengths in sectors including construction, professional services, business services and health and care. Jobs growth is forecast in these sectors over the Plan period. Important also to the District's economy is the long established horticultural and glasshouse industry in the Lee Valley. The Plan also seeks to capitalise on opportunities for growth in the visitor economy. The District is highly entrepreneurial with comparatively high levels of self-employment and business start-ups and is characterised by Small and Medium Enterprises (SMEs).
- 3.40 Drawing on the District's excellent transport links, strategic employment locations include Loughton and Waltham Abbey with significant, albeit smaller, concentrations of employment space in North Weald Bassett and Nazeing.
- 3.41 London is a clear economic driver with influence on the District. Harlow is also a major location for future economic growth, particularly with its Enterprise Zone status. The Harlow Enterprise Zone (serving all of West Essex) is seeking to create high quality and high technology employment close to the District. Development and employment at North Weald Airfield features in Essex County Council's and the South East Local Enterprise Partnership's plans for growth. The District sits within the London Stansted Cambridge (UK Innovation) Corridor, plans for which include promoting growth in sectors such as food and life sciences.
- 3.42 The Council, along with the other local authorities in the Functional Economic Market Area (East Herts, Harlow and Uttlesford), commissioned work in 2017 to assess the employment needs of West Essex and East Hertfordshire. Two District level studies have also been produced which have identified and analysed the supply of employment sites, opportunities for growth, and future needs for employment space.
- 3.43 The majority of existing employment sites within the District are in good or fair condition and are well occupied. There is a strong market

demand for employment space throughout the District whether it is clustered near to London Underground stations, within close proximity to the M25 and M11, or within more rural locations within the District. There is a need for further start-up space as well as 'grow-on' provision to enable existing businesses to grow and stay within the District. Local economic growth is however, challenged by the availability of suitable sites for employment development due to high land values, and vulnerability to the loss of sites through permitted development rights.

Approach

- 3.44 The Council's approach to meeting the District's employment needs is to protect and enhance existing employment sites (including through intensification), together with the allocation of new sites. Such an approach will provide for the employment development needed to support sustainable long term economic growth within the District and the wider area whilst limiting the extent of land that needs to be released from the Green Belt.
- 3.45 The Council supports the development of the rural economy in the District. This includes the designation of existing rural employment sites across the District. In designating many of these sites, the Council acknowledges that many have developed over time through the diversification of traditional farmsteads and thus retain agricultural and other authorised uses. In such cases, the designation protects the existing employment premises within Use Classes B2, B8, and E, and Sui generis uses of an employment character within these sites.
- 3.46 The Council supports the renewal or intensification of some existing employment sites, including those within the Council's ownership, in order to maximise their potential.
- 3.47 In order to retain sites in employment use and meet the identified need for employment land, the Council will require robust evidence from applicants seeking to demonstrate that there is no longer a reasonable prospect of a site's continued use for employment purposes before considering its release to other uses. Differing requirements will need to be met depending

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upon the size, nature and location of the site or property. It should be marketed effectively for a minimum of 12 months at a value which is comparable to the local market for its authorised use. It must also be demonstrated that the continuous use of the site is no longer viable, taking into account the site's existing and potential long term market demand for the authorised use(s). The Council should be engaged early in the process as it can help to maximise exposure of the employment/business opportunity that the site affords, to as wide a potential business audience as possible. Any application must include details of valuations undertaken prior to placing the site on the market and a statement detailing why the site has not been taken up.

3.48 The Local Plan makes provision for the District's employment needs in accordance with Policy SP1. This Policy sets out the Council's approach in relation to meeting future employment need. It also recognises that some uses fall outside of Use Classes B2, B8 and E but nevertheless are of an employment character.

3.49 Uses on employment sites which provide an essential facility or service will be considered in accordance with Policy D2. Policies elsewhere in the Plan address the need for other employment generating uses. This includes Policy E2 relating to Town and District Centres, Policy E3 on food production and glasshouses and Policy E4 on the visitor economy. Jobs will also be generated through the provision of future infrastructure, services and facilities, such as schools and health care. Furthermore, Policy D5 supports the provision of jobs which are primarily undertaken through homeworking and peripatetic working.

3.50 Recognising the crucial role that existing employment sites play in meeting the District's employment needs the Local Plan designates 56 existing employment sites, equating to approximately 149 hectares of land for employment use. In addition, the following employment allocations are made to provide sufficient land to meet future needs and ensure sufficient flexibility and choice to the market. Further details are provided in Policies SP1, SP4, Chapter 5 and in Part Two of this Plan. In

addition, other small-scale employment uses are expected to be provided as part of the development mix within the Garden Communities, Strategic Masterplan Areas and other appropriate locations.

Table 3.1 Employment site allocations

Allocation reference	Site Name	Primary Use	Indicative Development Area
LOU.E2A	Land adjacent to Langston Road Industrial Estate	B2	one hectare
NWB.E4A	North Weald Airfield	B2/B8/ offices, research and development and light industrial (within Use Class E)	ten hectares
RUR.E19A	Land adjacent to Dorrington Farm	Offices/ research and development (within Use Class E)	one hectare
WAL.E6A	Land adjacent to Galley Hill Road Industrial Estate	B2/B8	one hectare
WAL.E8	Land North of A121	B2/B8/ light industrial (within Use Class E)	ten hectare
Total			23 hectares

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Policy E1 Employment Sites

Existing Employment Sites (Designated and Undesignated)

- A. The Council will seek to retain and enhance existing employment sites and premises for their existing authorised uses within Use Class B2, B8 or E, or Sui generis uses of an employment character.
- B. Proposals for the redevelopment, renewal, intensification, or extension of existing employment sites and premises for employment uses or Sui generis uses of an employment character will be encouraged.
- C. Proposals for complementary and supporting uses may be considered acceptable where they will not individually, or cumulatively, result in a material change to the site's employment character and function.
- D. Proposals that do not conform with A-C above will not be permitted unless it can be demonstrated through evidence, including marketing of the site, that there is no longer a reasonable prospect of the site being used for the existing authorised employment use or alternative employment uses or Sui generis uses of an employment character.

New Employment Sites

- E. The Council will meet the identified need for employment land through the site allocations summarised in Table 3.1 and set out in Policies SP1, SP4 and the relevant Places policies.
- F. Proposals on allocated employment sites must accord with the relevant requirements set out within Table 3.1, the relevant Places policies and Part Two of the Plan.
- G. The Council will support and encourage the development of flexible local employment space to meet the employment and economic needs of the District.

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Centre Hierarchy/Retail Policy

3.51 The Town and District Centres across the District experience a significant leakage of comparison retail spend, as many of the District's residents choose to shop outside of the District for items like clothing, furniture and major home appliances. This is not surprising given the relatively small nature of the District's centres compared to surrounding areas within easy reach, such as Harlow, Stratford, Romford, Enfield, and Brentwood.

3.52 The evidence base for the Local Plan has assessed the relative roles of settlements and centres across the District, taking into account a range of factors including:

- sustainability;
- accessibility;
- town centre health checks;
- retail provision;
- employment provision; the historic environment;
- availability of services and facilities; and
- size of population.

This has informed the Town and District Centre hierarchy and requirements.

3.53 In preparing the Local Plan the Council has taken into consideration the changing nature of the District's centres, the influence of the internet on trading, an increasing demand for services and the level of forecast growth in expenditure across the District. Whilst population growth is forecast, this does not necessarily translate into a need for more retail and service floorspace, particularly given the competition from nearby centres and the impact of internet trading. An over provision of floorspace could be detrimental to the health of both it and other centres. Equally, under provision of floorspace will generate more car trips and potentially diminish the attractiveness of the centres.

3.54 Increasing the market share of retail expenditure is considered to be an unrealistic prospect for the District, given established and more significant nearby retail destinations.

3.55 The District does not wish to compete with other retail destinations and cannot compete

with the increasing use of the internet for making purchases. The evidence suggests that retaining a constant market share is more realistic, and identifies a need for up to 59,700 square metres of retail floorspace within the period 2009-2033. When 'pipeline' development is removed there is a net need for 39,700 square metres of retail floorspace. From this approximately 40% will be provided in Harlow, recognising the contribution this town makes to servicing the retail needs of the District.

Approach

3.56 The Council's planning policy approach is to introduce a simplified Town and District Centre hierarchy. Any growth will be focussed on the town centres at Epping and Loughton High Road. The Council will promote growth in other centres across the District where it supports their vitality and viability. In accordance with the requirements of national planning policy, Primary Shopping Areas, Primary and Secondary Commercial, Business and Service Frontages have been identified within each Town and District Centre.

3.57 The Council will keep under review how to meet future retail floorspace requirements over the Plan period, including the needs for out of centre sites, taking account of nearby retail offer including in the Broxbourne area.

Policy E2 Centre Hierarchy/Retail Policy

A. The following Town and District Centre hierarchy applies in the District:

(i) Town Centres:

- Epping
- Loughton High Road

(ii) District Centres:

- Waltham Abbey
- Loughton Broadway
- Ongar
- Buckhurst Hill

B. Proposals within defined Town and District Centres for retail, leisure, entertainment, offices, arts and culture, tourism and other

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main town centre uses, as defined by national planning policy, will be supported.

- C. Within defined Primary Commercial, Business, and Service Frontages, ground floor units will be maintained in Use Class E uses in accordance with Policies P1 to P5. Proposals that will not result in a reduction in the specified percentage of Use Class E uses will be permitted for other main town centre uses where this will support the function, vitality or viability of the Town or District Centre and maintain an active daytime frontage.
- D. Within defined Secondary Commercial, Business, and Service Frontages, ground floor units will be maintained in Use Class E uses in accordance with Policies P1 to P5. A wider range of main town centre uses may be acceptable where it can be demonstrated that they will maintain the diversity, viability and vitality of the Town or District Centre. Proposals for non Use Class E uses within Secondary Commercial, Business, and Service Frontages must include active frontages, attract a high footfall consistent with other main town centre uses and positively contribute to the function of the Town or District Centre.
- E. The scale and type of any development proposals should be proportionate to the position of the relevant centre in the hierarchy.
- F. The Council will not permit the change of use of shops as identified within Use Class F2, unless it can be demonstrated that:
- (i) there is no demand for the shop; or
 - (ii) a shop of comparable nature will be provided in the locality; or
 - (iii) the new use would meet an identified need for community facilities or services.
- G. Out of Centre development
- (i) All proposals for main town centre uses outside of defined Town and District Centres, including edge of centre or out of centre development, will be subject to sequential testing as required by national planning policy and will only be permitted where:
 - there is a demonstrable need for the development;
 - the proposal satisfies the sequential test;

- the proposal would not put at risk or harm proposals to safeguard the vitality and viability of any nearby Town and District Centre; and
- the development would be readily accessible, or will be made so, by a range of transport options, including public transport, cycle and foot.

- H. Relevant planning applications for main town centre uses outside of defined Town and District Centres will be required to undertake and provide an impact assessment in accordance with national planning policy.

Food Production and Glasshouses

3.58 The District has long been home to a major part of the Lee Valley glasshouse industry, now mainly focused in Roydon, Nazeing and Waltham Abbey. The District has historically provided a favourable location for the industry, due to its largely flat topography, rich soil, ample water supply, and proximity to London through road, rail and canal links. The industry experienced post-war growth. It has subsequently experienced decline due in part to growing competition with other land uses, increased competition from other areas and technological improvements which means that the industry no longer requires high quality arable land. Nevertheless, it continues to remain one of the main centres of the UK glasshouse industry, and whilst the land take has declined, production from the remaining sites has increased. The industry continues to rely on migrant-based labour for most of the glasshouse and packhouse jobs. However, the cost of local accommodation is too great for many employees, so some growers have made provision on site through a mix of permanent and temporary accommodation or building conversions.

3.59 Glasshouse horticulture is an appropriate use in the Green Belt, but technological changes and competition pressures mean new glasshouses are often much larger in area and taller, increasing their impact on the locality. Some growers are looking to expand, others are stable

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with some relying on niche markets. The remainder are either in long term decline or are derelict. Packhouses are vital to the industry to enable the producers to provide supermarkets with graded and packaged products. They handle produce from the Lee Valley, UK and abroad and allow growers to enter into long term contracts with the supermarkets on the basis of a guaranteed volume of produce throughout the year.

3.60 The glasshouse sector makes a significant contribution to the local economy. Looking to the future, and given operational matters of profit margins, costs and access to workers, growers are increasingly looking at investment in mechanisation and robotics. Modern operations often include the provision of energy efficient plant to assist in minimising costs as well as reducing greenhouse gas emissions.

3.61 The glasshouse industry provides two areas of opportunity for future employment and economic growth. They are the employment of local workers in the sector and the creation of new jobs. The market opportunities for home grown products, as a result of concern about food security and the widening gap between what the nation produces and requires is leading to renewed aspiration and real opportunities for growth in the sector. The industry has good growth prospects, and food production is one of the sector priorities for the London Stansted Cambridge (UK Innovation) Corridor. The Lee Valley Food Task Force recommended the development of robust employment and training provision and pathways to ensure that the industry has a skilled local workforce.

Accommodation for Glasshouse Workers

3.62 Traditionally the glasshouse industry in the District depended on the labour of seasonal workers who could be housed on site within temporary accommodation for the duration of the season. The modern glasshouse industry however, allows for year round growing, and there is therefore no longer a 'season'. Workers are needed year round and are therefore expected to live in houses or flats in nearby towns, villages and rural communities rather

than at their place of work. The glasshouses in the District are not in remote or inaccessible locations.

3.63 This is traditionally a low wage industry and the gradual change from seasonal to year round work together with the strict application of Green Belt planning policy to prevent new residential development, had resulted in many workers living in inappropriate or unsuitable temporary accommodation within glasshouse sites. The resulting poor living conditions of workers and reduction in the quality of the environment within glasshouse sites has made this a significant local problem. Concerted action on the part of the Council and growers has improved this situation in recent years. This Policy intends to avoid such problems in the future.

3.64 The provision of residential accommodation for workers is not inappropriate development in the Green Belt if proven to be ancillary to the glasshouse use. This means it must be proven to be essential in that location. The Council's Local List of Validation Requirements for planning applications will clarify the level of proof required to justify on site accommodation for workers. This will include operational plans that explain the number of workers required on site, and whether there is already existing workers accommodation on site. In order to avoid such ancillary residential accommodation becoming permanent general needs housing in the Green Belt, Policy E3 B(v) seeks to ensure that the land is returned to agricultural use when the need for glasshouse workers accommodation ceases.

3.65 House prices and rents within the traditional growing areas in the Green Belt so close to London, make permanent off site accommodation unattainable for many individual workers but this Plan seeks to deliver significant levels of affordable homes in settlements close to glasshouses and therefore provides a potential alternative to on site accommodation, particularly for workers and their families. The conversion of existing buildings within a glasshouse site to provide accommodation is one potential option where buildings are available and suitable.

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

Approach

3.66 An objective of the Plan is to support the diversification of the agricultural economy including the expansion of the glasshouse industry, subject to environmental considerations. The Council recognises the benefits to food security that the industry brings and seeks to be flexible in accommodating the modern needs of the industry whilst addressing any environmental impacts of the associated development. The Council takes a criteria based approach to the location and form of glasshouse development and associated low carbon energy generation and packhouse facilities. This provides the industry with much needed flexibility in the face of increased competition from other locations and increased demands from supermarkets. A criteria based approach will enable proposals to be considered on their merits whilst providing choice and flexibility to the market.

3.67 The consideration of water usage in relation to water stress is important and growers are expected to adopt water efficient measures in their operations. This includes using water harvesting wherever possible and sourcing water supply from appropriate sources such as above ground reservoirs.

Policy E3 Food Production and Glasshouses

A. New or replacement glasshouses, any ancillary packhouse development and any ancillary low carbon energy generation facilities including combined heat and power will be permitted subject to the following criteria:

- (i) the scheme does not have a significant visual impact upon the character of the landscape particularly with regard to long-distance views;
- (ii) the planning application includes full details of landscaping, including trees and other vegetation which will be retained or removed;
- (iii) the land is capable of being developed without major changes to existing site contouring;

- (iv) vehicular access from the site to the highway network is adequate and uses roads capable of accommodating any vehicle movements generated by the development without detriment to highway safety, the rural character of the roads, and residential amenity;

- (v) adequate surface water and foul drainage capacity exists or can be provided as part of the development. The Council may require inclusion of suitable and adequately maintained sustainable drainage systems to control the quality or attenuate the rate of surface water run-off;

- (vi) adequate quality and quantity of provision of water is available or can be provided on site, for all domestic and non-domestic purposes; and

- (vii) any energy generation facilities do not impact on the integrity of the Epping Forest Special Area of Conservation in accordance with the requirements of Policy DM2.

B. Within glasshouse sites, residential accommodation for workers will only be permitted where it can be demonstrated that:

- (i) there is clear and robust evidence which shows that the on site accommodation is required for operational purposes and is therefore ancillary to the glasshouse use. This includes proposals to convert or extend existing on site structures to provide for such accommodation; and

- (ii) there is no other alternative suitable accommodation within a reasonable distance from the glasshouse site, including by purchasing and renting of an existing residential property for use as a House in Multiple Occupation or hostel; and

- (iii) the quality, size and nature of the proposed structure is commensurate with the needs of the enterprise concerned; and

- (iv) any permission for such accommodation will be strictly tied by either a planning condition or planning obligation to ensure that the accommodation will only be occupied by horticultural workers employed by the relevant enterprise; and

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

- (v) any new and freestanding structures will be removed or demolished once the need for such accommodation ceases and the land will be reinstated to agricultural use; and
- (vi) where applicable, any permission will lead to the removal of existing temporary accommodation and prevent temporary accommodation on the site in future.

The Visitor Economy

3.68 Tourism provides an important source of revenue and employment for the District. Evidence suggests that in 2015 tourism provided for over 2,600 full time equivalent jobs in the District, which equated to approximately eight percent of overall employment in the District. The total value of the tourism industry in the District (in terms of local business turnover supported by tourism activity), equated to more than £200 million in 2015.

3.69 Both the Epping Forest and the Lee Valley Regional Park (LVRP) provide green links into the area from London and offer a wealth of leisure and recreation activities. The District also boasts an enviable built heritage with for instance, Waltham Abbey Church and Gardens, North Weald Airfield, the Epping Ongar Heritage Railway, Greensted Church, the Royal Gunpowder Mills and the market towns of Ongar, Epping and Waltham Abbey. The Lee Valley White Water Centre, constructed for the London 2012 Olympic Games, and just over the district border in Broxbourne near Waltham Abbey, could also be a catalyst in the medium to long term to encourage sport and other tourism-related activities in the locality. The LVRP has a vision for the White Water Centre as a major family leisure destination in the South East.

Approach

3.70 The Council considers that there is potential to develop the tourism sector locally, drawing on the 'green and unique' character of the District whilst continuing to protect and enhance the quality of the District's environment. The

Council is committed to supporting the sector through improving access to the wide range of existing attractions in the District.

3.71 The local tourism market is characterised by day visitors, with some 3.4 million compared to some 172,500 staying visitors, of which only around half used paid accommodation (2015). The District currently has a limited stock of hotel and visitor accommodation with a number of lower quality hotels. The lack of visitor accommodation is an issue, and increasing its provision is an opportunity to grow this sector of the local economy. Key markets for accommodation include:

- business visitors and contract workers;
- people attending weddings and family events;
- people visiting friends and family;
- leisure tourists using the District as a base for visiting London;
- people taking part in outdoor sports and recreation, particularly in the LVRP; and
- those coming from London for a rural break.

The Visitor Accommodation Needs Assessment identifies that these markets are set to grow over the Plan period.

3.72 The type of visitor accommodation that would be suitable in the District is wide ranging including, hotels and inns, camping and caravanning sites, activity holiday centres, holiday lodges, camping pod sites, wedding venues with accommodation and youth hostels-

3.73 The LVRP Authority's proposals for Area 5 (King George V reservoir and surrounding areas) within its Park Development Framework seek to provide a range of short stay accommodation within the Park including hotel, hostel, holiday village, touring caravan, camping and short term mooring. The Council is working with the LVRP Authority and other key partners as part of the One Epping Forest Local Strategic Partnership on a tourism strategy.

3.74 In order to retain visitor accommodation and to seek to meet the identified market need for various forms of accommodation, the Council will require applicants seeking to discontinue a visitor accommodation use to provide robust

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evidence that there is no market interest in its rental or acquisition and that investment to allow continued profitable operation of the business is not viable. Differing evidence requirements will need to be met depending upon the size, nature and location of the site or property. Evidence will be required to demonstrate that a visitor accommodation business has been effectively marketed through a reputable specialist agent, for a reasonable period of time (a minimum of 12 months), and at a realistic price, compared to the prices that have been achieved for other similar visitor accommodation businesses.

- 3.75 The Council should also be engaged early in the process as it can help to maximise exposure of the business opportunity that the site affords, to as wide a potential business audience as possible. Any application must include details of valuations undertaken prior to placing the site on the market and a statement detailing why the site has not been taken up.
- 3.76 The need to continue to protect and enhance the quality of the District's environment including its important and sensitive ecological habitats, whilst also taking the opportunity to make the most of the District's assets is recognised. The visitor economy is central to achieving the objective to support tourism in the District through the promotion of, and improving access to, a wide range of existing attractions in the District.
- 3.77 Whilst tourism is a key sector of the local economy, its growth may also raise challenges for the environment and for local communities. High numbers of visitors can put pressure on locations, including the Epping Forest Special Area of Conservation (SAC), in terms of their tranquillity, appearance and biodiversity.
- 3.78 Increased visitor traffic can result in increased traffic and congestion on certain routes which impact on both air quality and the operation of the highway network. Parking difficulties can affect the environment, as well as local peoples' and visitors' experiences of the area. It is therefore essential that growth in the tourism sector is based upon sustainable visitor attractions. Such attractions retain the

economic and social advantages of tourism development whilst having minimal impact on the environment and the local community through reducing, or mitigating any undesirable impacts on the natural, historic, cultural or social environment to balance the needs of the visitors with those of the destination.

Policy E4 The Visitor Economy

- A. Opportunities for the sustainable development of the visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality and provide local economic benefits, through the following:
- (i) support for the development of high quality visitor accommodation, in particular accommodation linked to outdoor sport and activity hubs in the Lee Valley Regional Park, and visitor accommodation of an appropriate scale and type that makes use of existing buildings and strengthens existing rural leisure businesses;
 - (ii) support for the upgrading of existing visitor attractions, visitor centres and development of appropriate new ones;
 - (iii) support the retention and improvement of existing visitor accommodation and venues unless there is proof that there is no market interest in rental or acquisition and that investment to allow continued profitable operation of the business is not viable;
 - (iv) encourage sustainable tourism in rural areas. This will include better linkages between the settlements and rural surroundings; and opportunities for the enjoyment of the Lee Valley Regional Park and the Epping Forest. Any proposal will need to ensure, where appropriate, that these sites are protected in accordance with the Habitat Regulations. Proposals will also need to respond to the importance of conserving and enhancing the cultural heritage of the area;
 - (v) support a year-round visitor economy whilst ensuring the facility remains for visitor use;

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

- (vi) support and encourage the improvement of sustainable and active transport opportunities for visitors in order to minimise increases in traffic and the affects it will have on the highway network and air quality; and
- (vii) encourage local food and produce related and appropriate tourism development that supports rural business and farm diversification.

Transport

3.79 This section of the Local Plan sets out the Council's approach to managing growth in car travel and its linked impacts including on the local economy, the environment and communities. The policies seek to widen the choice of travel opportunities using public transport, walking and cycling. The Council is also considering the development of residential car parking standards which are specific to the District to reflect local information on car ownership and the need to make best use of land. The policies also set out how land will be safeguarded for future transport schemes and seek to protect petrol filling stations and car repairs/servicing sites from redevelopment, as these are an important, but diminishing, local facility.

Sustainable Transport Choices

- 3.80 The District has a varied character ranging from urban areas located on the edge of London through to rural areas. As a consequence, there is varied access to public transport, walking and cycling opportunities even in some more urban areas.
- 3.81 The District is bisected by the M11 and M25 motorways which are key parts of the strategic road network. Incidents on both of these roads can very quickly result in impacts on the operation of the local road network within the District. The reverse can also happen. The consequences of this include:
- potential road safety issues, when the motorway slip roads cannot clear resulting in stacking back onto the main carriageway;

- impacts on journey time reliability for both residents and businesses; and
- slow moving traffic increasing impacts on air quality with resultant health consequences on both residents and the District's environmental assets, such as the Epping Forest SAC.

3.82 The District's economy is such that there are high levels of both in and out commuting which puts pressure on the District's road network (of all classes) at peak periods, and also impacts on rail capacity (on both the national rail and London Underground networks). The London Underground Central Line terminates at Epping, and there are a number of other Central Line stations within the District. This is a benefit to both District residents and businesses but also has a downside. Because there are large price differentials between the cost of travel on rail services and the London Underground (the latter being cheaper), the London Underground stations are an attractor at peak hours for longer distance car trips by commuters. Not only does this impact on the Central Line's capacity but also adds to peak hour traffic congestion within parts of the District, and places pressure for on-street parking on local roads.

3.83 An initial analysis of traffic growth across the District has shown that even without development in the future, parts of the highway network will be operating over-capacity, in some cases by 2026 and in other cases by 2033. Whilst some junctions could be improved, there are others which cannot due to either physical or environmental constraints. For example, traffic congestion and delays that occur on the routes South of Epping could only be resolved by using land which is designated as a Special Area of Conservation. Delays and queuing therefore affects economic productivity, increases air pollution and can sever local communities.

3.84 In 2008 road transport related carbon dioxide emissions produced per person per annum in the District was 1.66 tonnes. Whilst this is similar to the UK average, that average exceeds recognised UK climate change targets.

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3.85 Traffic based pollution also plays a major role in contributing to issues in relation to the ecological health of the Epping Forest SAC and on human health within the Bell Common Air Quality Management Area in particular.

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

3.87 The District faces a number of travel related challenges including the following:

- for some communities, public transport and walking and cycling are not realistic options. Bus services are becoming less commercially viable and therefore cannot operate without receiving subsidy from Essex County Council, which is itself operating within an environment of significant financial challenges;
- levels of traffic using roads through the Epping Forest SAC and associated junction capacity issues within and adjacent to the Forest have a negative impact on its ecological health as a result of, in part, air borne pollutants arising from vehicle emissions;
- recognition that the majority of new developments will still need to accommodate the car. Research undertaken nationally has been inconclusive as to whether reducing parking in new developments has any effect on vehicle ownership. This appears to be backed up by, albeit somewhat dated, post-occupancy research undertaken in relation to new residential developments that many households will still want to have access to a vehicle. Environmental, road safety and community impacts occur if an appropriate balance is not adopted;

- the size of modern vehicles has increased and this has led to a need to increase the size of parking spaces in new development. This means that more land is needed to accommodate the same number of vehicles thus placing additional pressure on land when planning for the development needs of the District; and
- the level of car ownership across the District is varied ranging from 66.7% of homes in the Loughton Town Council area having zero or one car through to 17.8% of homes in Theydon Garnon Parish Council area having zero or one car.

Approach

3.88 Recognising that there is a need to manage any future growth in vehicle travel this Plan has taken into account the need to maximise the potential to widen sustainable transport choices and encourage reductions in vehicle use wherever possible by:

- considering existing and future sustainable transport opportunities when identifying sites for allocation for residential and employment uses;
- ensuring the provision of facilities and services in new strategic developments to provide high levels of 'self- containment';
- securing the provision of, or financial support for, bus services, and walking and cycling facilities; and
- ensuring that all planning applications for developments which are likely to generate significant amounts of vehicle movements, as defined in the Council's Local List of Validation Requirements, will be required to submit a Transport Assessment or Transport Statement and normally be supported by a Travel Plan.

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

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

- 3.90 In order to encourage and facilitate at the earliest possible opportunity the commitment by government and car manufacturers to cease sales of petrol, diesel and hybrid cars by 2035 to support improvements in carbon emissions and air quality, the Council will require development proposals to make provision for electric vehicle charging points. The Council also proposes to develop an electric vehicle charging strategy to maximise opportunities to improve electric vehicle charging, including for different types of non-residential parking, based on an assessment of charging patterns and requirements, in consultation with local stakeholders.
- 3.91 The delivery of development around Harlow is a key part of the Council's Spatial Development Strategy for the future delivery of new homes within the District. It also supports the opportunities that Harlow's Enterprise Zone offers to create new jobs, as part of its partnership approach with Harlow, Uttlesford, and East Herts District Councils. A key part of the infrastructure needs to support this Strategy is the provision of a new junction (J7a) on the M11 motorway, which was completed in June 2022. The approach to delivering sustainable transport choices within the Harlow and Gilston Garden Town has helped to support the business case needed to support its funding.
- 3.92 Harlow and Gilston Garden Town provides a significant opportunity to build on Harlow's foundation as a New Town, using its distinctive spatial layout incorporating many open spaces and an extensive network for walking and cycling. These valued spaces and Green Wedges are to be protected and enhanced and should facilitate sustainable mobility through the creation of Sustainable Transport Corridors (see Map 2.2 in Chapter two).
- 3.93 These corridors will provide the high quality sustainable connectivity between the existing and new communities and key destinations. The Sustainable Transport Corridors will fully integrate with a network of public and active travel mode routes, with town-wide promotion (and adoption) of active travel behaviours, which will mark the Garden Town out as a national leader in sustainable movement.
- 3.94 As set out above there are issues around the provision of parking in new development. The Council believes that there are opportunities to take a more locally focused approach to parking standards across the District. It is therefore proposing to develop specific parking standards for the District. These parking standards will be developed based on:
- an understanding of differing levels of vehicle ownership across the District;
 - the different levels of current and future access to services and facilities across the District; and
 - making better use of land through widening the use of 'unallocated' parking within larger developments and looking at the justification for the need to continue providing on-site garage provision within new developments.
- 3.95 Until such time as those standards are adopted, the Council will regard Essex County Council's adopted Parking Standards as the starting point and will appraise proposals on a case by case basis to assess that the level of parking is commensurate to the development proposed. This will include consideration of the scale and type of development, the sustainability of its location (including access to sustainable transport modes and access to services) and local vehicle ownership levels. Where practicable and for sites within 400 metres of a London Underground Station and/or within a Town Centre or comparable sustainable location, the Council will seek reduced parking provision, including car free development.
- 3.96 Some of the issues raised through consultations undertaken to support the development of this Plan are not within the remit of local plans to address. These include:
- the differential pricing between rail and London Underground services;
 - the issues arising from the down time of barriers at rail crossings; and
 - the impact of existing Heavy Goods Vehicles (HGVs) on the local road network.
- 3.97 The Council recognises that these are important issues that need to be addressed wherever

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possible and will continue to pursue these matters with partners including Essex County Council, Network Rail and the Train Operating Companies and Transport for London.

Policy T1 Sustainable Transport Choices

- A. The Council will work in partnership with relevant stakeholders to promote a safe, efficient and convenient transport system which will:
- (i) build on the District's strategic location, through improvements to strategic road and rail connections and other public transport networks to the wider area;
 - (ii) promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent, safe, attractive and direct cycling and walking networks to create a genuine alternative to private vehicles and facilitate a modal shift;
 - (iii) provide opportunities to improve access to the two Town and four District Centres and railway and London Underground stations by all modes of transport and ensure good integration between transport modes;
 - (iv) manage congestion and maintain consistency in journey times;
 - (v) promote and improve safety, security and healthy lifestyles; and
 - (vi) improve the efficiency of the local highway network.
- B. Development should minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future.
- C. Development proposals that are likely to generate significant amounts of vehicle movements must be supported by a Transport Statement or Transport Assessment and will normally be required to provide a Travel Plan. Development proposals which are likely to generate a significant number of Heavy Goods Vehicle movements will be required to demonstrate by way of a Routing Management Plan that no severe impacts are caused to the efficient and safe operation of the road

network and no material harm is caused to the living conditions of residents.

- D. Development will, where appropriate, ensure that transport infrastructure will be of a high quality, sustainable in design, construction and layout, and offer maximum flexibility in the choice of travel modes, including walking and cycling, and provide easy access for all potential users.
- E. Development will be permitted where it can be demonstrated, where appropriate, that it:
- (i) does not result in a cumulative severe impact on the operation of, or accessibility to, the local or strategic highway networks or compromise highway safety;
 - (ii) mitigates impacts on the local or strategic highway networks and London Underground station infrastructure within the District, arising from the development itself or the cumulative effects of development, through the provision of, or contributions towards, necessary transport improvements, including those secured by legal agreement, subject to viability considerations;
 - (iii) protects and, where appropriate, enhances access to and the use of Public Rights of Way;
 - (iv) provides appropriate parking and servicing provision, in terms of amount, design and layout and cycle storage arrangements, has regard to adopted Parking Standards. Mitigates any impact on on-street parking provision within the locality, and in the case of new non-residential development, has regard to the Council's electric vehicle charging strategy when it is adopted. Reduced parking, including car free, development in sustainable locations will be supported; and
 - (v) provides a co-ordinated and comprehensive approach with layouts that are compatible for all potential users in terms of their safety, suitability, convenience and attractiveness, which do not prejudice the future provision of transport infrastructure on and through adjoining sites, and integrates with existing transport networks.

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

Safeguarding of Routes and Facilities

- 3.98 The Council's approach is to support the provision of sustainable transport choices to manage the impacts of traffic growth. However, there will still be a need to make some improvements to the local and strategic highway network. In addition, land will also be needed for improvements to rail, bus, cycling and walking networks, to improve connectivity and/or capacity. This includes in relation to the provision of the Sustainable Transport Corridors to be delivered as part of the development of the Harlow and Gilston Garden Town. It is important the Council ensures that such schemes are not prevented from being delivered as a result of permitting development on land required for their implementation.
- 3.99 Monitoring undertaken by the Petrol Retailers Association (PRA) identified that 886 forecourts closed between 2008 and 2013, about 10 ten percent of all those in the UK, with the loss of almost 6,000 jobs. The PRA has advised that more than a third of these were in rural areas, and it was of the view that this creates the risk of "fuel deserts" in isolated areas where people depend on their vehicles to get around. Concerns regarding closures have also been raised by Government following the commissioning of a report into the matter in 2013. Notwithstanding the move towards electric vehicles such sites will continue to be needed including, in some cases, to provide electric vehicle charging opportunities.

Approach

- 3.100 A number of transport investment opportunities have already been identified within the District. The Council recognises that there is a need to ensure the implementation of identified schemes and those which may emerge over the course of the Plan period. These are needed to support the delivery of future development, the success of the local and wider economy and on the wellbeing of residents and so should not be fettered. Consequently, it is important to ensure that land is protected from development which

would hinder the successful delivery of such schemes.

- 3.101 The Council will work with the relevant transport bodies, operators and landowners to secure the identification and delivery of transport infrastructure schemes.
- 3.102 In order to protect local filling stations and vehicle repair facilities from change of use, the Council will require robust evidence from applicants seeking to demonstrate that there is no longer a reasonable prospect of the site's continued use including for the provision of electric vehicle charging opportunities. It should be marketed effectively for a minimum of 12 months at a value which is comparable to the local market for its authorised use. It must also be demonstrated that continuous use of the site is no longer viable taking into account the site's existing and potential long term market demand for the authorised use(s).

Policy T2 Safeguarding of Routes and Facilities

- A. Land will be safeguarded for the delivery of the Sustainable Transport Corridors as part of the development of the Harlow and Gilston Garden Town as identified indicatively on the Policies Map. Development proposals and Strategic Masterplans will be required to safeguard land accordingly.
- B. Land required for proposed transport schemes or accessibility improvements as identified in the Local Plan, or in Plans and Programmes including Essex County Council's Highways and Transport Investment Programmes, the National Highways Route Investment Strategies, Network Rail Investment Strategies and Transport for London Investment Strategies will be protected from other developments which would prevent their proper implementation.
- C. Local filling stations and vehicle repair facilities will be protected from redevelopment for alternative uses unless it can be demonstrated through evidence, that the authorised use on site is no longer viable and that the site has been effectively marketed at a value which is comparable to the local market for its authorised use(s).

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

Chapter Four

Development Management Policies

Development Management Policies

- 4.1 The following development management policies apply to the whole of the District unless specific locations are indicated within them. They cover four broad categories that interlink and all applications for development will be judged against the full suite. The categories are:
- natural environment and green infrastructure;
 - historic environment;
 - design; and
 - environmental policies.

Natural Environment and Green Infrastructure

- 4.2 Policy SP6 sets the framework for Policies DM1 – DM6 which reinforce the approach of this Plan to provide a network of multifunctional green and blue infrastructure assets that:
- avoids harm to existing trees, green infrastructure, precious habitat and species;
 - strengthens the biodiversity assets of the District;
 - addresses the impacts of development on landscape character and geodiversity;
 - responds to the key assets of the Epping Forest and Lee Valley Regional Park (LVRP); and
 - provides for open spaces for people and other species to thrive.

Habitat Protection and Improving Biodiversity

- 4.3 The District is rich in biodiversity resources at an international, national and local scale of importance. In particular, Ancient Woodland, Veteran Trees and water habitats such as water meadows and rivers are prevalent in the District. These include the Epping Forest Special Area of Conservation designated primarily for its habitat features and Lee Valley Special Protection Area designated for its support of important bird species (both of which are internationally important sites), national Sites of

Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites. National and international legislation requires that these are protected to differing degrees. National planning policy requires the Council to take a positive approach to achieving net gains in biodiversity, thus improving the quality and extent of land assets that are of biodiversity value whilst the Natural Environment and Rural Communities Act 2006 places a duty on the Council to have regard to the purpose of conserving biodiversity. The biodiversity designations in the District are contained on the Policies Map but this does not include protected species and habitats that may be located outside of these areas.

- 4.4 The types of designated ecological sites in the District are as follows (and their definitions are contained within Appendix 1);

International:

- Special Areas of Conservation (SAC);
- Special Protection Areas (SPA); and
- Ramsar Sites.

National:

- Sites of Special Scientific Interest (SSSI).

Local:

- Local Nature Reserves; and
- Local Wildlife Sites.

- 4.5 The Council values the high degree of biodiversity in the District and takes its responsibilities seriously in regard to its protection. The fragmentation of habitats is particularly damaging to realising the aim of achieving net gains in biodiversity and linking habitats is important in this respect. In part due to its proximity to London, the pressure from infill development in the metropolitan area of London and into Essex makes protection of biodiversity assets within the District all the more important. Some fragile ecosystems in the District suffer both from visitor pressure and air pollution from traffic. The impact of climate change on biodiversity is a key consideration and means that species need space to move as conditions alter.

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

Approach

- 4.6 Given that development must seek to achieve net gains in biodiversity, the strategy and policies of the Plan seek to emphasise that development must be coupled with the active protection of existing and creation of new habitat. This includes physically linking habitat sites where appropriate and protecting sites that are functionally linked to others - for example where there are pockets of habitat supporting a species such as stands of trees used by woodland birds. It includes measures in order to protect species, sites, hedgerows and trees, and the restoration and enhancement of the wide variety of habitats in the District. It also includes measures to improve and protect rivers and their banks, ponds and wetland such as de-culverting and providing buffer zones around features.
- 4.7 In order to comply with national and international legislation and policy it is necessary to recognise that, under certain circumstances, the harm caused by a development to biodiversity should where possible be avoided, and if not mitigated for or compensation provided, or as a last resort offset including through financial contributions. Mitigation measures could include the provision of new habitats, relocation of species, and development details to encourage or discourage species movement, for example the retention of waterways as dark corridors to support bats feeding, and the introduction of toad crossings, or cat-proof fencing.
- 4.8 In order to understand the impact of development proposals on protected species and habitats, and potentially valuable habitat for protected species it may be necessary to provide detailed ecological survey information and an impact assessment. This is in order to enable the Council to judge the proposal and how effective measures to avoid, mitigate or compensate any harm identified. The requirement for a Preliminary Ecological Assessment is set out in the Council's Local List of Validation Requirements and will take account of the most up to date versions of LVRP Authority and Essex County Council's Biodiversity Action Plans.
- 4.9 For sites with hedgerows an assessment against the criteria of the Hedgerow Regulations 1997 will be required. Where hedgerows are deemed to be 'Important' under the Hedgerow Regulations, development proposals must demonstrate how adverse impacts will be avoided, and where mitigation is required, this must be provided on site.
- 4.10 To support the Council's biodiversity objectives, as well as the implementation of relevant adopted strategies, the Council also advocates the use of biodiversity accounting in the assessment of development proposals. A valuable Government biodiversity metric is used in the Biodiversity Impact Assessment Calculator (BIAC). This metric quantifiably demonstrates whether a net gain in ecological units has been achieved in regard to a proposed development and how compensatory measures on and off site can ensure a net gain. It can be applied to all habitats and can therefore assist in meeting the requirements to achieve net gains in biodiversity. The Council recommends the use of this tool to provide information regarding development proposals whilst recognising that the use of the tool does not override the protection afforded by law to many sites, habitats and species in the District.
- 4.11 Where insufficient information is provided regarding the ecological status of the site, or avoidance, management and mitigation measures the Council will take a precautionary approach. Any measures must conform to the requirements of relevant legislation and Government Standing Advice.
- 4.12 The design and layout of development should enable the achievement of net gains to the biodiversity of the District. All sites, regardless of their size, are capable of making a positive contribution to net gains, as set out in the Council's adopted Green Infrastructure Strategy.

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

Policy DM1 Habitat Protection and Improving Biodiversity

- A. All development should seek to deliver net biodiversity gain in addition to protecting existing habitats and species. Development proposals should seek to integrate biodiversity through their design and layout, including, where appropriate, through the provision of connections between physical and functional networks.
- B. Development proposals must seek to avoid harm to, protect and enhance natural habitats, species, areas and corridors for biodiversity. Development will not be permitted where significant impacts upon areas of international designation (including sites designated as Special Areas of Conservation or Special Protection Areas and Ramsar sites) or national designation (including Sites of Special Scientific Interest) cannot be avoided, mitigated or as a last resort compensated. Developments that are likely to have an adverse impact, either alone or in combination, on internationally designated sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. The creation of new corridors for biodiversity will be supported in appropriate locations. The provision of buffers to protect sensitive habitats including those of wetlands and ponds will be required where necessary.
- C. Development proposals which are likely to have a negative impact on a locally designated site (Local Wildlife Site and Local Nature Reserve) will only be permitted where the benefits of the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives.
- D. In exceptional circumstances where the negative impacts of development on natural habitat and biodiversity are unavoidable, the negative impacts must be proportionately addressed in accordance with the hierarchy of:
 - (i) mitigation;
 - (ii) compensation in the form of habitat; and finally
 - (iii) offsetting within the locality.

- E. The details of any necessary enhancement, mitigation or compensation measures should accompany the planning application as appropriate. When appropriate, conditions will be put in place to require that monitoring is undertaken (by a suitably qualified ecological professional), and to make sure that any mitigation, compensation and offsetting is effective.
- F. The loss, deterioration or fragmentation of irreplaceable habitats, such as Veteran Trees and Ancient Woodland, will not be permitted, unless the need for, and benefits of, the development in that location can be demonstrated to clearly outweigh the loss.
- G. Where there are grounds to believe that a Protected Species, Priority Species, Priority Habitat or other valuable habitat may be affected by proposed development, applicants must provide a full survey and site assessment to establish the extent of potential impact. This evidence should inform appropriately designed plans and mitigation measures.
- H. Ecological impacts of a proposed development will be quantified by using the Biodiversity Impact Assessment Calculator (BIAC) having regard to its relevance within the context of the scale and nature of the development proposed. Where it has been determined by the Council that there is a need to quantify the ecological impacts, development proposals must demonstrate a net gain in ecological units.
- I. Ecological information must be supplied in accordance with BS 42020 2013 for all relevant planning applications.

Epping Forest SAC and the Lee Valley SPA

- 4.13 The Epping Forest and Lee Valley form significant areas of land in the District and contain land subject to international protection for its biodiversity value. The Epping Forest contains a SAC identified primarily for its value in respect of beech trees and wet and dry heaths and for its population of stag beetle. The Lee Valley Regional Park contains a SPA and is a Wetland of International Importance under the Ramsar Convention. Both of these designations relate in particular to its importance as a bird

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habitat. The Ramsar designation also relates to populations of nationally scarce plants and insects.

- 4.14 These sites form a critical part of the green and blue infrastructure of the District. As internationally important sites they are afforded the highest level of protection due to their habitats and species that are vulnerable or rare within an international context. The Council, as a competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), has a duty to ensure that plans and projects for whose consent it is responsible will not have an adverse effect on the integrity of these designated sites either alone or in combination with other plans and projects. This includes by interfering with their restoration of favourable conservation status within the context of their site specific conservation objectives.

Approach

- 4.15 The Epping Forest (the Forest) in particular is experiencing considerable pressure on its habitats from visitors living within the District as well as from outside it. In addition, atmospheric pollution is having an adverse effect on parts of its ecosystems. This has resulted in large areas of the Forest being described as having an 'unfavourable conservation status'.
- 4.16 The potential impact of development on the Forest in relation to visitor pressure arises primarily from new residential development as a result of the increase in the number of new residents living in the area that it would generate. This in turn can result in additional visitors using the Forest for recreational purposes. This additional recreational pressure can have an adverse effect on the Forest's sensitive ecosystems.
- 4.17 The Habitats Regulations Assessment 2022 ("the HRA 2022"), which forms part of the Local Plan's evidence base, has concluded that, there would be no adverse effect on the integrity on the Lee Valley SPA/Ramsar sites from recreational pressures arising from new residential development allocated within the Local Plan. 'Windfall' development will need to be considered on a 'case by case' basis in

accordance with Policy DM2 as it relates to the Lee Valley SPA/Ramsar site. The HRA 2022 has concluded that adverse effects on integrity arising from recreational pressure may occur for the Epping Forest SAC without mitigation.

- 4.18 In terms of air quality, detailed modelling and analysis to inform the HRA 2022 has demonstrated that changes in atmospheric pollution would not lead to an adverse effect on the Lee Valley SPA/Ramsar sites either alone or in combination with other projects and plans (including those plans being developed by neighbouring local authorities). However, the Epping Forest SAC is currently assessed as being of 'unfavourable conservation status' in part as a result of the effects of air-borne pollutants, including from traffic. This concern arises from existing substantial baseline traffic flows and the resulting queues, combined with the age and mix of vehicle types that currently use roads in close proximity to the Forest. Developments allocated through this Plan together with other plans and projects and a growth in background traffic levels will result in an increase in vehicles using roads in close proximity to the Forest, and there is therefore forecast to be an increase in pollutants of concern (being nitrogen dioxide and ammonia) relative to a situation without that growth. Whilst it is expected that there will be some improvement in air quality through the introduction of new technologies the HRA 2022 modelling forecasts that this on its own will not be sufficient to reduce the level of air pollution to acceptable levels by the end of the Plan period.
- 4.19 Planning applications need to be supported by sufficient information to enable the Council to conclude that the proposals would not result in an adverse effect on the integrity of either the Epping Forest SAC or the Lee Valley SPA/Ramsar sites. Such information may include the identification of specific avoidance or mitigation measures and how they would be secured and delivered. To help applicants identify such measures, the Council has developed and adopted a number of strategies which planning applications should have regard to. Each provides an overview of what impacts the strategy is seeking to address together with

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guidance as to what measures are likely to be the most effective and the ways that they will be delivered. These strategies are outlined in the following paragraphs.

4.20 Air Pollution Mitigation Strategy (APMS) for the Epping Forest – The APMS includes a number of specific measures and how they would be delivered to ensure that there would be no adverse effect on the integrity of the Epping Forest SAC in relation to atmospheric pollution. This reflects the findings of the HRA 2022 that new development within the District has the potential to increase pollutants of concern within the Epping Forest SAC, primarily arising from emissions of nitrogen dioxide and ammonia from additional vehicles using roads in close proximity to it. The APMS has taken account of the need for development proposals to be assessed both alone and in combination with other plans and projects and therefore provides a strategic approach to the identification and delivery of mitigation and monitoring measures. These measures range from those which will help to limit the increase in the level of traffic using roads through the Epping Forest SAC and significantly increase the uptake of electric vehicles, through to the implementation of a ‘Clean Air Zone’ should the future monitoring demonstrate that it is required¹. The APMS also includes targets against which progress will be assessed together with a Monitoring Framework, which includes for future on-site monitoring. This Monitoring Framework is necessary to ensure that progress towards the achievement of these targets is assessed and informs any necessary changes that may need to be made to the targets and measures identified in the APMS.

4.21 Epping Forest District Green Infrastructure Strategy -The Council recognises that additional residential development within parts of the District is likely to result in an increase in the number of residents visiting the Forest. The parts of the District where this is a concern are defined by a ‘Zone of Influence’ which has been

established using evidence from visitor surveys in 2017 and 2019. The ‘Zone of Influence’ for the purpose of this Plan is 6.2km. As well as providing guidance on protecting and enhancing green and blue infrastructure across the whole of the District the Strategy includes ways in which planning applicants can demonstrate that their proposals will minimise increases in visitors to the Epping Forest SAC. These approaches are intended to improve access for walkers, dog walkers, cyclists and horse riders to recreational spaces other than the Forest as well as provide for additional space for wildlife and plant species. The Strategy includes guidance on appropriate measures and how they can be delivered including through the provision of Suitable Alternative Natural Greenspace at strategic sites and enhancing existing green infrastructure assets.

4.22 Epping Forest Strategic Access Management and Monitoring (SAMM) Strategy -The Council recognises that there are no mechanisms for preventing new residents of the District from using the Forest. There is, therefore, a need to ensure that the adverse effects to the fabric of the Forest that would occur as a result of its increased use for recreational purposes are mitigated. Working with the Conservators of Epping Forest and neighbouring local authorities the Council has developed and adopted an Epping Forest SAMM Strategy. The Strategy identifies measures that are capable of being delivered within the Forest itself and how these will be delivered, including through securing financial contributions from new residential development within the Zone of Influence. It also identifies the monitoring activities to be undertaken over the course of the Plan period.

Policy DM2 Epping Forest SAC and the Lee Valley SPA

A. The Council will expect all relevant development proposals to assist in the conservation and enhancement of the

¹ The HRA 2022 concludes that a Clean Air Zone will be required, but it is possible that improvements in air quality may proceed more quickly than has been assumed in the

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modelling underlying the HRA and in that eventuality the need for a Clean Air Zone can be reviewed in response to air quality monitoring data.

biodiversity, character, appearance and landscape setting of Epping Forest and the Lee Valley. The Council will expect all relevant development proposals to ensure that there is no adverse effect on the site integrity of the Epping Forest Special Area of Conservation and the Lee Valley Special Protection Area.

- B. New development for which it is not possible to conclude no adverse effect on the integrity of the Epping Forest Special Area for Conservation or the Lee Valley Special Protection Area, either alone or in combination with other plans or projects, will not be permitted. Where development would have likely significant effects, mitigation measures, on-site and off-site as appropriate, will be required to ensure that it will have no adverse effect on the integrity of these areas. In designing mitigation measures, regard should be had to the Air Pollution Mitigation Strategy for the Epping Forest, the District's Green Infrastructure Strategy and Epping Forest Strategic Access Management and Monitoring Strategy. Contributions towards off-site measures to mitigate the likely impacts air pollution and adverse recreational effects arising from a development will be sought where these are necessary to make the development acceptable, are directly related to the development and are fairly and reasonably related in scale to the development.
- C. In recognition of the risks posed to the Epping Forest Special Area of Conservation from urbanisation effects over and above that resulting from recreational pressures (including from fly-tipping, the introduction of non-native plant species and incidental arson) planning applications for development will not be permitted within 400 metres of the boundary of the Epping Forest Special Area of Conservation unless it can be demonstrated through project level HRA that the development would not generate any such impacts².

² Note that this is not a 'no development' buffer but rather a trigger for application level further consideration of each proposal within that zone.

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Landscape Character, Ancient Landscapes and Geodiversity

4.23 The predominant land use of the District by area is agriculture, and the countryside provides the setting of its rural communities, villages and towns in addition to providing part of the setting for London. The mosaic patchwork of countryside, Ancient Woodland, hedgerows and trees (including many Veteran Trees) is a distinctive characteristic of the landscape, as are the river valleys. Therefore the landscape character forms an important consideration in planning for the District's future development, and the Council seeks to maintain a careful balance between managing change to the landscape character and providing much needed new development. In this regard the manner in which the edges of settlements, and ridges, are treated in development is particularly important, as is, the protection of, and where feasible, the enhancement of long distance views.

Approach

4.24 The District is located on a plateau, immediately north of the basin in which Greater London is largely contained. The plateau is cut by the two main river systems, the Lea/Stort and the Roding. Soils have been influenced by glaciation and erosion, but are generally London Clay, with boulder clay and gravels. The District contains some geological features of interest and particular factors shaping the current landscape include relatively low rainfall, London Clay geological formations, as well as the effects of past glaciation. These have created the gently sloping landform of the District, together with its wooded ridges, crowned by the forests of Epping and Hainault.

4.25 The gently undulating landscapes of South West Essex make a significant contribution to landscape character in the District. The topography of the District gives rise to some long distance views, both of countryside and to

London. Given its location, climate and topography the main factor shaping the District's landscape character outside the urban areas is the presence or absence of trees and hedgerows, as influenced by farming practice. These ridges and valleys; ancient landscapes; the hedgerow and woodland patchwork; urban open spaces giving character to some settlements; Veteran and protected trees including avenues and lanes; and roadside trees form the particular characteristics of the setting for development in the District.

4.26 Pressures on the landscape from development mirror those outlined under Policy DM1. Whilst the long term impacts of climate change on the landscape, particularly trees, is uncertain - some species will suffer and others benefit. The need to ensure the preservation of existing trees and provide space for the next generation of large trees is critical to the future landscape as well as providing for shade in a changing climate, and the species they support.

4.27 The future development pattern of the District must recognise its setting, and respond to the particular landscape characteristics which vary in their sensitivity to change. Developments should be designed in a manner that minimises their impact on the landscape through careful design, materials and landscaping and pay attention to long distance views. In addition, development should actively seek to contribute to the immediate and wider landscape (as appropriate) by considerate and careful landscaping of proposals. This includes the provision of permeable areas of planting for the purposes of reducing flood risk. The landscape sensitivity studies and Historic Environment Characterisation Study, undertaken on behalf of the Council, provide key evidence in this respect against which to measure the impact of proposed development and its design. This Policy applies equally to sites within built-up areas and those on the edge of settlements.

Policy DM3 Landscape Character, Ancient Landscapes and Geodiversity

- A. Development proposals will be permitted where applicants are able to demonstrate that the proposal will not, directly, indirectly or cumulatively, cause significant harm to landscape character, the nature and physical appearance of ancient landscapes, or geological sites of importance. Proposals should:
- (i) be sensitive to their setting in the landscape, in particular in settlement edge locations, and to its local distinctiveness and characteristics;
 - (ii) use techniques to minimise impact on, or enhance the appearance of, the landscape by:
 - taking into account existing landscape features from the outset;
 - careful landscaping of the site;
 - ensuring the sensitive use of design, layout, materials and external finishes; and
 - having regard to protecting, and where possible, enhancing long views to distant landmarks and landscapes of interest.
- B. The impact of proposed development and its design will be assessed with reference to the landscape sensitivity studies and the Historic Environment Characterisation Study or subsequent studies.

Green Belt and Development

4.28 Over 90% of the District is designated as Metropolitan Green Belt. Green Belt policy relates to the function and purposes of the Green Belt and not the intrinsic value of the land to which it relates such as its relative value for agriculture or biodiversity. Policy SP5 Green Belt and Local Greenspace provides the strategic approach regarding the Green Belt within the District. The impact of development on the purposes of the Green Belt can be significant and therefore must be carefully assessed and controlled.

Approach

4.29 National planning policy on Green Belt is clear as to the purposes of the Green Belt against which applications for development proposed in it are assessed. The assessment exercise is undertaken to establish the suitability of the proposals in respect of any harm that may occur to the purposes of the Green Belt. Policy DM4

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sets out that whilst a great deal of development in the Green Belt is considered to be inappropriate there are certain circumstances under which some development is permissible.

- 4.30 The Council does not consider that it would be in compliance with national planning policy to define specific 'rules' for development in the Green Belt beyond those contained in Policy DM4. In respect of extensions to existing buildings and replacement of existing buildings it is therefore not intended to define "disproportionate" or "materially larger" since they would depend on the characteristics of the site locality, and existing buildings themselves in relation to the specific proposals. For the purposes of Policy DM4, "limited infilling" means the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development. Limited infilling should be appropriate to the scale of the locality and should not have an adverse impact on the character of the countryside or the local environment. Similarly it is not intended to define very special circumstances as this will need to be clearly demonstrated by the applicant based on site specific considerations. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other material considerations.

Policy DM4 Green Belt

- A. The purposes of the Green Belt are to:
- (i) check the unrestricted sprawl of large built-up areas;
 - (ii) prevent neighbouring towns from merging into one another;
 - (iii) to assist in safeguarding the countryside from encroachment;
 - (iv) preserve the setting and special character of historic towns; and
 - (v) assist urban regeneration by encouraging the recycling of derelict and other urban land.

- B. Within the Green Belt planning permission will not be granted for inappropriate development, except in very special circumstances, in accordance with national planning policy.
- C. The construction of new buildings is inappropriate development in the Green Belt. Exceptions to this are:
- (i) buildings for the purposes of agriculture and forestry;
 - (ii) provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as any development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
 - (iii) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - (iv) the replacement of a building, provided the building is of the same use and not materially larger than the one it replaces;
 - (v) limited infilling in rural communities and limited affordable homes, in locations that are in accordance with Policy H3; and
 - (vi) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- D. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These include:
- (i) mineral extraction;
 - (ii) engineering operations;
 - (iii) local transport infrastructure that can demonstrate a requirement for a Green Belt location;
 - (iv) the re-use of buildings provided that the buildings are of a permanent and substantial construction; and
 - (v) development brought forward under a Community Right to Build Order.

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Green and Blue Infrastructure

4.31 The implementation of a strategy for the natural environment and green and blue infrastructure is a key component of the spatial development strategy of this Local Plan. Green and blue infrastructure performs many roles including adapting to and mitigating against the impacts of climate change for example:

- providing shade during higher temperatures;
- space for species migration;
- reducing greenhouse gas emissions;
- and providing flood mitigation.

4.32 In addition invasive non-native species of plants can cause damage to habitats and features and the management of these is an important aspect of protecting the current and future assets.

4.33 Policy SP6 sets the context for green and blue infrastructure requirements of development in the District. The detailed requirements relating to that policy are contained in Policy DM5 and the Council's adopted Green Infrastructure Strategy which provides further guidance with respect to specific development proposals.

Approach

4.34 The Council considers that its green and blue infrastructure assets form a critical part of the District. The Local Plan seeks to effectively protect, link (where appropriate) and enhance wildlife sites, including:

- Local Wildlife Sites;
- Priority Species and Habitats;
- Veteran Trees;
- Ancient Woodland;
- hedgerows and field boundaries;
- unmetalled lanes;
- ancient paths and walks;
- green lanes and bridleways;
- watercourses; ponds;
- wetlands;
- protected trees;
- meadow lands;

- playing fields;
- Epping Forest buffer lands;
- farmland (for food production);
- access to and biodiversity value of agricultural land;
- allotments;
- cemeteries;
- parks;
- urban greenspace; and
- ecological corridors, including those between the Lee Valley and the Epping Forest (unless such corridors would facilitate public access to the Epping Forest SAC so as to result in placing additional pressure on it from visitors).

4.35 The expectation is that new development will consist of high quality design which carefully incorporates and links multifunctional spaces (for example for wildlife, recreation, and sustainable drainage). The landscaping of development is expected to form a key element of mitigation against the effects of climate change and the management of flood risk.

4.36 The development pattern for a significant amount of new development over the Plan period will be on the edges of settlements on greenfield land that was previously protected by Green Belt policy. There is therefore a particular emphasis on ensuring that existing green and blue infrastructure assets are respected and used to best effect in new development. The connection between existing and new development and accessible spaces and habitats should not be broken. New spaces and links should be created within developments to perform effective functions for recreation and other purposes. It should be clear that the design of development has carefully considered and responded to the context of green and blue infrastructure assets and provides access to the countryside, water features and urban greenspaces as appropriate.

4.37 Most development in the District should be capable of providing for some landscape features suitable to the site. It is also critical that native species are used in planting schemes as well as ensuring, where applicable, that

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biosecurity measures for non-native invasive species are included.

4.38 Trees are of particular importance in the District and are a key element of the Council's Green Infrastructure Strategy. The Council has a particular focus on increasing the tree cover in the District, and aims where possible to allow for space for the next generation of large trees. In providing new trees the Council expects applicants to include a suitable proportion of larger, slower growing and longer living trees in order to avoid only shorter life, fast growing species being planted over the Plan period.

4.39 The Council's Local List of Validation Requirements sets out 'thresholds' and types of planning application where information including Preliminary Ecological Assessments, Hedgerow Surveys, Arboricultural Implication Assessments and Method Statements should be submitted.

Policy DM5 Green and Blue Infrastructure

- A. Development proposals must demonstrate that they have been designed to:
- (i) retain and where possible enhance existing green and blue infrastructure assets, including trees, hedgerows, woods and meadows, green lanes, wetlands, ponds and watercourses and improve connectivity of habitats;
 - (ii) use native species where appropriate and take account of the need for biosecurity including control of non-native invasive species, and ensure all planting stock is supplied free of pests or disease, and uses non-invasive species;
 - (iii) incorporate appropriate provision of new green and blue infrastructure assets or space;
 - (iv) enhance connectivity and integration by providing pedestrian/cycle access to existing and proposed green and blue infrastructure networks and established routes, including footpaths, cycleways and bridleways/Public Rights of Way (except where by doing so would create additional recreational pressures on the Epping Forest Special Area of Conservation); and

(v) enhance the public realm through the provision and/or retention of trees and/or designated and undesignated open spaces within built-up areas.

B. Development proposals must be accompanied by sufficient evidence to demonstrate that:

(i) the retention and protection of trees (including Veteran Trees), landscape features or habitats will be successfully secured in accordance with relevant guidance and best practice;

(ii) the provision of new trees, new landscape and water features or habitat creation/improvement will be implemented in accordance with relevant guidance and best practice; and

(iii) the proposals for green and blue infrastructure assets are appropriate and adequate, taking into account the nature and scale of the development, its setting, context and intended use.

C. In the Garden Communities, a framework plan of proposed green and blue infrastructure assets and networks that incorporates existing features on the site and its links to the wider landscape and townscape will be required for submission with any planning application. Further requirements may be outlined within Strategic Masterplans in accordance with Policies SP2 and DM9.

Designated and Undesignated Open Spaces

4.40 Open space provision is critical to the physical and mental health of our communities, as well as important to our experience of the character of settlements and the landscape in the District. The population growth expected over the Plan period will add to demand for space for all forms of recreation. Provision needs to be suitable for all, including:

- older people;
- those with limited mobility;
- those on low incomes; and
- children.

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- 4.41 The Council wishes to provide communities with opportunities to improve their lifestyle and maintain their health.
- 4.42 Open space in the District varies in character, quality and usage from children's playgrounds, through sports pitches to natural space that can be used for a variety of recreational purposes. New development in the District should provide the amount and type of open space appropriate to its size or contribute to improvements of existing spaces as appropriate.

Approach

- 4.43 National planning policy defines open space as all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. These spaces can be opportunities for sports and recreation and to play, relax and meet for social gatherings close to home. It can also present opportunities to view local wildlife. The quality of the spaces in the District vary but they need to be protected, enhanced and where possible connected to local communities (unless the connection facilitates greater visitor access to the Epping Forest SAC) and other open spaces, in line with the Council's adopted Green Infrastructure Strategy.
- 4.44 Providing new publicly accessible open space in new development is a critical part of creating healthy places to live and ensure the contrast between built areas and outdoor spaces that support our social, physical and mental wellbeing. The Council will take into account the individual characteristics of sites when assessing what level of open space provision is appropriate.
- 4.45 Local evidence in the form of Epping Forest District Council Open Space Strategy 2017, assesses the quantity and type of open spaces in the District, access to them and their quality. The types of spaces identified in the Open Space Strategy are:
- Amenity Greenspace;
 - Public Parks and Gardens;
 - Provision for Children and Young People;
 - Natural, and Semi Natural Greenspace;
 - Allotments; and
 - Cemeteries and Churchyards.
- 4.46 The Open Space Strategy indicates a variation in the provision of different types of open space across the District as measured against national standards. In some cases a deficit in the amount of one type of open space might offset surplus in another. For example, whilst there is an overall deficit in the amount of land given over to Public Parks and Gardens there is a significant

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level of Natural and Semi Natural Greenspace as a result of the presence of Epping Forest and LVRP. However, the Council recognises that the different types of open space are likely to be required to meet the needs of differing sections of the community and locally accessible space, close to home, is important. Of significant concern is the deficit in the amount of, and access to, play facilities for children and young people.

- 4.47 The way in which open space is designed and managed has a significant impact on how much it is used, and its value for recreation, health and biodiversity. The creation and management of multifunctional open space will be encouraged in line with the Council's adopted Green Infrastructure Strategy.
- 4.48 The Council seeks to protect and improve the quality and quantity of open spaces in line with the evidence base regarding needs. However, in exceptional circumstances development of a publicly accessible open space or a reduced level of publicly accessible open space provision may be considered appropriate. In such circumstances this would need to be supported by improvements in quality to any remaining space, or to existing open space in the locality if there is sufficient capacity to accommodate additional users. This should be clearly set out in any justification for the proposals.
- 4.49 Local Greenspaces can only be designated in accordance with national planning policy. Communities are able to seek to designate, and thus protect, Local Greenspace when a Local or Neighbourhood Plan is prepared or reviewed. The Council will obtain information on potential sites as part of a consultation exercise and assess the suitability for designation as a Local Greenspace. The assessment criteria include whether the site is reasonably close to the community it serves, demonstrably special to that community, local in character and not extensive in size. The evidence collected will inform the Council's decision on whether sites should be designated as Local Greenspace.
- 4.50 The Infrastructure Delivery Plans Schedules contain the priorities and measures intended to improve the quantity, quality and access to the

range of open spaces in the District. The Council will use the national standards for different types of spaces as a starting point for determining the level and type of open space to be provided as part of a development proposal.

Policy DM6 Designated and Undesignated Open Spaces

- A. Where appropriate development proposals will be required to provide open space, or links to open space (with the exception of to the Epping Forest Special Area of Conservation) in accordance with the guidance contained within the Infrastructure Delivery Plans Schedules and the Council's adopted Green Infrastructure Strategy. National space standards and quantity guidelines will be used as a starting point for provision.
- B. Development on open spaces will only be permitted if it does not result in a net loss of usable publicly accessible open space or reasonable publicly accessible access to alternative publicly accessible open space within a settlement. Existing open space should not be built upon unless:
- (i) an assessment has been undertaken showing the land to be surplus to requirements; or
 - (ii) development would not have a detrimental impact on public accessibility to open space; or
 - (iii) the loss would be replaced by equivalent or better provision in terms of quantity or quality in a suitable location; or
 - (iv) the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss.
- C. In circumstances where partial loss of an open space is considered justified, the predominantly open nature of the remainder of the site should be maintained and enhanced in terms of its visual amenity and function for active play and recreation.

Historic Environment

- 4.51 The historic environment is a critical part of the District's character and the policies in this

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section set out the Council's approach to its preservation, conservation and enhancement.

Heritage Assets

- 4.52 Epping Forest District benefits from a rich and varied historic environment some of which is afforded national protection by law, and other locally protected through planning policy. The heritage assets span thousands of years from the Early Iron Age to the 20th Century.
- 4.53 The relationship between the historic environment and landscape which retains historic and ancient features in many places, and provides the setting of towns and villages is well recognised. The Council seeks to positively conserve and enhance this through the Local Plan by having clear respect for the District's heritage assets.

Approach

- 4.54 The Council is required to take a positive approach to the conservation and enjoyment of the historic environment of the District. This includes taking into account the desirability of preserving and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. It is also important that the concept of conservation is not devalued through, for example, the designation of Conservation Areas that lack special interest. National planning policy sets out that, as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. For example, substantial harm to designated heritage assets should be exceptional, or in the case of those which are of the highest significance, highly exceptional, unless it can be demonstrated that substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 4.55 Policy DM7 applies to both 'designated' and 'non-designated' heritage assets. Designated heritage assets include Listed Buildings, Registered Parks and Gardens, Scheduled Monuments and Conservation Areas. 'Non-designated' assets include Protected Lanes, locally listed buildings and structures (such as

monuments and memorials). Archaeological remains depending upon their significance, should be treated as though they are designated heritage assets under national planning policy. The Council will undertake periodic reviews of its designated and non-designated heritage assets and introduce additional levels of protection, such as through the use of Article 4 Directions and areas of Special Advertisement Control, where justified.

- 4.56 A Heritage Statement is required for any application that may affect heritage assets (both designated and non-designated). The Heritage Statement should:
- include a description of the significance of any heritage assets affected, including the contribution made by its setting;
 - provide an evaluation of the impact the development may have on any assets of significance; and
 - demonstrate how the significance of any heritage assets have informed the design of the proposed development.
- 4.57 Further information (and links to guidance) is set out in the Council's Local List of Validation Requirements. Outline planning applications will not be accepted for development proposals within Conservation Areas. In addition, where the principle of demolition has been established, consent to demolish will be given only when acceptable plans for development have been agreed and a legal contract for the redevelopment of the site has been entered into. Full detailed recording of the heritage asset including plans and photographs may be required depending upon the significance of the asset. Where there is any harm or loss to significance the applicant will be required to record and submit detailed information about the asset gained from desk based and site investigations and provide this to the Council, the Essex Historic Environment Record and Historic England.
- 4.58 Applications for proposals in respect of heritage assets will be expected to demonstrate that they have positively-responded to matters, where relevant, including detailing, streetscape, roofscape, landscape, scale, height, density,

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massing, layout, elevation, design, plot and site frontage sizes, materials and external finishes. In addition the Council will encourage proposals which seek the conservation, regeneration, maintenance, repair or enhancement, of Listed Buildings, and which improve access for people with disabilities who visit or work there. In such cases it must be fully justified and demonstrated that any harm to the significance of the asset is necessary to achieve substantial public benefits.

4.59 Where proposals affect heritage assets of archaeological interest, preference will be given to preservation and management in situ. However, where loss of the asset is justified in accordance with national planning policy, the Council will require:

- an archaeological evaluation demonstrating that the remains have been properly assessed and the implications of development understood, and any impacts of development minimised through design; and
- where in situ preservation proves impossible, a full investigation should be undertaken and the recording and documentation of the findings submitted by a competent archaeological organisation to the Council, the Essex Historic Environment Record and Historic England prior to the commencement of development.

4.60 As set out in national planning policy, in certain exceptional circumstances, development may be allowed to take place that would not normally be granted permission if it provides significant improvements to a heritage asset which could not otherwise be obtained, and which secures its long term future or use for the public benefit. This is known as 'enabling development'. In such cases, the Council will expect the applicant to obtain relevant specialist advice, including from Historic England, and to provide the Council with unequivocal evidence (including financial details) as to how the proposal will secure the future conservation of a heritage asset, and why the development is necessary in order to achieve this.

Policy DM7 Historic Environment

- A. Heritage assets (both designated and non-designated) and their settings will be preserved or enhanced in a manner appropriate to their significance in accordance with national planning policy and guidance. The more important the asset the greater the weight that will be given to its conservation.
- B. Development proposals that affect any heritage asset or its setting should preserve and, wherever possible, enhance the significance of the heritage asset having regard to the special architectural or historic interest of its character, appearance and the contribution made by its setting.
- C. A Heritage Statement, to be produced using appropriate expertise, will be required for any application which may affect the significance of any heritage asset (both designated and non-designated). The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on the significance of any heritage asset. Where development proposals may affect heritage assets of archaeological interest, an archaeological evaluation will be required.
- D. Where there is evidence demonstrating the neglect of, or damage to, a heritage asset, any consequential deteriorated or damaged state of the heritage asset will not be taken into account in any decision.

Designated Heritage Assets

- E. When considering the impact of proposed development on the significance of designated heritage assets, the Council will give great weight to the assets' conservation. Any harm or loss will require clear and convincing justification.
- F. Development proposals that would lead to substantial harm to or total loss of significance of a designated heritage asset will not be permitted unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss; or alternative criteria are satisfied in accordance with the requirements of national planning policy and guidance. Less than substantial harm to the

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

significance of a designated heritage asset should be weighed against the public benefits of the proposal, where appropriate, securing its optimum viable use.

Non-Designated Heritage Assets

- G. There is a general presumption in favour of retaining non-designated heritage assets. When considering the impact of proposed development on the significance of non-designated heritage assets, or their setting, including local heritage assets on the Council's Local List of Validation Requirements, the Council will give weight to the assets' conservation. Proposals that would lead to harm to the significance of non-designated heritage assets or their loss will not be permitted unless it can be demonstrated that:
- i. The level of harm or loss is justified following a balanced judgement of the scale of harm and significance of the heritage asset; and
 - ii. Any harm or loss is mitigated through the retention of features of significance and/or good design.

Enabling Development

- H. In exceptional circumstances, where a heritage asset requires significant investment to secure its long term future conservation, and the cost of repair and/or investigation cannot be funded by any other means, the principle of Enabling Development may be considered acceptable. Proposals for Enabling Development that would secure the long term future conservation of a heritage asset will not be supported unless the significant public benefits secured clearly outweigh the disbenefits of granting planning permission for the development.

Heritage at Risk

- 4.61 A significant part of the enhancement of heritage assets is their care and maintenance which is the responsibility of the owner of the asset. Many owners of heritage assets in the District take pride in those assets and are responsible owners. However, the Council's Heritage Asset Review identified a concentration of buildings at risk in four particular Conservation Areas namely Abridge,

Royal Gunpowder Mills, Roydon and Waltham Abbey, together with some Locally Listed Buildings which are also at risk. These are not the only heritage assets at risk in the District as a result of neglect or inappropriate development. Policy is required to encourage owners of heritage assets to maintain them and respect them for future generations to enjoy.

Approach

- 4.62 A positive approach to the conservation and enhancement of heritage assets requires that they are maintained to a high standard. This is the responsibility of the owner. The simple fact of a heritage asset being in a poor condition is not a reason for allowing redevelopment or development that could cause harm to the significance of the asset. Owners are encouraged to maintain heritage assets to a high standard in order to preserve their significance.
- 4.63 The Council seeks to support owners to secure the future of the heritage assets currently at risk, or which have the potential to become at risk in the future, in a way that respects and enhances the significance of the heritage asset.

Policy DM8 Heritage at Risk

- A. The Council will expect property owners/partners to work proactively with the authority to bring forward proposals for the preservation and enhancement of heritage assets at risk or under threat within the District to secure their future and seek a viable use consistent with their significance.

High Quality Design

- 4.64 The following policies relate to the design of proposed development in the District. National planning policy encourages the securing of good design and its importance is increasingly recognised by the development industry. In the past there has been a tendency to view design solely as a visual concern – in these policies the Council is seeking to consider the social and environmental elements of design, such as the potential of a high quality public realm to

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contribute to public health, quality of life and the sustainability agenda.

- 4.65 National planning policy expects local plans to include design policies which set out the quality of development expected for the area and recognises the local context both in terms of the locality, and the immediate site and its surrounds.

Approach

- 4.66 The design of schemes should be of a high quality to ensure that new development is responsive to local character, visually attractive, helps to promote healthy communities and creates buildings and places which are durable, adaptable, and function well within the surrounding area to create a safe and accessible environment. Good design should enable and encourage people to live healthy lifestyles, reduce the risk of crime, create accessible environments which are inclusive for all sectors of society, and increase opportunities for social interaction. Secured by Design provides guidance on how to include security considerations into a development.

- 4.67 The Council is keen to ensure that the next generation of development in the District positively responds to its location and meets the needs of occupiers and users in an effective and sustainable manner. A clear contribution to the townscape and landscape of the District is sought through high quality design. The design of development which impacts on the historic and natural assets of the District is particularly important and the Council seeks to pay particular attention to them.

- 4.68 The Council expects development to integrate the principles of sustainable design and construction and encourages developers to deliver schemes that meet the performance set by appropriate standards e.g. latest Passivhaus, Home Quality Mark and BREEAM UK New Construction standards. Development should have minimal environmental impact with respect to its energy use, water use, waste and transport and provide for green infrastructure and healthy environments for users.

- 4.69 The quality of amenity for the occupiers of buildings and users of open spaces is increasingly the subject of concern, particularly in higher density developments. In order to assess development proposals, the Council will have regard to the BRE guidelines produced in 2011 (BRE209) or subsequent revisions which although not mandatory are heavily relied upon as they advise on the approach and evaluation of impact in daylight and sunlight matters. An assessment should accompany proposals which have the potential to negatively impact on existing levels of daylight or sunlight to adjoining properties or within the development site itself.

- 4.70 New developments should be designed to protect the privacy of both new and existing occupiers. Separation distances, the provision of screening as well as the angle of orientation will be assessed.

- 4.71 Development proposals will be required to accord with the place shaping principles set out within Policy SP2. It will be necessary for proposals to demonstrate compliance with these principles through the production of Strategic Masterplans, Design Codes and Concept Framework Plans where indicated.

Policy DM9 High Quality Design

- A. All new development must achieve a high quality of design and contribute to the distinctive character and amenity of the local area. The Council will require all development proposals to be design-led and:
- (i) relate positively to their context, drawing on the local character and the natural and historic environment;
 - (ii) make a positive contribution to a place;
 - (iii) incorporate sustainable design and construction principles that integrate adaptation and mitigation measures to address climate change;
 - (iv) are planned to minimise vulnerability to climate change impacts and which will not exacerbate vulnerability in other areas;
 - (v) incorporate design measures to promote healthy communities and individuals,

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

reduce social exclusion, the risk of crime, and the fear of crime; and

- (vi) enable/encourage healthy and active lifestyles.

Strategic Sites

- B. The Council will require Strategic Masterplans to be prepared and developed for the Garden Communities set out in SP4 and other relevant allocated sites as set out in Chapter 5. Strategic Masterplans will be produced by the applicant, in partnership with the Council, and the local community, and be capable of being adopted by the Council as Supplementary Planning Documents. Design Codes will be required to be produced and agreed with the Council to support the implementation of the Strategic Masterplans. All relevant applications will be required to be in general conformity with the agreed Strategic Masterplans and Design Codes.
- C. The Council will require the use of its Quality Review Panels for schemes of more than 50 homes or 5,000 square metres of employment/other floorspace at appropriate stages, to be agreed with the Council. Other smaller schemes which are complex or locally sensitive may also be appropriate for review.

Design Standards

- D. Development proposals must relate positively to their locality, having regard to:
 - (i) building heights;
 - (ii) the form, scale and massing around the site;
 - (iii) the network of routes and spaces connecting locally and more widely;
 - (iv) the rhythm of any neighbouring or local plot and building widths and, where appropriate, existing building lines;
 - (v) the need to provide active frontages to the public realm; and
 - (vi) distinctive local architectural styles, detailing and materials.
- E. Development proposals for extensions or alterations to residential buildings will be required to respect and/or complement the form, setting, period, and detailing of the original buildings. Matching or complementary materials should be used.

Landscaping

- F. Development proposals must demonstrate how landscaping and planting has been integrated into the development as a whole. The Council will expect development proposals to respond to:

- (i) the topography of the site and its surroundings;
- (ii) trees on and close to the site;
- (iii) natural or historic boundary features;
- (iv) the biodiversity of the site and its surroundings; and
- (v) the need to maximise the use of permeable surfaces.

Public Realm

- G. Where appropriate development proposals must contribute positively to the public realm and to any public spaces to which it is physically or functionally connected.

Connectivity and Permeability

- H. Development proposals are expected to maximise connectivity within, and through the development and links to the surrounding areas including the provision of high quality and safe pedestrian and cycle routes.

Privacy and Amenity

- I. Development proposals must take account of the privacy and amenity of the development's occupiers and neighbours, and integrate occupier comfort and wellbeing within the design and layout. The Council will expect proposals to:
 - (i) provide good sunlight, daylight and open aspects to all parts of the development and adjacent buildings and land (including any private amenity space);
 - (ii) minimise risks of overheating and provide adequate ventilation within development proposals;
 - (iii) avoid overlooking and loss of privacy detrimental to the living conditions of neighbouring occupiers and the occupiers of the proposed development;
 - (iv) not result in an over-bearing or overly enclosed form of development which materially impacts on either the outlook of occupiers of neighbouring properties or the occupiers of the proposed development; and

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

(v) address issues of vibration, noise, fumes, odour, light pollution, air quality and microclimatic conditions likely to arise from the development or from neighbouring uses or activities.

J. All development proposals must demonstrate that they are in general conformity with relevant Local Development Documents, Design Guides, Neighbourhood Plans or Village Design Statements adopted or endorsed by the Council.

K. Where appropriate, the design of development proposals must integrate health and wellbeing principles and any relevant Health and Wellbeing strategies.

Housing Design and Quality

4.72 Much of the development coming forward over the Plan period will be residential. A core planning principle is to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. National planning policy expects a high quality of design which is inclusive for all.

Approach

4.73 The Council seeks to ensure that it is not possible to identify the tenure of a residential development from its external appearance. This approach is very important to creating inclusive and attractive residential environments.

4.74 The design of residential development can impact significantly on the living conditions of occupiers and the size and design of internal and external space is therefore an important consideration. An analysis of planning applications for residential development highlights that there is pressure in the District for accommodation to be approved that does not meet the Nationally Described Space

Standards. There is therefore a need to ensure that all residential development meets at least those minimum space standards. The Council expects developments to take opportunities to improve the external environment of residential developments and to provide suitable public open space within developments.

Policy DM10 Housing Design and Quality

A. All new housing development is required to meet or exceed the minimum internal space standards set out in the latest Nationally Described Space Standards and should have regard to open space standards, as adopted or endorsed by the Council.

B. Ground floor family housing must provide access to private garden/amenity space, and family housing on upper floors should have access to a balcony and/or terrace of a usable size, subject to acceptable amenity, privacy and design considerations, or to shared communal amenity space and children's play space.

C. Where appropriate development proposals should seek to include enhanced provision of green infrastructure, including the quantity and quality of landscaped areas, trees and additional open space as required by Policies DM5 and DM6.

D. Mixed tenure residential development proposals will generally be expected to be designed to be 'tenure blind' to ensure homes across tenures are indistinguishable from one another in terms of their character and appearance, including the quality of their design, the space standards applied and the building materials used.

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Waste Recycling Facilities in New Development

4.75 National planning policy requires that attention is paid to minimising waste as part of sustainable development and policies should make provision for the infrastructure needed to support waste management including recycling.

Approach

4.76 The Council is committed to reducing waste and the Local Plan requires the reuse, recycling and composting of waste material as a priority over disposal to landfill. Provision for the disposal of waste including separation for recycling is integral to the convenience afforded to occupiers and users. The Council expects waste facilities to be integrated into design so that they operate effectively and do not look out of place.

4.77 The management of waste in flatted properties poses particular challenges which need to be incorporated into the design of a building from the outset. Where flatted development includes basement, undercroft or other similar parking provision, the servicing of waste management and collection should avoid compromising the quality and provision of amenity space, forecourts or active ground floor frontages.

Policy DM11 Waste Recycling Facilities in New Development

- A. All development which generates waste will be required to make on-site provision for general waste, the separation of recyclable materials and organic material for composting. The on-site provision must:
- (i) ensure adequate dedicated internal and external storage space to manage the volume of waste arising from the site;
 - (ii) provide accessible and safe access to on-site storage facilities, both for occupiers and collection operatives including vehicles; and
 - (iii) be located and screened to avoid nuisance and adverse impact on visual and other

amenity to occupiers and neighbouring uses; and

- (iv) for mixed use development, suitably separate household and commercial waste.

B. Proposals for new flatted residential development will be required to make provision for:

- (i) adequate storage space within each flat, allowing for separate storage of recyclable materials; and
- (ii) adequate communal storage for waste, including separate storage for recyclables and organic material for composting pending its collection.

Subterranean, Basement Development and Lightwells

4.78 Development of basements and subterranean rooms below gardens, particularly in established residential areas, has become an increasingly popular way of gaining additional space in homes. Like many other authorities in areas with high property values, Epping Forest District has experienced an increase in the number of planning applications for basement development in recent years.

Approach

4.79 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 the host building, adjoining properties, increase flood risk or damage the character of the area, historic or natural environments in line with national planning policy. It should be noted that the Council uses the term basement development as a collective term to capture basement as well as subterranean development and extensions to existing basements.

4.80 The Council will seek to control the overall size of basement development to protect the character and amenity of the area, the quality of garden space and vegetation and to minimise the impact of construction on neighbouring properties. A basement that is no deeper than one full storey below ground level is often the

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

most appropriate way to extend a building below ground to avoid adverse impacts. Criterion B(i) of this Policy states that basements should not comprise more than one storey. The Council considers a single storey for a basement to be approximately three to four metres in height. Basement development should not exceed 50% of each area of garden within the curtilage of the property. Where properties have larger gardens, basement development will be limited to a smaller percentage of the garden area to ensure that development remains subordinate to the main property.

4.81 Some development falls within the scope of permitted development. However, where control can be exercised the Council will seek to manage adverse impacts. Where appropriate, applicants will need to submit specific information as part of any planning application to demonstrate that these impacts can be addressed. Applications should be supported by sufficient information to be able to assess the impact of the proposed development in accordance with the Council's Local List of Validation Requirements.

4.82 The introduction of lightwells where they are not an established and positive feature of the streetscape can harm the character or appearance of an area. External visible elements may be permitted where they are sensitively located and designed to avoid light pollution and harm to the existing character and appearance of the building, streetscape and gardens in the vicinity.

Policy DM 12 Subterranean, Basement Development and Lightwells

- A. Basements will only be permitted where it can be demonstrated that the proposal:
- (i) will not adversely affect the structural stability of the host building, neighbouring buildings or other infrastructure, including the adjoining highway, having regard to local geological conditions;
 - (ii) does not increase flood risk to the property and adjacent properties from any source;

- (iii) avoids harm to the appearance or setting of the property or the established character of the surrounding area;
- (iv) will not adversely impact the amenity of adjoining properties by reason of noise, light pollution or increased levels of internal or external activity; and
- (v) will conserve or enhance the local natural and historic environment.

- B. The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:
- (i) not comprise of more than one storey; and
 - (ii) not exceed 50% of each area of garden within the curtilage of the property.
- C. Applications should demonstrate through the submission of a Construction Management Statement that the construction:
- (i) will not cause harm to pedestrian, cycle, vehicular and road safety, adversely affect bus or other transport operations, significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working or visiting nearby; and
 - (ii) will minimise construction impacts such as noise, vibration and dust for the duration of the works.
- D. The Council will not permit basements which include habitable rooms or other sensitive uses in areas prone to flooding and where there is no satisfactory means of escape from flooding.
- E. In determining planning applications for lightwells, the Council will permit development proposals which protect:
- (i) the architectural character of the building; and
 - (ii) the character and appearance of the surrounding area.
- F. In determining proposals for basements the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate a Basement Construction Management Statement in accordance with the Council's Local List of Validation Requirements.

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

- G. Within the Green Belt basement developments may be considered acceptable provided they do not result in disproportionate additions over and above the size of the original building or have a greater impact on the openness of the Green Belt, either themselves or cumulatively with other developments.

Advertisements

- 4.83 The term ‘advertisement’ covers a wide range of advertisements and signs. Some advertisements benefit from “deemed consent”, as set out in the Control of Advertisement Regulations, which means that the permission of the Council as local planning authority is not required. “Deemed consent” depends on the size, location, siting and illumination of the advertisement. Other advertisements will always need consent.
- 4.84 When determining applications for Advertisement Consent the Council can only have regard to matters relating to amenity and public safety. This Policy sets out the criteria against which amenity and public safety considerations will be assessed in the District in relation to advertisements. The design, colour, materials and positioning of all advertisements and how they are illuminated (where relevant) should respect the character and style of the host building or structure and be appropriate within the street scene.
- 4.85 Historic buildings and structures can be particularly sensitive to the change in amenity caused by advertisements that include illumination. Therefore the Council will carefully control advertisements affecting heritage assets including Conservation Areas, individual historic buildings and buildings that are locally listed. Externally illuminated fascia signs are more likely to be acceptable whilst internally illuminated box fascia signs will normally be resisted.
- 4.86 Estate agents’ boards have deemed consent rights for their display subject to conditions including the number of boards and length of time that they are displayed. The urban parts of the District and the frequency of sales and lettings can lead to a proliferation of estate

agents boards, which are not always removed within the required timescale. This results in a build-up of boards, both legal and illegal, which detract from the appearance of building façades and can cause an untidy and cluttered street scene. The Council may use its powers to secure the removal of estate agents boards where necessary and proportionate to do so.

Policy DM13 Advertisements

- A. Where advertisement consent is required, such consent will be permitted if the proposal respects the interests of public safety and amenity, taking into account the following criteria:
- (i) the design, materials and location of the advertisement respects the scale and character of the building on which it is displayed and the surrounding area;
 - (ii) the proposals would not result in a cluttered street scene, excessive signage, or result in a proliferation of signs advertising a single site or enterprise;
 - (iii) any illumination will be considered in relation to its impact on visual amenity, potential light pollution, road safety and functional need;
 - (iv) Internally illuminated signs will not be permitted where harm is caused to heritage assets including Listed Buildings and Conservation Areas; and
 - (v) to safeguard residential and visual amenity, illuminated signs will not be permitted in residential areas to protect the general characteristics of such areas.

Shopfronts and On Street Dining

- 4.87 There is a need for a policy to ensure that proposals for new shopfronts are of a high quality and relate well to the scale and character of the original building and surrounding area. Attractive shopfronts make a positive contribution to local distinctiveness and can enhance the vitality of the retail frontage as well as the wider area.

Approach

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

4.88 The Council considers that the distinctive character of town and district centres in particular should be maintained by retaining or designing high quality shopfronts that refer to the architecture of the host building, neighbouring units and general scale and rhythm of the shop front widths in the area. New shopfronts should contribute positively towards an attractive and cohesive streetscape. Materials, detailing, craftsmanship and finishes are equally important in achieving high quality shopfront design especially as they are viewed close up.

4.89 Shopfronts with poor quality materials, internally illuminated box fascias and intrusive signage add to visual clutter and detract from the appearance of the streetscape. Projecting shutter boxes have a negative impact on shopfronts, whilst solid shutters generally create a bleak, unattractive and hostile environment. Their significant detrimental impact in this regard also inhibits passive surveillance and encourages graffiti. Therefore in most cases permission is unlikely to be granted for the installation of any form of roller shuttering on the outside of a building. If a shutter box is unavoidable, it should normally be located internally behind the shop window.

4.90 On street dining facilities can add to the vibrancy of centres. However these should not disrupt normal pedestrian movement or other high street activities. Where possible, such facilities should integrate with the public realm of the surrounding area. The Council may consider limiting the hours of use through the use of planning conditions. Where such facilities fall within the Public Highway a licence will need to be obtained.

Policy DM14 Shopfronts and On Street Dining

Shopfronts

- A. The Council requires shopfronts, including their signs, security shutters and canopies, to be designed to a high standard and contribute to a safe and attractive environment. In particular:
- (i) The Council will seek the retention of traditional shopfronts which contribute to

the visual, architectural or historic quality of the local townscape;

- (ii) Replacement shopfronts should relate positively to the host building and conserve historic materials and features as far as possible. Opportunities to restore lost character should be taken where appropriate;
- (iii) Shopfronts should protect, and where possible, enhance the historic character of heritage assets and their settings;
- (iv) The alteration or replacement of an existing shopfront or the development of a new shopfront must allow for easy access by all members of the community; and
- (v) Security shutters must be open mesh and, wherever possible, be located internally.

On Street Dining

B. Proposals for on-street or forecourt dining facilities must demonstrate the suitability of the proposed location having regard to the proximity of residential development and should:

- (i) be integral and functionally related to the business; and
- (ii) provide sufficient space to not obstruct the pavement and not create a permanent enclosure.

Environmental Policies

4.91 The final set of development management policies address a wide range of matters relating to the wider site environment pertaining to individual developments. It includes additional requirements to those contained in the design policy section of the Local Plan. Many of the measures address the use of natural resources and mitigate against, or help to adapt to, the impacts of climate change.

Managing and Reducing Flood Risk

4.92 Parts of the District currently experience flooding from a range of sources and climate change is projected to increase the risk of flooding and number of flooding incidents over the plan period. It is critical to manage flood risk in order to minimise harm to people and property. Key factors in reducing the risk of

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flooding include identifying flood risk from all sources. Critical Drainage Areas are particularly susceptible to surface water flooding. Implementing flood mitigation schemes and improving drainage infrastructure can help to alleviate the risk. The location and design of buildings and their settings are key factors in reducing the risk of flood damage to properties and keeping people safe.

Approach

- 4.93 Parts of the District have experienced flooding that has caused damage to property. Avoiding development in areas at risk of all types of flooding is the most effective way of mitigating against flood risk over the Plan period. The careful provision of flood mitigation measures can help to minimise flood risk where water run-off from buildings and land can be managed.
- 4.94 The Epping Forest District Council Strategic Flood Risk Assessment Level 1 Update (SFRA 2015) and the Strategic Flood Risk Assessment – Site Assessment contains a great deal of detail on flood risk within the District. The forms of flooding experienced in the District are: ‘fluvial’ from rivers and other watercourses; ‘pluvial’ from rain i.e. surface water flooding resulting from rain; and ‘groundwater’ flooding which is the emergence of water from the ground away from river channels.
- 4.95 The SFRA 2015 identified surface water run-off as the greatest risk to the District with regard to flooding due to the underlying geology and the presence of watercourses in the area. The corridors of the River Lea and River Roding, including their main tributaries Cobbins and Cripsey Brooks contain the majority of the flood risk zones in the District – i.e. areas at risk from flooding by rivers. In particular the rapid onset flash flooding of the smaller watercourse system is an ongoing concern.
- 4.96 The approach of directing development to areas where the risk of flooding is lowest, taking account of climate change and the vulnerability of types of development to flooding, is known as ‘sequential testing’. If necessary an ‘exceptions test’ is applied to the location of development to establish whether there is a

way to locate and design the development within a flood risk area. This approach requires the proposed development to demonstrate wider sustainability benefits to the community that outweigh the flood risk and that it will be safe for its lifetime without increasing flood risk elsewhere.

- 4.97 Some uses are more vulnerable to flood risk than others. For example, caravans and basement dwellings are classified as ‘highly vulnerable’ whilst marinas are classified as being ‘water compatible’. National planning policy and guidance explains these distinctions and suitable approaches to considering proposals within different classifications.
- 4.98 National planning policy sets out that for the sequential test to be passed development proposals need to demonstrate that the most vulnerable development within the site has been located in areas with the lowest flood risk unless there are overriding reasons to prefer a different location. For the Exception Test to be passed development proposals need to demonstrate that it is appropriately flood resistant and resilient, including safe access and escape routes where required; and that any residual risk can be safely managed, including by emergency planning; and it gives priority to sustainable drainage systems; and the development would provide wider sustainability benefits to the community that outweigh the flood risk.
- 4.99 For areas of river flooding the SFRA 2015 establishes that these are principally in flood risk zones 2 and 3. Flooding can also occur in areas defined as flood risk zone 1 where there are Critical Drainage Areas (as notified by the Environment Agency).
- 4.100 The Epping Forest District Flood Risk Assessment Zones (FRAZ’s) have been defined by the Council as ‘catchments of ordinary watercourses identified as key areas where surface water run-off is contributing to Main Rivers or areas of known historic flooding’. Within FRAZ’s particular attention should be applied to surface water management, with the aim of reducing the cumulative impact of development throughout the District.

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

4.101 A Surface Water Management Plan outlines the predicted risk and preferred surface water management strategy for areas under study. They identify local Critical Drainage Areas (CDAs) and site specific measures that could help reduce the risk of surface water flooding in these areas. The Council has in place a Surface Water Management Plan (SWMP) for Loughton, Buckhurst Hill and Theydon Bois. Further SWMPs may be produced for other areas in the future. Development proposals should also take into account the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW).

4.102 Because flood risk can arise from development in a different location to the proposed development itself, both existing and new development need to be considered in terms of associated flood risks. This means opportunities should be taken to introduce measures in new development where it is possible to assist communities that are currently at risk of flooding.

4.103 In addition, there can be opportunities to reduce flood risk overall and reduce the causes and impacts of flooding through, for example:

- the layout and form of development;
- the provision or enhancement of green and blue infrastructure;
- by safeguarding land for flood risk management; and
- by designing off-site works required to protect and support development.

4.104 It is important to ensure that there is no net loss of flood storage capacity.

4.105 This Policy follows the sequential approach set out in national planning policy. It applies to all operations that are defined as development in Section 55 of the Town and Country Planning Act 1990. This includes engineering operations such as ground works, conversions of buildings and extensions to existing buildings. The Policy will be applied across the District, taking into account all sources of flooding.

4.106 Flood risk should be assessed at the site level as this enables an understanding of the risk of flooding on-site and the impact of flooding elsewhere.

4.107 The information on Critical Drainage Areas and the Epping Forest District Flood Risk Assessment Zones will be used to support decision making on planning proposals. The Council seeks to improve drainage, and therefore reduce flood risk, within the Critical Drainage Areas and the FRAZs and ensure that site specific flood risks are properly assessed. It is also important to ensure that the cumulative impact of flood risk from development is reduced throughout the District.

4.108 The Council will use conditions on approvals for development to secure the relevant information required for assessments – these vary in accordance with the size of development proposed in these areas.

Policy DM15 Managing and Reducing Flood Risk

- A. The Council will require all development proposals to demonstrate that they avoid and reduce the risk of all forms of flooding to future occupiers and do not increase the risk of flooding elsewhere.
- B. Development proposals which include land which falls wholly or partially within Flood Zones 2 and/or 3a and other areas affected by other sources of flooding will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and if necessary, the Exception Test, have been satisfied. The Sequential Test does not need to be applied to development which accords with the site allocation policies in the Plan.
- C. Where required by national planning policy and guidance, development proposals must be informed by a site specific Flood Risk Assessment taking account of all potential sources of flooding and climate change allowances and should:
 - (i) demonstrate the application of a sequential approach for the development of individual sites to ensure that the highest vulnerability of land uses are located in areas of the site that are at lowest risk of flooding;

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- (ii) preserve overland flood and flow routes and ensure there is no net loss of flood storage;
 - (iii) ensure that there is no adverse effect on the operational functions of any existing flood defence infrastructure;
 - (iv) provide adequate flood storage and compensation on site;
 - (v) where appropriate, set out the mitigation measures that will be incorporated on site to manage residual flood risk including finished floor levels to accord with Environment Agency's Standing Advice; and
 - (vi) naturalise watercourses where opportunities arise, in line with Policy DM17 (Protecting and Enhancing Watercourses and Flood Defences).
- D. All proposals for new development will be required to:
- (i) manage and reduce surface water run-off, in line with Policy DM16 (Sustainable Drainage Systems);
 - (ii) manage water and waste water discharges, in line with Policy DM18 (On-site Management of Waste Water and Water Supply);
 - (iii) ensure safe access and egress for future users of the development and an appropriate emergency evacuation plan where appropriate; and
 - (iv) include measures to assist existing communities at risk of flooding where feasible.
- E. All proposals for development within a Critical Drainage Area or an Epping Forest District Flood Risk Assessment Zone will be required to provide a site specific flood risk assessment consisting of: an assessment of the risks involved, focussing predominantly on surface water and ordinary watercourses; details of any mitigation measures on-site where required (e.g. increased thresholds); and a drainage strategy incorporating the use of sustainable drainage systems to mitigate any impacts of site.
- F. With the exception of water compatible uses and essential infrastructure, or unless the Exception Test has been passed, development in areas designated in Epping Forest District's

Strategic Flood Risk Assessment or as determined by specific Flood Risk Assessment as being within Flood Zone 3b will not be permitted.

- G. Proposals for developments within identified Critical Drainage Areas could, based on the outcome of the site specific flood risk assessment, be subject to securing the delivery of appropriate flood alleviation schemes either on site or by way of a financial contribution.
- H. Site specific Flood Risk Assessment must be undertaken in accordance with relevant national and local requirements. Revised hydraulic modelling including climate change allowances will be required as part of a site specific Flood Risk Assessment where this is deemed necessary by the Council.

Sustainable Drainage Systems

4.109 Avoiding development in areas at risk of all types of flooding is the most effective way to minimise flood risk over the Plan period. This needs to be coupled with careful provision of flood mitigation measures where run-off can be managed. National planning policy gives priority to sustainable drainage systems which manage run-off.

Approach

- 4.110 The Strategic Flood Risk Assessment Level 1 Update 2015 (SFRA 2015) identifies surface water run-off as the greatest risk to the District with regard to flooding.
- 4.111 Surface Water run-off is the excess water that flows off the land as a result of rainfall that is unable to filter through the soil. Surface water flooding occurs when high intensity or prolonged rainfall generates run-off which flows over the surface of the ground and ponds in low lying areas. It can be especially problematic when the ground is saturated or when the drainage network has insufficient capacity to cope with the additional flow. Climate change is projected to increase the frequency and intensity of heavy rainfall events, placing greater pressure on traditional drainage systems.
- 4.112 All development has the potential to increase the risk of surface water flooding. Sustainable drainage systems (SuDS) are an important tool

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

in managing surface water flood risk. SuDS mimic natural drainage systems and retain water at or near a site when rain falls. They can also be of added benefit by enhancing biodiversity and amenity through design treatments and incorporate trees and other vegetation that also assist in mitigating flooding. The Council will expect development proposals to manage surface water run-off as close to the source as possible and will apply a hierarchy of drainage solutions with priority being given to sustainable solutions. Proposals should seek to maximise the value of SuDS by making use of their features, such as trees, greenspace and clean water at the surface, to improve the value of landscapes and to strengthen the sense of place.

4.113 There are numerous types of SuDS including swales, ponds, green walls and brown, blue and green roofs. ‘Green roofs’ are a design feature that is planted whilst ‘brown roofs’ are composed of soil allowed to colonise with plants naturally and ‘blue roofs’ are themselves water features. All of these design elements slow the rate of run-off of rainwater from land or buildings. In addition, paying attention to designing permeable surfaces in development assists with drainage.

4.114 Applicants will be expected to demonstrate that the proposed SuDS will function effectively over the lifetime of the development, by ensuring adequate arrangements for its management and maintenance. Attention should be paid to the most up to date Technical Guidance from the Council, Government, British Water, the Environment Agency and Essex County Council. Sources of detailed design guidance include Essex County Council’s SuDS Design Guide and the CIRIA SuDS Manual.

Policy DM16 Sustainable Drainage Systems

A. All proposals for new development must seek to manage surface water as close to its source as possible using the most appropriate sustainable drainage systems solution, or combination of solutions, taking into account site specific circumstances and the Council’s

preferred drainage hierarchy in the following order:

- (i) store rainwater for later use;
 - (ii) use infiltration techniques, such as porous surfaces in non-clay areas. Porous surfaces are suitable in areas of clay but must be adequately tanked with an outfall. The District is predominantly clay so any infiltration proposals must be subject to and pass the relevant percolation tests;
 - (iii) attenuate rainwater in ponds or open water features for controlled release;
 - (iv) attenuate rainwater by storing in tanks or sealed water features for controlled release.
- B.** The Council will encourage the use of green, brown and blue roofs.
- C.** The Council will require sustainable drainage systems to be sensitively incorporated into new development by way of site layout and design, having regard to the following requirements:
- (i) All major development proposals will be required to submit a Drainage Strategy to identify the most appropriate drainage solutions.
 - (ii) all major greenfield development proposals will be required to reduce surface water flows to the 1 in 1 greenfield run-off rate and provide storage for all events up to and including the 1 in 100 year critical storm event including an allowance for climate change, and include at least one source control sustainable drainage systems measure resulting in a net improvement in water quantity and quality discharging from the site to a sewer and/or a watercourse;
 - (iii) all non-major greenfield development proposals should aim to achieve the 1 in 1 greenfield run-off rate where possible, including an allowance for climate change, or a rate as otherwise agreed with the Council; and
 - (iv) all major and non-major brownfield development proposals which involve a quantum of new-build should aim to achieve the 1 in 1 greenfield run-off rate and, at a minimum, achieve a 50% reduction in existing site run-off rates for all events, including an allowance for

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climate change, and include sustainable drainage systems measures resulting in a net improvement in water quantity and quality discharging from the site to a sewer and/or a watercourse and;

- (v) for all development where the 1 in 1 greenfield run-off rate cannot be achieved, justification must be provided to demonstrate that the run-off rate has been reduced as much as possible.

- D. Where sustainable drainage systems are implemented they will be expected to:
 - (i) meet the requirements set out in national standards, and meet the Council's standards if they exceed national guidance;
 - (ii) incorporate measures identified in Surface Water Management Plans;
 - (iii) be designed to maximise biodiversity and local amenity benefits and where appropriate, ensure that sustainable drainage system techniques provide for clean and safe water at the surface;
 - (iv) improve water quality; and
 - (v) full details of the means of achieving future management and maintenance of the sustainable drainage system scheme to ensure that it will function effectively over the lifespan of the development will be required, including responsibilities and funding.
- E. The Council will give consideration to adopting sustainable drainage systems. Financial contributions will be sought for maintenance if adopted by the Council.
- F. Where sustainable drainage systems cannot be implemented due to site constraints (such as land contamination) robust justification must be provided along with proposed alternative approaches to surface water management.
- G. Where particular sites and the wider catchment have identified existing flood issues, the implementation of good practice on Natural Flood Management must be explored.

Protecting and Enhancing Watercourses and Flood Defences

- 4.115 National planning policy sets out that opportunities offered by new development should be used to reduce the causes and impacts of flooding. Some developments have, in the past, included changes to natural watercourses that do not necessarily assist in modern flood management or support building in resilience to climate change. New development must not reduce the quality of an adjacent watercourse, and should provide enhancements wherever there is an opportunity to do so.

Approach

- 4.116 In order to manage the risk of flooding to properties close to a watercourse, buffers of open land should be applied between the watercourse and new buildings.
- 4.117 The most effective way to reduce flood risk is to enable a watercourse to operate naturally. However in urban areas these have often been redirected, and culverted over the years whilst areas of land that may have been used for water storage during times of flood have been developed. Such changes can now contribute to the risk of flooding. The Environment Agency advises that in order to manage flood risk where there are opportunities to re-naturalise watercourses, and provide land for flood storage, these should be taken. In addition such measures can be used to actively encourage the creation, restoration and enhancement of habitats. All development proposals should therefore take into account these opportunities in their design wherever possible.
- 4.118 The canal system in the District is navigable and used for leisure purposes. There is no intention to interfere with the navigability of the canal system in implementing this Policy.
- 4.119 It is not possible in all circumstances to re-naturalise existing watercourses. Where it is not possible to re-naturalise watercourses then development must pay particular attention to ensuring that the existing built defences, such as walls and culverts, serving the development are fit to last, and will be maintained throughout the lifetime of the development.

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

4.120 The Council will seek financial contributions towards the protection and enhancement of watercourses and flood defences where appropriate in addition to undertaking work required on site.

Policy DM17 Protecting and Enhancing Watercourses and Flood Defences

A. New development must be set back at a distance of at least eight metres from a main river³ and an ordinary watercourse⁴, or at an appropriate width as agreed by the Council and/or the Environment Agency, in order to provide a naturalised and undeveloped buffer zone, free of built development, other than for site access and other essential infrastructure connections. Exceptions may be acceptable for the navigable sections of the rivers Lee and Stort where a smaller buffer would result in a better environment or facilities for users of these multifunctional assets and where it can be demonstrated that there would be no adverse impacts on flood risk or flood defences and that the natural environment is enhanced. Any reduction of this eight metre zone should be justified as part of a planning application. Consent from the Environment Agency is required for any works within the byelaw distance of a main river, which is generally eight metres. Consent from Epping Forest District Council is required for any works to or within eight metres of an ordinary watercourse. Buffer zones should be designed for the benefit of biodiversity and should be undisturbed by lighting. Planning applications must include a long term scheme to protect and enhance the conservation value of the watercourse and ensure access for flood defence maintenance, in line with the requirements of the Water Framework Directive and the Thames River Basin Management Plan.

B. All major development will be required and minor development will be expected, to:

(i) investigate and secure the implementation of environmental enhancements to open⁵ sections of the river or watercourse if appropriate; and

(ii) investigate and secure the implementation of measures to restore culverted sections of the river or watercourse, if appropriate.

C. Where de-culverting or other river enhancements are shown to be unfeasible, the Council will seek a financial contribution to restore another section of the same watercourse.

D. Proposals must not adversely affect the natural functioning of main rivers and ordinary watercourses, including through culverting.

E. Where appropriate the Council will require planning applications to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development and, if necessary, the proposal must make provision for repairs or improvements.

F. Development on or adjacent to a watercourse must not result in the deterioration of the water quality of that watercourse. Development must not impact on the stability of the banks of a watercourse or river.

On-site Management and Reuse of Waste Water and Water Supply

4.121 There is a clear need to ensure that surface water and foul water drainage and treatment is undertaken effectively in the interests of protecting human health and the wider environment. In order for development to be acceptable within this context it should not cause any pollution to water bodies or controlled waters including ground water. The pressure that new development can place on existing water supplies is also of concern.

Approach

⁴ the ordinary watercourses are those that are not Main Rivers.

⁵ Open in this context means any length of watercourse that is not culverted.

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³ the main rivers and their associated tributaries are the River Lea, River Lee Navigation and Stort Navigation River Roding, Nazeing Brook, Cobbins Brook and Cripsey Brook

- 4.122 National planning policy sets out that local authorities should adopt proactive strategies to ensure climate change resilience and take full account of water supply and demand considerations. This includes policies to secure the delivery of infrastructure for waste management, water supply and wastewater.
- 4.123 UK legislation has established a framework for the protection and improvement of rivers and lakes, estuaries, coastal waters and groundwater. This sets out that development must not result in the deterioration of the status of the water quality of a water body and must not prevent the future attainment of 'Good Ecological Status', or 'Good Ecological Potential'.
- 4.124 The chemical quality of the water body is an important factor as it has the potential to affect its biological quality. The ecological potential or status of the water bodies in the District varies. The Environment Agency's Thames River Basin Management Plan seeks to ensure that all relevant water bodies in the area should be of 'good ecological status' by 2027 at the latest.
- 4.125 During the Plan period the Council will take any measures that are within its powers to improve the quality of these water bodies and is working with the Environment Agency and the relevant statutory water undertaker to establish how to influence these beyond dealing with any historical misconnection problems from properties. Sustainable drainage systems are considered to be capable of contributing to improvements in water quality given their potential to 'filter' run-off water all new development must avoid any detriment to water quality.
- 4.126 The Environment Agency has identified Groundwater Source Protection Zones for 2,000 groundwater sources used for public drinking water supply nationally. Groundwater Protection Zones identify areas which have the potential for contaminants to migrate to a water source/resource as a result of activities that might cause pollution in the area. The closer the activity the greater the risk. The groundwater source catchments are divided into zones that relate to the travel time of water from any point below the water table to the source. The Lee

Valley contains some areas of Groundwater Source Protection Zones within the Inner Zone 1 (50 day travel time) and Outer Zone 2 (400 day travel time) and Total Catchment Zone 3. The Environment Agency use the zones in conjunction with its Groundwater Protection Policy to set up pollution prevention measures in areas which are at higher risk and to monitor the activities of potential polluters nearby. Although not considered in national source protection zones, the Lee Valley is especially sensitive to groundwater contamination, as a whole, due to the history of gravel extraction and landfilling. There are also significant numbers of private water supplies in the area which require protection.

- 4.127 The Council expects developers to work with the water companies to ensure that their proposals can be suitably serviced with an adequate water supply and make use of water saving measures such as grey water systems and rain water harvesting. In addition, development proposals should demonstrate that suitable arrangements are in place for foul water drainage and treatment, taking into account potential impacts on Groundwater Source Protection Zones in particular as well as the wider environment in general.
- 4.128 This will also apply to operators of commercial developments to ensure that contaminated surface water is properly treated in order to protect drainage systems, watercourses and the environment in general. Sources of contamination include, for example, car and lorry washing facilities and hardstandings. In the majority of cases the Council does not have the power to refuse planning permission in relation to connections to the public sewer. A statutory undertakers' role is to provide connections to the public sewer and their ability to refuse to make connections is limited. Therefore, planning proposals should be referred to the relevant local sewerage infrastructure provider for assessment. The applicant will be expected to provide proof of the adequacy of the proposals in respect of water supply and foul drainage in the form of correspondence from the local sewerage infrastructure provider. The Council will use

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conditions to address wastewater and water supply issues.

Policy DM18 On Site Management and Reuse of Waste Water and Water Supply

- A. The Council will expect planning proposals to set out how they will ensure that there is adequate surface water, foul drainage and treatment capacity to serve their development and demonstrate that it does not impact on the adequacy of existing development in this regard. All proposals for new development will be required to:
- (i) ensure the separation of surface and foul water systems; and
 - (ii) implement sustainable drainage systems, in line with Policy DM16.
- B. Where there are capacity concerns regarding the local public sewer network, developers will be required to demonstrate that consultation has taken place with the local sewerage infrastructure provider and that any necessary upgrade can be delivered in advance of the occupation of development or at an agreed point where development is phased. All developers are encouraged to discuss their development proposals with the local sewerage infrastructure provider ahead of the submission of their planning applications.
- C. The Council will expect new development to connect to mains foul drainage, and will restrict the use of non-mains drainage for foul water disposal, particularly in Groundwater Source Protection Zones, in line with Environment Agency guidance. The location of, and likely impact on, the private water supplies within the District must also be taken into account. Where non-mains drainage is proposed for the disposal of foul water, a foul drainage assessment will be required to ensure the most sustainable drainage option will be implemented.
- D. All proposals for new development will be required to:
- (i) ensure that there is adequate water supply infrastructure capacity both on and off-site to serve the development with wholesome water of sufficient quantity, flow rate and

pressure, without adversely impacting on existing users; and

- (ii) make provision for the installation and management of measures for the efficient use of mains water and where possible with direct connection to the mains public water supply.

Sustainable Water Use

4.129 It is important to manage the water resources that serve the District as it is in an area of 'serious stress' on water resources which, if not properly managed, could culminate in potentially significant impact on the District's water supply and the wider water environment. Consequently the use of water efficiency measures in buildings is necessary and justifiable.

Approach

4.130 Thames Water and Affinity Water are the main companies which provide mains water potable water supplies in the District. The District is classed as being in an area of 'serious water stress' in the Environment Agency's Water Stressed Areas Classification 2013. In such areas it is recommended that efficiency standards are introduced in order to manage demand on the water environment.

4.131 The average UK consumption of water is 150 litres per person per day (in the home). Government guidance sets out that the Council has the option to establish technical requirements in the Local Plan which exceed the minimum water efficiency standard of 125 litres per person per day required by the Building Regulations. The Council will therefore expect that new homes built in the District will result in an average consumption of no more than 110 litres per person per day.

4.132 Given the significant pressure on the supply of water in the District, the Council will use planning conditions to ensure the standard is met. There are many ways of achieving the standard including through the use of grey water systems and rainwater harvesting together with water efficient fittings and appliances.

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- 4.133 With respect to non-residential development the Council considers it reasonable to require a similar reduction in water consumption as that for residential uses recognising that some commercial uses need more water for operational processes.
- 4.134 The Home Quality Mark Technical Manual provides a useful resource to assist in developing water efficiency measures and the latest BREEAM UK 'New Construction' provides the relevant standard for non-domestic new build properties. The Council expects all new non-residential development to secure a reduction in water usage commensurate with that achieved by the requirement for residential development.

Policy DM19 Sustainable Water Use

- A. Development will need to demonstrate that:
- (i) Water saving measures and equipment will be incorporated in all new development;
 - (ii) New homes (including replacement dwellings) meet a water efficiency standard of 110 litres or less per person per day; and
 - (iii) New non-residential development of 1,000 square metres gross floor area or more aims to achieve at least a 30% improvement over baseline building consumption.
- B. The standards set out in Part A(ii) and (iii) will apply unless, in exceptional circumstances, it can be clearly demonstrated that it would not be feasible on technical or viability grounds.
- C. Where new national standards exceed those set out in Part A, the new national standards will take precedence.

Low Carbon and Renewable Energy

4.135 National planning policy provides that local authorities should adopt proactive strategies with regard to climate change which secure reductions in greenhouse gases, minimise vulnerability and provide resilience to the impacts of climate change. Such strategies should include the promotion of energy generation from low carbon and renewable energy sources. It also sets out that local authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.

Approach

- 4.136 National planning policy notes that local authorities should include Local Plan policies to deliver the provision of energy infrastructure including heat. Low carbon and renewable energy measures take a variety of forms including commercial 'farms' that whilst they can be intrusive, generate energy on a large scale, individual installations for individual properties (micro generation) and schemes that include a number of properties (district heating schemes). Some installations are permitted development not requiring planning permission.
- 4.137 The Council wishes to encourage new development that designs from the outset an environment of zero or low carbon energy use as well as the retrofitting of renewable energy installations on existing development where appropriate in terms of its size, siting and design.
- 4.138 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 consideration should be given to:
- locally Listed buildings;
 - buildings of architectural or historic interest within registered parks and gardens and the curtilages of scheduled monuments; and

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- buildings of traditional construction with permeable fabric that both absorb and readily allow the evaporation of moisture.

4.139 The Council recognises the need for energy generation in helping to address climate change and has adopted a Climate Change Action Plan having declared a Climate Emergency in 2019. Through this policy the Council seeks to support the generation of low carbon and renewable energy. In doing so the Council has had regard to the findings of the Carbon Reduction and Renewable Energy Assessment 2013 in its conclusions that the potential in the District for large scale renewable energy production is hampered by the policy designation of the Green Belt. National Policy does not rule such development out but notes that elements of many renewable energy projects will comprise inappropriate development. In such cases the demonstration of very special circumstances would be required for proposals to proceed. In any case careful consideration of the impact of proposals including on the openness of the Green Belt is needed. More positively, the Assessment concluded that small-scale renewable energy schemes of all kinds can be accommodated in the District and incorporation in the design of development on larger sites is feasible and viable, as would be installations on individual buildings.

4.140 Decentralised heating is supported by national planning policy as a form of renewable or low carbon decentralised energy supply, and a means of meeting the requirements of the Climate Change Act 2008 in relation to carbon emission reduction. Decentralised or community energy schemes can be connected into larger District wide schemes. Potential opportunities exist within the glasshouse industry and within some larger scale employment and residential sites.

4.141 A small number of gas fired combined heat and power plants already exist in the District.

4.142 The Policy seeks to support appropriate low carbon and renewable technologies to assist in delivering more energy efficient development in support of local and national carbon reduction ambitions. The Council's approach is to support

low carbon and renewable technologies as part of a package of measures to assist in delivering more energy efficient development.

Policy DM20 Low Carbon and Renewable Energy

- A. The incorporation of low carbon and renewable energy measures in new and existing development will be encouraged with regard to both standalone installations and micro renewables integrated into development.
- B. Proposals for the provision of low carbon and renewable energy technologies will be supported where they:
 - (i) do not have any adverse impact on the integrity of any European sites, wildlife sites, protected species or habitats or the openness of the Green Belt;
 - (ii) demonstrate how any impacts on the environment and heritage assets, including cumulative landscape, noise, visual, air quality and emissions, and traffic generation impacts can be avoided or mitigated through careful consideration of location, scale and design; and
 - (iii) the benefits of the proposal are clear with regard to the amount of heat or electricity generated and consequential reduction in greenhouse gases, and the local individual or community benefit.
- C. The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged.
- D. Strategic Masterplans should demonstrate how the development will employ on-site low carbon or renewable technologies, and/or other energy efficiency measures (for example, infrastructure to connect to an existing or future planned decentralised energy network) to help meet national and local plan energy and carbon reduction objectives.

Local Environmental Impacts, Pollution and Land Contamination

4.143 National planning policy supports the planning system in preventing development from

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contributing to environmental damage and putting people and the environment at risk, or subjecting them to the adverse effects from unacceptable levels of soil, air, water, light or noise pollution or land instability. If not properly considered, these factors can impact significantly on the living conditions of existing and new residents and on the future operation of new and existing sites and premises. This includes the potential disruption albeit temporary, as a result of the demolition and construction phases of development. National planning policy also sets out that planning should remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land where appropriate.

Approach

4.144 The Council's approach is to minimise pollution and other adverse effects on people, the proper functioning of the local area and the natural environment. The prevention of unacceptable risks from pollution and land instability should be taken into account when considering the location of development. Some engineering operations and ground works can result in unacceptable impacts such as the movement of significant amounts of soil, or using inert waste to re-contour land. Therefore all development falls within this Policy.

4.145 National planning policy states that where a site is affected by contamination or land instability it is the responsibility of the developer or landowner to ensure that development is safe. However, planning policy and decision making is required to ensure that any site is suitable for its use taking account of ground conditions, land stability and pollution including from former activities and uses. Such assurance can be provided through the provision of site investigation information prepared by a competent person. National planning policy defines a competent person in this regard as being "a person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation."

4.146 Contamination of land in the District largely arises as a result of previous industrial and agricultural activity, waste disposal, accidental spillages and transportation. Many processes are now controlled by legislation but historically this was not the case. This has created a legacy of contaminated land and surface or ground water pollution in some areas of the District that may need to be addressed as part of any development.

4.147 The construction process, whether or not accompanied by demolition or other ground preparation, can cause a significant degree of noise, dust and vibration within the locality. The Council seeks to minimise impacts through the use of Construction Management Statements, which should include information on matters such as hours of operation on site, the reuse of materials on site and the amount of materials that need to be removed from or taken to the site. This has a range of benefits including reducing the need for new source materials and the number of vehicle trips made to the site with the commensurate amenity benefits and helps to reduce the carbon footprint of the development.

4.148 The Policy seeks to ensure that these factors are considered and managed effectively when assessing the suitability of development.

Policy DM21 Local Environmental Impacts, Pollution and Land Contamination

- A. The Council will require that the residual local environmental impacts of all development proposals after mitigation do not lead to unacceptable impacts on the health, safety, wellbeing and amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air and water (surface and groundwater) pollution, dust, noise, vibration, light pollution, odours, and fumes as well as land contamination.
- B. The Council will:
 - (i) resist development that leads to unacceptable local environmental impacts, including, but not limited to, air pollution,

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noise and vibration, light pollution, odours, dust and land and water contamination;

- (ii) require that activities likely to generate pollution are located away from sensitive uses and receptors where possible, practical and economically feasible;
- (iii) require development proposals to mitigate and reduce to a minimum any adverse local environmental impacts and activities that may have wider cumulative effects;
- (iv) where there are unacceptable risks of contamination or land instability, require these to be properly and fully addressed through remediation. If remediation measures are not suitable then planning permission will be refused; and
- (v) where necessary, apply planning conditions to reduce local environmental impacts on adjacent land uses to acceptable levels.

Land Contamination

C. The Council will expect the remediation of contaminated land through development. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds. To deliver this the Council will require development proposals on contaminated land:

- (i) to be informed by a desktop study and preliminary risk assessment, including an assessment of the site's history, potential contamination sources, pathways and receptors;
- (ii) where necessary to undertake a site investigation and detailed risk assessment in line with current best practice guidance, including where appropriate physical investigations, chemical testing and assessments of ground gas risks and risks to groundwater;
- (iii) where necessary to provide a remediation strategy that sets out how any identified risks from any assessment are going to be addressed. If remediation measures are not suitable then planning permission will be refused;
- (iv) where necessary to provide a long term maintenance and monitoring regime for the mitigation of any ongoing risk and

identify the person/s responsible for the regime;

- (v) where necessary to provide a validation report once remediation has taken place, including evidence that demonstrates that risks from contamination have been controlled effectively; and
- (vi) to ensure that all above assessments and investigations are carried out by a competent person.

Construction and Demolition

D. The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of subterranean developments. To deliver this the Council requires the submission of Construction Management Statements for the following types of developments:

- (i) all major developments;
- (ii) any basement developments;
- (iii) developments of sites in confined locations or near sensitive receptors; and
- (iv) if substantial demolition and/or excavation works are proposed.

E. The Council will support the use of sustainable design and construction techniques, including where appropriate, local or on-site sourcing of building materials to enable their use or recycling as close to the development site as possible. For existing buildings which are heritage assets, in considering whether sustainable construction requirements are practical, consideration should be given to Policies DM7 and DM8. 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 any alteration and extension of such buildings.

Air Quality

4.149 Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with internationally set limit values and nationally set Air Quality Strategy objectives. It is important that the potential impact of new development on air quality is taken into account in planning where

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the national assessment indicates that relevant limits values and objectives have been exceeded or are near the limit close to being exceeded.

4.150 The local air quality management (LAQM) regime requires every local authority to regularly review and assess air quality in their area. These reviews identify whether national objectives have been, or will be, achieved at relevant locations, by an applicable date. If national objectives for human health are not met, or at risk of not being met, the local authority concerned must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP). This identifies measures that will be introduced in pursuit of the objectives and can have implications for planning. The Council was required to declare an AQMA in the area of Bell Common, Epping in 2010. The AQMA is still in place due to very localised NO_x levels and the Council is continuing to monitor the situation and work towards reducing these levels such that there is no longer a need to declare an AQMA. Poor air quality can also affect the District's ecological assets (see Policy DM2).

The Approach

4.151 Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach is taken to air quality and help secure improvements in overall air quality where possible. Therefore, in plan-making, it is important to take into account AQMAs and other areas where there could be specific requirements or limitations on new development because of air quality and its effects on human health.

4.152 The approach to the location of development in the Local Plan has included the consideration of the sustainability of sites in respect to accessibility, or potential accessibility to facilities, services and jobs, by means other than the car. The reduction in levels of car use can have a significant positive effect on the air quality in an area, as can the provision of

infrastructure which supports the use of new technologies.

4.153 It is important that the effects from development, both individually and cumulatively, are assessed where they have a potential effect on the health of people within the District, and that appropriate mitigation and monitoring measures are secured. The Council's Local List of Validation Requirements sets out the type and scale of planning application that will be required to be supported by an air quality assessment. It is important that applicants engage at an early stage in the formulation of their development proposals with both the Council's planning and environmental health departments to establish the need and scope of any assessment to support an application. For large and complex industrial processes, the Environment Agency should also be engaged at an early stage. As traffic is a major contributing factor to effects of humans and habitats, all new development which requires the submission of a Transport Assessment or Transport Statement (as set out in the Council's Local Validation Checklist) will be required to submit an assessment of air quality impacts which may arise as a result of the development. This is in addition to other developments which will require the submission of such assessment where the proposal has the potential to impact on air quality.

Policy DM22 Air Quality

- A. The Council will seek to ensure that the District is protected from the impacts of air pollution. Potential air pollution risks will need to be properly considered and adequate mitigation included in the design of new development to ensure neither future, or existing residents, workers, visitors, and other sensitive receptors are adversely impacted as a result of the development.
- B. Any required mitigation measures will be determined by the scale of development, its location, the potential to cause air pollution, and the presence of sensitive receptors in the locality.

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

C. Larger proposals or those that have the potential to affect air quality, will be required to undertake an air quality assessment that identifies the potential impact of the development together with, where appropriate, contributions towards air quality monitoring. Assessments shall identify mitigation that will address any deterioration in air quality as a result of the development and these measures shall be incorporated into the development proposals together with financial contributions to support the implementation of off-site measures and the monitoring of their efficacy. Such assessments should include an assessment of emissions (including from traffic generation) and calculation of the cost of the development to the environment. All assessments of air quality impacts shall be undertaken by competent persons.

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