

## **Appendix B: Summary of Responses from National Bodies, Town and Parish Councils and Local Planning Authorities**

The following provides a summary overview of the emerging key findings arising from the analysis undertaken to date of responses received from 'national bodies' (including Statutory Consultees), Town and Parish Councils, Local Planning Authorities and some 'local organisations'. It should be noted that analysis of all responses received is ongoing, and a further report will be provided to the Cabinet in due course once analysis has been completed. The following summary may be subject to change over time as further analysis is undertaken.

### **National Bodies**

The Council received written responses from a number of 'national bodies' in response to the Draft Local Plan consultation, including:

1. Sport England
2. Theatres Trust
3. Transport for London
4. United Karate Association
5. British Gymnastics
6. Historic England
7. National Grid
8. Canal River Trust
9. Natural England
10. The London Green Belt Council /Campaign to Protect Rural England
11. Environment Agency
12. Home Builders Federation
13. Forestry Commission
14. Highways England
15. Royal Mail
16. Anglian Water
17. Thames Water

1. **Sport England** has raised an objection and advised that they consider that the Council's current evidence base for sport is not robust and is out of date for informing sports facility needs for the period of the Plan. They have also advised that the tools and guidance available for collecting data and undertaking assessments and strategies with respect to indoor and outdoor sports facilities has advanced. The approach to making provision for open space including outdoor sports facilities in new development should not be focused around meeting conventional quantity standards in order to be consistent with the current guidance the approach should be focused around identifying sport specific needs and developing specific proposals to respond to such needs. The Council should prepare an up to date sports facility strategy including indoor and outdoor sports facilities.

2. **The Theatre's Trust** is in general agreement with the policies and allocations set out in the Draft Local Plan. The Trust made some suggestions on the inclusion of social and cultural well-being in the Draft Vision and Objectives and to Policy D4.

3. **Transport for London** submitted two responses, one from TfL Planning and one from TfL Property. TfL Planning's response is generally supportive of policies and allocations set out in the Draft Local Plan, in particular the vision for the London Stansted Cambridge

Corridor Core Area and the commitment to protect land for transport schemes. Of importance, TfL state that they do not believe that Central Line capacity should act as a deterrent to planned growth in the Draft Local Plan. There are some station capacity improvements which will require financial contributions from developers. On parking, TfL has requested that all applications affecting car parking capacity in the vicinity of the Central Line will need to consult with them and that they support a restraint based approach to car parking in the London Plan. TfL Property's response is generally supportive of the draft policies and proposed allocations set out in the Draft Local Plan. TfL Property support the principal objectives and approach to new housing in the Draft Local Plan and welcome the allocation of TfL's sites as proposed residential sites.

4. The **United Karate Association** submitted seven responses from individual members to the Draft Local Plan consultation. All of the responses stated that the Association supports improved provision of Karate facilities in the district.

5. **The British Gymnastics Association** would like to see current gymnastics provision in Epping Forest District retained. British Gymnastics would like to stay involved in the progress of the Draft Local Plan in relation to gymnastics provision especially if a new facility is needed.

6. **Historic England** is generally supportive of the policies and allocations set out in the Draft Local Plan. Historic England's response suggests that a strategic policy on the historic environment should be included in the Pre-Submission Local Plan, and advises against the inclusion of a policy on enabling development. Site-specific notes were also included and the potential impact on heritage assets in relation to the four strategic sites around Harlow was raised. It should be noted that all of these heritage assets lie outside of the site boundaries of these sites.

7. **National Grid** is generally supportive of the policies and allocations set out in the Draft Local Plan. The response drew attention to the limitations to building on or around National Grid high pressure and immediate pressure pipelines and electricity transmission overhead lines; and set out what gas transmission pipelines and gas distribution apparatus are in the district.

8. The **Canal and River Trust** is generally supportive of the policies and allocations set out in the Draft Local Plan. The Trust raised that housing authorities have a requirement to consider the needs for residential boaters and associated moorings, and that the Trust are keen to work with the Council in providing for these and also for leisure/recreational users of canal boats. The trust makes some suggestions to policies to reflect these aims. The Trust's comments centre on ensuring that the nature and management of canals are protected by the Draft Local Plan, in particular the inclusion of a section that encourages developers to seek pre-application advice from the Trust.

9. **Natural England** is generally supportive of the policies and allocations set out in the Draft Local Plan, noting the Council's protection of the Epping Forest Special Area of Conservation and the Lee Valley Regional Park. Natural England has asked that the Draft Memorandum of Understanding agreed by the Cooperation for Sustainable Development Board would need to be complete before the Plan could be found fully sound. They have also suggested some policy wording changes and encouraged EFDC to consult with them in the development of the Sustainability Appraisal. They have advised that more detail is needed on the impact of allocations on Sites of Special Scientific Interest and in particular the Latton Priory strategic site; and that the Draft Local Plan should safeguard the long-term capability of agricultural land in line with the National Planning Policy Framework. Since the end of the consultation period officers have met with Natural England. In addition to the

comments made in response to the Draft Local Plan in a recent meeting with officers, Natural England have stated that they would require additional information on the impact of proposed growth in the District on recreational pressure in the Forest.

10. The responses from **Campaign for Rural England Essex** and the **London Green Belt Council** both raise a general objection to the draft policies and proposed allocations in the Draft Local Plan. The organisations consider that the Draft Local Plan is inconsistent with the National Planning Policy Framework, and in particular that the use of housing need to justify the altering of Green Belt boundaries goes against national policy and statements made by Government. Objections were also raised in relation to the proposed use of the District Open Land designation and the lack of information on infrastructure.

11. **The Environment Agency** response outlines a number of priorities that should be addressed in relation to the Draft Local Plan and gives site-specific feedback and policy wording suggestions. Of most importance, the Environment Agency consider that the Council will need to demonstrate sufficient capacity of the sewage network to support the proposed allocations and suggest there should be a Water Cycle Study or alternatively the provision of confirmation from the sewage provider about capacity. This is important so that if there are any adverse impacts work can be undertaken to confirm mitigation measures in line with the Water Directive Framework. The Environment Agency also identified the need for a Level 2 Strategic Flood Risk Assessment if the Council continue their current allocation of sites partially within Flood Zones 2, 3a and 3b. The East of Harlow strategic allocation is particularly highlighted in this regard. Officers intend to meet with the Environment Agency to discuss this matter as all the proposed development in the Draft Local Plan is located within Flood Zone 1.

12. The **Home Builders Federation (HBF)** has raised a general objection to the draft policies and proposed allocations set out in the Draft Local Plan on the basis that the Council together with other authorities in the Housing Market Area is not meeting the full objectively assessed housing need.

13. The **Forestry Commission's** response outlined that it is not in a position to input into the consultation process for Local Plan, however lists published guidance that should be taken note of when assessing the appropriateness of sites for future development and encourages the use of trees in flood risk, locally sourced resources, carbon lean energy and delivering planning objectives such as green infrastructure.

14. **Highways England** response is generally supportive of the policies and allocations set out in the Draft Local Plan, stating particular support for the focus on public transport improvements and sustainability of transport systems in the Draft Plan. In relation to the strategic sites, Highways England identified that Latton Priory may impact upon the M11 Junction 7 and would require a Transport Assessment detailing mitigation measures. North Weald Bassett is also stated to require developers to provide a Transport Assessment with respect to the potential impact on M11 Junction 7. East of Harlow is also identified as having a potential impact on M11 Junction 7, but Highways England acknowledge the planned upgrades to the M11 including a new Junction 7a and improvements to Junction 7. The proposed allocations in Chigwell and Loughton are also identified as potentially impacting on M11 Junction 5, and HE request that developers should be asked provide Transport Assessments to address mitigation measures. Proposed allocations in Waltham Abbey similarly are identified as potentially impacting on M25 Junctions 25 and 26.

15. **Royal Mail** is generally supportive of the policies and allocations set out in the Draft Local Plan. Royal Mail raise two key points in relation to the Draft Local Plan: housing growth and future postal provision, and the protection of existing employment sites. The

estimated increases in postal rounds is outlined, with Royal Mail indicating that sites may need allocating for additional delivery offices. Royal Mail stated particular support for Policy E 1 and made some minor suggestions to protect employment use on existing sites.

16. **Anglian Water** is generally supportive of the policies and allocations set out in the Draft Local Plan and is supportive of the inclusion and promotion of Sustainable Drainage Systems in the Plan.

17. **Thames Water** is generally supportive of the policies and allocations set out in the Draft Local Plan and they have provided site-specific comments relating to water supply and drainage. Thames Water suggested the contacting of developers as early as possible to discuss the implications of their sites in relation to the water network. Areas highlighted as having low capacity were Loughton/Chigwell and North Weald Bassett.

### **Town and Parish Councils**

The Council received seventeen written responses from Parish and Town Councils in response to the Draft Local Plan consultation:

1. Nazeing Parish Council
2. Theydon Bois Parish Council
3. Loughton Town Council
4. Epping Town Council and North Weald Bassett Parish Council – Joint Response
5. Buckhurst Hill Parish Council
6. Waltham Abbey Town Council
7. Epping Town Council
8. Theydon Mount Parish Council
9. Moreton, Bobbingworth and the Lavers Parish Council
10. Sheering Parish Council
11. Roydon Parish Council
12. Stanford Rivers Parish Council
13. Ongar Town Council
14. Epping Upland Parish Council
15. Chigwell Parish Council
16. Fyfield Parish Council
17. North Weald Bassett Parish Council

#### **1. Nazeing Parish Council**

The main points raised are:

- Nazeing Parish Council support the principles included in the Draft Vision and Objectives of the Draft Local Plan.
- The nature of future employment sites should reflect rural nature of the Parish.
- There should be no further expansion of traveller sites in Nazeing and Roydon, where the majority of the district's traveller sites are already located.

#### **2. Theydon Bois Parish Council**

The main points raised are:

- The Draft Local Plan presents an unsustainable approach to development in Epping Forest District. The Parish Council have strong objections around the allocated sites and the building on of Green Belt land.
- Theydon Bois Parish Council disagree with the Green Belt boundary amendment for Theydon Bois included in the Draft Local Plan, and believe that if it were changed it would no longer represent a defensible boundary.
- There is no detailed evidence at the settlement level to justify the release of Green Belt land at Theydon Bois. The allocations for Theydon Bois are not centred around the existing urban area which poses a challenge to maintaining the character of the village. The railway line will make it very difficult for development to relate to the existing village.
- There is a lack of information on infrastructure in the Draft Local Plan.
- The Draft Local Plan does not go into enough detail in its Green Belt policies.

### **3. Loughton Town Council**

The main points raised are:

- Loughton Town Council support the principles included in the Draft Vision and Objectives of the Draft Local Plan but this is paired with significant objection to the allocations in Loughton.
- The Draft Local Plan is not perceived to reflect the Issues and Options consultation feedback especially in relation to the topics of green spaces and urban intensification.
- The two key issues for Loughton Town Council are the approach to urban intensification and the inadequate provision and the lack of information regarding infrastructure in the Plan.
- Sites SR-0356, SR-0358, SR-0361 are opposed due to the impact that development of these spaces would have on the community. Loughton Town Council believe that the allocations conflict with the Draft Local Plan policies.
- EFDC should prepare a CIL charging schedule.
- The Central Line is under immense pressure already and development proposals will worsen this.
- Loughton Town Council stated their support for a new garden settlement, potentially in the form of the Roding Village proposals.

### **4. Epping Town Council and North Weald Bassett Parish Council's Joint Response**

This was a joint response submitted to the Council alongside individual responses by Epping Town Council and North Weald Bassett Parish Council. The main points raised are:

- The spatial strategy put forward in the Draft Local Plan does not represent proportionate distribution between settlements as put forward in the Issues and Options 2012 consultation and favoured by residents.
- This has led to a disproportionate distribution pattern focusing on allocations in Epping town and North Weald village. The population increases that will result from this pattern of growth are of concern to both Epping Town Council and North Weald Bassett Parish Council.

## **5. Buckhurst Hill Parish Council**

The main points raised are:

- Buckhurst Hill Parish Council support the principles included in the Draft Vision and Objectives of the Draft Local Plan, however the magnitude of development and the impacts for some settlements are not supported.
- The Parish Council raised concern over the relocation of the Princess Alexandra Hospital and stated that the new location would need to be easily accessible by public transport.
- The employment policies in the Draft Local Plan are supported however there is widespread concern over the loss of retail space to residential uses.
- The number of homes proposed for Buckhurst Hill is too high, the figure for 53 homes put forward in the Issues and Options consultation is more achievable and realistic. Some of the specific site allocations are unsuitable for Buckhurst Hill.
- There is a lack of information on infrastructure in the Draft Local Plan. The current infrastructure is at capacity and there is a lack of public transport alternatives to the Central Line in the district. Development should not be able to progress without infrastructure being guaranteed.

## **6. Waltham Abbey Town Council**

The main points raised are:

- Waltham Abbey Town Council support the principles included in the Draft Vision and Objectives of the Draft Local Plan and the spatial strategy in general. However, some sites are too large and the Council has a preference for smaller sites.
- Concern was expressed in relation to the proposed change in the primary shopping area boundary for Waltham Abbey. The Town Council do not agree with the designation of the retail area as a small district centre and the exclusion of Tesco and Lidl in the proposed new boundary amendment, as these are two of the main retail attractions in the Town.
- There is not enough information on employment and infrastructure in the Draft Local Plan.
- The approach to widen the visitor economy is supported.

## **7. Epping Town Council**

The main points raised are:

- The proposed housing allocation for Epping has increased since the Issues and Options consultation in 2012.
- The level of development poses a threat to the character of Epping. Its current physical layout will not cope with the amount of new houses proposed and there will be significant impacts on traffic congestion and parking.
- The Town Council considers development can only be sustainable if infrastructure is in place and this should be in place before new residents move in. The requirements for each site regardless of size should be set out clearly in the Draft Local Plan.

- The Town Council support the protection of bungalows and town centre retail space through the Draft Local Plan.

## **8. Theydon Mount Parish Council**

The main points raised are:

- Theydon Mount Parish Council raised concern over the relocation of community facilities on traffic congestion and the accessibility to residents.
- Public transport is a key issue in the district and needs to be supported in the Draft Local Plan. The Parish Council support the Epping-Ongar railway extension.

## **9. Moreton, Bobbingworth and the Lavers Parish Council**

The main points raised are:

- There is a lack of information on infrastructure in the Draft Local Plan. Key issues that need to be addressed are the impact of Heavy Goods Vehicles on rural roads and the decline of rural bus services.
- Support for the flood risk policies included in the Draft Local Plan.

## **10. Sheering Parish Council**

The main points raised are:

- Sheering Parish Council agree with Draft Vision and Objectives in the Draft Local Plan, however raise concern over the Green Belt boundary amendments in Sheering.
- Local employment and retail provision should be further protected in the Draft Local Plan policies.
- The Parish Council raised objection with the Harlow strategic sites due to the magnitude of the impact on Sheering, and felt that development would lead to Sheering merging with Harlow.
- There is a lack of information on infrastructure. There is a current deficit in infrastructure provision in Sheering.

## **11. Roydon Parish Council**

The main points raised are:

- The Parish Council stated support for development focused around the M11 and the LSCC corridor.
- Concern was raised over the volume of development in Harlow due to the possibility of merging with some settlements within Roydon Parish, and potential impacts on the character of settlements.
- The Parish Council object to the release of Green Belt land at Roydon.
- There are too many Traveller sites in the Roydon Parish.
- The impact of HGVs on rural roads is a key issue that the Draft Local Plan must address.

## **12. Stanford River Parish Council**

The main points raised are:

- There is a lack of information on infrastructure in the Draft Local Plan. Key issues that need to be addressed are the impact of Heavy Goods Vehicles on rural roads and the decline of rural bus services.
- Support for the flood risk policies included in the Draft Local Plan.

## **13. Ongar Town Council**

The main points raised are:

- There is a lack of Green Belt policies in the Draft Local Plan.
- Ongar Town Council stated a preference for smaller allocated sites.
- There is a lack of information on infrastructure in the Draft Local Plan. The existing infrastructure is already at or over capacity.
- The Town Council raised concern over the provision of public transport in rural areas, in light of the declining bus services.
- The overall scale of housing is considered to be too high across the district.

## **14. Epping Upland Parish Council**

The main points raised are:

- The Draft Local Plan must ensure that the landscape ridges in Epping Upland are protected from negative impacts of the proposed development.
- Not enough attention has been given to potential brownfield sites to meet the district's housing requirement.
- There is a lack of information on infrastructure and employment in the Draft Local Plan.
- A key issue facing the district is pollution from traffic congestion, and EFDC need to address this in the context of future development.

## **15. Chigwell Parish Council**

The main points raised are:

- The Parish Council disagrees with the proposed Limes Farm site allocation due to its impact on a Grade 2 Listed Building and the resultant loss of urban open space. The loss of open space goes against Draft Local Plan policies that should be designed to protect green spaces in the district.
- The options for development in the Chigwell Neighbourhood Plan are preferred by the residents of Chigwell rather than those set out in the Draft Local Plan.
- The impact on transport networks in the District has not been adequately considered in the Draft Local Plan.

## **16. Fyfield Parish Council**

The main points raised are:

- The amount of affordable housing in the area fails to address the difficulties of young people and families to buy a house in the district.
- There is a lack of material assurances for infrastructure provision in the Draft Local Plan.

### **17. North Weald Bassett Parish Council**

The main points raised are:

- The strategy of proportionate distribution allowing for constraints has not followed and the Parish Council disagree with the spatial strategy in the Draft Local Plan.
- The feedback to the Issues and Options consultation has not been represented in the Draft Local Plan.
- Housing densities should be increased to enable the reduction in the number of sites allocated and in consequence Green Belt land removed.
- The Parish Council stated support for the North Weald Masterplan.
- High quality agricultural land should not be built on in line with the requirements of the NPPF.
- There is a weighted focus on North Weald Bassett in all of the options put forward in the Sustainability Appraisal.
- The Parish Council strongly support the retention of aviation uses and the promotion of leisure uses at North Weald Airfield.
- The overall scale of housing is considered to be too high across the district, especially at North Weald Bassett.

### **Local Planning Authorities**

The Council received sixteen written responses from Local Planning Authorities in response to the Draft Local Plan consultation:

1. Braintree District Council
2. City of London – Conservators of Epping Forest
3. Harlow District Council
4. London Borough of Newham
5. Uttlesford District Council
6. Mayor of London
7. Broxbourne Borough Council
8. Lee Valley Regional Park Authority
9. Brentwood Borough Council
10. Chelmsford City Council
11. London Borough of Waltham Forest
12. Basildon Borough Council
13. London Borough of Redbridge
14. East Herts Council
15. Hertfordshire County Council
16. Essex County Council

#### **1. Braintree District Council**

Braintree District Council had no comments for the Draft Local Plan at this stage.

## **2. City of London – Conservators of Epping Forest**

The Conservators of Epping Forest encourage a consistent approach to Sites of Special Scientific Interest (SSSI's) and the Epping Forest Special Area of Conservation (SAC). The response recommends that the vision should be expanded to include the wider environment and elements of green infrastructure. The Conservators have developed a vision for Epping Forest which they recommend should be included in the Draft Local Plan, along with specific reference to the vision for a Green Arc – the response highlights that the Infrastructure Delivery Plan does not currently map out the Green Arc or green infrastructure ambitions for the district. The Conservators state support for policies DM 3 and DM 4 however had some wording suggestions. The Conservators are concerned that the Plan is disproportionately led by housing targets. Disagreement was raised to the spatial strategy on the basis that smaller sites distributed across the district do not allow for integrated and large scale infrastructure provision; and that one Green Belt boundary amendment allowing for a large settlement would be preferable to multiple boundary amendments that may lead to further weakening of the Green Belt. The response notes the need for a further iteration of the IDP, work on transport modelling and a full recreational use survey for the Forest. In relation to the strategic sites, the response notes that the Latton Priory site would require green space to the south to protect the setting of the Forest. The Conservators also note that the provision or loss of open space would need to account for impacts on the Forest. Finally, when discussing the Habitats Regulation Assessment the response raises issues around fly tipping, the 400m buffer around the Forest, the impact of recreational uses, and the current impact threshold of 400 houses being too high. The importance of the MoU process is highlighted in relation to the HRA.

## **3. Harlow District Council**

Harlow Council submitted two responses to the consultation. The first response, submitted by Councillor Danny Purton, the Portfolio Holder for Environment, indicates that the Council objects to development to the west and south of Harlow (located in Epping Forest District) unless or until such time as it has been demonstrated that transportation and infrastructure requirements can be delivered at a rate and scale necessary to meet the needs of the Harlow urban area that arise from any such proposed development. The response also expresses concerns that the Draft Local Plan is silent on ways to assist Harlow Council meet its affordable housing need. A further response was also received from Officers which provides support for the collaborative working being undertaken by the Council in accordance with the Duty to Cooperate, but reiterated concerns in relation to ensuring that the transport and infrastructure requirements for Harlow arising from growth proposed can be met.

## **4. London Borough of Newham**

LB Newham is generally supportive of the policies and allocations set out in the Draft Local Plan. The response is focused on the Debden House Centre and Debden House Campsite site, which the Borough owns. The Borough would like to promote residential development on part of the site, which is currently in the Green Belt. The response is supportive of the Council's approach to the visitor economy, promoting recreational activities in the district and the natural environment. The response raises objection to Policy SP 5 on the Green Belt as it lacks clarity on how the Council will consider development proposals that present exceptions to inappropriate development in the Green Belt.

## **5. Uttlesford District Council**

Uttlesford District Council is generally supportive of the draft policies and proposed allocations in the Draft Local Plan and in particular the Council's approach to meet the housing need identified through the joint Strategic Housing Market Assessment. It notes that the SHMA authorities will, however, need to carefully consider the implications of the 2014 projections. Uttlesford note that the proposed allocation of sites around Harlow reflects the outcomes of the strategic sites assessment work undertaken jointly by the SHMA authorities.

## **6. Mayor of London**

The Mayor of London is generally supportive of the policies and allocations set out in the Draft Local Plan. The response supports the approach to strategic collaboration within the LSCC corridor and nearby Local Planning Authorities, and the approach to housing need in the HMA. The response recommends that the Council may wish to reassure itself that it is addressing housing need in accordance with NPPF requirements.

## **7. Broxbourne Borough Council**

Broxbourne Borough Council is generally supportive of the policies and allocations set out in the Draft Local Plan, in particular the settlement strategy of development focused around Harlow and larger town centres, and the aim to meet the full identified need for Travellers over the plan period. The Council seek further information on the impacts and mitigation to the transport network of future development.

## **8. Lee Valley Regional Park Authority**

The Lee Valley Regional Park (LVRP) Authority is generally supportive of the policies and allocations in the Draft Local Plan. The response welcomes the detail on the Park included in the Strategic Context chapter especially the reference to supporting the recreational aims of the Park. The Authority recommends a separate policy on the LVRP due to its importance as part of the district's green infrastructure network. The Authority support Policy SP 5 on the Green Belt; however only agree with the boundary amendments made to reflect planning decisions over the past 20 years. The response does not agree with the other Green Belt boundary amendments or the new designation of 'District Open Land' within the Plan. In particular, the removal of land that is not designated for development at Waltham Abbey and the land that contributes to the landscape of the LVRP at Nazeing. The Authority raises a concern over whether the Lea Valley Glasshouse Industry report had been used to support Policy E 3; and recommended that Policy E 4 made specific reference to the Lee Valley White Water Centre. The Authority does not agree with the sequential approach to Traveller site accommodation used in the Draft Local Plan as it is not considered to comply with Government guidance (Planning Policy for Traveller Sites, August 2015) and puts pressure on Green Belt temporary Traveller sites in the LVRP. The response supports the policies on biodiversity and green infrastructure in the Draft Local Plan, however recommends that reference to the Lea Catchment Nature Improvement Area be included. More detailed text on the relationship between the settlements and the LVRP in the Places chapter is also recommended. Finally, the Authority express their wish to continue to promote the two sites they put forward in the Call for Sites for consideration for residential development.

## **9. Brentwood Borough Council**

Brentwood Borough Council is generally supportive of the policies and allocations set out in the Draft Local Plan, in particular the strategic objectives and vision and the aim to meet the

full identified need for Travellers over the plan period. Brentwood Council raise concerns over the status of the Memorandum of Understanding to agree the 51,100 requirement and the lack of information on how the shortfall will be met from the OAN figure based on 2014 projections.

#### **10. Chelmsford City Council**

The response is generally supportive of the policies and allocations set out in the Draft Local Plan. Chelmsford Council has raised concerns over how the full objectively assessed housing need will be met and that due attention needs to be paid to the 2014 housing projections. There is also concern about pressure on the highway network and in particular on the A414 as a result of the proposed development.

#### **11. London Borough of Waltham Forest**

LB Waltham Forest is generally supportive of the policies and allocations set out in the Draft Local Plan, in particular the Council's attempt to meet the OAN. Waltham Forest consider that the affordable housing policy should be strengthened to include an expectation for on-site provision.

#### **12. Basildon Borough Council**

Basildon Borough Council is generally supportive of the policies and allocations set out in the Draft Local Plan and supports the approach taken to identifying the objectively assessed housing need for the District. Concern is however raised over the decision by the Strategic Housing Market Area not to meet the projected housing needs as identified in the 2014 projections in full due to the pressure that might result on other South Essex authorities. This is of concern as the South Essex Housing Market Area growth is unlikely to be able to be accommodated in full. The Council seek assurance that the West Essex and East Hertfordshire authorities identify how this unmet need will be addressed. Support is given to the approach towards employment need and Gypsy and Traveller accommodation. Basildon Borough Council raised queries in relation to the site selection process.

#### **13. London Borough of Redbridge**

LB Redbridge is generally supportive of the policies and allocations set out in the Draft Local Plan in particular the vision and policies for Epping and Chigwell, and EFDC's hierarchical approach to the delivery of strategic sites. The Council appreciate that further work will be undertaken in relation to specifying the infrastructure required to support the Draft Local Plan.

#### **14. East Hertfordshire District Council**

East Hertfordshire District Council is generally supportive of the approach in the Draft Local Plan and in particular the way in which the Council has reviewed the Green Belt to identify potential land for development and the commitment shown to joint working across the Housing Market Area. East Herts appreciate that further work will be undertaken to assess the deliverability of the proposed sites.

#### **15. Hertfordshire County Council**

The response received was from the Children's Services department of Hertfordshire County Council. Hertfordshire County Council outlined that the draft Local Plan needs to ensure that sufficient school places are being provided, and that there is some crossover between

children attending school in Epping Forest District and Herts County. Both Waltham Abbey and Lower Sheering/Sheering were highlighted as areas where the County Council's will need to work together to ensure that the correct number of school places are provided.

## **16. Essex County Council**

Essex County Council is generally supportive of the draft policies and proposed allocations set out in the Draft Local Plan. The County support the continuation of the Duty to Co-operate practices and state they will continue to support the Council in the development of the Infrastructure Delivery Plan and consider that it is important for the full range of infrastructure requirements arising from growth to be included. Some amendments to flood risk, drainage and surface water management policies are suggested along with some strengthening of the evidence base. An additional policy on healthy communities is suggested.

### **Local Organisations**

The Council has received responses from a variety of local organisations. The summaries provided only represent a selection of the responses received from local organisations. The bulk of responses are still being reviewed and will be included in a further detailed report on the Regulation 18 consultation. The responses covered here are:

1. Buckhurst Hill Village Forum
2. The Epping Society
3. Loughton Residents Association
4. Chigwell Resident Association
5. The Roydon Society
6. Theydon Bois Action Group
7. Friends of Epping Forest
8. North Weald Bassett Preservation Society
9. Lea Valley Growers Association
10. Lea Valley Food Task Force
11. Broadway Town Centre Partnership
12. Theydon Bois and District Rural Preservation Society
13. Abbess Roding Conservation Society
14. Buckhurst Hill Residents Society
15. Waltham Abbey Community Association

#### **1. Buckhurst Hill Village Forum**

The main points raised include:

- The Village Forum commented on the site allocations in Buckhurst Hill. In regards to SR-0225 Queens Road Car Park, the Forum highlighted the importance of the current car park to small businesses in Queens Road. Concern was expressed over whether the parking spaces would be retained as well as providing parking for new residents, the impact of construction and heightened traffic congestion in the area.
- In regards to SR-0813 Lower Queens Road, the Forum stated that the current businesses have not been informed of the plans to allocate the site, and raise concerns that development here could be disruptive and damaging to retail provision in the area.
- The Forum would like both sites removed from the Plan.

- There is a lack of information on infrastructure in the Draft Local Plan.

## **2. The Epping Society**

The main points raised include:

- The Epping Society disagree with the Draft Local Plan's intention to build on the Green Belt. The review that these allocations are based on was undertaken with the premise of releasing land for building sites.
- The Green Belt is a successful UK environmental policy and should not be approached casually.
- There is a lack of information on infrastructure in the Draft Local Plan, specifically it is missing the location/funding/phasing of future infrastructure to support allocations.
- The Society feel that there was not an objective decision process on site allocations. Some sites have been allocated despite identifying negative elements in the Arup report, and for some the housing density has been changed from that recommended in the report.
- Further consultation must take place on any additional sites or changes to the Green Belt.
- The focus for future housing should be on increasing the density of existing communities and the housing density of individual sites.

## **3. Loughton Residents Association**

The main points raised include:

- The Loughton Residents Association has raised a strong objection to the Draft Local Plan. The Association is concerned that the Draft Local Plan does not reflect the outcomes of the Issues and Options 2012 consultation; that the policies are in contrast to the stated Draft Vision and Objectives and that genuine alternatives to the current housing distribution have not been explored. Specifically, the justification for not considering a new village development or greater densification around Harlow is considered to be insufficient.
- The Regulation 18 consultation has been inadequate.
- The definition of 'adequate' open space is not clearly defined in the Draft Local Plan.
- The Association stated support for Policy E 2 on local retail provision.
- Central Line capacity cannot be expanded which makes any future development in Loughton unsustainable.
- The Association strongly disagree with the proposals for Loughton based on issues such as the impact on parking and the building on of valuable open spaces that aid the quality of life and health and wellbeing of residents.
- Jessel Green and Westall Road Amenity Green Space should both be designated as Local Green Space.
- The Association query whether the Council is committed to delivering the necessary infrastructure needed to support housing allocations. The existing infrastructure in Loughton is already under strain.

## **4. Chigwell Residents Association**

The main points raised in the response from the Chairman include:

- Building should take place on the edges of Chigwell where there will be less visual impact. Sites located in the central area will worsen current congestion and sites toward Redbridge could cause the merging of settlements.
- The Chairman does not agree with the allocations for Chigwell, and outlined how he strongly opposed the sites SR-0478 and SR-0588 due to impacts on traffic congestion and the loss of open space. SR-0557 would lead to the merging of communities and would negatively impact on environment.
- Support was stated for SR-0601, SR-0894, SR-0895, SR0896 and SR-0898.
- Residents support the Chigwell Neighbourhood Plan which has proposed alternatives for development.

## **5. The Roydon Society**

The main points raised include:

- There is a lack of information on infrastructure in the Draft Local Plan.
- The Society raised concerns over the allocations for Roydon Parish in terms of the provision of infrastructure.
- Landscaping should be a priority for the area separating the village of Roydon with proposed major development around Harlow.
- The B181 is a busy rural road and the impact of the West Sumners site will need to be considered.
- If other areas reject their housing allocations it should not fall to Roydon and Harlow to expand their already large allocation.
- There is an overconcentration of Gypsy and Traveller sites in Roydon Parish.
- The Society would support development on the Old Coal Yard site.

## **6. Theydon Bois Action Group**

The main points raised include:

- The number of homes needed in the district is based on out-migration from London not to provide for natural growth of the existing residents. Developers should be required to build on London brownfield sites first before looking to the district to house London's population.
- The Draft Local Plan does not justify exceptional circumstances to amend the green belt boundary.
- There is no justification for the 23% increase in size of Theydon Bois and this is not sustainable due to the strain on the village's infrastructure. Development should be focused on towns.
- The Action Group disagree with the loss of Green Belt land for development of Harlow and the Garden Town designation.
- Employment sites should be focused on the towns and large settlements.
- Policy SP 5 is not strong enough and only repeats the NPPF.
- Theydon Bois Action Group disagree with all site allocations in the Green belt at Theydon Bois due to there being a lack of permanent boundary features and the resulting impact on the landscape/openness of the Green Belt.

## **7. Friends of Epping Forest**

The main points raised include:

- Friends of Epping Forest support the Draft Vision and Objectives, however feel that the text could be strengthened by referencing nature conservation and green spaces.
- The projected housing need of an 11,400 increase is significant and may impact the forest through pollution from congestion, pressure on car parking and increased visitor pressure. The current buffer zone that surrounds the Forest should remain undeveloped.
- Policy E 4 on the visitor economy should include an appreciation of the finite capacity of both Epping Forest and the Lee Valley Regional Park.
- Friends of Epping Forest agreed with the Draft Local Plan policies on landscape character, the Epping Forest SAC/Lee Valley SPA, green infrastructure, open space, place shaping and the natural environment
- There is a lack of information on infrastructure in the Draft Local Plan, the Council have limited control over the delivery of infrastructure.
- More parking should be provided and parking spaces should not be lost.
- Loss of Green Belt should be resisted especially when it breaches the existing village boundary, all brownfield sites should be used first.

### **8. North Weald Bassett and District Preservation Society**

The main points raised include:

- The consultation questionnaire was inadequate and the maps contained within the Plan were not of a good quality.
- North Weald is receiving 23% of planned growth which will change it from a village to a small town.
- There is a lack of information on infrastructure in the Draft Local Plan.
- The sites proposed for release from the Green Belt at North Weald Bassett all perform highly against the purposes of the Green Belt in the Green Belt Assessment and therefore should not be proposed for development.
- Concern was raised over the impact of development on flooding and drainage in North Weald Bassett.

### **9. Lea Valley Growers Association**

The main points raised include:

- The Lea Valley Growers Association support the Draft Vision and Objectives' reference to the glasshouse horticultural industry
- The Association will look to the Council to prevent the loss of glasshouse sites to residential uses or the surrounding of glasshouse sites by homes that may prevent them from functioning.
- A number of comments were made to Policy E 3 on the glasshouse industry, focusing on: enabling the expansion of the glasshouse horticultural industry; adding low carbon energy generation to the facilities permitted to be built on glasshouse sites; the removal of 'openness' as a criteria against development; support for a criteria based approach that allows for development outside horticultural development areas; and the provision of workers accommodation on site.
- Multiple glasshouse sites that are not currently in use are put forward for alternative uses. Site SR-0151 is promoted as a new employment site in the response.

### **10. Lea Valley Food Task Force**

The main points raised include:

- The glasshouse industry appreciated the need to develop a long term plan on the location of glasshouse industry sites that covers what approach will be used to determining alternative uses for existing sites that are no longer financially viable.
- New/alternative sources of energy supply are crucial to the future of the glasshouse industry.

### **11. Broadway Town Centre Partnership**

The main points raised include:

- New development in Loughton should not negatively impact existing retail provision.
- Langston Road and Debden Broadway are two interlinked areas. The Broadway Town Centre Partnership would support the extension of the town centre boundary to include both so they can be considered as a whole.

### **12. Theydon Bois and District Rural Preservation Society**

The main points raised include:

- The online questionnaire was inadequate for the purposes of the consultation and limited the response able to be given.
- The removal of small areas of the Green Belt in the Draft Local Plan undermines the integrity of the Green Belt. There is no justification of the exceptional circumstances needed for Green Belt release.
- Building on the Green Belt is not sustainable as encourages commuting into London from the district. The Draft Local Plan should only plan for the natural population change of the existing residents.
- The level of contingency included in the Draft Local Plan is way too high.
- The Society disagrees with the Draft Local Plan's spatial strategy to distribute housing across the settlements in the district. Instead, housing should be focused on towns where brownfield sites exist and around Harlow.
- There is no justification for the 23% increase in the size of Theydon Bois.
- Employment opportunities should be focused on sites where large allocations of houses have already been made.
- Allocations for Theydon Bois are on high quality Green Belt land with no exceptional circumstances demonstrated for their release. If developed, they will harm the existing character of the village.
- There is a lack of information on infrastructure in the plan, and the infrastructure in Theydon Bois is already under strain. The Society has concerns on healthcare provision, public transport, roads, school places, water supply and drainage and flooding.

### **13. Abbess Roding Conservation Society**

The main points raised include:

- Ongar leisure centre is a thriving business and should not be replaced by housing. It is important to the community.

### **14. Buckhurst Hill Residents Society**

The main points raised include:

- The Buckhurst Hill Residents Society object to the Draft Local Plan's inclusion of a site being a material consideration to planning applications.
- There is a lack of information on infrastructure in the Draft Local Plan and more detail must be included.
- The consultation was inadequate and has not given the residents a fair chance to comment on the plan.
- The Society disagree with the removal of the Green Belt at SR-0176 Powell Road and outline that the Council needs to communicate what will happen to the businesses that currently are located at SR-0813. The Society disagree with site SR-0225 on the basis that its development would worsen parking and traffic difficulties in Buckhurst Hill.

### **15. Waltham Abbey Community Association**

The main points raised include:

- There is a lack of information on infrastructure in the plan and provision cannot be guaranteed by Council. Infrastructure should be in place before development is built.
- The response raised concern over the development of Waltham Abbey Community Centre as it is a much used facility that is part of the community.
- Existing retail struggles to cope with out of town provision and the Draft Local Plan should address this.