

Overarching response to the provision of Suitable Alternative Natural Greenspace and the Epping Forest Special Area of Conservation

Officer response

- 1.1 A significant number of submissions made in response to the consultation on the Draft Green and Blue Infrastructure Strategy ('the GI Strategy') related to the provision of Suitable Alternative Natural Greenspace (SANG) in order to avoid or mitigate any adverse effects on the integrity of the Epping Forest Special Area of Conservation ('the SAC'). Having reviewed the submissions officers consider that the most appropriate way of providing a response, recognising the level of commonality in the matters raised, is by providing an overarching response rather than commenting on each individual submission. The officer response is set out in the paragraphs below.

Legal Duties

- 1.2 To clarify some points raised in submissions the Council, as a competent authority under the Habitats Regulations, has a legal duty to ensure that plans and projects, either alone or in combination do not have an adverse effect on the integrity of internationally important sites such as the Epping Forest SAC. This includes the Council's emerging Local Plan. Where an adverse effect on integrity is identified then the Council is required to have in place strategies which avoid or mitigate that effect. There is no hierarchy within the legislation that sets out that avoidance should have priority over mitigation – either approach is legally compliant.

The need for a separate Mitigation Strategy

- 1.3 Submissions have been made that guidance in relation to SANG provision should form part of a separate Strategy. Officers are of the view that the provision of SANG should form a component part, albeit a critical one, of the GI Strategy rather than providing a 'standalone' Strategy. Taking this approach will enable the provision of SANG to be integrated with other forms of Green and Blue Infrastructure provision.
- 1.4 The Strategy has been amended to make it clear that SANG should be incorporated as part of the overall Masterplanning process of those strategic sites where the provision of SANG is required. This reflects the fact that the Council's published guidelines on Masterplanning require the development of a Landscape Framework (see Cabinet report of 18 October 2018: Appendix 4 EB133 which sets out the requirements for the preparation of Masterplans <https://www.efdclocalplan.org/wp-content/uploads/2019/01/EB133-Governance-Arrangements-for-Local-Plan-Implementation-18th-Oct-2018.pdf>). SANG should be an integrated part of the GI offer on such sites recognising that SANG is not the only element of GI provision that is required as set out in the site-specific policies in the Council's emerging Local Plan. Such an approach supports the place-making principles set out in the relevant strategic policies.
- 1.5 Officers also consider that taking this approach creates greater opportunities to secure SANG which positively enhances the overall GI provision, provides variety in the collective offer and ultimately a greater 'offer' for new residents.

1.6 In response to comments made that it was not clear what the Council's overall approach to avoidance and mitigation is, the Strategy has been amended to clearly set this out. The introduction (Part 0 – Primer) now includes greater detail about the component parts of the Council's approach to mitigation which are as follows:

- Strategic Access Management and Monitoring (SAMMs). The Council endorsed an 'Interim Approach to Managing Recreational Pressures on the Epping Forest Special Area of Conservation': October 2018 (EB143) in October 2018
<https://www.efdclocalplan.org/wp-content/uploads/2020/01/EB143.pdf>
This was prepared jointly with the Conservators of Epping Forest (as the landowner) and neighbouring local authorities. The Strategy contains measures which will be implemented within the SAC itself.
- Bespoke SANG provision or site-specific measures. This is set out in Part 3 to the Strategy and provides the mechanism for ensuring that strategic sites 'consume their own smoke' so that new residents have Suitable Alternative Natural Greenspace (SANG) available which acts as an alternative recreation offer to the SAC. The provision of SANG in close proximity to where new residents will live is considered to be an effective approach based on findings from the Epping Forest Visitor Surveys where closeness to home was cited as the main factor influencing their choice of site to visit.
- Infrastructure Projects as set out in Part 4 of the GI Strategy. These projects are specific to Debden, Loughton and Buckhurst Hill and involve the enhancement of existing GI assets to increase their attractiveness as a recreational offer for new residents. This approach has been adopted recognising that the sites proposed for development in the emerging Local Plan within this part of the District are of an insufficient size to accommodate any meaningful proportion of SANG.
- Air Pollution Mitigation Strategy as adopted by the Council in January 2021.

1.7 At a more strategic level the creation of a separate SAC Mitigation Strategy which contains all of the elements of mitigation identified would provide a number of procedural, governance and implementation challenges. As can be seen from paragraph 1.6 there are a number of components that collectively avoid and mitigate the effects on the SAC arising from development in the District. It is considered that the on-site mitigation measures are more appropriately addressed on a more strategic basis because of the cross-over of residents from one local authority area using parts of the SAC in another. However other measures are considered to be specific to Epping Forest District. Consequently, it would not be appropriate for other authorities to make decisions on the Council's approach to mitigation, nor oversee their delivery. The approach the Council has proposed is considered to be appropriate and, whilst the Habitats Regulations require a competent authority to have regard to other plans and projects including those within other relevant local authority areas (otherwise known as the 'in-combination' requirement) there is no legal requirement to adopt a composite mitigation strategy. Furthermore, the Council is only legally required to mitigate the effects of development arising from its emerging Local Plan.

The level of guidance provided for the Masterplan Sites

1.8 A number of submissions set out that further detail should be provided in relation to the provision of SANG. Others suggested that too much detail had been provided and concerns were raised that additional requirements were being sought which went beyond that necessary, or did not relate appropriately to the wider Masterplanning process. It is considered that it is important to achieve an appropriate balance between providing

sufficient certainty that SANG provision will come forward at an appropriate time whilst not fettering the proper Masterplanning of individual sites.

- 1.9 Part 3 of the Strategy now includes an indication of the quantum and location of SANG to be provided on individual strategic sites. This is based on the indicative quantum of development proposed in the emerging Local Plan. Some submissions sought clarification on why a figure of 8ha per 1,000 new population has been used to determine the level of SANG to be provided in relation to the relevant sites. The rationale for using this figure was clearly set out in Appendix 3 of the draft Strategy. Officers consider that the quantum being sought is justified and therefore no amendment to the Strategy has been made in this regard. An average occupancy of 2.36 people per household has been used. No material objections were raised with regard to the use of this figure.
- 1.10 In doing so recognition is given to the fact that the Latton Priory, Water Lane and North Weald Bassett Masterplan areas do not lie entirely within the current 6.2km 'Zone of Influence'. The Strategy acknowledges this but also sets out that provision will need to be made for an element of residential development beyond the current Zone of Influence in order to 'future-proof' the developments. This reflects the fact that the Zone of Influence may extend further over the lifetime of the Plan in response to further Visitor Surveys which are proposed to be conducted and to ensure that development on these sites would not contribute to such an expansion. The Strategy has been amended to make it clear that the guidance provided are principles to inform the provision of SANG but are not prescriptive. This enables flexibility in site specific design to respond to site specific circumstances. It also reflects the fact that the Masterplans for the strategic sites are still being developed. Furthermore, it is not necessary to have the full details of each SANG determined as part of the GI Strategy or at the time of the adoption of the emerging Local Plan.
- 1.12 Some respondents raised concerns that additional processes and site requirements were being proposed. The Council has already endorsed guidance on what is expected as part of the Masterplanning of strategic sites through its 'Strategic Masterplanning Briefing Note' (October 2018). This includes the requirement to prepare a landscape framework as part of any Masterplan. The reference to 'Landscape Framework' within the Strategy relates to that component of the Masterplanning process rather than being separate to it. The Strategy has been amended to reflect this.
- 1.13 Comments were raised regarding the need for a Memorandum of Understanding in relation to the delivery of SANG. The policies in the emerging Local Plan, and the Council's published Masterplanning guidance, require joint working between landowners. In particular the guidance states that:

'Where the Masterplan Area comprises more than one allocation site, the Strategic Masterplan should be undertaken jointly between all promoters of the site allocations with oversight by EFDC (and where applicable Harlow District Council and the Harlow and Gilston Garden Town team).'

Consequently, the requirement for a Memorandum of Understanding would be an unnecessary duplication of processes and this has been removed from the Strategy.

- 1.14 The use of the term 'strategic SANG' has caused an element of confusion as to what the role of SANG to be provided at the Masterplan sites is. In particular, concerns were raised that

seeking to provide SANG on the Masterplan sites to provide for existing residents was contrary to Regulation 122 of the Community Infrastructure Levy Regulations. The purpose of the site specific SANG is to mitigate the effects of that new development and not to address existing issues. The level of SANG provision identified is directly related to the number of new homes to be provided within or in close proximity to the 6.2km Zone of Influence, and the number of new residents that would arise based on household projections. The level of provision does not include any requirements to provide land for existing recreational impacts. There is no requirement to do so in the Habitats Regulations and would be contrary to Regulation 122 of the CIL Regulations. . To reflect this the Strategy has been amended to make reference to ‘bespoke’ SANG rather than ‘Strategic’ SANG to make this clearer and the previous guidance in relation to the provision of car parking has been removed.

- 1.15 The provision of SANG is not specifically intended to provide mitigation from other development. Nevertheless, the Strategy does not preclude additional SANG from being provided if an appropriate commercial agreement is arrived at between the relevant parties. The Strategy has been amended to reflect this. Other relevant residential development proposals will be required to mitigate their effect on the Epping Forest SAC as set out in Paragraph 1.6 above.

Delivery and costs

- 1.17 Concerns were raised that the provision of SANG would be an on-going cost burden to local councils and residents. The cost of providing the SANG and its on-going maintenance will be the responsibility of the developer of the site. This will be secured through the use of Section 106 planning obligations at the planning application stage which will require that an appropriate and robust approach to the long-term stewardship of such assets and funding to achieve this. Further information on potential stewardship models has been provided in Part 2 of the GI Strategy as proposed to be adopted. This is a well-established approach to managing assets such as these. The Council will also be adopting an approach of using a 125 year period to equate to ‘in-perpetuity.’ This is an industry wide figure that is regularly used.
- 1.18 Submissions were made in relation to the lack of detail in relation to the timing of the delivery of SANG. The Strategy has been amended to provide indicative timescales of delivery. This reflects the Council’s most up-to-date Housing Trajectory. The Strategy has been amended to make it clear that the land proposed for the delivery of SANG should be made available from first occupation of residential development within the first Phase of development within the Masterplan area. The laying out of the SANG will be undertaken on a phased basis in accordance with a phasing plan to be agreed with the Council as part of the outline planning permission. This will be secured through a Section 106 planning obligation as will the requirement for the SANG to be provided and retained for that purpose. The Strategy has been amended to make this clear.

The appropriateness and efficacy of the ‘Sites for Enhancement’ identified in Appendix 4 of the consultation draft of the Strategy.

- 1.19 Concerns were raised regarding the deliverability of SANG on sites identified in Appendix 4 ‘Sites for Enhancement’ not within either a developers or the Council’s control. A number of concerns were also raised in relation to the acceptability and/or appropriateness of a number of the sites identified including at Copped Hall, Warlies Park and Jessel Green. The inclusion of these sites in the draft Strategy were to ‘test’ the community’s views on their

appropriateness as part of the consultation. These sites were either identified by responders to the Epping Forest Visitor Survey 2019 or where landowners had initially indicated that land could be made available for the provision of SANG.

- 1.20 Further consideration has been given to the appropriateness, effectiveness and potential unintended consequences of enhancing the sites identified – including the potential for attracting more traffic to use roads in close proximity to the Epping Forest SAC. Consideration has also been given to potential sites for enhancement identified through the consultation on the draft Strategy. This has identified specific projects which officers consider are both deliverable and provide a more robust approach to mitigating the effects of residential development on the Epping Forest SAC. These have been included within Part 4 to the Strategy including how they will be delivered and funded. The projects focus on enhancements to the Roding Valley Recreation Ground and the adjoining part of the Roding Valley Nature Reserve and to the Public Rights of Way linking Debden and Theydon Bois to Theydon Bois Wood. It is therefore not proposed to pursue the enhancement of the Sites identified in Appendix 4 of the draft Strategy at this point in time.

The relationship with the Lee Valley Regional Park

- 1.22 There were requests that more recognition should be given to the Lee Valley Regional Park (LVRP). The Strategy has been amended to include more information on the LVRP. In addition, the Strategy has been amended to reflect the proximity of the Waltham Abbey North Masterplan Area to the LVRP. The Masterplan Area lies within the Zone of Influence of the SAC. Officers consider that because of the site's proximity to the LVRP the provision of SANG would be unlikely to be effective as a mitigation measure for the SAC. Rather the Masterplan Area should be required to enhance connections to the LVRP and make financial contributions towards the implementation of a number of projects identified within the Area 6 Strategy developed by the LVRP Authority. The Strategy has been amended to reflect this.

Applying a multi-functional approach within SANG

- 1.23 Submissions were made in relation to the appropriateness of applying a multifunctional approach to the provision of SANG. The Strategy has been amended to make it clear that there are only limited opportunities for multi-functionality on SANG – primarily for the provision of natural play to act as an attractor and for the incorporation of Sustainable Drainage Systems where these are of a natural design which would add value to the visual interest and biodiversity of the SANG.

A need to provide additional SANG beyond the Masterplan areas

- 1.24 Submissions were made regarding the need for SANG to be provided in addition to that required for a number of the strategic Masterplanning sites. The Council has undertaken further analysis of SANG provision and is of the view that the provision of new SANG not associated with that for the identified strategic Masterplan sites would not be effective in diverting new visitors from the Epping Forest SAC. This is because of the scale of development proposed through the emerging Local Plan and its distribution. Consequently, such an approach would not be justified in accordance with either the Habitats Regulations or Regulation 122 of the CIL Regulations. Instead the Council, through Part 4 of the Strategy, has identified two projects which could be justified in terms of securing contributions from new residential development within the parishes of Debden, Loughton and Buckhurst Hill. These projects would provide for enhancements to the Roding Valley Playing Fields which is

a significant existing asset but which has capacity to absorb additional use, and for enhancements to the PRow network to support access to the Theydon Bois Woodland Trust site. This site has been developed for the benefit of local residents within this part of Epping Forest District in particular as there are no car parking facilities and can again accommodate some increase in use. It is considered that these provide more effective opportunities to address Epping Forest SAC visitor pressures as part of the package of measures that the Council is proposing.

The Strategy should mitigate for the full quantum of Local Plan development

- 1.25 Submissions were made regarding the quantum of development that should be mitigated for, within the context of the emerging Local Plan housing requirement of 11,400 dwellings. It is important to recognise that, in relation to recreational pressures, there is only a legal requirement to mitigate for residential development within the 6.2km Zone of Influence (Zoi). Furthermore, a quantum of residential development has been built since the start of the Plan period i.e. 2011 – the Plan period has been set at 2011 for technical planning reasons. This predated the approach now required to be taken by the Council. Consequently the quantum of residential development that needs to be mitigated for is materially less than the 11,400 housing requirement figure. Appendix 1 to this response identifies the sites proposed for allocation in the emerging Local Plan (having had regard to the Local Plan Inspector’s Advice Note of 2 August 2019) and the associated indicative quantum of development.

Introducing charging for car parks within the SAC

- 1.26 Submissions have been made in relation to the Council encouraging the Conservators of Epping Forest to apply car parking charges at car parks within their control and the impact this would have for residents of the District, and particularly those on low incomes or with mobility issues. Submissions were also made in relation to the introduction of on-road parking restrictions (red-lining) and the impacts of both initiatives on local roads.
- 1.27 Car parking charging is ultimately a matter for the Conservators of Epping Forest. The suggestion within the draft Strategy was in order to encourage new residents to make use of the SANG provided. It is also important to consider that many of the visitors to the Forest who come by car are from further afield and therefore put pressure on the Forest. Recognising that this adds to vehicular traffic on roads in close proximity to the Forest and therefore contributes to the atmospheric pollution that is impacting on the health of the Forest, charging for parking could act as a deterrent to some visitors. Any proposals to introduce car parking would need to be undertaken in conjunction with Essex County Council as the local highway authority within the area to ensure that parking isn’t diverted to local streets.
- 1.28 Since the publication of the draft Strategy for consultation in June 2020 a proposal to introduce car parking charging within Forest Car Parks was considered by the City of London Corporation’s Epping Forest & Commons Committee on 16 November, 2020. ([Item 12 pages 285-294](#)). The committee resolved to approve the implementation of a car park charging scheme in Epping Forest. [A further report](#) was considered by the same committee on 18 January 2021 (Item 13) with three options for levels of charging.

An alternative approach to Mitigation should be adopted.

1.29 Submissions were made suggesting that the Council should adopt a different approach to mitigation, such as that being pursued through the Essex Coast Recreational Disturbance, Avoidance and Mitigation Strategy ('the Essex Coast RAMS'). The Council is satisfied that the approach that it is taking towards the mitigation of recreational pressures arising from development is an appropriate, robust and proportionate approach having regard to the particular geographic context and the specific nature of the challenges facing the Epping Forest SAC.

Appendix 1: Location and quantum of Local Plan development

The Masterplan sites identified as requiring the provision of 'bespoke' SANG are as follows:

Latton Priory Garden Community

This site has an indicative capacity for 1050 homes. Based on this indicative c. 20ha of SANG would be required. Part of the site lies beyond the current 6.2km ZoI. However, the Council has determined that there is a need to 'future-proof' the development and therefore expect that the full quantum of residential development is mitigated for. Further work is currently being undertaken by the site promoter in terms of the detailed form of the SANG provision once the final location of the access road has been resolved. Notwithstanding this, as indicated at the Examination Hearing Session on 21 May 2019, the site promoter has control over land contiguous with the southern boundary of the site allocation (as proposed to be amended) such that the Council considers there is sufficient land available to provide a sufficient quantum of SANG.

Water Lane Garden Community

The Masterplan area provides for some 2,100 new homes. Based on the total number of homes proposed within the Masterplan area the provision of SANG would equate to c.40ha. However, it is also important to note that a significant part of the site lies beyond the current 6.2km Zone of Influence. The Council has determined that there is a need to 'future-proof' the development and will therefore expect SANG provision for the southern development site of West Sumners. An assumed figure of 700 dwellings on the land would result in the need for some 13ha of SANG.

North Weald Bassett Masterplan Area

The Masterplan Area provides for 1050 new homes. Based on the total number of homes proposed within the Masterplan area this equates to 20ha. The approach to be taken is set out in Appendix 2 of the Strategy. The Council as landowner is currently working with the site promoters to incorporate land as part of the SANG provision. However, it is also important to note that a large part of the site lies beyond the current 6.2km Zone of Influence. Nevertheless, the Council has determined that there is a need to 'future-proof' the development and will therefore require an element of additional SANG provision in this location.

South of Epping Masterplan Area

The site lies within 3km of the EFSAC. The proposed MMs in relation to the Masterplan Area include a significant reduction in the number of new homes to be provided from c.950 dwellings to c. 450 dwellings. This change will significantly reduce the number of new residents potentially accessing the northern part of the EFSAC. Nevertheless, due to the proximity of the Masterplan Area to the EFSAC it is key that SANG provision should be of a sufficient size to accommodate a reasonable length of walk within the Masterplan Area itself. Consequently the indicative quantum of SANG required is therefore a minimum of 10ha. The Council's updated housing trajectory indicates that this site will not begin delivering new homes until 2028 i.e. in the second five year period of the plan.

1.18 Masterplan sites not required to provide SANG.

Waltham Abbey North Masterplan Area

The vast majority of the Masterplan Area lies some 3km from the Epping Forest SAC. And is proposed to deliver some 740 new homes. Both the 2017 and 2019 Visitor Surveys show that very few EFSAC visitors are derived from the Waltham Abbey area. It is one of the nuances that in deriving a Zol that an average across the area is used which does not necessarily reflect different geographic variances. In the case of Waltham Abbey the limited number of visitors is not surprising recognising its proximity to the Lee Valley Regional Park (LVRP). The Waltham Abbey North Masterplan Area is located within a few hundred metres of an access point into the LVRP at its closest point. Consequently it is considered that the provision of on-site strategic SANG would be unlikely to be either effective or necessary and may well not pass the CIL Regulation 122 tests. Rather the Council is of the view that investment in improving/providing new walking and cycling links, including in to the LVRP, are more justifiable and more likely to be effective based on the evidence contained in the 2017 and 2019 Visitor surveys. Such an approach is considered to be in line with the Lee Valley Regional Park Authority's Strategy for the area (Area 6).

Residential sites within 3km of the SAC not required to provide SANG

Epping

- EPP.R4 Land at St Johns Road – approximately 34 homes and appropriate uses.
- EPP.R5 Epping Sports Centre – approximately 42 homes
- EPP.R6 Cottis Lane Car park – approximately 47 homes
- EPP.R7 Bakers Lane Car Park – approximately 31 homes
- EPP.R8 Land and part of Civic Offices – approximately 44 homes
- EPP.R9 Land at Bower Vale – approximately 50 homes
- EPP.R11 Epping Library – approximately 11 homes

Total number of new homes: 259

Loughton and Debden

- LOU.R3 Land at Vere Road – Approximately 9 homes
- LOU.R4 Borders Lane playing fields – Approximately 217 homes
- LOU.R6 Royal Oak public house – Approximately 10 homes
- LOU.R7 Loughton Library – Approximately 20 homes
- LOU.R9 Land at former Epping Forest College – Approximately 111 homes
- LOU.R10 Land at Station Road – Approximately 12 homes
- LOU.R11 Land west of Roding Road – Approximately 9 homes
- LOU.R12 Land at 63 Wellfields – Approximately 10 homes
- LOU.R13 Land at 70 Wellfields – Approximately 6 homes
- LOU.R14 Land at Alderton Hill – Approximately 19 homes
- LOU.R15 Land at Traps Hill – Approximately 6 homes
- LOU.R16 St Thomas More RC Church – Approximately 18 homes
- LOU.R18 Land at High Beech Road – Approximately 8 homes

Total number of new homes: 455

LOU.R4 (Borders Lane) and LOU.R9 are required to provide an element of on-site open space provision. The remained are all smaller sites. Due to the scale of the developments there is no ability to make provision for SANG. The Council has identified opportunities to enhancement the Roding Valley Recreation Ground and adjoining parts of the Roding Valley Meadows Nature Reserve and access together with enhancements to the Public Rights of Way to Theydon Bois Wood. Developments in Loughton and Debden will be required to make a financial contribution to these enhancements in addition to the contributions required for the implementation of the Epping Forest SAMM measures.

Waltham Abbey

- WAL.R4 Fire Station, Sewardstone Road – Approximately 16 homes
- WAL.R5 Waltham Abbey Community Centre, Saxon Way – Approximately 53 homes and re-provision of a community centre
- WAL.R6 Waltham Abbey Swimming Pool, Roundhills – Approximately 27 homes

Total number of new homes: 96

These sites are primarily located within close proximity to the LVRP and therefore the Council is of the view that the LVRP has the potential to provide a suitable alternative recreational opportunity having had regard to the LVRP Authority's Area 6 Strategy.

Buckhurst Hill

- BUCK.R1 Land at Powell Road – Approximately 31 homes
- BUCK.R2 Queens Road car park – Approximately 41 homes
- BUCK.R3 Stores at Lower Queens Road – Approximately 15 new homes and reprovision of 24 homes and retail floorspace.

Total number of new homes: 87

The Council has identified opportunities to enhancement the Roding Valley Recreation Ground and adjoining parts of the Roding Valley Meadows Nature Reserve and access together with enhancements to the Public Rights of Way to Theydon Bois Wood. Developments in Buckhurst Hill will be required to make a financial contribution to these enhancements in addition to the contributions required for the implementation of the Epping Forest SAMM measures.

Chigwell

- CHIG.R5 Land at Chigwell Nurseries – Approximately 65 homes
- CHIG.R8 Land at Fencepiece Road – Approximately 6 homes
- CHIG.R9 Land at Grange Court – Approximately 8 homes
- CHIG.R11 Land at Hainault Road – Approximately 11 homes

Total number of new homes: 90

Theydon Bois

- THYB.R1 Land at Forest Drive – Approximately 39 homes
- THYB.R2 Theydon Bois London Underground Station car park – Approximately 12 homes
- THYB.R3 Land at Coppice Row – Approximately 6 homes

Total number of new homes: 57

The Council has identified opportunities to enhancement the Roding Valley Recreation Ground and adjoining parts of the Roding Valley Meadows Nature Reserve and access together with enhancements to the Public Rights of Way to Theydon Bois Wood. Developments in Buckhurst Hill will be required to make a financial contribution to these enhancements in addition to the contributions required for the implementation of the Epping Forest SAMM measures.

Sites between 3.0km and 6.2km

Chigwell

- CHIG.R4 Land between Froghall Lane and railway line – Approximately 105 specialist homes
- CHIG.R10 The Maypole – Approximately 11 homes.

Total number of new homes: 116

CHIG.R4 is for the provision of specialist housing and therefore, whilst it may result in some increase in recreational use on the Forest this is, in light of the nature of the use and its distance from the Forest, likely to be of limited impact.

Nazeing

- NAZE.R4 Land at St Leonards Farm – Approximately 21 homes

This site lies on the cusp of the 6.2km ZOI and is located significantly closer to the LVRP than to the EFSAC. Neither the 2017 or 2019 Visitor Surveys show visitors arising from Lower Nazeing which is not surprising considering its distance from the EFSAC and its immediate proximity to the LVRP.

Thornwood

- THOR.R1 Land at Tudor House – Approximately 124 homes
- THOR.R2 Land West of High Road – Approximately 48 homes

No mitigation provision is deemed necessary for these sites. Moreover, these sites are both located materially closer to the proposed new SANG provision at Latton Priory and North Weald Bassett and therefore the provision of alternative SANG sites elsewhere or requiring SAMM contributions is likely to be difficult to justify in accordance with CIL Regulation 122.

Coopersale

- COOP.R1 Land at Parklands – Approximately 6 homes

No mitigation provision is deemed necessary for this site. Moreover, it is located materially closer to the proposed new SANG provision at North Weald Bassett and therefore the provision of alternative SANG sites elsewhere or requiring SAMM contributions is likely to be difficult to justify in accordance with CIL Regulation 122.