

**Epping Forest District Council**

**Development Plan Provision for Gypsies and Travellers:  
Consultation on Options**

**Draft Sustainability Appraisal  
and  
Strategic Environmental Assessment**

**Environmental Report**

**September 2009**



The information contained in this document can be made available in alternative formats: large print, braille, audio tape or on disc.

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## Glossary of Acronyms

DPD	Development Plan Document
EFDC	Epping Forest District Council
LDF	Local Development Framework
NTS	Non-Technical Summary
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal incorporating the Strategic Environmental Assessment
SEA	Strategic Environmental Assessment



## **PART A – NON-TECHNICAL SUMMARY**



# NON-TECHNICAL SUMMARY

## 1.1 Introduction

This is the Non-Technical Summary of the Environmental Report for the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) of Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District document. The plan provision will form part of Epping Forest District Council's Local Development Framework and will be adopted as a Development Plan Document. Consequently there is a requirement for the document to be subject to Sustainability Appraisal and Strategic Environmental Assessment. Further stages in preparation of the Development Plan Document will be subject to additional SA/SEA.

The SA/SEA of the Consultation on Options document has been produced by the Spatial Planning Group of Essex County Council acting as consultants to Epping Forest District Council. The content of the report should not be interpreted or otherwise represented as the formal view of Essex County Council.

## 1.2 Development Plan Provision for Gypsies and Travellers

The Government has directed Epping Forest District Council (EFDC) to produce a Development Plan Document (DPD) setting out the provision for Gypsies and Travellers as part of the production of EFDC's Local Development Framework (LDF) documents for Epping Forest District. The DPD, when approved, will be used to deliver sites allocated for Gypsies and Travellers and to assess the merits of other proposals for pitch sites that come forward through the statutory planning process.

EFDC published a Consultation on Options document in November 2008. The document sought views on, firstly, the strategy to be adopted for additional pitch provision in Epping Forest District, and secondly, potential sites which may be identified.

Sustainability Appraisal is mandatory under the Planning and Compulsory Purchase Act 2004 (as amended) for the production of LDF DPDs. There is a requirement for local planning authorities when producing these documents to consider the wider social, environmental and economic effects; and how implementation of proposals set out by the documents may impact on existing and future conditions.

There is also a requirement under European Directive 2001/42/EC to undertake a Strategic Environmental Assessment of LDF DPDs. Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach.

## 1.3 The purpose of this report

This Non-Technical Summary, Part A of this document, together with the Environmental Report, Part B of this document, sets out the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) that has been undertaken for the Policy Options contained within the Consultation on Options document. This report highlights the key matters arising from the SA/SEA.

The purpose of undertaking the SA/SEA at this stage of the process is to identify potential significant sustainability effects arising from the content of the Consultation on Options

document. The outcome of this stage of the Appraisal is designed to assist the plan preparation process and, with the responses to the consultation, to inform future stages of the Gypsies and Travellers DPD. The DPD will be subject to additional appraisal before adoption, to take account of proposals and amendments that may arise from the consultation and this SA/SEA.

## 1.4 Sustainability Appraisal Objectives

Eighteen sustainability objectives were identified to appraise the Consultation on Options document as outlined in Table NTS1.

**TABLE NTS1: SUSTAINABILITY APPRAISAL OBJECTIVES**

Sustainability Objective	Economic	Social	Environmental
1) Create safe environments which do not undermine the quality of life or community cohesion.		✓	✓
2) To ensure the successful integration of existing and proposed residents and communities.		✓	
3) To provide everyone with the opportunity to live in a decent home.	✓	✓	✓
4) To maximise the use and availability of open space for recreation.		✓	✓
5) Promote accessibility.	✓	✓	✓
6) To maximise the education and skills of the population and ensure inclusive access to educational facilities.	✓	✓	
7) To promote sustainable and inclusive access to health services.		✓	
8) To minimise the potential noise and health risks, especially those associated with sites near motorways and other major highways or railways.		✓	✓
9) To achieve sustainable levels of prosperity and economic growth and help people gain access to work appropriate to their period of tenancy, skills, potential and place.	✓	✓	
10) To conserve and enhance biodiversity and geodiversity.			✓
11) To maintain and enhance cultural heritage and assets, and important landscapes within Epping Forest.			✓
12) To maintain and enhance the quality of landscapes and townscapes.	✓	✓	✓
13) To avoid unnecessary development of the countryside.			✓
14) To minimise the risk of flooding.			✓

Sustainability Objective	Economic	Social	Environmental
15) To promote the use of sustainable drainage systems.			✓
16) To promote water conservation.		✓	✓
17) To improve air quality.	✓	✓	✓
18) To minimise the cumulative effects of climate change.		✓	✓

## 1.5 Summary of Appraisal of Policy Options

The key points arising from the appraisal of each question are shown in Table NTS2.

**TABLE NTS2: SUMMARY OF APPRAISAL OF POLICY OPTIONS**

Question	Summary of Appraisal
Question 1: Draft Objectives	The range of necessary matters is covered. Epping Forest District Council should satisfy itself that draft objectives 5 and 6 are sufficiently general to be consistent with the objectives for the matters to be used in the forthcoming Core Strategy.
Question 2: Focus of Search for Sites	A focus on provision of sites in the south and west of Epping Forest District is supported but each individual site would need separate appraisal.
Question 3: Phasing of Sites	The approach is supported as it should give greater certainty and continuity of future supply.
Question 4: Scale of Sites	Sites of 6-15 pitches would best meet the needs of Gypsies and Travellers but provision could be augmented by smaller sites. Larger sites are likely to raise management issues.
Question 5: Concentration in Roydon and Nazeing Area	The scale of sites and their effect on the existing settled community is a relevant factor in the appraisal of potential sites. However, general restrictions on an area-wide basis may increase adverse impacts if sites are not available elsewhere or do not meet the needs of Gypsies and Travellers.
Question 6: The Main Possible Strategies	A strategy which seeks sites close to larger settlements in urban extensions and/or sites in the immediate rural area of larger settlements is preferred. These sites should provide a degree of physical separation from the existing settled community in accordance with documented preference.
Question 7: The Site Search Sequence	The proposed approach is sustainable and matches the approach to search sequences for other types of development.
Question 8: Large Urban Sites	Large urban sites can make a contribution to Gypsy and Traveller site provision. But, the preferred type of assistance will be influenced by the characteristics of, and proposals for, specific sites so flexibility of contribution is advised.
Question 9: Urban Extensions	Provide a positive benefit due to location of sites alongside other new development with implementation at the same time. Urban extensions to Harlow could provide more direct access to the sub-regional facilities within the town. A location south west of Harlow would be close to the existing concentration of sites in the rural parts of Roydon and Nazeing. A location north east of Harlow has less certainty in meeting needs arising within Epping Forest District. In both locations a Gypsy and Traveller site should be implemented as early as possible in the development programme for each urban extension.

Question	Summary of Appraisal
Question 10: Sites as part of other Urban Extensions	Would provide a positive benefit in principle. But, further appraisal would be required once urban extensions are identified by settlement, location and size.
Question 21: Criteria for Windfall Sites	Would provide a positive benefit to consideration of planning applications for non-allocated sites. But, the definition of terms within criteria c) and k) should be considered further as well as the relationship to other adopted policies for environmental matters.
Question 22: Transit Sites	Help to facilitate the nomadic way of life of Gypsies and Travellers and could also provide alternative pitches to those on unauthorised sites. But, the demand for such sites is uncertain and large sites can present management concerns.
Question 24: Site Delivery	The effective delivery of allocated sites could reduce adverse impacts from unauthorised sites. But, options to provide a higher allocation than required or to use of compulsory purchase powers can have adverse impacts. Future stages in preparation of Plan should include an Implementation Framework that sets out actions and a timetable for delivery of sites, especially for sites to be provided in Phase 1 and Phase 2.
Question 25: Indicators	The identification of monitoring indicators is welcomed. But, further consideration should be given to preparation of a broader Monitoring Framework so that the needs of Gypsies and Travellers continue to inform implementation of the Plan. The Framework should be set in the wider context of implementation of the Vision and Core Strategy for Epping Forest District.

## 1.6 Summary of Appraisal of Individual Sites

The key points arising from the appraisal of individual sites identified for each question are shown in Table NTS3.

**TABLE NTS3: SUMMARY OF APPRAISAL OF INDIVIDUAL SITES**

Question	Summary of Appraisal
Question 11: Potential for expansion of two existing sites	The Little Brook Road site performs reasonably well against the sustainability objectives.  The Greenleaver, Hoe Lane site at Nazeing performs poorly against 10 of the 18 sustainability objectives.
Question 12: Potential for expansion of other existing authorised sites	Sustainability appraisal of the sites not recommended for further expansion shows all of those sites listed to be lacking in accessibility, especially with regard to primary health care and educational facilities. These sites can be seen to perform more negatively against sustainability objectives than sites put forward within the document.
Question 13: Tolerated Sites	The four tolerated pitches which are proposed for allocation perform well against the majority of sustainability objectives appraised. The sites are all further than would be recommended from educational and health care facilities, but as single pitch sites their location has minimal impact on other environmental considerations.  Conversely the two tolerated sites which are not proposed for allocation perform consistently poorly against sustainability objectives.
Question 14: Potential extension of tolerated site – Bournebridge	More sustainable alternative sites are not available in this part of Epping Forest District and an expanded site at this location could enable additional Gypsy and

Question	Summary of Appraisal
Lane, Stapleford Abbots	Traveller needs arising in the area to be met locally.
Question 15: Unauthorised sites	The sustainability appraisal has shown that the unauthorised sites which are deemed unsuitable in the document perform consistently badly against the majority of sustainability objectives.
Question 16: Temporary permission at Holmsfield Nursery, Nazeing	The site does not perform well against key sustainability objectives.
Question 17: Rural brownfield sites at North Weald – Merlin Way	<p>The permanent site for 4 pitches performs reasonably well against sustainability objectives, subject to areas of concern being addressed.</p> <p>In addition, the allocation of the site for a transit / emergency stop over facility has good access to the strategic road network. However, a transit and/or emergency stop over facility of this size is likely to require a strong management structure to ensure its smooth operation.</p> <p>The cumulative impact of both sites being allocated should be considered; especially with regard to the quality of life of residents of the proposed permanent pitch who would be located next to a more transient population. Access to the transit site potentially through the permanent site may cause conflict within the site, and requires careful consideration prior to allocation.</p>
Question 18: Possible sites in the Epping and North Weald Bassett areas	Sites 18a, 18c and 18b perform most positively against sustainability objectives within the Epping and North Weald Bassett areas. However should sites 18a, 18b and 18c all be allocated on this basis the cumulative impacts of potentially 25 pitches being delivered in close proximity may negate elements which were shown as positives in the individual site appraisals. It would therefore be more appropriate to allocate sites which may not perform as well individually, but where the cumulative impact to achieve the number of pitches required would be less in a given area.
Question 19: Possible sites in the Waltham Abbey, Roydon and Nazeing areas	Sites 19a, 19b and 19d as perform most positively against sustainability objectives in the Waltham Abbey, Roydon and Nazeing areas. Conversely sites 19h, 19i and 19g perform least well. However the cumulative impacts of allocating sites should also be taken into account. Should sites 19a, 19d, 19e and 19f all be allocated the cumulative impacts of potentially 29 pitches being delivered in close proximity may negate elements which were shown as positives in the current appraisal. In this instance the adverse cumulative impacts on the sites proposed and the adverse secondary impacts on the settled community in Sewardstone would negate the positive scores the sites achieve individually. It would therefore be more appropriate to allocate sites which may not perform as well individually, but where the cumulative impact to achieve the number of pitches required would be less in a given area.
Question 20: Possible sites in the Roding Valley area	The appraisal identifies site 20e as performing the most negatively against sustainability objectives in the Roding Valley Area. However the cumulative impacts of allocating sites should also be taken into account. Should sites 20b and 20c both be allocated the cumulative impacts of potentially 21 pitches being delivered in close proximity may negate elements which were shown as positives in the current appraisal. In this instance the adverse cumulative impacts on the sites proposed and the adverse secondary impacts on this rural area between Theydon Garnon and Theydon Bois would negate the positive scores the sites achieve individually. It would therefore be more appropriate to allocate sites which may not perform as well individually, but where the cumulative impact to achieve the number of pitches required would be less in a given area.
Question 23: Travelling	On-site accommodation of identified household growth of existing residents should

Question	Summary of Appraisal
Showpeople	ensure adequate accommodation and equipment storage space and make a positive contribution to the quality of life of the group. It may also mean that additional sites may not be required elsewhere to meet the specific requirements of travelling showpeople.

Sites taken forward would have to be subject to further appraisal at future stages of the DPD. Urban extensions of Harlow and other urban extensions, if included, would need to be subject to appraisal once identified. Additionally once the preferred strategy and preferred site locations are known additional appraisal would have to be undertaken to identify any additionally arising secondary, cumulative and / or synergistic effects.

In addition to the above, consideration should be given to how the removal of existing pitches on unauthorised, tolerated and temporary sites is to be managed. The Consultation on Options Document identifies a need to remove 23 pitches and this appraisal suggests that those may not sufficiently assist sustainability objectives to justify retention. It is not clear from the Consultation on Options Document whether the proposed allocations to be made by the DPD include provision for relocation of pitches. This would need to be clarified during preparation of further stages of the DPD.

## **PART B – ENVIRONMENTAL REPORT**





# 1 INTRODUCTION

## 1.1 Background

The Government has directed Epping Forest District Council to produce a Development Plan Document (DPD) setting out a provision for Gypsies and Travellers as part of the production of their Local Development Framework (LDF) for Epping Forest District. The DPD, when approved, will be used to deliver sites allocated for Gypsies and Travellers and to assess the merits of other proposals that come forward through the statutory planning process.

In July 2009 EERA published Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England; A Revision to the Regional Spatial Strategy for the East of England. The review of policies covering the regional provision of Gypsies and Travellers and Travelling Showpeople was therefore ongoing during the production of this appraisal. It has not been taken into account in this appraisal; however it will be considered during later stages in the preparation and appraisal of the Development Plan Document.

Epping Forest District Council published a Consultation on Options document in November 2008. The options seek views on, firstly, the strategy to be adopted for additional pitch provision in Epping Forest District, and secondly, potential sites which may be acceptable or otherwise depending, in part, on which strategy is chosen.

## 1.2 Sustainability Appraisal / Strategic Environmental Assessment

The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

*‘...development that meets the needs of the present without compromising the ability of future generations to meet their own needs ‘*

The European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) was adopted in June 2001 with a view to increase the level of protection for the environment, integrate environmental considerations into the preparation and adoption of plans and programmes and to promote sustainable development.

The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 (the ‘SEA Regulation’), which came into force on 21 July 2004. It requires a Strategic Environmental Assessment to be carried out for all plans and programmes

*“...which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions”.*

The few exceptions are detailed in Article 3 (8, 9) of the SEA Directive. The aim of an SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic, material assets including architectural

and archaeological heritage, landscape and the interrelationship between these factors (Annex 1(f)).

Sustainability Appraisals examine the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. They are mandatory for all Development Plan Documents and Regional Spatial Strategies in accordance with S.19 (5) of the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008; and in accordance with the policy provisions of PPS12 with regard to Development Plan Documents.

Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met.

### **1.3 The aim and structure of this report**

A combined SA/SEA has been undertaken on the Gypsies and Travellers DPD Options Consultation to assess and predict the economic, social and environmental effects that are likely to arise from its implementation. This is in accordance with the Planning and Compulsory Purchase Act 2004, the SEA Directive 2001/42/EC and Government guidance. Table 1 outlines the relevant sections of this report that represent the required content of an Environmental Report as outlined within the SEA Directive.

This report sets out the SA/SEA that has been undertaken for the Consultation on Options document. The purpose of undertaking the SA/SEA at this stage of the process is to identify potential significant sustainability effects arising from the content of the Consultation on Options document. The outcome of this stage of the SA/SEA is designed to assist the plan preparation process and, with the responses to the consultation, will inform future stages of the Gypsies and Travellers DPD. The document will be subject to additional appraisal before adoption, to take account of proposals and amendments that may arise from the consultation and this appraisal.

The SA/SEA of the Consultation on Options document has been produced by the Spatial Planning Group of Essex County Council acting as consultants to Epping Forest District Council. The content of the report should not be interpreted or otherwise represented as the formal view of Essex County Council.

**TABLE 1: THE ENVIRONMENTAL REPORT REQUIREMENTS**

SEA Regulations – required content of Environmental Report	Where covered in this Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 1 and Annex A
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Annex B
The environmental characteristics of areas likely to be significantly affected;	Annex B and Sections 3 and 4
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Annex B and Sections 3 and 4
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programmes and the way those objectives and any environmental considerations have been taken into account during its preparation;	Annex A
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Sections 3, 4 and 5
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Sections 3, 4 and 5
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 2
A description of measures envisaged concerning monitoring in accordance with Article 10;	Sections 5 and 6
A non-technical summary of the information provided under the above headings.	See Non-Technical Summary as Part A of this report
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2).	The whole report does this.

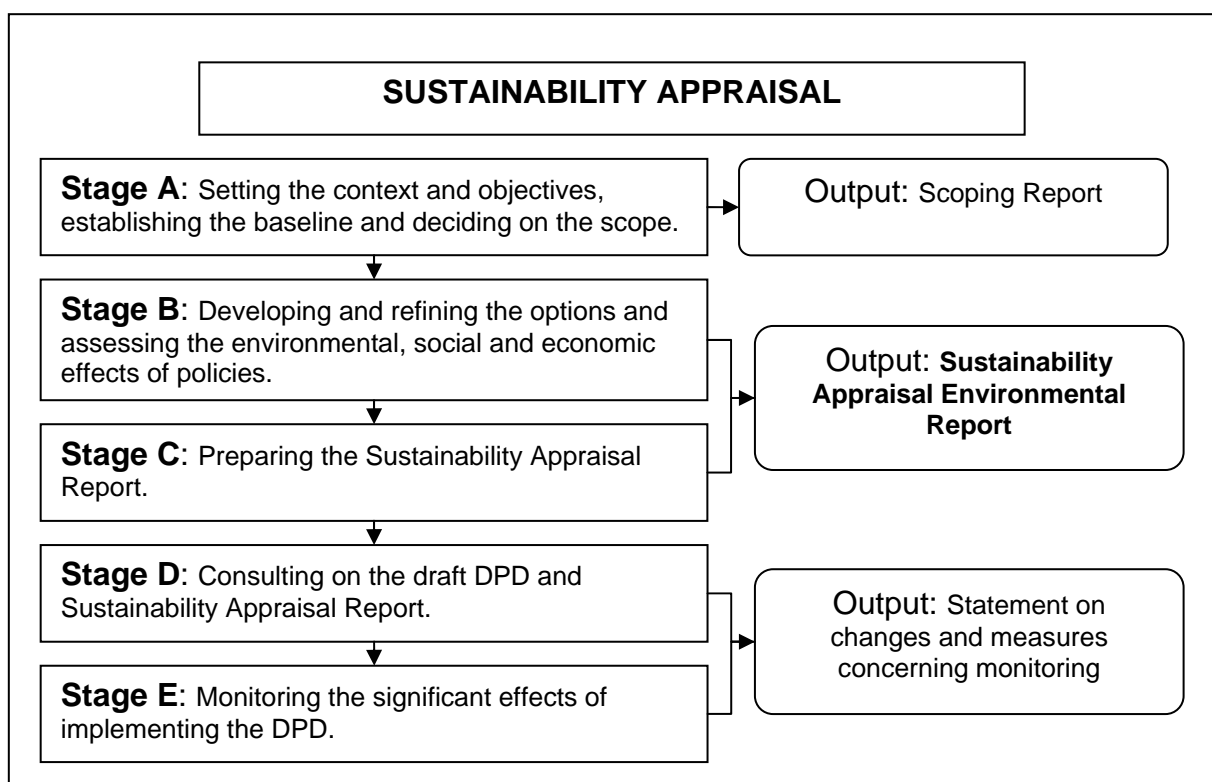
## 2 METHODOLOGY

This Environmental Report of the Sustainability Appraisal, incorporating Strategic Environmental Assessment, has been prepared in accordance with guidance set out in:

- A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, 2005; and,
- Sustainability Appraisal (SA) of Regional Spatial Strategies and Local Development Frameworks, ODPM, 2005

The appraisal of the Consultation on Options Document has been conducted in accordance with the guidance as part of a five stage process as outlined in Figure 1.

**FIGURE 1: STAGES OF SUSTAINABILITY APPRAISAL**



This document reports on Stages A, B and C of the SA/SEA process, which are outlined in detail below.

### 2.1 Preparation of a Scoping Report (Stage A)

Stage A culminated in the preparation of a Scoping Report which identified relevant plans, programmes and environmental protection objectives; baseline information; and sustainability objectives; to be used during the SA/SEA. The relevant aspects of the current state of the environment are outlined in Epping Forest District Council's Strategic Environmental Baseline Information Profile 2008-2009.

The review of relevant plans and programmes and baseline information highlighted key sustainability issues within the District. The identification of sustainability issues, particularly those which are significant, provides the opportunity to define sustainability

objectives which directly relate to the policy document and District within. Eighteen sustainability objectives were identified to appraise the Consultation on Options Document. The sustainability objectives are listed in Table 2, with an indication of their contribution to social, economic and environmental factors.

**TABLE 2: THE SUSTAINABILITY OBJECTIVES**

Sustainability Objective	Economic	Social	Environmental
1) Create safe environments which do not undermine the quality of life or community cohesion.		✓	✓
2) To ensure the successful integration of existing and proposed residents and communities.		✓	
3) To provide everyone with the opportunity to live in a decent home.	✓	✓	✓
4) To maximise the use and availability of open space for recreation.		✓	✓
5) Promote accessibility.	✓	✓	✓
6) To maximise the education and skills of the population and ensure inclusive access to educational facilities.	✓	✓	
7) To promote sustainable and inclusive access to health services.		✓	
8) To minimise the potential noise and health risks, especially those associated with sites near motorways and other major highways or railways.		✓	✓
9) To achieve sustainable levels of prosperity and economic growth and help people gain access to work appropriate to their period of tenancy, skills, potential and place.	✓	✓	
10) To conserve and enhance biodiversity and geodiversity.			✓
11) To maintain and enhance cultural heritage and assets, and important landscapes within Epping Forest.			✓
12) To maintain and enhance the quality of landscapes and townscapes.	✓	✓	✓
13) To avoid unnecessary development of the countryside.			✓
14) To minimise the risk of flooding.			✓
15) To promote the use of sustainable drainage systems.			✓
16) To promote water conservation.		✓	✓

Sustainability Objective	Economic	Social	Environmental
17) To improve air quality.	✓	✓	✓
18) To minimise the cumulative effects of climate change.		✓	✓

The Scoping Report was subject to a 5-week consultation with the three statutory consultees:

- the Environment Agency,
- Natural England, and
- English Heritage.

Responses received from the consultees are outlined in Table 3 and have been incorporated into the Appraisal.

**TABLE 3: SUMMARY OF CONSULTEE COMMENTS**

Consultee Name: Environment Agency	
Comment Received	Response
None received	
Consultee Name: Natural England	
Comment Received	Response
In the “International” table in Plan and Programmes “Working with the Grain of Nature” should be moved to the “National “ section	Agreed, document has been moved.
“Woodland for life – The Regional Woodland Strategy for the East of England” should be deleted from the National Table as it is already included in the Regional table.	Agreed, document reference has been deleted.
“Natural England Strategic Direction 2006 -09” has been superseded by a refreshed “Strategic Direction 2008 – 2013”.	This update has been included.
The “Essex and Southend Waste Local Plan” should be included within County Table.	This update has been included.
If Essex has commissioned a County Level Landscape Assessment this should be included.	This update has been included.
“The Lee Valley Biodiversity Action Plan” should be included in the Local Table.	This update has been included.
“The Epping Forest District Local Biodiversity Plan 2008 - 2012” should be included in the Local Table.	This update has been included.

Air Quality indicators should be expanded to include other statistics and re-arranged into one chapter.	This has been considered but the availability of the requested data is unreliable, the data is purposefully split into the Air Quality and the Transport chapters and after due consideration this has not been changed. NE has been advised of this.
Main rivers are currently listed twice, within water quality and flooding indicators.	It is thought necessary to include these indicators in both chapters.
Benefit claimants are included in 2 chapters also	It is thought necessary to include these indicators in both chapters.
<b>Consultee Name: English Heritage</b>	
Comment Received	Response
None received	

## 2.2 Appraisal of the Document (Stage B)

An appraisal of the Document was undertaken which assessed the contents of the Consultation on Options document against each of the sustainability objectives with reference to identified policy guidance, objectives and other available information produced by technical consultees. The Appraisal identifies the impact of the contents of the document on sustainability objectives; whether the impacts vary over time; and potential cumulative and significant effects.

The Consultation on Options document does not set out specific policies. Therefore, the sustainability performance of each of the questions on policy options and the suggested approach to each individual existing and potential site was assessed. The potential sustainability impact of each of these matters was individually appraised against each of the eighteen sustainability objectives.

## 2.3 Preparation of the Report (Stage C)

The final stage involved the preparation of this report, the Environmental Report, which highlights the key matters arising from the Appraisal.

There are three key components that inform the appraisal process,

- Review of Plans & Programmes - The review of plans and programmes has considered a full range of planning policy and guidance documents, together with a broad range of documents that address sustainability objectives and issues of environmental protection (see Annex A). The plans and programmes inform:
  - formulation of the sustainability objectives;
  - the higher level context for preparation of the DPD;
  - identification of cumulative effects between the DPD and other policies.
- Baseline Information - The baseline information for the SA/SEA of the 'Gypsy and Traveller' DPD has been collated from a wide range of sources (see Annex B). The information provides the basis for assessing the potential impact of the options and will aid development of suitable alternatives and/or appropriate mitigation measures, together with future monitoring data. It aims to highlight the current relevant data for Epping Forest District Council area; regional and national level data to compare

local performance; established trends; identified targets; and existing environmental and sustainability concerns and problems.

- SEA Objectives and Sustainability Framework - The sustainability objectives were derived from the review of plans and programmes and a strategic analysis of the baseline information. Objectives are based on policy advice and guidance and related to the assessment of the current state of the District. The appraisal is then able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the plan's proposed policies. It also means that indicators established for use in the appraisal process can be carried forward into subsequent monitoring of the implementation and delivery of policies and proposals. Recognising which indicators can be used to assess the impact of policies being appraised is important and points towards the specific monitoring which will need to be carried out. Collection of this information over a period of time will result in data trends being established, which will show if the policies appraised, have a positive or negative impact on the social, economic or environmental factors they influence.

The Appraisal informs:

- The extent to which the document and each selected statement may contribute to achieving the sustainability objectives;
- Any change in the degree of impact over time;
- Measures that could improve contribution of the document to sustainability;
- Any linkage with, or impact on, other statements or matters that could have broader implications and may be defined within one of 3 types of effect,
  - Secondary effect – not a direct result of the statement, but occur away from the original effect or as a result of a complex pathway,
  - Cumulative effect – whereby several statements each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect,
  - Synergistic effect – effects that interact to produce a total effect greater than the sum of the individual effects;
- Any other factors to consider during future work on the Gypsies and Travellers DPD.

Table 4 shows the Sustainability Framework which shows the relationship between,

- each of the SA/SEA objectives;
- where each of the objectives has been sourced from;
- which topics refer to each objective;
- what key questions have to be asked of each policy objective to assess its relationship with each of the objectives; and,
- what data sources can be monitored to see if policies accord with the objectives?



**TABLE 4: SUSTAINABILITY FRAMEWORK**

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
1) Create Safe environments which do not undermine the quality of life or community cohesion.	CLG (2005) Planning Policy Statement (PPS) 1 – Delivering Sustainable Development	SEA Directive: Cultural Heritage Population & Human health Other relevant issues: Townscape Social	Are inequalities related to age, gender, disability, race, faith, location and income being redressed?	Crime rates. Perception or fear of crime.
2) To ensure the successful integration of existing and proposed residents and communities.	CLG (2006) New Commission on Integration and Cohesion	SEA Directive: Population & Human health Other relevant issues: Economy Housing Social	Are inequalities related to age, gender, disability, race, faith, location and income being redressed?  Are local people being encouraged in the involvement of community activities?  Can family groups be located together or in close proximity?  Will social and community support networks be implemented?  Is there scope for expansion space to support extended families?	Number of displacements to unauthorised sites Community support networks Traffic flows via public transport Changes in noise levels

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
3) To provide everybody with the opportunity to live in a decent home.	CLG (2006) Planning Policy Guidance (PPS) 3 – Housing	SEA Directive: Cultural Heritage Population & Human health Other relevant issues: Townscape Social Economy Housing Transport	Are dwellings easily accessed by transport links, jobs, services, commercial areas and leisure facilities? Has a GTAA been carried out? Is the size of the site adequate for its means? Can family groups be located together or in close proximity? Have Council sites considered adequate expansion space for extended families? Have all kinds of sites been considered? i.e. public, private, long-stay and transit. Is there sufficient scope for small self-owned long-stay sites?	House Prices Perception of quality of built environment/access to open space and leisure facilities Access to sustainable transport links. Disabled Access to sites Sites, including transit sites, in locations that meet the current working patterns of gypsies, travellers and travelling showpeople. Amount of public, private, long-stay and transit sites
4) To maximise the use and availability of open space for recreation.	CLG (2002) PPG 17 – Planning for open space, sport and recreation.	SEA Directive: Biodiversity, fauna and flora Landscape Population and Human health Other relevant issues: Social	Does it seek to enhance the range and quality of the public realm and open spaces? Will it reduce the amount of derelict, degraded and underused land? Are new proposals in close proximity to existing open space? Will new proposals impact on amenity and condition at Lee Valley Regional Park? Will new proposals have sustainable access to open space?	Number of parks allocated green flag status. Landscape features – hedges, walls, ponds, buildings Residents opinion on availability of open space/leisure facilities Perception of quality of built environment/access to open space and leisure facilities.

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
5) Promote accessibility.	CLG (1999) PPG13 - Transport	SEA Directive: Population and Human health Air Quality Climatic Factors Cultural Heritage Other relevant issues: Transport Economy Housing	Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all?  Will it reduce the need to travel?  Does it seek to ensure that developments encouraging a larger volume of people or transport movements are located in sustainable accessible locations?	Residents opinion on availability of open space/leisure facilities Access to services by public transport Recorded traffic flows KSI casualties for adults and children Car ownership
6) To maximise the education and skills of the population and ensure inclusive access to educational facilities.	CLG (2005) Planning Policy Statement (PPS) 1 – Delivering Sustainable Development	SEA Directive: Population and Human health Other relevant issues: Economy Transport	Will the policies and options proposed seek to enhance the qualifications and skills of the local community?  Will the employment opportunities available be mixed to suit a varied employment skills base?  Will employment opportunities be accessible by a wide range of transport types?	Employment status of residents Educational achievements Average Gross earnings Standard Occupational Classification Industrial and employment vacancies

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
7) To promote sustainable and inclusive access to health services.	CLG (2005) Planning Policy Statement (PPS) 1 – Delivering Sustainable Development	SEA Directive: Biodiversity, fauna and flora Air Soil/Minerals & Waste Population & Human health Other relevant issues: Transport Water Quality Social	Will it reduce health inequalities? Will it improve access to high quality health facilities? Will it encourage healthy lifestyles? Will it increase access to recreation facilities and open space? Will it improve air quality? Will it improve the management of waste arising from development? Will pollutants (air, water, noise vibration and light) be minimised? Will measures to increase the safety of roadside sites be implemented?	Time to reach nearest GP Number of evictions Condition of roadside sites Number of roadside sites with access to clean water Access to services
8) To minimise the potential noise and health risks associated with sites near motorways and other major highways or railways	CLG (2005) Planning Policy Statement (PPS) 1 – Delivering Sustainable Development	SEA Directive: Biodiversity, fauna and flora Air Soil/Minerals & Waste Population & Human health Other relevant issues: Transport Water Quality Social	Will it reduce health inequalities? Will it encourage healthy lifestyles? Will it increase access to recreation facilities and open space? Will it improve air quality? Will it improve the management of waste arising from development?	Residents opinion on availability of open space/leisure facilities Perception of quality of built environment/access to open space and leisure facilities Carbon footprint of new development Air Quality Management Areas (number and performance) and P10 emissions Number of days of air pollution Travel to work methods and flows KSI casualties for adults and children

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
<p>9) To achieve sustainable levels of prosperity and economic growth and help people gain access to work appropriate to their period of tenancy, skills, potential and place of residence.</p>	<p>CLG (2005) PPS 1 – Delivering Sustainable Development</p>	<p>SEA Directive: Population and Human health Other relevant issues: Economy Transport</p>	<p>Will it improve business development and attract investment? Does it secure more opportunities for residents, of all abilities, and in all employment sectors, to work in the district? Does it promote a wide variety of multi purpose and multi use spaces? Can family groups be located together or in close proximity?</p>	<p>Percentage change and comparison in the total number of VAT registered businesses in the area. Travel to work flows Employment status by residents and job type Job densities Economic activity of residents Average Gross weekly pay Amount of vacant industrial floorspace Travel to work flows</p>
<p>10) To conserve and enhance biodiversity and geodiversity.</p>	<p>CLG (2005) PPS 9 – Biological and Geological Conservation</p>	<p>SEA Directive: Biodiversity, fauna and flora Landscape Climatic Factors Cultural Heritage Soils, Minerals and Waste Material Assets (Flooding) Other relevant issues: Water</p>	<p>Will it conserve and enhance natural/semi natural habitats? Will it conserve and enhance species diversity, and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will an interesting diverse community be established to add value to an areas character? Will it maintain and enhance sites designated for their nature conservation interest? Will new or expanded sites encroach into or be in close proximity to SSSIs, SPAs, SACs, CWSS, areas of conservation or the Lee Valley Regional Park?</p>	<p>Populations of wild birds. Number and condition of designated sites within the District Trends in plant and animal species. Achievement of Biodiversity Action Plan targets. Condition of MGB in proximity to sites Condition of SSSIs in proximity to sites Condition of SPAs in proximity to sites Condition of SACs in proximity to sites Condition of areas of conservation in proximity to sites Condition of CWSSs in proximity to sites Condition of Lee Valley Regional Park in proximity to sites.</p>

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
<p>11) To maintain and enhance cultural heritage and assets, and important landscapes within Epping Forest.</p>	<p>CLG (1994) PPG 15 – Planning and Historic Environment</p>	<p>SEA Directive: Landscape Cultural Heritage Other relevant issues: Townscape</p>	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas?</p> <p>Will new development seek to preserve and enhance the existing cultural heritage?</p> <p>Will areas of landscape and historic character be protected from development, and will new development enhance landscape character?</p> <p>Does it seek to enhance the range and quality of the public realm and open spaces?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p>	<p>Loss or damage to listed buildings and their settings.</p> <p>Loss or damage to scheduled ancient monuments or parks and gardens and their settings.</p> <p>Percentage of conservation area demolished or otherwise lost.</p> <p>Loss or damage to the historic environment.</p> <p>Number of parks allocated green flag status.</p> <p>Percentage of highways that are either of a high or acceptable level of cleanliness.</p> <p>Amount of vacant land.</p> <p>Amount of derelict properties.</p> <p>Landscape features – hedges, walls, ponds, buildings</p>

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
12) To maintain and enhance the quality of landscapes and townscapes	CLG (2005) Sustainable Communities Plan	SEA Directive: Biodiversity, fauna and flora Landscape Cultural Heritage Other relevant issues: Social Townscape	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas?</p> <p>Will new development seek to preserve and enhance the existing cultural heritage?</p> <p>Will areas of landscape and historic character be protected from development, and will new development enhance landscape character?</p> <p>Does it seek to enhance the range and quality of the public realm and open spaces?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p> <p>Will it maintain and enhance sites designated for their nature conservation interest?</p> <p>Will homes be designed to enhance the existing street scene creating a better cultural heritage &amp; public realm?</p> <p>Will it ensure the delivery of high quality and inclusive design?</p>	<p>Loss or damage to listed buildings and their settings.</p> <p>Loss or damage to scheduled ancient monuments or parks and gardens and their settings.</p> <p>Percentage of conservation area demolished or otherwise lost.</p> <p>Loss or damage to the historic environment.</p> <p>Number of parks allocated green flag status.</p> <p>Percentage of highways that are either of a high or acceptable level of cleanliness.</p> <p>Amount of derelict properties.</p> <p>Landscape features – hedges, walls, ponds, buildings</p> <p>Residents opinion on availability of open space/leisure facilities</p> <p>Perception of quality of built environment/access to open space and leisure facilities</p>
13) To avoid unnecessary development of the countryside.	CLG (1995) PPG 2 – Green Belts	SEA Directive: Biodiversity, fauna and flora Landscape Climatic Factors Cultural Heritage Material Assets (Flooding)	<p>Will it conserve and enhance natural/semi natural habitats?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p>	<p>Water quality</p> <p>Areas of flood risk</p> <p>Residents opinion on availability of open space</p> <p>Number of parks allocated green flag status.</p> <p>Landscape features – hedges, walls, ponds, buildings</p>

Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
14) To minimise the risk of flooding	CLG (2006) PPG25 – Development and Flood Risk	SEA Directive: Material (Flooding) Assets	<p>Will the development be in areas designated as at risk of flooding, or on water catchment areas?</p> <p>How will flood risk be managed and mitigated against and what impact will this have on the environment?</p> <p>How will flood risk areas change with the impact of climate change?</p> <p>Are more sustainable alternatives to conventional drainage systems to be used to reduce downstream flooding?</p> <p>Are sites situated suitably away from areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans?</p>	<p>Location of main rivers in District.</p> <p>Spatial extent of flood zones 2 and 3</p> <p>Residential properties flooded from main rivers</p> <p>Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency</p>
15) To promote the use of sustainable drainage systems	CLG (2006) PPS 25 – Development and Flood Risk	SEA Directive: Material (Flooding) Assets Soils, Minerals & Waste Biodiversity, fauna and flora Other relevant issues: Water Quality Flooding	<p>Will water quality suffer as a result of existing or proposed drainage systems?</p> <p>Will new proposals increase the amount of surface water runoff?</p> <p>Are the implications on sewer and foul water included?</p>	<p>River systems classification and those failing ecosystem targets</p> <p>District Chemistry General Quality Assessment Results.</p> <p>Biological General Quality Assessment Results</p>



Sustainability Objective	Source	Topics	Key Questions	Detailed Indicator
16) To promote water conservation.	Water Framework Directive (England and Wales) Regulations 2000/60/EC.	SEA Directive: Climatic Factors Population and Human health Other relevant issues: Water Flooding	Will it have no detrimental effect on the quality of inland water? Will water consumption be limited to levels supportable by natural process and storage systems? Are the implications on sewer and foul water included?	River systems classification and those failing ecosystem targets District Chemistry General Quality Assessment Results. Biological General Quality Assessment Results Spatial extent of floodzones
17) To improve air quality.	EU Air Quality Framework Directive (1996/62/EC)	SEA Directive: Air Quality Population and Human health Climatic Factors	Will it have an impact on air quality?	Number of AQMA's in the District PM10 emissions Number of days of air pollution
18) To minimise contributions to climate change.	CLG (2004) PPS 22 – Renewable Energy	SEA Directive: Air Quality Climatic Factors Soils, Minerals & Waste Material Assets (Flooding) Other relevant issues: Water Quality	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will the materials used in construction originate from sustainable sources? Will lead to an increased proportion of energy needs being met from renewable sources? Will developments be accessible by various transport types? Will the minimisation of waste production be promoted? Will the recycling of waste products be sought? Will planning contributions be sought/used to mitigate climate change?	Carbon Dioxide emissions Energy consumption GWh/households Spatial extent of flood zones. Air Quality Management Areas and PM10 emissions % of energy supplied from renewable sources. Amount of waste recycled/landfilled.

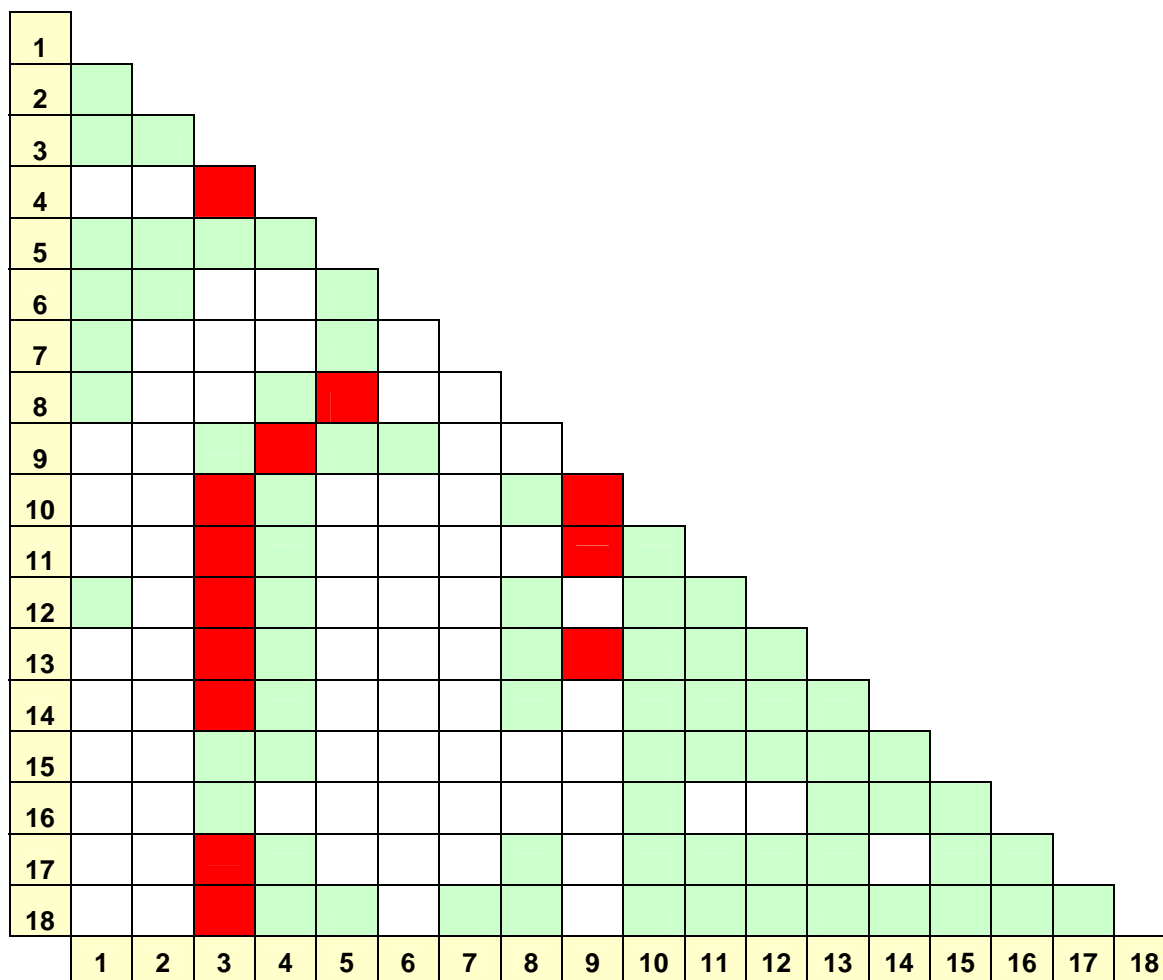
The Sustainability Objectives set out in Table 2 and Table 4 cover a wide range of social, economic and environmental issues. To test the potential compatibility of the sustainability objectives a compatibility assessment was undertaken to highlight any areas where potential conflict and tensions may occur. This is in accordance with advice in 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (ODPM, 2005).

Figure 2 sets out the compatibility matrix for the sustainability objectives. The 18 sustainability objectives are numbered in sequence along each axis. The table below assesses the compatibility of these objectives and highlights any tensions that are shown between them. The following key has been used:

**TABLE 5: SUSTAINABILITY OBJECTIVES MATRIX KEY**

	Where the objectives are compatible
	Where it is uncertain the objectives are related
	Where the objectives are not related
	Where the objectives are potentially incompatible

**FIGURE 2: COMPATIBILITY MATRIX OF SUSTAINABILITY OBJECTIVES**



It is to be expected that some objectives are not compatible with other objectives and thereby indicating that tensions could occur. One common thread is that objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa.

As can be seen there are areas where the objectives are potentially incompatible, although these could be classified differently, depending upon different factors within the DPD. The crucial differences are:

- Objective 3 and Objective 10 are potentially incompatible, with the need to preserve and enhance the biological and geological diversity of the District potentially conflicting with a need to locate gypsies, travellers and travelling showpeople in the most appropriate locations with regard to proximity to key services and amenities.
- This problem is similarly relevant to Objectives 4, 11, 12, 13, 14, 17, and 18.
- Objective 5 is also potentially incompatible with Objective 8, where better accessibility may increase the potential noise and health risks associated with motorways and other major highways.

What is crucial here, and integral to the plan making process, is the ability to identify mitigating measures necessary to offset any negative effects caused by managing the different spatial needs of Epping Forest through the Local Development Framework process.

## 3 APPRAISAL OF POLICY OPTIONS

### 3.1 Introduction

This chapter of the Report sets out the appraisal of the Policy Options contained in the Consultation on Options Document. The Policy Options have been identified as Questions 1 to 10, together with Questions 21, 22, 24 and 25 of the Document. Questions 11 to 20, with Question 23, address site specific issues and options and are discussed in the following section of this Report.

Each question is appraised individually. The appraisal is set out as follows:

Each question is included as it appears in the Consultation on Options Document, in a box.

In accordance with the time scale of the DPD and its plan period, the appraisals recognise that the impacts of policy options may vary over time. Three time periods have been used to reflect this in the appraisals. These three time periods are:

- Short term - present to 2011
- Medium term - 2011 to 2016
- Long term - 2016 and beyond

The impacts of the policy options are indicated through colour coding within a 6-fold categorisation. These individually colour-coded assessments of temporal effects are outlined below the box containing the policy option / question. The six categories are highlighted in Table 6 below:

**TABLE 6: TEMPORAL EFFECT MATRIX**

Colour	Impact
++	Major Positive
+	Positive
0	No Impact
/	Uncertain
-	Negative
--	Major Negative

The temporal effects are then followed by the commentary of the appraisal. A summary of key points arising from the appraisal of each Policy Options Question is set out at the end of this chapter.

## 3.2 Question 1: Draft Objectives

### Question 1

Do you agree with the draft objectives?

The draft objectives are,

1. To meet regional requirements for pitch provision for Gypsies and Travellers and to reduce unauthorised encampments;
2. To improve the living conditions of Gypsies and Travellers;
3. To improve the health and educational opportunities of Gypsies and Travellers;
4. To minimise the impact of sites on the countryside and on settled communities;
5. To make provision in areas that will minimise the need to travel; and
6. To protect nationally and internationally designated environmentally sensitive areas

Question 1	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	+	+	0	++	++	++	+	++	+	/	/	/	/	0	/	+	+
Medium Term	+	+	+	0	++	++	++	+	++	+	/	/	/	/	0	/	+	+
Long Term	+	+	+	0	++	++	++	+	++	+	/	/	/	/	0	/	+	+

The draft objectives address key matters facing the Gypsy and Traveller community and Epping Forest District. Pursuing the objectives as outlined could assist the positive achievement of related sustainability objectives. An approach which identifies requirements for pitch provision and seeks to secure their implementation could benefit both the Gypsy and Traveller community and the settled community. Provision of sites that sought to improve living conditions and opportunities at accessible locations could contribute positively to the well-being of the Gypsy and Traveller community. Identification of the sites in the DPD could give certainty to all sections of the community on the future availability of sites at locations which could minimise impacts.

The Development Plan Document is being produced in advance of the Core Strategy for Epping Forest District. The Core Strategy would be expected to set out a full range of social, economic and environmental objectives for Epping Forest District, which would also inform specific objectives for the Gypsy and Traveller Development Plan. Consideration should be given to ensure that draft objectives 5 and 6 are sufficiently expressed in this current Development Plan to be consistent with the probable objectives for those matters to be used in the forthcoming Core Strategy. It is acknowledged however that Epping Forest District needs to establish objectives for this DPD in advance of the Core Strategy as a result of the Government Direction.

### 3.3 Question 2: Focus of Search for Sites

Question 2:

Do you agree that the search for sites should be broadly confined to the west and south of the district closest to the main urban areas, rather than the more rural northeast of the district?

Question 2	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	++	++	++	/	+	++	++	/	+	+	/	/	/	/	0	/	/	/
Medium Term	++	++	++	/	+	++	++	/	+	+	/	/	/	/	0	/	/	/
Long Term	++	++	++	/	+	++	++	/	+	+	/	/	/	/	0	/	/	/

The results of the Area Suitability Study show that accessibility to services (health, education, shops and passenger transport) is very limited in the north east of Epping Forest District and within Ongar. Whilst there are locally available services, public transport availability and local employment opportunities in this area are poor. Locations closer to the main settlements in the south and the west of Epping Forest District offer the greatest prospect of promoting accessibility to services by the Gypsy and Traveller community. Due to changes in the economy, specifically a decline in agricultural and related employment, locations closer to settlements also increase economic opportunity for the community. The increased pressure for Gypsy and Traveller pitches in areas accessible to settlements and their services is further evidence of these preferences.

A focus on provision of sites in the south and west of Epping Forest District could generally support sustainability objectives by accommodating demand whilst promoting accessibility to services, increasing employment opportunities and reducing the need for travel. Nevertheless, the merits of each individual site would need to be appraised to ensure that it could contribute to the supply of sites in a sustainable manner.

### 3.4 Question 3: Phasing of Sites

Question 3:

Do you agree with the proposed phasing of pitch provision?

Question 3	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	+	-	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/
Medium Term	++	++	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/
Long Term	++	++	+	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/

The phasing of pitch provision enables designated sites to come forward as a continual process in order to meet demand for pitches as need arises. This provides greater certainty on use and availability of sites at appropriate locations. As such, it supports sustainability objectives of providing a decent home for all. Staggered delivery of pitches within the site allocations, to accommodate local household growth during future phases would enable more continuous and permanent occupation of sites by Gypsies and Travellers familiar with the local area.

Monitoring to ensure that the take up of pitches and sites is reflecting the provisions in the East of England Plan should be undertaken.

### 3.5 Question 4: Scale of Sites

Question 4:

Which option do you prefer for the typical scale of Gypsy and Traveller sites?

Option 1 – sites of 1 – 5 pitches, with potential for expansion to 2 – 7 pitches (requiring at least 15 additional sites).

Question 4 Option 1	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	+	+	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Medium Term	+	+	+	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Long Term	+	+	+	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/

Sites capable of accommodating 1 to 7 pitches could benefit those Gypsies and Travellers wishing to live in small family or community groups and could also generally have low impact on the environment and existing communities. However, focussing on sites of such size increases the number needed to accommodate the pitch requirement. A large number of smaller sites could reduce the benefits associated with the provision of such sites by distributing environmental impacts over a wider area. In addition to this there is the potential that a large number of smaller sites could result in reduced accessibility of their residents to services and facilities. Further, provision of safe access and utilities and other services to sites could be compromised depending on their size and location. Any permanent sites of this size would require further detailed assessment of the specific location.

Option 2 – sites of 5-10 pitches, with potential for expansion to 15 pitches (requiring at least 5 additional sites)

Question 4 Option 2	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	++	++	++	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Medium Term	++	++	++	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Long Term	++	++	++	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/

Sites capable of accommodating 5 to 15 pitches in suitable locations are likely to have the greatest potential to contribute to sustainability objectives. The contribution to the sustainability objectives could be further assisted, if deemed appropriate, through an initial provision of pitches on sites with allowance for limited future expansion to a total provision within the range 5 -15 pitches. Fewer sites of this size would be required to meet the pitch provision and this should enhance the prospects of finding a sufficient number of suitable sites. With fewer sites there is increased opportunity to ensure that site selection assists in the achievement of sustainability objectives, particularly in regard to accessibility to services and facilities and environmental impacts. Sites of this size should also be capable of securing safe access and provision of utilities and services to enable a quality



residential environment. Any permanent sites of this size would require further detailed assessment of the specific location.

Option 3 – sites of 16-30 pitches, with potential for expansion to 21-45 pitches (requiring 2-3 additional sites)

Question 4 Option 3	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	-	-	-	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Medium Term	-	-	-	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Long Term	-	-	-	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/

Sites capable of accommodating 16 to 45 pitches would have greater potential impacts on environmental factors than sites of smaller size. Sites within this range of pitches would require very careful on-going management during implementation and future occupation to mitigate adverse impacts that may arise within the Gypsy and Traveller community and with the settled community. Since fewer sites of this size would be required to accommodate the pitch provision the accessibility needs of Gypsies and Travellers could be better promoted if suitable locations were available at the major settlements in Epping Forest District. Their size could also facilitate provision of utilities and services to the site and secure safe access. Any permanent sites of this size would require further detailed assessment of the specific location.

#### Question 4 – Conclusion of Appraisal

Sites capable of accommodating 16 to 45 pitches would have greater adverse impacts than several sites of smaller size. Designing Gypsy and Traveller Sites: Good Practice Guide (CLG, May 2008) states that sites should ideally consist of up to 15 pitches. However smaller sites of 3-4 pitches can also be successful when their use is for one extended family. This size of site is generally consistent with that set out in Option 2, which is likely to have the most positive impact on sustainability objectives, particularly environmental and accessibility to services and facilities. However, where suitable sites of 1 to 7 pitches are available they can provide a beneficial source of sites that are sustainable in environmental and accessibility terms. The smaller sites could also provide for those Gypsies and Travellers who prefer to live individually or as a single extended family. An approach which seeks to provide a mix of site sizes in the range of 1 to 15 pitches should assist achievement of sustainability objectives and allow for a choice of designated sites by Gypsies and Travellers. However, this range of site sizes may require assistance with measures to secure safe access and on-site utilities and services. In addition the cost-effectiveness of site provision could have an impact on the sustainability of site size.

### 3.6 Question 5: Concentration in Roydon and Nazeing Area

Question 5:

Concentration in Roydon and Nazeing Area

Which option do you prefer?

Option 1

No special restriction, sites in this area considered on their merits

Option 2

Restriction on new sites in the Roydon Hamlet/Hamlet Hill, Sedge Green and Bumbles Green/Long Green areas, but authorisation of tolerated sites and expansion of existing suitable sites.

Option 3

No further permissions granted in the whole of the Roydon and Nazeing areas.

Question 5 Option 1	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	/	++	++	++	++	++	++	++	++	++	++	++	++	0	++	++	++
Medium Term	+	/	++	++	++	++	++	++	++	++	++	++	++	++	0	++	++	++
Long Term	+	/	++	++	++	++	++	++	++	++	++	++	++	++	0	++	++	++

Question 5 Option 2	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	/	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+
Medium Term	+	/	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+
Long Term	+	/	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+

Question 5 Option 3	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	-	-	-	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Medium Term	-	-	-	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/
Long Term	-	-	-	/	/	/	/	/	/	/	/	/	/	/	0	/	/	/

The Roydon and Nazeing area has attracted a concentration (currently about 80%) of the total number of Gypsies and Travellers residing in Epping Forest District. This is thought to be due to a combination of the availability of sites for pitches together with accessibility to local services and facilities, to main urban areas and to sources of employment.

Social considerations, in terms of suitability of sites for Gypsies and Travellers and their quality of life, together with the quality of life of existing settled communities and the potential interaction between the two communities should form part of the assessment of sites. Considering sites on their individual merits should lead to the most suitable and sustainable sites being brought forward. Placing restrictions on such consideration, whether generally over the whole area or to specific parts, could result in provision of less suitable and sustainable sites elsewhere. This could have adverse impacts on sustainability objectives if sites provided elsewhere do not meet the needs of Gypsies and Travellers, and pressure continues for sites in the Roydon and Nazeing area. These impacts have the potential to increase if suitable sites were not available within Epping Forest District to accommodate the removal of currently unauthorised pitches or locally arising household growth.

### 3.7 Question 6: The Main Possible Strategies

Question 6:

The Main Possible Strategies

Which option do you prefer?

Option 1

Edge of Urban Areas/Urban Extensions Option

Question 6 Option 1	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	++	++	++	/	++	++	++	++	++	/	/	/	++	/	0	+	+	++
Medium Term	++	++	++	/	++	++	++	++	++	/	/	/	++	/	0	+	+	++
Long Term	++	++	++	/	++	++	++	++	++	/	/	/	++	/	0	+	+	++

Sites located at the edge of urban areas or as part of urban extensions could positively assist the quality of life for Gypsies and Travellers whilst potentially aiding fair, tolerant and cohesive communities. Such locations could provide good accessibility to education and health facilities, shops, employment opportunities, and modal choice in transportation methods for the Gypsy and Traveller community.

Limited contact between Gypsies and Travellers and the settled community can feed distrust and misconceptions. However it is understood that local stated preferences of both the settled and Gypsy and Traveller communities is for a degree of physical and social separation. Edge of settlement locations have the potential to offer a degree of separation, whilst providing accessibility and minimising environmental impacts.

When provided as part of a broader urban extension such locations could also contribute positively to environmental objectives through the availability of utilities and inclusive design considerations. However, the need to ‘frontload’ provision for Gypsies and Travellers means that potentially sites are likely to be required before new urban extensions would be delivered.

Option 2:

Rural Areas close to Chigwell, Abridge, Waltham Abbey, Epping and Epping Green, Thornwood Common, Theydon Bois and North Weald Bassett

Question 6 Option 2	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term.	++	++	++	/	++	++	++	++	++	/	/	/	++	/	0	+	+	++
Medium Term	++	++	++	/	++	++	++	++	++	/	/	/	++	/	0	+	+	++
Long Term	++	++	++	/	++	++	++	++	++	/	/	/	++	/	0	+	+	++

Locating Gypsy and Traveller sites close to the named existing settlements could positively contribute to sustainability objectives. Supporting text states that sites would be

allocated broadly with regard to the results of the Area Suitability Study in areas with the best access to services and which would cause the least environmental harm. The Area Suitability Study confirms that the named settlements offer the best opportunities for meeting these needs. Whilst it is recognised that the settlements listed above do not necessarily offer the best pool of services, it is believed that by focussing provision on the findings of the Area Suitability Study, sites would be created in areas of Epping Forest District with suitable provision of services. Creating Gypsy and Traveller sites close to existing settlements but with a degree of physical and social separation, could potentially assist in facilitating fair, tolerant and cohesive communities.

In more site specific terms, the suitability of identified sites can be expected to vary around each settlement in environmental and amenity terms. Each site would need to be appraised on an individual site by site basis.

**Option 3:**

Wider distribution throughout the district

Question 6 Option 3	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	-	-	-	-	--	-	-	/	-	-	-	-	--	/	0	-	--	--
Medium Term	-	-	-	-	--	-	-	/	-	-	-	-	--	/	0	-	--	--
Long Term	-	-	-	-	--	-	-	/	-	-	-	-	--	/	0	-	--	--

A strategy which sought a wider distribution of Gypsy and Traveller sites across Epping Forest District would have a number of adverse impacts on sustainability. It would lead to the provision of sites in locations with poor access to services and facilities, few employment opportunities and limited transport choices other than private motor vehicles. Such impacts could restrict the quality of life for Gypsies and Travellers.

A wider distribution of sites throughout Epping Forest District could have increased adverse impact on environment and amenity by potentially placing sites closer to natural and heritage features of importance and by increasing the need to travel. There is the potential for sites provided at locations which did not meet the needs of Gypsies and Travellers to remain unused whilst pressure for sites remained in other areas.

### 3.8 Question 7: The Site Search Sequence

#### Question 7

Do you agree with the proposed site search sequence?

The site search sequence is set out in Paragraph 7.1 in descending order of priority as:

Urban previously developed (brownfield) sites

Sites close to the urban edge provided as part of any wider urban extension

Rural previously developed sites not at the urban edge in locations with suitable access and services

Followed by other rural sites in locations with suitable access and services

Question 7	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term.	+	/	++	++	++	++	++	/	++	/	/	/	++	/	0	0	+	++
Medium Term	+	/	++	++	++	++	++	/	++	/	/	/	++	/	0	0	+	++
Long Term	+	/	++	++	++	++	++	/	++	/	/	/	++	/	0	0	+	++

The site search sequence has the potential to positively assist sustainability objectives by seeking to locate sites at the most accessible locations in or adjacent to existing settlements and on previously developed land. This could help to limit environmental impacts by reducing the need to travel and limiting the need to release greenfield sites.

However, consideration of efficiency of use and cost of urban land in Epping Forest District are likely to limit opportunities for sites within settlements. Moreover, a preference from the Gypsy and Traveller community for sites which offer a degree of physical separation from the settled community may limit the number of previously developed sites within settlements which would be taken up.

### 3.9 Question 8: Large Urban Sites

Question 8a):

Large Urban Sites

Should large brownfield sites (1ha +) in the urban areas outside the Green Belt be required to provide 20% of their land area for travellers pitches?

Question 8b):

Large Urban Sites

If so [20% of the land area of large brownfield sites (+1ha) in urban areas be used for travellers pitches], should the alternative of off-site provision be allowed even if this were in the green belt?

Question 8a	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
8a) Short Term.	/	/	+	+	++	++	++	/	/	++	++	++	++	++	0	++	/	/
8a) Medium Term	/	/	+	+	++	++	++	/	/	++	++	++	++	++	0	++	/	/
8a) Long Term	/	/	+	+	++	++	++	/	/	++	++	++	++	++	0	++	/	/

Question 8b	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
8b) Short Term.	/	/	/	/	/	/	/	/	/	/	/	/	--	/	0	/	/	/
8b) Medium Term	/	/	/	/	/	/	/	/	/	/	/	/	--	/	0	/	/	/
8b) Long Term	/	/	/	/	/	/	/	/	/	/	/	/	--	/	0	/	/	/

The inclusion of Gypsies and Travellers sites as part of urban redevelopment schemes has the potential to provide good accessibility to services and facilities for residents as well as reducing the need to travel and the need to release greenfield sites.

Where redevelopment schemes have a high housing component they could potentially assist in facilitating fair, tolerant and cohesive communities, although it is worth noting that Gypsies and Travellers tend not to traditionally live in urban areas. Moreover, Myriad Consultants 2008 findings, suggested that respondents from the Gypsy and Traveller community wished to remain separated, both physically and culturally from the settled community in order to maintain their cultural value base.

Provision of Gypsy and Traveller sites on non-housing based redevelopment schemes may be inappropriate where pitches could potentially be located adjacent to un-neighbourly uses. Efficiency of land use is a key consideration within Epping Forest District so the availability of developable land within settlement boundaries is likely to demand a cost premium, bringing the issue of affordability and deliverability of such sites into question for pitch provision.

The use of land within the settlement boundaries within Epping Forest District for Gypsy and Traveller sites would compete with the delivery of land uses which would positively contribute to the economic potential of District. In addition, the opportunities for affordable

housing, or other community facilities, on redevelopment sites could be unduly restricted to provide a limited number of pitches which, by their nature, require a large area of land comparative to the majority of urban land uses.

The alternative of off-site provision potentially offers less beneficial impacts. Sites would potentially be located a greater distance from services and facilities, encouraging greater travel by private motor vehicle from sites with lower accessibility to alternative means of transport. However, the degree of impact would be closely related to the specific site and location and therefore sites would need to be fully appraised on an individual basis.

Although urban brownfield sites are the first preference in the site search sequence (see Question 7) there could be benefit in securing off-site provision if it facilitates provision of a designated site that is better able to meet Gypsy and Traveller needs and could accommodate more pitches than the urban site. The cost of urban sites may well be beyond the scope of the Gypsy and Traveller community, and therefore such off-site provision is likely to better assist delivery of pitches.



### 3.10 Question 9: Urban Extensions

#### Question 9: Urban Extensions

##### Sites as part of Harlow Urban Extensions

Harlow has been identified as a Key Centre for Development and Change (KCDC), and as such offers a wide range of services, facilities and opportunities. The incorporation of Gypsies and Travellers sites within the planned urban extensions to Harlow could positively assist achievement of sustainability objectives. Such an approach enables provision of sites to be considered within the initial planning and design phases of the urban extension. This should allow for the needs of future settled and Gypsies and Travellers communities to be respected and acknowledged during the design process which would assist in the facilitation of fair, tolerant and cohesive communities.

Local facilities and services provided as part of the urban extension would be designed to be readily available and accessible. An urban extension on the edge of Harlow, which is a sub-regional centre, would also provide good accessibility to higher order services and wider employment opportunities elsewhere in the town by a choice of means of sustainable transport. Further, any impacts on environmental factors could be mitigated within the overall design and planning of the urban extension. A Gypsy and Traveller site could also take advantage of sustainable drainage and power provision.

Nevertheless, the location of a Gypsy and Traveller site may tend towards the edge of the urban extension in recognition of the preference of that community for a rural location consistent with its traditional way of life.

#### Question 9a):

Do you agree with these proposals for gypsy/traveller sites to be provided as part of urban extensions to the West of Harlow?

Phase II 2012 – 2017 - 6 pitches west of Harlow with potential for expansion by 3 pitches 2017 – 2023.

Question 9a	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medium Term	++	++	++	++	++	++	++	++	++	/	/	/	++	/	0	++	++	++
Long Term	++	++	++	++	++	++	++	++	++	/	/	/	++	/	0	++	++	++

[Nb – Provision would fall within medium term and long term only]

A site within an urban extension to the south west of Harlow would be close to the existing concentration of pitch provision in the Roydon and Nazeing area. As such it could allow for future demand from that area to be met in close proximity to the existing Gypsy and Traveller community, either through relocation of existing pitches or accommodation of additional pitches arising from future local household growth. This could help to support family and community ties of Gypsies and Travellers.

One matter to be resolved within the broader discussions of the urban extension would be whether incorporation of a site within an urban extension offered an opportunity for the provision of a site of up to 15 pitches, rather than the 9 pitches suggested within the

Question. A larger site would further contribute to sustainability objectives but the impact on the remainder of the urban extension would require full evaluation, when detailed proposals are available. It is assumed that provision of pitches on any site would be identified as meeting the needs of Epping Forest.

Any provision of gypsy pitches between 2012 and 2017 would potentially be dependent on sufficient progress being achieved in implementing the urban extension; but it would be preferable to provide the Gypsy and Traveller site during the earliest possible development phase of this urban extension.

Question 9b):

Do you agree with these proposals for gypsy/traveller sites to be provided as part of urban extensions to the North East of Harlow?

Phase III 2018 – 2023 – 6 pitches north east of Harlow with land (with potential for expansion by 3 pitches after the plan period) held as a reserve.

Question 9b	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medium Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Long Term	++	++	++	++	++	++	++	+	++	/	/	/	++	/	0	++	++	++

[Nb – Provision would fall within long term only]

A site within an urban extension to the north east of Harlow would give ready access within an integrated new development to local services and facilities and to the sub-regional centre of Harlow. Although a site at this location would be relatively distant from existing Gypsy and Traveller sites within Epping Forest District, it could broaden the geographical spread of pitches.

One matter to be resolved within the broader discussions of the urban extension would be whether incorporation of a site within an urban extension offered an opportunity for the provision of a site of up to 15 pitches rather than the 9 pitches suggested within the Question. A larger site would further contribute to sustainability objectives but the impact on the remainder of the urban extension would require full evaluation, when detailed proposals are available. It is assumed that provision of pitches on any site would be identified as meeting the needs of Epping Forest. Further it would be preferable to provide the Gypsy and Traveller site during the earliest possible development phase of this urban extension.

### 3.11 Question 10: Sites as part of other Urban Extensions

Question 10:

Sites as part of other Urban Extensions

Do you agree that one of the urban extensions to the towns in the district that is likely to be required after 2017 should be required to provide a gypsy / traveller site or sites totalling fifteen pitches?

Question 10	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medium Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Long Term	++	++	++	++	++	++	++	++	++	/	/	/	++	/	0	++	++	++

[Nb – Provision would fall within long term only]

The incorporation of Gypsies and Travellers sites within planned urban extensions could positively assist achievement of sustainability objectives. Such an approach enables provision of sites to be considered within the initial planning and design phases of an urban extension. This could allow for the needs of future settled and Gypsies and Travellers communities to be respected and acknowledged during the design process which could assist in the facilitation of fair, tolerant and cohesive communities.

Local facilities and services provided as part of an urban extension could be designed to be readily available and accessible. Urban extension on the edge of towns in Epping Forest District could also provide good accessibility to higher order services and wider employment opportunities by a choice of means of sustainable transport. Further, any impacts on environmental factors could be mitigated within the overall design and planning of the urban extension. A Gypsy and Traveller site could also take advantage of sustainable drainage and power provision.

Nevertheless, the location of a Gypsy and Traveller site may tend towards the edge of the urban extension in recognition of the preference of that community for a rural location consistent with its traditional way of life.

The contribution that this approach could make to achievement of sustainability principles is uncertain at this time. The approach has merit in principle, by broadening geographic choice of sites, coordinating design and implementation of the site within the extension, and facilitating improved accessibility to services and facilities with benefit to quality of life. However, the degree to which these merits will assist achievement of sustainability objectives will be influenced by the specific proposals for urban extensions and for Gypsies and Travellers sites within them. Currently it is not known which towns will be identified for urban extension, or the location and size of the urban extension in relation to the town. Until there is greater clarity on these matters the proposed approach of locating a site of 15 pitches within one of the urban extensions is uncertain.

Furthermore once a policy designation for an urban extension with residential uses is adopted, the value of the land will increase significantly. This must therefore bring into play considerations such as efficiency of use and cost of land. Further appraisal of this Question would be necessary once the scale and location of urban extensions are known. This will raise considerations of efficient use of land and the cost of land to secure delivery of a Gypsy and Traveller site within an urban extension.

### 3.12 Question 21: Criteria for Windfall Sites

Question 21:

Criteria for Windfall Sites

Do you agree with the wording of the suggested policy?

The potential policy is set out on Page 65 as,

Applications for Gypsy and Traveller's sites will be permitted where all of the relevant criteria below are met:

- a. The site could be occupied solely by persons meeting the official definition of Gypsies and Travellers;
- b. The site is necessary to meet the required need and phasing of provision for Gypsy and Traveller pitches as set out in the development plan. If the site is not allocated then it must either meet a shortfall in provision from allocated sites, or be preferable to allocated sites when each is assessed against this policy;
- c. Further provision in the Sedge Green, Hamlet Hill and Bumbles Green/Long Green areas will not be permitted if this could exacerbate the unacceptable over-concentration of pitches in these areas;
- d. Where the proposal is for an extension to an existing site then this must be justified by the housing needs of those living on the site or their families;
- e. The location must have adequate access to public transport, schools, shops, primary healthcare and local services;
- f. The proposal must have a satisfactory relationship with, and must not be likely to cause unacceptable disturbance to, nearby settled residential areas;
- g. The proposal must be of an appropriate size so as to not put unacceptable strain on infrastructure or dominate settled communities – schemes of no more than 15 pitches should be the norm but each proposal will be assessed on its merits;
- h. Site design must ensure that pitches are of adequate size, with appropriate amenity and communal facilities including provision for children's play;
- i. There must be no significant detrimental visual impact on the landscape which could not be overcome by appropriate landscape design, planting or screening;
- j. The site should have safe and suitable access for caravans and mobile homes; and
- k. Where the proposal is in the green belt then there must be very special circumstances (which might include personal circumstances of housing need and the requirement to meet the pitch provision requirements of the development plan) which clearly outweigh the harm by virtue of the inappropriate use, the harm to the openness of the green belt, the harm to the character and appearance of the area and other harm.

Proposals for associated stabling and/or yard working areas will be assessed on their own merits and will be acceptable if they meet these criteria.

Criteria d-k will also be used to assess proposals for sites for Travelling Showpeople. Regard will be had for the need for larger yard sizes, access for plant and access to major roads to urban centres.

Question 21	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	/	/	/	++	++	++	++	+	+	/	+	+	++	/	0	++	++	++
Medium Term	/	/	/	++	++	++	++	+	+	/	+	+	++	/	0	++	++	++
Long Term	/	/	/	++	++	++	++	+	+	/	+	+	++	/	0	++	++	++

Inclusion of a policy setting out criteria for considering applications for Gypsy and Traveller sites that are not allocated in the DPD has the potential to assist sustainability objectives. The inclusion of such a policy would allow for the consideration of sites which are not identified within the DPD, but which may be equally or potentially more suitable than sites which have been identified. If permission were to be granted to Windfall Sites which met the specified criteria then this would allow for additional flexibility in meeting the pitch provision requirements for Epping Forest District. This would be particularly useful should unforeseen difficulty and / or delay be experienced in the delivery of allocated sites. In this instance criterion b. is especially useful in restricting the provision of windfall sites to instances where allocated sites are not coming forward.

The proposed wording of the suggested policy generally supports the sustainability objectives by including criteria relating to the quality of life of both settled and travelling communities; accessibility to services and facilities; safety; and landscape. However, the suggested policy wording does not include reference to key matters, including biodiversity, geodiversity, heritage features or flooding. The District Council should consider whether the suggested policy wording is sufficient and whether other existing adopted policies are adequate to operate alongside the suggested policy.

Nevertheless, there is potential scope for the criteria to be clarified during later stages in preparation of the Plan Document. For criterion c. the phrase ‘exacerbate the unacceptable over-concentration of pitches’ should be defined in a manner that clearly states what constitutes over-concentration, why it could be unacceptable and how the situation could be exacerbated.

For criterion k. the phrase ‘very special circumstances’ is then provided with a limited example in brackets. To avoid misinterpretation, this example could be removed from the policy and if deemed appropriate included within the explanatory text, or ‘very special circumstances’ should be defined by a fuller range of possibilities. This is especially pertinent given that beyond settlement boundaries Epping Forest District lies fully in the Green Belt, and this criterion could unduly restrict consideration of otherwise suitable sites.

### 3.13 Question 22: Transit Sites

Question 22:

Transit Sites

Do you agree with the initial assessment that the need for transit sites is very low in the district?

Question 22	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	+	+	0	/	/	/	/	/	/	/	/	/	0	/	/	/	/
Medium Term	+	+	+	0	/	/	/	/	/	/	/	/	/	0	/	/	/	/
Long Term	+	+	+	0	/	/	/	/	/	/	/	/	/	0	/	/	/	/

Transit sites facilitate the nomadic way of life which is a traditional defined characteristic of the Gypsy and Traveller community. Such sites can also be used to provide emergency stop-over accommodation for those evicted from unauthorised sites. Available data suggest that the need for such sites in Epping Forest District is 'very low', although it is difficult to make estimates.

The availability of a transit/emergency stop-over site could make a positive contribution to sustainability objectives. It could assist the removal of unauthorised sites by providing alternative accommodation. This in turn could contribute to reduced tensions between communities and less harm to natural and heritage features due to the use of unauthorised sites. A transit / emergency stop-over site could also assist positively in the quality of life of residents by providing them with safe, serviced pitches with reasonable access to services and facilities. However, careful consideration should be given to the scale and location of a transit/emergency stop-over site given uncertainty about the level of demand for such a site and the implications of managing a site with a changing mix of temporary residents.

### 3.14 Question 24: Site Delivery

Question 24:

Site Delivery

Which option towards ensuring site delivery do you think should be prioritised?

The effective delivery of sites allocated in the DPD could assist achievement of the sustainability objectives. An inability to deliver the allocated sites, either in full or in part, could have adverse impacts on the quality of life of the Gypsy and Traveller community, relations between the settled and the traveller communities, and on natural and heritage features.

Question 24a): Site Delivery

Allocating many more sites than are needed on the expectation that some will not come forward.

Question 24a	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term.	+	-	++	+	+	+	+	+	+	+	+	+	+	+	0	0	+	+
Medium Term	+	/	++	+	+	+	+	+	+	+	+	+	+	+	0	0	+	+
Long Term	+	/	++	+	+	+	+	+	+	+	+	+	+	+	0	0	+	+

Allocation of more sites than are needed would provide an identified pool of sites which could be drawn upon to ensure delivery of the regionally defined provision for Epping Forest District. This would assist in the provision of accommodation for Gypsies and Travellers that contributes to improved quality of life through being located on serviced sites with good to reasonable access to services and facilities. It would also afford the opportunity to offer a broader range of suitable sites to the traveller community. Nevertheless, a larger pool of sites would require careful management to ensure that each site is provided to the necessary standard at the appropriate time. This may require a comparatively greater financial commitment.

Delivery of sites by this means may not result in the optimum distribution of sites and pitches across Epping Forest District but could result in over-delivery of sites in some areas and under-delivery in other areas. Identification of a larger number of sites than required could also create uncertainty in location of sites which may adversely impact on relations between communities, accessibility, and natural and heritage features.

If this approach were to be taken, all sites would need to be subject to individual appraisal.

Question 24b): Site Delivery

Purchasing of sites using compulsory powers if necessary

Question 24b	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	+	--	/	+	+	+	+	++	++	+	+	+	+	+	0	++	0	+
Medium Term	+	--	/	+	+	+	+	++	++	+	+	+	+	+	0	++	0	+
Long Term	+	--	/	+	+	+	+	++	++	+	+	+	+	+	0	++	0	+

The use of compulsory purchase powers could have a positive impact in securing Gypsy and Traveller sites which are the most sustainable and contribute to improved quality of life of that community. However, the use of compulsory purchase powers risks exacerbating tensions between the settled and travelling communities because the powers are only likely to be used in situations where allocated sites do not come forward by other means. Nevertheless, use of compulsory powers would be a means by which to secure provision of allocated sites at locations that contributed positively to sustainability objectives.



### 3.15 Question 25: Indicators

Question 25:

Indicators

Do you agree with the proposed suite of indicators?

The following are potential indicators of how successfully or otherwise the plan is being implemented,

Number of unauthorised pitches;

Number of authorised pitches;

Number of planning approvals given, by allocated and unallocated sites and whether in conformity with the development plan or not; and

Number of enforcement/stop notices issued.

Question 25	SUSTAINABILITY OBJECTIVES																	
	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
Short Term	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medium Term	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Long Term	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The DPD once adopted should be regularly monitored against identified indicators and targets to ensure that there is continued progress in its implementation and on the achievement of sustainability objectives. The four potential indicators could all contribute to this process. Maintenance of a record of progress on all site allocations would ensure that implementation of individual sites was progressing sufficiently to meet the DPD's provisions for phasing of the required total sites and pitches. Such information would help inform decisions on, for instance, planning applications for windfall sites or whether to exercise compulsory purchase powers. In addition to recording the number for each indicator the location and the reasons for decision should also be collected to allow analysis of distribution across Epping Forest District and consistency of decision making. Further to this, the use of regular surveys of the resident Gypsy and Traveller community would help to ensure that the planned provision continued to be appropriate and sufficient to their needs. Analysis should also be augmented by cross-reference to contextual information and other indicators and targets used to monitor other Development Plan Documents for Epping Forest District.

### 3.16 Summary of Appraisal of Policy Options

The key points arising from the appraisal of each question are shown in Table 7.

**TABLE 7: SUMMARY OF APPRAISAL OF POLICY OPTIONS**

Question	Summary of Appraisal
Question 1: Draft Objectives	The range of necessary matters is covered. Epping Forest District Council should satisfy itself that draft objectives 5 and 6 are sufficiently general to be consistent with the objectives for the matters to be used in the forthcoming Core Strategy.
Question 2: Focus of Search for Sites	A focus on provision of sites in the south and west of Epping Forest District is supported but each individual site would need separate appraisal.
Question 3: Phasing of Sites	The approach is supported as it should give greater certainty and continuity of future supply.
Question 4: Scale of Sites	Sites of 6-15 pitches would best meet the needs of Gypsies and Travellers but provision could be augmented by smaller sites. Larger sites are likely to raise management issues.
Question 5: Concentration in Roydon and Nazeing Area	The scale of sites and their effect on the existing settled community is a relevant factor in the appraisal of potential sites. However, general restrictions on an area-wide basis may increase adverse impacts if sites are not available elsewhere or do not meet the needs of Gypsies and Travellers.
Question 6: The Main Possible Strategies	A strategy which seeks sites close to larger settlements in urban extensions and/or sites in the immediate rural area of larger settlements is preferred. These sites should provide a degree of physical separation from the existing settled community in accordance with documented preference.
Question 7: The Site Search Sequence	The proposed approach is sustainable and matches the approach to search sequences for other types of development.
Question 8: Large Urban Sites	Large urban sites can make a contribution to Gypsy and Traveller site provision. But, the preferred type of assistance will be influenced by the characteristics of, and proposals for, specific sites so flexibility of contribution is advised.
Question 9: Urban Extensions	Provide a positive benefit due to location of sites alongside other new development with implementation at the same time. Urban extensions to Harlow could provide more direct access to the sub-regional facilities within the town. A location south west of Harlow would be close to the existing concentration of sites in the rural parts of Roydon and Nazeing. A location north east of Harlow has less certainty in meeting needs arising within Epping Forest District. In both locations a Gypsy and Traveller site should be implemented as early as possible in the development programme for each urban extension.
Question 10: Sites as part of other Urban Extensions	Would provide a positive benefit in principle. But, further appraisal would be required once urban extensions are identified by settlement, location and size.
Question 21: Criteria for Windfall Sites	Would provide a positive benefit to consideration of planning applications for non-allocated sites. But, the definition of terms within criteria c) and k) should be considered further as well as the relationship to other adopted policies for environmental matters.

Question	Summary of Appraisal
Question 22: Transit Sites	Help to facilitate the nomadic way of life of Gypsies and Travellers and could also provide alternative pitches to those on unauthorised sites. But, the demand for such sites is uncertain and large sites can present management concerns.
Question 24: Site Delivery	The effective delivery of allocated sites could reduce adverse impacts from unauthorised sites. But, options to provide a higher allocation than required or to use of compulsory purchase powers can have adverse impacts. Future stages in preparation of Plan should include an Implementation Framework that sets out actions and a timetable for delivery of sites, especially for sites to be provided in Phase 1 and Phase 2.
Question 25: Indicators	The identification of monitoring indicators is welcomed. But, further consideration should be given to preparation of a broader Monitoring Framework so that the needs of Gypsies and Travellers continue to inform implementation of the Plan. The Framework should be set in the wider context of implementation of the Vision and Core Strategy for Epping Forest District.

## 4 APPRAISAL OF INDIVIDUAL SITES

### 4.1 Introduction

This chapter of the Report sets out the appraisal of the Individual Sites contained in the Consultation on Options document. The Individual Sites have been identified from those contained within Questions 11 to 20 and Question 23, together with other sites that are identified in Figures 9, 15, and 17. Questions 1 to 10, together with Questions 21, 22, 24 and 25 of the document address Policy Options and are discussed in the preceding section of the Report.

Each site has been appraised individually in terms of each possible future role which is being considered for it within the Consultation on Options Document, that is, whether the sites or pitches should be retained, expanded or identified as a potential new site. Where sites fall into more than one category there is an appraisal of the site for each category for which a site is proposed.

The appraisal is set out as follows:

Each question is included as it appears in the Consultation on Options Document, in a box.

This is then followed by a commentary of the appraisal for each relevant site. Each site is listed with an appraisal table which displays how the site performs against the 18 sustainability objectives. These are displayed as coloured boxes representing the following impacts

Colour	Impact
++	Major Positive
+	Positive
0	No Impact
/	Uncertain
-	Negative
--	Major Negative

Individual sites have not been appraised in terms of their potential impact over time. This is because there is insufficient information on the possible phasing of sites within the Consultation document. This aspect of the appraisal would be addressed at future stages of the plan preparation when the proposed phasing of individual sites will be available.

A summary of key points arising from the appraisal of each question is set out at the end of this chapter, together with an appraisal matrix displaying how each site performed against each of the 18 sustainability objectives.

## 4.2 Question 11: Potential for Expansion of Two Existing Sites

### Question 11a)

Do you agree with the expansion of the site at Little Brook Road Roydon [2 pitches] by up to four pitches?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
10a (2 + 4 proposed pitches)	+	+	+	++	+	-	--	-	/	/	+	/	+	/	0	/	/	/

The Little Brook Road site, located adjacent to Roydon, has the potential to positively impact the quality of life of potential residents by enabling sustainable access to local services and facilities in the village, including primary school, shops and railway station. For other services and facilities, including access to health resources, residents would need to travel to the main urban area of Harlow. Anti-social behaviour at the existing site is reported to have increased recently and the Council should satisfy itself that this matter can be adequately managed before expansion of the site is proposed.

The existing single track access provides poor visibility on to the highway network at present, this and a possible lack of manoeuvrability onto the estate road may potentially require improvement following further investigation prior to expansion of the site. A Local Wildlife Site and an area within flood risk zone 2 are identified downstream on the watercourse on the western boundary of the site. Expansion of the site should be subject to a suitable drainage system being provided to address water run-off and water quality issues.

### Question 11b)

Do you agree with the expansion of the site at Greenleaver Hoe Lane Nazeing [10 pitches] by a further five pitches?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
11i (10 + 5 proposed pitches)	+	-	+	-	--	--	--	-	-	-	/	/	+	-	0	/	-	/

The Greenleaver, Hoe Lane site at Nazeing relies on local services and facilities including GP and Primary School in Lower Nazeing but residents need to travel to the main towns for higher order services and facilities such as secondary school provision in Harlow. Limited accessibility to public transport and the condition of Hoe Lane could encourage the use of private motor vehicles by residents. Further expansion of pitches within the site would not encroach into the countryside. However, further development of the site could adversely impact on that part of the Nazeing Common Conservation Area that extends across the access to the site and on the Protected Lane at the eastern end of Hoe Lane.

A local wildlife site is associated with the watercourses on the northern and western boundaries of the site. These watercourses fall within flood risk zones 2 and 3 which extend into the site as well as west over Hoe Lane and into the built up area of Lower Nazeing. The flood risk zones limit the area of the site available for additional pitches. The site is also potentially contaminated with recorded past pollution incidents and believed use of a ditch crossing the site for discharge of waste water. A full contaminated land survey would be required before additional occupation of the site together with provision of a suitable drainage system to address surface run-off and water quality issues.

### 4.3 Question 12: Potential for Expansion of Other Existing Authorised Sites

#### Question 12

Do you agree with the assessment of the unsuitability for extension of these [other existing authorised] sites?

Figure 9 and the associated text identify other existing authorised sites which are not suitable for expansion as:

(11a) Hopgardens, Little End, Stanford Rivers – 16 approved pitches

(11b) Carters Mead, Long Green, Nazeing (owner proposes expansion, maximum 4 pitches desirable) – 1 approved pitch

(11c) Mamelons Farm, Long Green, Bumbles Green, Nazeing – 20 authorised pitches and 4 unauthorised (now 20 authorised pitches plus 4 with temporary planning permission)

(11d) Longmead, Moreton – 1 approved pitch

(11e) Victory Orchard, Berners Roding, Abbess Beauchamp and Berners Roding – 1 approved pitch (now with planning permission for other development)

(11f) Weald Hall Lane, North Weald Bassett – 1 approved pitch

(11g) Moss Nursery, Nazeing – 1 approved pitch

(11h) Tylers Cross Nursery, Roydon – 15 authorised pitches and 5 unauthorised

(11j) Richards Farm, Hamlet Hill, Roydon – 1 approved pitch

(11k) Downshoppit, Hamlet Hill, Roydon – 1 approved pitch

(11l) Tomary, Hamlet Hill, Roydon – 12 approved pitches

(No ref) Horsmanside Farm - 2 pitches

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
11a (16 existing pitches)	-	-	+	--	-	--	--	-	-	+	+	-	-	++	0	/	-	/
11b (1 existing pitch)	/	-	+	-	--	--	-	-	-	+	-	-	-	++	0	/	-	/
11c (20 existing pitches)	-	--	-	-	-	--	--	-	/	+	-	-	--	++	0	/	-	/
11d (1 existing pitch)	+	-	-	-	--	--	--	+	-	+	+	-	-	++	0	/	-	/
11 e	Not appraised due to redevelopment of site																	
11f (1 existing pitch)	/	-	-	-	--	--	--	--	-	+	+	/	/	++	0	/	-	/
11g (1 existing pitch)	+	-	+	-	-	--	--	-	-	--	-	--	--	--	0	/	-	/
11h (15 existing pitches)	--	--	-	--	-	--	--	-	/	+	+	+	+	++	0	/	/	/
11j (1 existing pitch)	+	-	+	--	--	--	--	-	-	+	/	-	-	-	0	/	-	/
11k (1 existing pitch)	+	-	+	--	--	--	--	-	-	-	/	-	-	-	0	/	-	/
11l (12 existing pitches)	-	-	-	--	--	--	--	-	-	+	/	-	-	-	0	/	-	/
No ref (Horsmanside) (2 existing pitches)	+	+	-	-	--	--	--	/	-	+	+	/	/	++	0	/	-	/

(Site 11a) Hopgardens, Little End, Stanford Rivers

The Hopgardens site lies in otherwise open countryside and has very poor accessibility to any services and facilities. Residents at this site would be highly dependent on the use of private motor vehicles. Expansion of the site is therefore unlikely to assist the achievement of sustainability objectives.

(Site 11b) Carters Mead, Long Green, Nazeing

The site is poorly located in relation to accessibility of services and facilities and its expansion would therefore encourage increased use of private motor vehicles. The lack of facilities close to the site would adversely impact the quality of life of potential residents. Expansion of the site and the presence of an adjacent existing authorised site with 20 authorised and 4 temporary pitches would contribute to a Gypsy and Traveller provision in the Bumbles Green / Long Green area that would be out of scale with the small scale existing settled community. Intensification of the site would encroach on the rural aspect of the locality and has the potential to further adversely impact upon this by introducing urban-type uses into an area of rising land.

(Site 11c) Mamelons Farm, Long Green, Bumbles Green, Nazeing

The site is poorly located in relation to accessibility of services and facilities and its expansion would therefore encourage increased use of private motor vehicles. The lack of facilities close to the site would adversely impact the quality of life of potential residents. Further expansion of the site which has 20 authorised pitches, together with a further 4 which have recently been granted temporary permission, would contribute to a Gypsy and Traveller provision in the Bumbles Green / Long Green area that would be out of scale with the small scale existing settled community. There is no scope for intensification within the existing site and its outward expansion would encroach on the rural aspect and introduce urban-type uses into an area of rising land. Further expansion of the site is likely to require a full contaminated land survey; together with archaeological investigation relating to the dispersed medieval settlement of Nazeing.

(Site 11d) Longmead, Moreton

The site is poorly located in relation to accessibility to services and facilities and its expansion would increase the use of private motor vehicles. The lack of facilities close to the site would adversely impact the quality of life of potential residents. Intensification of the site would encroach on the rural aspect of the locality.

(Site 11e) Victory Orchard, Berners Roding, Abbess Beauchamp and Berners Roding

Epping Forest District Council advise that this site has been redeveloped and therefore appraisal is not required.

(Site 11f) Weald Hall Lane, North Weald Bassett

The site is poorly located in relation to accessibility to services and facilities and its expansion would increase the need to travel and encourage increased use of private motor vehicles. The lack of facilities close to the site would not assist improvement in quality of life for residents whilst expansion could encroach into the countryside. The site

is within a 300m buffer zone associated with the M11, which gives rise to issues of noise pollution.

(Site 11g) Moss Nursery, Nazeing

The site is poorly located in relation to accessibility to services and facilities and its expansion would increase the need to travel and encourage increased use of private motor vehicles. The lack of facilities close to the site would not assist improvement in quality of life for residents. An expanded site would encroach into an open area of the Lee Valley and, lying within the Lee Valley Regional Park, could adversely affect achievement of the objectives of the Park and proposals within the Park Plan. Furthermore, the site lies entirely within flood risk zone 2.

(Site 11h) Tylers Cross Nursery, Roydon

The site is poorly located in relation to accessibility to services and facilities and its expansion would increase the need to travel and encourage increased use of private motor vehicles. The lack of facilities close to the site would not assist improvement in quality of life for residents. The site is already above the higher end of Government recommended optimum site sizes and there have been issues of anti-social behaviour. In addition the site is potentially contaminated and would require a full contaminated land survey before additional occupation.

(Site 11j) Richards Farm, Hamlet Hill, Roydon

The site is poorly located in relation to access to local services and facilities which would encourage increased use of private motor vehicles. An increase in the number of pitches would encroach into an area of open countryside and steeply rising ground. Overhead power lines, although not high voltage, and potentially contaminated land limit extension to the east. A well or borehole is thought to be located on the site, and this may restrict the installation of foul or surface water drainage. Further, the junction of Hamlet Hill with Netherhall Road to the west of the site lies within flood risk zone 2, which could restrict access to the site from that direction during flood events.

(Site 11k) Downshoppit, Hamlet Hill, Roydon

The site is poorly located in relation to access to local services and facilities which would encourage increased use of private motor vehicles. The site is potentially contaminated and, although the existing occupation of the site indicates that there should be no adverse impact on residents, a full contaminated land survey would be required should extension be proposed. Further, the junction of Hamlet Hill with Netherhall Road to the west of the site lies within flood risk zone 2, which could restrict access to the site from that direction during flood events.

(Site 11l) Tomary, Hamlet Hill, Roydon

The site is poorly located in relation to access to local services and facilities which would encourage increased use of private motor vehicles. The site currently has permission for up to 12 authorised pitches and further intensification of pitches on the site could reduce residential amenity which, in association with the above factors, would limit improvement in the quality of life for residents. An increase in the number of pitches on the site would



encroach into an area of open countryside and steeply rising ground. The site is potentially contaminated and although the existing occupation of the site indicates that there should be no adverse impact on residents a full contaminated land survey would be required should extension be proposed. Further, the junction of Hamlet Hill with Netherhall Road to the west of the site lies within flood risk zone 2 and could restrict access to the site from that direction during flood events.

(No Ref) Horsemanside Farm

The site is poorly located in relation to access to local services and facilities which could encourage increased use of private motor vehicles. It is not likely to impact on any designated natural or heritage feature, apart from, possibly, a Local Wildlife Site to the south. The site is close to but beyond the consultation area for a high pressure gas pipeline, where advice of the pipeline's operator and the Health and Safety Executive should be sought on proposed uses.

## 4.4 Question 13: Tolerated Sites

### Question 13

Do you agree with the assessment that the listed four tolerated sites should be allocated permanently?

Figure 15 identifies the four sites as,

Carisbrook Farm, Kiln Road, North Weald Bassett – 1 pitch

Hoe Lane, Nazeing – 1 pitch

Dales, Perry Hill, Nazeing – 1 pitch

Pond View, Bournebridge Lane, Stapleford Abbots – 1 pitch

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
12c (1 pitch)	+	+	++	+	+	--	--	-	/	/	/	/	+	-	0	/	/	/
12d (1 pitch)	+	-	+	+	--	--	--	++	-	/	/	/	-	++	0	/	-	/
12e (1 pitch)	++	-	+	+	+	-	--	++	/	/	/	+	+	++	0	/	/	/
13a (1 pitch)	/	+	++	+	+	-	--	-	/	+	+	+	++	++	0	/	/	/

#### (Site 12c) Carisbrook Farm, Kiln Road, North Weald Bassett

The site offers reasonable access to a range of local services and facilities in North Weald Bassett which has the potential to improve the quality of life of residents. However the site is poorly related to health services and educational facilities in the main urban areas, which would encourage the use of private motor vehicles. The site is on rising ground and abuts an Ancient Landscape, Ancient Woodland and a Local Wildlife Site. Kiln Road to the north is within flood risk zone 2 and flood risk zone 3 and could impact on access to the site during flood events.

#### (Site 12d) Hoe Lane, Nazeing

The site is not well located to access services and facilities increasing the need to travel and encouraging increased use of private motor vehicles. Located in open countryside the site is in a prominent position but existing screening should mitigate the potential visual impact. The site lies just inside the boundary of the Nazeing Common Conservation Area and gains access directly onto the part of Hoe Lane that is a Protected Lane.

#### (Site 12e) Dales, Perry Hill, Nazeing

The site offers reasonable access to a range of local services and facilities including primary school in Lower Nazeing. However the site is poorly related to other services and facilities including health care providers and secondary schools which are located in the main urban areas, which is likely to encourage the use of private motor vehicles. The site lies just inside the boundary of the Nazeing Common Conservation Area.

(Site 13a) Pond View, Bournebridge Lane, Stapleford Abbots

This established site borders the settlement boundary of Stapleford Abbots and given other adjacent uses does not encroach into the countryside or directly impact on visual amenity or heritage and natural features. Services and facilities are limited in the village and accessibility to other services and facilities is quite poor, other than by private motor vehicle. The existing single track access does not meet highway visibility standards which would need addressing prior to allocation of the site, although lack of control of the access point may limit opportunity for improvement. However, retention of the site could continue to meet the needs of the existing residents in a part of Epping Forest District where more sustainable alternative sites are not available.

Two tolerated sites are not identified for allocation permanently.

Figure 15 identifies the two sites as:

Hosanna, Sedge Green, Nazeing – 1 pitch

La Rosa Nursery, Tylers Road, Roydon – 1 pitch

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
12a (1 pitch)	-	-	+	+	+	--	--	-	/	+	+	0	0	--	0	/	/	/
12b (1 pitch)	-	-	+	+	+	--	--	-	/	--	+	--	--	-	0	/	/	/

(Site 12a) Hosanna, Sedge Green, Nazeing

The site is poorly located in relation to accessibility to services and facilities and its continued use increases the need to travel and encourages increased use of private motor vehicles. The lack of facilities close to the site could impact the quality of life of potential residents. The site encroaches into an open area of the Lee Valley and, lying within the Lee Valley Regional Park, could adversely affect achievement of the objectives of the Park and proposals within the Park Plan. Further, the site lies entirely within flood risk zone 2.

(Site 12b) La Rosa Nursery, Tylers Road, Roydon

The site is poorly located in relation to accessibility to services and facilities, which would increase the need to travel and encourage increased use of private motor vehicles. The lack of facilities close to the site would impact the quality of life of potential residents. Expansion of the site should not adversely affect any designated natural or heritage features or impact on visual amenity. The site adjoins the site at Tylers Cross Nursery where there have been issues of anti-social behaviour and the Council should satisfy itself that this matter can be adequately managed before allocation of the site at La Rosa. The site is potentially contaminated and although the existing occupation of the site indicates that there should be no adverse impact on residents a full contaminated land survey would be required should allocation be proposed.

#### 4.5 Question 14: Potential Extension of Tolerated Site – Bournebridge Lane, Stapleford Abbots

##### Question 14

Should this site [the tolerated site at Pond View, Bournebridge Lane, Stapleford Abbots – 1 pitch] be expanded by around five pitches?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
13a (1 tolerated pitch + 4 proposed pitches)	/	+	++	-	+	-	--	--	/	+	+	+	++	++	0	/	/	/

The existing site for one pitch would require outward expansion to accommodate up to four additional pitches. However, the expanded site would border the settlement boundary of Stapleford Abbots and, given other adjacent uses, would not encroach into the countryside or directly impact on visual amenity or heritage and natural features. Services and facilities are limited in the village and accessibility to other services and facilities is quite poor, other than by private motor vehicle. The existing single track access does not meet highway visibility standards which would need addressing prior to expansion of the site, although lack of control of the access point may limit the opportunity for improvement. However in the absence of more sustainable alternative sites in the vicinity an expanded site at this location could enable additional Gypsy and Traveller needs arising in the area to be met locally.

## 4.6 Question 15: Unauthorised Sites

### Question 15

Do you agree that the unauthorised sites are unsuitable?

Figure 17 identifies four unauthorised sites as:

Mamelons Farm, Long Green/Bumbles Green, Nazeing – 4 pitches

Tylers Cross Nursery, Broadly Common, Roydon – 5 pitches

Hallmead Nursery, Nazeing Lane, Nazeing – 2 pitches

Devoncot, Carthagen Estate, Nazeing – 2 pitches

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
11c (4 unauthorised)	-	--	-	-	-	--	--	-	/	+	-	-	--	++	0	/	/	/
15a (5 unauthorised)	--	--	-	-	+	--	--	-	/	+	+	0	0	++	0	/	/	/
15b (2 unauthorised)	-	-	-	+	-	--	--	-	-	+	+	--	--	--	0	/	-	/
15c (2 unauthorised)	-	-	-	+	--	--	--	/	-	--	/	--	--	--	0	/	-	/

#### (Site 11c) Mamelons Farm, Long Green/Bumbles Green, Nazeing

The site is poorly located in relation to accessibility of services and facilities and the retention of 4 unauthorised pitches would therefore encourage increased use of private motor vehicles. The lack of facilities close to the site would adversely impact the quality of life of potential residents. The site, with 20 authorised pitches is already above the higher end of Government recommended optimum site sizes, would contribute to a Gypsy and Traveller provision in the Bumbles Green / Long Green area that would be out of scale with the small scale existing settled community. There is no scope for intensification within the existing site and its outward expansion could encroach on the rural aspect and introduce urban-type uses into an area of rising land. Further expansion of the site is likely to require a full contaminated land survey; together with archaeological investigation relating to the dispersed medieval settlement of Nazeing.

#### (Site 15a) Tylers Cross Nursery, Broadly Common, Roydon

The site is poorly located in relation to accessibility to services and facilities and retention of 5 unauthorised pitches would perpetuate the need to travel and encourage increased use of private motor vehicles at the site. The lack of facilities close to the site has the potential to limit the quality of life for residents. Retention of the unauthorised pitches should not adversely affect any designated natural or heritage features or impact on visual amenity. The 15 authorised pitches at Tylers Cross Nursery are already at the higher end of Government recommended optimum site sizes and there have been issues of anti-social behaviour. The site is potentially contaminated and, although the existing occupation of the site indicates that there should be no adverse impact on residents, a full contaminated land survey would be required should allocation be proposed.

(Site 15b) Hallmead Nursery, Nazeing Lane, Nazeing

The site is reasonably located in relation to accessibility to services and facilities in Lower Nazeing but limited access to other services and facilities could increase the need to travel and encourage increased use of private motor vehicles. The lack of facilities and mix of uses adjacent to the site would also adversely impact the quality of life of potential residents. The site encroaches into an open area of the Lee Valley and, lying within the Lee Valley Regional Park, could adversely affect achievement of the objectives of the Park and proposals within the Park Plan. Furthermore, the site lies entirely within flood risk zone 3.

(Site 15c) Devoncot, Carthagen Estate, Nazeing

The site is poorly located in relation to accessibility of services and facilities and the retention of 2 unauthorised pitches would encourage increased need to travel and encourage use of private motor vehicles. The lack of facilities close to the site would limit possibilities for improvement of quality of life of residents. The site lies within the Lee Valley Regional Park and would adversely affect achievement of the objectives of the Park and proposals within the Park Plan. Furthermore, the site lies entirely within flood risk zone 3 limiting the suitability of the site for pitches.

## 4.7 Question 16: Temporary Permission at Holmsfield Nursery Nazeing

### Question 16

Do you agree that this site [Holmsfield Nursery Nazeing] should not be given temporary permission beyond five years (or the coming on stream of sites secured through urban extensions to Harlow if these do not come forward within five years)?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
16 (8 pitches)	-	-	-	--	-	-	--	-	-	+	-	--	--	--	0	-	-	/

The site is located some distance away from residential areas and surrounded by potentially contaminated non-residential uses. In addition to this there are high voltage overhead power lines just to the west. The site is not well located with regard to the provision of local services and facilities with access to services and facilities in the main towns being difficult by means other than by private motor vehicle. The site encroaches into an open area of the Lee Valley and, lying within the Lee Valley Regional Park, would adversely affect achievement of the objectives of the Park and proposals within the Park Plan. The site lies entirely within flood risk zone 2 and abuts flood risk zone 3 to the north and west. Use of the site could have a further adverse impact on water quality. Much of the Lee Valley area is affected by eutrophic water quality (although this is to be addressed via AMP3 funding under the Urban Waste Water Treatment Directive). The site was a former landfill site and there is contamination present on the land, with methane emissions being an identified issue, although this could be mitigated against by appropriate site remediation such as capping. A full contaminated land survey would be required before extending permission for occupation of the site together with provision of a suitable drainage system to address surface run-off and water quality issues.

## 4.8 Question 17: Rural Brownfield Sites at North Weald – Merlin Way

### Question 17a)

Do you agree that a small permanent travellers site [4 pitches] is suitable in this location [Merlin Way North Weald]?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
17a (4 pitches)	/	+	+	+	+	-	--	--	/	+	/	/	-	+	0	/	/	/

The site offers reasonable access to a range of local services and facilities in North Weald which could assist in provision of a higher quality of life for residents. However, the site is poorly related to other services and facilities in the main urban areas, which is likely to encourage use of private motor vehicles. Although a site at this location would encroach into the open countryside, appropriate boundary treatment such as the use of native vegetation could mitigate any adverse impact whilst increasing the biodiversity value of the site. The site could have an adverse impact on heritage features due to surviving World War II monuments, although prior investigation could mitigate the impact. The safety of residents could be adversely affected by potential contamination of the site due to its former use as a military airfield, which would require remediation prior to occupation. Further investigation into the potential for noise disturbance from use of the airfield would be required prior to allocation. In addition there is the potential for odour issues arising from the sewage treatment works located north east of the site which would need to be investigated prior to allocation, although existing residential development to the south east of the works is equidistance to the proposed site. Highways access to the site requires further investigation to establish required improvements prior to occupation of the site.

### Question 17b)

Do you agree that this location [Merlin Way North Weald] is suitable for a transit and/or emergency stop over facility [25-30 pitches]?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
17b Transit site	/	-	++	+	+	-	--	-	/	+	/	/	-	+	0	/	/	/

The site, central to Epping Forest District and with good access to the strategic road network, would be accessible to those needing to use the facility and provide an alternative to use of new unauthorised sites. However, a transit and/or emergency stop over facility of this size would require a strong management structure to ensure its smooth operation. The site offers reasonable access to a range of local services and facilities in North Weald which would assist the quality of life of residents using the facility. However, the site is poorly related to other services and facilities in the main urban areas, which would encourage the use of private motor vehicles. Although a site at this location would encroach into the open countryside, appropriate boundary treatment such as the use of native vegetation could mitigate any adverse impact whilst increasing the biodiversity value of the site. The site could have an adverse impact on heritage features due to surviving World War II monuments, although prior investigation could mitigate the impact. The safety of residents could be adversely affected by potential contamination of the site due to its former use as a military airfield, which would require remediation prior to occupation. Further investigation into the potential for noise disturbance from the Airfield would be required prior to allocation. In addition there is potential for odour issues arising



from the sewage treatment works located east of the proposed site which would need to be investigated prior to allocation. Highways access to the site requires further investigation to establish potential improvements required prior to occupation of the site.

## 4.9 Question 18: Possible Sites in the Epping and North Weald Bassett Areas

Question 18:

Possible Sites in the Epping and North Weald Bassett Areas

Site 18a – Former Allotment, Wintry Park, Epping – 4 potential pitches

Site 18b – Paddock, Wintry Park, Epping – 6 potential pitches

Site 18c – Land at Rear of 137-167 Lindsey Street Epping – 15 potential pitches

Site 18d – West of Epping Green – 15 potential pitches

Site 18e – East of Epping Green – 2 potential pitches

Site 18f – Duck Lane, Woodside, Thornwood Common – 8 potential pitches

Site 18g – Woodside to the rear of Forest House – 10 potential pitches

Site 18h – Junction of High Road and Upland Road, Thornwood Common – 8 potential pitches

Site 18i – Rear of Neales Garage, High Road/Rye Hill Road, Thornwood Common – 8 potential pitches

Site 18j – West of Tylers Green, North Weald Bassett – 8 potential pitches

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
18a (4 pitches)	+	+	++	/	++	+	+	-	+	+	/	/	/	++	0	/	+	/
18b (6 pitches)	++	+	++	++	++	+	+	+	+	/	/	/	/	++	0	/	+	/
18c (15 pitches)	++	+	++	++	++	+	-	+	+	+	/	/	/	++	0	/	+	/
18d (15 pitches)	/	/	+	+	-	-	--	/	-	-	-	-	-	++	0	/	-	/
18e (2 pitches)	+	-	+	+	-	+	--	/	/	+	-	/	/	++	0	/	+	/
18f (8 pitches)	/	/	/	-	-	--	--	-	/	+	--	-	-	-	0	/	/	/
18g (10 pitches)	+	/	+	/	+	-	--	/	/	/	/	/	/	++	0	/	/	/
18h (8 pitches)	/	/	+	-	+	--	--	/	/	--	-	-	-	++	0	/	/	/
18i (8 pitches)	+	/	+	/	+	--	--	-	/	+	+	-	-	++	0	/	/	/
18j (8 pitches)	/	+	++	+	+	-	--	-	-	+	/	/	/	++	0	/	/	/

### (18a) Former Allotment, Wintry Park, Epping

The site is adjacent to the settlement boundary of Epping and is well located to a wide range of services and facilities within the town, which are readily accessible, together with good connections elsewhere by public transport, including the London Transport Central Line. The site would extend development into the countryside, although visual impact would be limited and could be mitigated by appropriate boundary treatment. Loss of the allotments could reduce open space and recreational opportunities and the current status and usage of the allotments should be confirmed if a site at this location is to be promoted further. There should be no direct impact on known biodiversity features but increased use and necessary improvement of the access on to Thornwood Road could impact on the quality of Epping Forest Act land. Furthermore the existing access is in poor condition and access improvements would be required prior to occupation. Use of the site would require

the installation of suitable drainage system to deal with foul and surface water. Adjoining the site to the south is an electricity sub-station and overhead lines although not high voltage, pass over the western fringes of the site. The site could positively assist the quality of life of residents provided the site layout respected the presence of the electricity sub-station and the overhead lines.

#### (18b) Paddock, Wintry Park, Epping

The site is adjacent to the settlement boundary of Epping and is well located to a wide range of services and facilities within the town, which are readily accessible, together with good connections elsewhere by public transport including the London Transport Central Line. Being generally bordered by existing development, the site would have limited visual impact which could be further mitigated by appropriate boundary treatment. Such treatment would also assist maintenance of the footpath on the western boundary of the site and should contribute to biodiversity interests given the proximity of Epping Forest. The existing access is in poor condition and increased use, together with necessary improvements would be required prior to occupation. Objections have been raised to the use of this site because of the potential impact on the setting of a listed building close to the site. Increased use could adversely impact on the quality of Epping Forest Act land.

#### (Site 18c) Land at Rear of 137-167 Lindsey Street Epping

The site is adjacent to the settlement boundary of Epping and is well located to access a wide range of services and facilities within the town. There are also good connections elsewhere by public transport including the London Transport Central Line. The site does not impact directly on any natural or heritage features, although a strip of Common Land abutting the south eastern corner of the site could impact on a potential access to Lindsey Street. There is currently no highway access to the site; therefore further investigation would be required to ensure that the proposed access would be satisfactory. Development of the site would close the gap in the frontage between the edge of Epping and the ribbon of development extending north along Lindsey Street. Although not encroaching into open countryside the site would benefit from appropriate boundary treatment to mitigate impacts on long distance views of Epping from the north. Sustainable drainage systems should be provided to mitigate any water run-off and quality issues that may affect the watercourse to the north-east of Lindsey Street. Also, consideration would need to be given to impact on the site of noise from operations at Shaftesbury Farm, immediately to the south.

#### (Site 18d) West of Epping Green

The site is poorly related to Epping Green and other development, being situated in open countryside within the Living Landscape of Cobbins Woods, as identified by the Essex Wildlife Trust. Consequently, the site could give rise to adverse impact on visual amenity and biodiversity interests. Furthermore there may be potential impacts on two footpaths that cross the site and archaeological remains associated with the medieval moated site at Hunters Hall to the south. The site is poorly located to services and facilities, with the closest available being in Epping, apart from the primary school in Epping Green. The presence of common land at the junction of Carters Land and the B181 could restrict achievement of highway visibility requirements and improvement and further investigation would be required prior to allocation of the site. Also, there is a Public Right of Way coincidental with the narrow track access.

#### (Site 18e) East of Epping Green

The site is poorly located to services and facilities, with the closest available being in Epping apart from the primary school in Epping Green. However, access to public transport is low and this could increase the use of private motor vehicles. The site would extend development into the countryside though impact on visual amenity should be limited and could be further mitigated by appropriate boundary treatment that may assist biodiversity interests. There is existing allotment access but this is opposite a residential estate junction, consequently access arrangements would require further investigation prior to allocation of this site. It may be difficult to achieve highway visibility requirements given third party ownership of land.

#### (Site 18f) Duck Lane, Woodside, Thornwood Common

The site is poorly located to services and facilities with the nearest being in Epping. A number of bus services pass through Thornwood Common, giving access to public transport. Highway access, especially with regard to visibility requires further investigation prior to allocation. There is potential noise and pollution from the scrapyards opposite the site and the industrial estate to the east which could create adverse health impacts which would require further investigation prior to allocation of the site. The site would encroach into the open area to the east of Thornwood Common but should not directly impact on any designated natural features, although parts of Epping Forest extend to just south of Woodside. There could be significant adverse impact on the setting and integrity of Marshalls, a scheduled medieval moated site, which abuts the north east of the site requiring further investigation prior to allocation. The western part of the site falls into flood risk zone 2 with Duck Lane being in flood risk zone 3 therefore a suitable drainage strategy would be required, should pitch provision not be ruled out by flood risk issues.

#### (Site 18g) Woodside to the rear of Forest House

The site is relatively poorly located to services and facilities with the nearest being located in different settlements and directions; at Coopersale (primary school and shop), North Weald Bassett (shop and GP surgery) and Epping (secondary school and town centre). This would increase the need to travel and encourage increased use of private motor vehicles, with nearest public transport passing through Thornwood Common. The site would encroach into an open area within a scattered ribbon of development on the eastern side of Woodside but should not directly impact on designated natural features, although parts of Epping Forest extend just to the south. There are three listed buildings in the vicinity of the site, the potential impact on which should be examined carefully prior to any designation. Currently there is no clear highway access to the site, which would require further investigation prior to allocation especially with regard to the provision of visibility requirements.

#### (Site 18h) Junction of High Road and Upland Road, Thornwood Common

The site is well located to a GP surgery and provides access to services and facilities, with the nearest being located in Epping. The site has relatively low access to primary schools. This could increase the need to travel and, although there is also intermediate public transport access, this is likely to encourage increased use of private motor vehicles. There is no clear current highway access to the site which would need to be further investigated prior to allocation. There could be a significant adverse impact on a County Wildlife Site close to the pinch point within the site that would have to accommodate access from

Upland Road to the bulk of the site. This will require assessment by the Essex Wildlife Trust. The site could contribute to consolidation of scattered development in the countryside although its enclosure by existing features limits any impact on visual amenity to views from the east, which could be mitigated by appropriate boundary treatment.

(Site 18i) Rear of Neales Garage, High Road/Rye Hill Road, Thornwood Common

The site is intermediately located to services and facilities with the nearest being located in Epping. This could increase the need to travel by private motor vehicle even though the site has the highest score, shared with other sites, for public transport provision within the Area Accessibility Study. The site, together with the adjoining garage, is potentially contaminated and appropriate remediation would be required before occupation of the site. The site could consolidate a small area of scattered development in otherwise open countryside which could adversely impact on the rural nature of the area and wider views. Access provided from Rye Hill Road would need to respect the presence of Common Land along the opposite verge.

(Site 18j) West of Tylers Green, North Weald Bassett

The site offers reasonable access to local services and facilities within North Weald Bassett which could assist quality of life of residents. However, it is poorly located for other services and facilities available in the main urban areas, increasing the need to travel and, although the site has good access to bus services would encourage use of private motor vehicles. Development of the site would encroach into the narrow gap of open land separating North Weald Bassett from Tylers Green but should not have an impact on the wider countryside.

There would be an adverse impact on road safety hazards for residents and others unless high quality access can be provided from the site to the A414. Normally access from the site would attract a policy objection due to the A414 being a strategic route, operating with a 60mph speed limit. In addition the potential impact of noise emanating from the A414 would require further consideration prior to allocation.

Occupation of the site should not be adversely affected by the presence of a potentially contaminated site to the east or by the 250m buffer of a landfill site covering the south western corner of the site. However a suitable drainage solution would need to be in place prior to occupation.

## 4.10 Question 19: Possible Sites in the Waltham Abbey, Roydon, and Nazeing Areas

Question 19:

Possible Sites in the Waltham Abbey, Roydon and Nazeing Areas

Site 19a – Yard at rear of Lea Valley Nursery, Crooked Mile, Waltham Abbey – 10 potential pitches

Site 19b – Smallholding off Crooked Mile, Waltham Abbey – 10 potential pitches

Site 19c – Former Kingsfield Nursery, Sewardstone, Waltham Abbey – 4 potential pitches

Site 19d – Chandlers Farm, Sewardstone, Waltham Abbey – 8 potential pitches

Site 19e – Part of Brookfield Nursery, Sewardstone, Waltham Abbey – 2 potential pitches

Site 19f – Netherhouse Farm, and the rear of Beechfield Nursery, Sewardstone, Waltham Abbey – 15 potential pitches

Site 19g - Meadows, Long Green/Bumbles Green, Nazeing – 8 potential pitches

Site 19h – Spinney Nursery, Hoe Lane, Nazeing – 4 potential pitches

Site 19i – Part of Burleigh Nursery, Hoe Lane, Nazeing – 4 potential pitches

Site 19j – Hamlet Hill Farm (North), Roydon Hamlet, Roydon – 8 potential pitches

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
19a (10 pitches)	+	+	++	++	++	++	++	-	+	+	+	/	+	++	0	/	+	/
19b (10 pitches)	+	+	++	+	++	+	++	--	+	+	+	/	-	++	0	/	+	/
19c (4 pitches)	-	-	+	+	+	--	--	-	/	+	/	+	+	+	0	/	/	/
19d (8 pitches)	+	-	+	+	+	--	--	-	/	+	/	/	+	++	0	/	/	/
19e (2 pitches)	-	-	+	+	+	--	--	-	/	+	+	+	+	++	0	/	/	/
19f (15 pitches)	+	-	+	+	+	--	--	-	/	+	-	-	/	++	0	/	/	/
19g (8 pitches)	+	-	/	/	-	--	--	-	-	--	-	-	--	++	0	/	-	/
19h (4 pitches)	/	-	+	-	--	--	--	--	-	-	-	+	+	-	0	/	-	/
19i (4 pitches)	/	-	/	-	--	--	--	--	-	-	-	+	+	-	0	/	-	/
19j (8 pitches)	Not appraised due to removal from list of options.																	

### (Site 19a) Yard at rear of Lea Valley Nursery, Crooked Mile, Waltham Abbey

The site, on the northern edge of Waltham Abbey offers an opportunity to assist in the improved quality of life of residents. It has good accessibility to services and facilities in the urban area of Waltham Abbey, enhanced by good bus services to other centres, including Waltham Cross which offers rail access. Access to the site would usually be subject to a highway policy objection; however should this be overcome then access improvements to the site would require further consideration prior to allocation. The site is potentially contaminated from previous uses and remediation may be necessary prior to any occupation. The site abuts the settlement boundary of Waltham Abbey to the west and south and should not unduly encroach into the countryside or impact on known natural or heritage features. Any visual impact from higher ground to the north could be mitigated by sensitive landscape treatment. Although not lying within an identified flood risk zone

itself, development of the site could include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts within the Lee Valley.

#### (Site 19b) Smallholding off Crooked Mile, Waltham Abbey

The site, on the northern edge of Waltham Abbey offers an opportunity to assist in the improved quality of life of residents. It has good accessibility to services and facilities in the urban area of Waltham Abbey, enhanced by good bus services to other centres, including Waltham Cross which offers rail access. The site is potentially contaminated from previous uses and remediation may be necessary prior to any occupation. The site is on a route which raises highways policy objection to provision of access for the site, more so because existing access is problematic due to poor visibility restricted by buildings that increase road safety hazards to residents and others. The site is just to the north of the settlement boundary of Waltham Abbey but should not unduly encroach into the countryside or impact on known natural or heritage features. Any visual impact from higher ground to the north could be mitigated by sensitive landscape treatment. Although not lying within a flood risk zone itself, development of the site should include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts within the Lee Valley.

#### (Site 19c) Former Kingsfield Nursery, Sewardstone, Waltham Abbey

The nearest services and facilities are available in Waltham Abbey which would increase the need for travel and, given limited bus services, encourage increased use of private motor vehicles. This would limit the potential quality of life of residents. The site is generally enclosed within a small area of existing development and should not have an adverse impact on visual amenity, countryside or designated natural or heritage features. However the site lies within the Lee Valley Regional Park and would adversely affect proposals in the Park Plan. The western part of the site is within the 250m buffer of a landfill site and the site itself is potentially contaminated from previous uses, with appropriate remediation needed prior to any occupation. Although not lying within a flood risk zone itself, development of the site should include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts within the Lee Valley. Access to the site is narrow and may not accommodate HGVs. Improvements would be required prior to any occupation.

#### (Site 19d) Chandlers Farm, Sewardstone, Waltham Abbey

The nearest services and facilities are available in Waltham Abbey and access to shopping centres has been assessed as low. Given the intermediate provision of public transport, this could encourage increased use of private motor vehicles. Access to GP services is high and primary school accessibility is viewed as intermediate. The site is generally enclosed by frontage development to Sewardstone Road on the west and nurseries on all other sides and should have little additional adverse impact on visual amenity, countryside or designated natural or heritage features. However, it would introduce urbanised development, both directly and through highways visibility improvements on to Mott Street, is narrow with poor visibility and with verges which are subject to the Epping Forest Act. The site is potentially contaminated from previous uses, with appropriate remediation needed prior to any occupation. Although not lying within a flood risk zone itself, development of the site should include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts within the Lee Valley.

(Site 19e) Part of Brookfield Nursery, Sewardstone, Waltham Abbey

The nearest services and facilities are available in Waltham Abbey which would increase the need for travel and, given limited bus services, could encourage increased use of private motor vehicles. This would limit improvements to quality of life of residents. The site is generally enclosed by frontage development to Sewardstone Road on the west and nurseries on all other sides and should have little additional adverse impact on visual amenity, countryside or designated natural or heritage features. The site is potentially contaminated from previous uses, with appropriate remediation needed prior to any occupation. Although not lying within a flood risk zone itself, development of the site should include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts within the Lee Valley. Satisfactory safe access to the site would need to be investigated prior to allocation of the site.

(Site 19f) Netherhouse Farm, and the rear of Beechfield Nursery, Sewardstone, Waltham Abbey

The nearest services and facilities are available in Waltham Abbey which would increase the need for travel and, given limited bus services, encourage increased use of private motor vehicles. This would limit improvements to quality of life of residents. The site would extend development on the eastern side of Sewardstone Road into the open countryside. Part of the site may have been included within the curtilage of the listed building immediately to the south of the site and further investigation of the impact on the setting and integrity of that building would be required prior to allocation. Suitable boundary treatment may be required to maintain the adjoining public footpath. The western part of the site is potentially contaminated from previous uses, with appropriate remediation needed prior to any occupation. Although not lying within a flood risk zone itself, development of the site should include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts within the Lee Valley. The adequacy of the existing access would require further investigation prior to the allocation of the site.

(Site 19g) Meadows, Long Green/Bumbles Green, Nazeing

The site is poorly located in relation to accessibility of services and facilities and its use would encourage increased use of motorised vehicles. The lack of facilities close to the site would limit possibilities for improvement of quality of life of residents. Further, use of the site, with the presence of two adjacent existing authorised sites for 20 pitches and 1 pitch respectively, could contribute to pitch provision for Gypsies and Travellers in the Bumbles Green/Long Green area that would be out of scale with the existing small scale settled community. Development of the site would encroach on the rural aspect and potentially have an adverse visual impact by introducing urban-type uses into an area of rising land. It could also have an adverse impact on a Local Wildlife Site and the potential site of a prehistoric fort along its southern boundary. Waltham Road is a route which raises a highways policy objection to provision of access for the site due to increased road safety hazards to residents and others.

(Site 19h) Spinney Nursery, Hoe Lane, Nazeing

The site offers high accessibility to a shopping centre, GP surgery and primary school. However, limited accessibility to public transport and the condition of Hoe Lane could encourage use of private motor vehicles. An existing site, with permission for up to 10



pitches, lies to the east of the site and further sites in this area may be viewed as out of scale with the limited and scattered residential development. Further development of the site could have an adverse impact on that part of the Nazeing Common Conservation Area that extends across the access and abuts the western boundary of the site and on the Protected Lane at the eastern end of Hoe Lane. The watercourses to the east and north of the site fall within flood risk zones 2 and 3 which extend west over the access to the site and west along Hoe Lane into the built up area of Lower Nazeing. A County Wildlife Site associated with the watercourses also extends across the access to the site. Suitable drainage would need to be provided should the site be allocated to ensure that no issues related to water quality or surface run-off were to occur. Similarly suitable access arrangements would need to be investigated prior to allocation.

(Site 19i) Part of Burleigh Nursery, Hoe Lane, Nazeing

The site offers high accessibility to a shopping centre, GP surgery and primary school. However, limited accessibility to public transport and the condition of Hoe Lane would encourage use of private motor vehicles. An existing site, with permission for up to 10 pitches abuts the site to the east and further sites in this area may be viewed as out of scale with the limited and scattered settled community. Further development of the site could have an adverse impact on that part of the Nazeing Common Conservation Area that extends across the access and abuts the southern boundary of the site and on the Protected Lane at the eastern end of Hoe Lane. Also, the eastern boundary of the site falls within flood risk zones 2 and 3 which extend north to include the access to the site and west along Hoe Lane into the built up area of Lower Nazeing. A Local Wildlife Site associated with the watercourse also extends into the eastern part of the site. Development of the site should include the installation of sustainable drainage systems to mitigate any water run-off or quality impacts. Use of the site would need to be subject to provision of satisfactory safe access.

(Site 19j) Hamlet Hill Farm (North), Roydon Hamlet, Roydon

Following further consultation with Epping Forest, it is understood that this site has been removed from the list of potential Gypsy and Traveller sites and is therefore not included within this appraisal.

## 4.11 Question 20: Possible Sites in the Roding Valley Area

Question 20: Possible Sites in the Roding Valley Area:

Site 20a – Site next to Victory Hall, Hainault Road, Chigwell – 2 potential pitches

Site 20b - Paddock, Coopersale Lane, Theydon Garnon – 11 potential pitches

Site 20c – Paddock, Abridge Road, Theydon Garnon – 10 potential pitches

Site 20d – Paddock, Ongar Road, east of Abridge – 4 potential pitches

Site 20e – Former Crowther Nursery, Ongar Road, Lambourne – 15 potential pitches

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
20a (2 pitches)	/	+	++	++	++	++	-	-	+	/	/	/	++	++	0	/	+	/
20b (11 pitches)	/	+	++	+	++	-	+	--	/	/	-	-	-	++	0	/	+	/
20c (10 pitches)	/	+	++	+	++	-	+	--	/	/	-	-	-	++	0	/	+	/
20d (4 pitches)	+	+	++	+	+	-	++	-	/	+	-	-	-	-	0	/	+	/
20e (15 pitches)	/	-	+	+	+	--	--	-	/	+	-	/	-	-	0	/	/	/

### (Site 20a) Site next to Victory Hall, Hainault Road, Chigwell

The site is highly accessible to local services and facilities within Chigwell, with bus routes passing the site and nearby Chigwell station (London Underground) affording good passenger transport links to other centres. The availability of services and public transport links would positively assist the quality of life of residents. The site is the only undeveloped frontage to Hainault Road and should not encroach into the countryside, although there could be an impact on a Local Wildlife Site situated on the southern boundary of the site. There are several listed buildings in the vicinity but the site should not affect their setting and integrity. Use of the site would need to be subject to provision of satisfactory safe access.

### (Site 20b) Paddock, Coopersale Lane, Theydon Garnon

The site is accessible to a range of local services and facilities within nearby Theydon Bois, including Theydon Bois Station (London Underground) which, with a reasonable bus service close to the site, affords good public transport links to other centres. The availability of services and public transport links would positively assist the quality of life of residents. The site would encroach into the countryside although impacts on visual amenity could be mitigated with appropriate boundary treatment. Coopersale Lane is a Protected Lane and additional activity and vehicle movement could have an adverse impact on its setting and integrity. Also, the site is close to the M11, abutting the 300m buffer, and could be affected by noise and pollution from motorway traffic. Use of the site would need to be subject to provision of satisfactory safe access.

### (Site 20c) Paddock, Abridge Road, Theydon Garnon

The site is accessible to a range of local services and facilities within nearby Theydon Bois, including Theydon Bois Station (London Underground) which, with a reasonable bus service close to the site, affords good public transport links to other centres. The availability of services and public transport links would positively assist the quality of life of

residents. The site would introduce development into a currently open frontage on Abridge Road, although the site is generally surrounded by homes in large grounds that reduce the impact on visual amenity, which could be mitigated further with appropriate boundary treatment. Coopersale Lane is a Protected Lane with access to the site needing careful treatment to mitigate impact but to the east of the site additional activity and vehicle movement could have an adverse impact on the setting and integrity of the Lane. The site is close to the M11, abutting the 300m buffer, and could be affected by noise and pollution from motorway traffic. Use of the site would need to be subject to provision of satisfactory safe access.

#### (Site 20d) Paddock, Ongar Road, east of Abridge

The site affords good access to the primary school and GP surgery in Abridge but it is poorly located for other services and facilities in other centres. This would increase the need to travel and encourage increased use of private motor vehicles. The site would further consolidate the ribbon of development extending east along Abridge Road but its visual impact could be mitigated by appropriate boundary treatment that may assist enhancement of biodiversity interests. The northern part of the site is within flood risk zone 2 which extends across the frontage of the site and to the west and east along Abridge Road, thereby potentially limiting access to the site during flood events. The flat nature of the site means that the potential extent of flooding would need to inform the layout of any proposed development. The site would need to incorporate a suitable drainage system to mitigate adverse impacts arising from water run-off and quality. Ongar Road is a route which raises a highway policy objection to provision of access for the site due to increased road safety hazards to residents and others.

#### Site 20e) Former Crowther Nursery, Ongar Road, Lambourne

The site is poorly related to services and facilities with the nearest primary school and GP surgery located in Abridge to the west and the nearest shop, located in Stapleford Abbots to the east. This would increase the need to travel and, due to the lack of public transport services, would encourage increased use of private motor vehicles. A lack of services and facilities would potentially have a negative impact on the quality of life of residents. The site would introduce development into a generally open area of countryside and would impact on the rural aspect of the area, although it should not impact on the setting and integrity of designated natural and heritage features. However the Essex Way long distance footpath passes along the eastern boundary of the site and any development would need to maintain public access along the route or propose an acceptable alternative. The northern part of the site is within flood risk zone 2 which extends across the frontage of the site and to the west and east along Abridge Road, and which could therefore potentially limit access to the site during flood events. The potential extent of flooding would need to inform the layout of any proposed development on the site. Additionally, there would need to be a suitable drainage system proposed to mitigate adverse impacts arising from water run-off and quality. Further, the site would create potential safety hazards for residents since the northern half of the site lies within the buffer zone of a high pressure gas pipeline. Ongar Road is a route which could raise a highway policy objection due to increased road safety hazard to residents and others, although further investigation of the existing access arrangements would be required prior to allocation.

## 4.12 Question 23: Travelling Showpeople

Question 23:

Do you agree with adding two extra yards to the [existing travelling showpeople] site at Moreton [existing 9 yards]?

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
23 (Travelling Showpeople)	+	+	++	+	-	-	--	-	+	+	+	/	/	/	0	/	-	/

Apart from a shop and primary school in Moreton the site is poorly located in terms of accessibility to other services and facilities. This increases the need to travel, with limited availability of public transport encouraging increased use of private motor vehicles. The site should not impact on designated natural and heritage features and any intensification of use should not encroach into the countryside or affect visual amenity. The site is potentially contaminated and lies within the 150m buffer of a former landfill site and although the existing occupation of the site indicates that there may be no adverse impact on residents the situation should be kept under review. On-site accommodation of identified household growth of existing residents should ensure adequate accommodation and equipment storage space and make a positive contribution to the quality of life of the group. It may also mean that additional sites may not be required elsewhere in the District to meet the specific requirements of travelling showpeople.

## 4.13 Summary of Appraisal of Individual Sites

The appraisal of individual sites shows that not all sites in the Options Consultation perform well against the sustainability objectives. Table 8 outlines the summary of the appraisal of individual sites.

**TABLE 8: SUMMARY OF APPRAISAL OF INDIVIDUAL SITES**

Question	Summary of Appraisal
Question 11: Potential for expansion of two existing sites	<p>The Little Brook Road site performs reasonably well against the sustainability objectives.</p> <p>The Greenleaver, Hoe Lane site at Nazeing performs poorly against 10 of the 18 sustainability objectives.</p>
Question 12: Potential for expansion of other existing authorised sites	<p>Sustainability appraisal of the sites not recommended for further expansion shows all of those sites listed to be lacking in accessibility, especially with regard to primary health care and educational facilities. These sites can be seen to perform more negatively against sustainability objectives than sites put forward within the document.</p>
Question 13: Tolerated Sites	<p>The four tolerated pitches which are proposed for allocation perform well against the majority of sustainability objectives appraised. The sites are all further than would be recommended from educational and health care facilities, but as single pitch sites their location has minimal impact on other environmental considerations.</p> <p>Conversely the two tolerated sites which are not proposed for allocation perform consistently poorly against sustainability objectives.</p>
Question 14: Potential extension of tolerated site – Bournebridge Lane, Stapleford Abbots	<p>More sustainable alternative sites are not available in this part of Epping Forest District and an expanded site at this location could enable additional Gypsy and Traveller needs arising in the area to be met locally.</p>
Question 15: Unauthorised sites	<p>The sustainability appraisal has shown that the unauthorised sites which are deemed unsuitable in the document perform consistently badly against the majority of sustainability objectives.</p>
Question 16: Temporary permission at Holmsfield Nursery, Nazeing	<p>The site does not perform well against key sustainability objectives.</p>
Question 17: Rural brownfield sites at North Weald – Merlin Way	<p>The permanent site for 4 pitches performs reasonably well against sustainability objectives, subject to areas of concern being addressed.</p> <p>In addition, the allocation of the site for a transit / emergency stop over facility has good access to the strategic road network. However, a transit and/or emergency stop over facility of this size is likely to require a strong management structure to ensure its smooth operation.</p> <p>The cumulative impact of both sites being allocated should be considered; especially with regard to the quality of life of residents of the proposed permanent pitch who would be located next to a more transient population. Access to the transit site potentially through the permanent site may cause conflict within the site, and requires careful consideration prior to allocation.</p>
Question 18: Possible	<p>Sites 18a, 18c and 18b perform most positively against sustainability objectives</p>

Question	Summary of Appraisal
sites in the Epping and North Weald Bassett areas	within the Epping and North Weald Bassett areas. However should sites 18a, 18b and 18c all be allocated on this basis the cumulative impacts of potentially 25 pitches being delivered in close proximity may negate elements which were shown as positives in the individual site appraisals. It would therefore be more appropriate to allocate sites which may not perform as well individually, but where the cumulative impact to achieve the number of pitches required would be less in a given area.
Question 19: Possible sites in the Waltham Abbey, Roydon and Nazeing areas	Sites 19a, 19b and 19d as perform most positively against sustainability objectives in the Waltham Abbey, Roydon and Nazeing areas. Conversely sites 19h, 19i and 19g perform least well. However the cumulative impacts of allocating sites should also be taken into account. Should sites 19a, 19d, 19e and 19f all be allocated the cumulative impacts of potentially 29 pitches being delivered in close proximity may negate elements which were shown as positives in the current appraisal. In this instance the adverse cumulative impacts on the sites proposed and the adverse secondary impacts on the settled community in Sewardstone would negate the positive scores the sites achieve individually. It would therefore be more appropriate to allocate sites which may not perform as well individually, but where the cumulative impact to achieve the number of pitches required would be less in a given area.
Question 20: Possible sites in the Roding Valley area	The appraisal identifies site 20e as performing the most negatively against sustainability objectives in the Roding Valley Area. However the cumulative impacts of allocating sites should also be taken into account. Should sites 20b and 20c both be allocated the cumulative impacts of potentially 21 pitches being delivered in close proximity may negate elements which were shown as positives in the current appraisal. In this instance the adverse cumulative impacts on the sites proposed and the adverse secondary impacts on this rural area between Theydon Garnon and Theydon Bois would negate the positive scores the sites achieve individually. It would therefore be more appropriate to allocate sites which may not perform as well individually, but where the cumulative impact to achieve the number of pitches required would be less in a given area.
Question 23: Travelling Showpeople	On-site accommodation of identified household growth of existing residents should ensure adequate accommodation and equipment storage space and make a positive contribution to the quality of life of the group. It may also mean that additional sites may not be required elsewhere to meet the specific requirements of travelling showpeople.

Sites taken forward would have to be subject to further appraisal at future stages of the DPD. Urban extensions of Harlow and other urban extensions, if included, would need to be subject to appraisal once identified. Additionally once the preferred strategy and preferred site locations are known additional appraisal would have to be undertaken to identify any additionally arising secondary, cumulative and / or synergistic effects.

In addition to the above, consideration should be given to how the removal of existing pitches on unauthorised, tolerated and temporary sites is to be managed. The Consultation on Options Document identifies a need to remove 23 pitches and this appraisal suggests that those may not sufficiently assist sustainability objectives to justify retention. It is not clear from the Consultation on Options Document whether the proposed allocations to be made by the DPD include provision for relocation of pitches. This would need to be clarified during preparation of further stages of the DPD.

## 5 SIGNIFICANT EFFECTS

The Consultation on Options Document for Development Plan Provision for Gypsies and Travellers in Epping Forest District presents a reasonable range of options for potential policy approaches and for consideration of potential sites. The options contained in the document are unlikely to lead to large scale significant adverse effects beyond those identified in the appraisal. The draft objectives address key matters facing the Gypsy and Traveller community and Epping Forest District and positively seek to avoid adverse impacts whilst promoting positive benefits.

The key matters with potential for likely significant effects are:

- delivery of sites in a timely manner to meet needs arising within Epping Forest District
- relocating pitches from unauthorised and tolerated sites
- relationships between the settled community and Gypsies and Travellers
- accessibility to services and facilities by the Gypsy and Traveller community

The change in the degree of impact is likely to remain minimal with a slow improvement of the positive impacts and a slow decline of the negative impacts expected over time. Further assessment of the temporal effects would be required at the next stage, when the preferred strategy and preferred sites are clear.

The further preparation of the Core Strategy provides scope for the preferred strategy and its supporting policies, to mitigate and reduce these effects. Much will depend on the scale and location of proposed Gypsy and Traveller sites, which still have to be determined. The greater the alignment between the preferred strategy and the range of detailed policies then the greater prospect of reducing the adverse impacts. The preferred strategy would require a further Sustainability Appraisal and Strategic Environmental Assessment.

Preparation of the preferred strategy should be supported by,

- A Monitoring Framework that includes proposed indicators and the broader context specific to provision of Gypsy and Traveller sites but which is well-related to monitoring to be undertaken for the Core Strategy;
- An Implementation Framework that includes necessary actions, infrastructure and service provision, and mitigation measures to facilitate implementation of sites to be allocated in the DPD in accordance with required delivery timescales.

## 6 CONCLUSIONS

The Consultation on Options Document sets out a range of realistic issues and options for consultation purposes before development of a preferred strategy. The issues and options set out in the document are unlikely to lead to large scale significant adverse effects beyond those identified in the appraisal.

Epping Forest District Council, in considering the responses to the consultation on the Document and preparing the preferred strategy option, is recommended to consider,

- a strategy for the relocation of pitches to allocated sites from existing unauthorised, tolerated or temporary sites;
- whether draft objectives 5 and 6 are sufficiently specific for the Gypsies and Travellers DPD or could duplicate the Core Strategy;
- identifying sites in the range of 6 to 15 pitches augmented by suitable smaller sites;
- sites in urban extensions or close to the larger settlements;
- clear definition of terms to be applied through the proposed policy in the Criteria for Windfall Sites (particularly criteria c) and k)) to aid understanding and interpretation;
- whether a transit/emergency stop-over facility of 25-30 pitches should be provided in preference to options for smaller sites that could better assist good management;
- how the effective delivery of allocated sites could be best assisted to minimise identified adverse impacts of available measures;
- a Monitoring Framework;
- an Implementation Framework.



