

Appendix A - Key Issues identified through the Regulation 18 Consultation of the Draft Local Plan 2016

Key Issue	EFDC Response
<p>Meeting the requirements for providing land for custom and self-build housing.</p>	<p>Draft Policy H 1 in the Draft Local Plan includes the Council's proposed policy for future housing mix and accommodation types, including self-build and custom-build housing. As required under Section 1 of the Self-build and Custom Housebuilding Act (2015), the Council currently maintains a register of individuals and associations of individuals seeking to acquire land for self- or custom- build housing. Should the SHMA be updated at a later date, this register will be used as evidence to identify the level of demand for custom and self-building housing.</p>
<p>Demonstrating a five year housing land supply and addressing an historic shortfall in housing delivery.</p>	<p>The Draft Local Plan includes a range of proposed housing allocations, including smaller sites which may be delivered relatively quickly, and other larger strategic sites of greater complexity which will may have longer lead-in times to delivery. Appendix 5 to the Draft Local Plan includes an indicative housing trajectory for residential allocations across the Plan Period. The Council will be undertaking further work to identify and demonstrate a five year supply of housing and to agree an approach to meeting any shortfall in housing supply in a way that is feasible. This will be informed by the further site selection work which is being carried out this year.</p>

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<p>Identifying the District's full Objectively Assessed Housing Need.</p>	<p>The 2012 SHMA used as its starting point the DCLG household projections of 2012 to define the objectively assessed need for the West Essex/East Herts SHMA. This set out a combined level of housing need across the SHMA area of 46,058 homes for the period 2011-2033.</p> <p>Following the publication in July 2016 of the 2014 household projections updating the 2012 data the SHMA authorities undertook an update – see note on updating the overall housing need based on 2014 based projections (ORS August 2016). This note was used as the basis for preparing the Memorandum of Understanding (MoU) on the distribution of objectively assessed housing need across the West Essex/East Herts SHMA.</p> <p>The East Herts District Plan has been submitted for examination and in response to the Inspector’s note of 16 May 2017 on the submitted plan the four authorities have commissioned a further update from ORS to review the overall housing need across the SHMA taking account of the latest ONS population estimates due to be published in June 2017. This will include clear recommendations on the OAN for the SHMA and individual authorities. It will include an update of the balance between the need for market housing and the need for affordable housing within the overall housing need. A final report is scheduled for 14 July 2017.</p> <p>The Draft Local Plan based the level of housing growth on the work undertaken for the four authorities and provides for in excess of 11,400 homes (the OAN) over the plan period. Further technical assessments following publication of more recent data may lead to changes to the proposed housing requirement and this will be kept under review between now and the examination of the Plan.</p>
<p>The appropriateness of the housing requirement set out in the Draft Local Plan.</p>	<p>As stated in paragraph 3.62 of the Draft Local Plan, the Council has made provision for sites above and beyond those required to meet the housing target of 11,400 dwellings. This is intended to provide flexibility in terms of managing economic cycles, factors relating to specific sites which may result in them being stalled or needing to be removed from the Plan, and to provide flexibility in case housing requirements increase prior to Examination. This demonstrates the Council's commitment to positive planning to meet the full Objectively Assessed Housing Need.</p>

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<p>The Council's preferred Spatial Strategy and the proposed distribution of growth across the District, including the number of new homes identified for each settlement, and whether this is proportionate.</p>	<p>The Council's preferred spatial strategy as set out in the Draft Local Plan is to focus growth around Harlow, which represents the most sustainable location, with the remaining housing need distributed housing across the settlements of the District. This approach was based on the outcome of the 2012 Issues and Options consultation along with planning judgement, taking account of:</p> <ul style="list-style-type: none"> - impact on the Green Belt and landscape - accessibility to services, - the level of growth need to ensure infrastructure can be supported and any specific needs identified, - the mixture of suitable, available and achievable sites within each settlement, - maximising the development potential within existing settlements focussing on brownfield land with higher densities where possible, - maximising opportunities for growth of North Weald Bassett in line with the Masterplanning Study, and - that development proposals should support the realisation of the emerging settlement visions. <p>Further testing of the proposed distribution of growth across the settlements in the District will be undertaken through options appraisal in the ongoing Sustainability Appraisal.</p>
<p>Ensuring adequate provision for older persons in the District.</p>	<p>In preparing the Draft Local Plan, the Council has used up-to-date evidence on housing needs, including careful consideration of future population projections. This evidence (set out in the SHMA 2015) identifies the need for specialist housing to support an ageing population, included assisted living and care homes over the plan period, and this is included within the general housing requirement. Draft Policy H 1 demonstrates that the Local Plan will require that future development includes an appropriate mix of housing to meet the needs of the ageing population in the District, and that development is located in the most sustainable locations and supported by the necessary infrastructure. Part C of Draft Policy H 1 makes provision for specifically designed housing to meet these specialist needs, including older persons accommodation, where there is a proven identified need, the location is appropriate and the proposals are well designed.</p> <p>Comments made on meeting older persons housing needs, including the potential for a new specific policy on older persons housing, will be considered by the Council as it finalises the Pre-Submission (Regulation 19) version of the Plan.</p>

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<p>The level of affordable housing provision required by Draft Policy H 2 and whether the approach provides sufficient flexibility, and is supported by evidence.</p>	<p>The Draft Local Plan sets out the approach to affordable housing in Draft Policy H 2. The approach to seeking a minimum of 40% affordable homes on sites of 11 or more dwellings is supported by evidence in the SHMA (2015) and the Stage 1 Assessment of the Viability of Affordable Housing, Community Infrastructure Levy and Local Plan (2015). This evidence suggests that the level of affordable housing is viable and deliverable. Further viability work will be undertaken to consider in more detail the viability of the Local Plan and its draft housing allocations, and the viability implications of the Starter Home requirements, and will take into account the responses received to the Draft Local Plan consultation.</p>
<p>The District's approach to managing impacts on Epping Forest Special Area of Conservation (SAC).</p>	<p>An HRA screening of the Draft Local Plan supported the approach outlined in the agreed Memorandum of Understanding (MoU) on managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation as a basis to achieve material improvements in air quality and nitrogen inputs to the Forest SAC by 2033. The MoU commits the authorities to prepare an action plan which will be taken forward to Regulation 19 publication. The Council is currently updating the transport modelling in this District to inform this work and will be looking to identify the requirements for accessible natural greenspace and financial contributions, working together with other relevant authorities.</p>
<p>Satisfying the Duty to Cooperate.</p>	<p>The four districts in the HMA for West Essex/East Herts (Epping Forest DC, East Herts DC, Harlow DC and Uttlesford DC) have a substantial history of coordinated working on strategic cross boundary planning issues including housing need, employment, transport etc. The Councils together with other adjoining authorities and the two Counties (Herts CC and Essex CC) established the Cooperation for Sustainable Development Member Board in October 2014. This has been meeting monthly and is serviced by an officer group. The authorities through the Board have commissioned a number of pieces of evidence to support the identification of the objectively assessed employment and housing need; to review strategic options for accommodating residential growth across the area; and to assess the potential for delivery of strategic sites around Harlow. Further work is programmed. There are now three signed MOUs on distribution of housing need, highway impact and air quality impacts on Epping Forest, and further evidence base work is underway to underpin a fourth MOU on the distribution of economic growth across the Functional Economic Market Area.</p> <p>The Council is satisfied that it is fulfilling the requirements of the Duty to Cooperate in the preparation of its Local Plan and continues to engage constructively, actively and on an on-going basis with relevant bodies on strategic planning matters.</p>

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<p>Planning for the relocation / redevelopment of the Princess Alexandra Hospital.</p>	<p>The Princess Alexandra Hospital, which is located on a highly constrained site near Harlow town centre, faces a number of challenges in continuing to serve the needs of its catchment. One potential option is to relocate to a new site, and two potential new sites have been identified, one of which is in Epping Forest District and the other in East Herts District. The hospital is currently preparing a Strategic Outline Case in order to apply for the necessary funding from Government and the outcome of this work will be required before a decision is made on the future of hospital provision in the area.</p>
<p>Meeting the requirements for Sustainability Appraisal and Habitats Regulation Assessment.</p>	<p>An Interim Sustainability Appraisal and Habitats Regulation Assessment screening were published alongside the Draft Local Plan. Further work will be undertaken on SA and HRA as part of the Proposed Submission (Regulation 19) version of the Plan, and will consider comments made through representations.</p>
<p>The assessment of Strategic Options and sites around Harlow.</p>	<p>The AECOM study (August 2016) for the West Essex and East Herts authorities considered the strategic options for residential growth around Harlow, and the result of this work informed the proposed strategic site allocations. Further work is being undertaken by AECOM and a technical addendum is being prepared to support this work which will provide additional information. This will be published alongside the Pre-Submission (Regulation 19) version of the Plan and will consider the comments made through representations.</p>
<p>Consistency between the draft vision and objectives, draft policies and proposed site allocations in the Draft Local Plan.</p>	<p>Plan-making is an iterative process. The draft vision and objectives, draft policies and proposed site allocations have informed, and in turn have been informed, as the work to produce the draft Local Plan has progressed. Following Regulation 18 consultation, the vision and objectives, policies and site allocations will be revisited as part of preparation of the Proposed Submission (Regulation 19) version of the Plan.</p>

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<p>Infrastructure requirements and delivery, including provision for CIL charging schedule.</p>	<p>A Draft Infrastructure Delivery Plan (IDP) was published alongside the Draft Local Plan for Regulation 18 consultation, which set out a baseline of existing infrastructure provision and areas of identified shortfall. The IDP is being developed iteratively, and the Council will be undertaking further modelling work on the proposed site allocations and policies in the Draft Local Plan. The updated IDP which will be prepared in support of the Pre-Submission (Regulation 19) version of the Plan will identify the infrastructure required to support planned growth, including the organisation responsible for delivering each infrastructure item, the period over which the relevant investment will be required, and the cost of each item and how it will be funded.</p> <p>A decision on whether to adopt a Community Infrastructure Levy (CIL) schedule for funding infrastructure has not yet been made. The Council will be undertaking further viability work on the proposals and policies in the Draft Local Plan to assess whether or not a CIL charging schedule would be viable and appropriate. This further evidence will then be used to inform the preparation of the Pre-Submission (Regulation 19) version of the Plan, and will be used to decide whether or not to progress with introducing CIL for the District.</p>
<p>The identification of District Open Land in Draft Policy SP 5.</p>	<p>The rationale for identifying District Open Land is set out in Background Paper 4.</p>
<p>Concerns about traffic congestion and other transport issues (including cross-boundary issues), and how these are being addressed in the Plan.</p>	<p>The Council has undertaken a number of transport studies to inform the Draft Local Plan. Information on these can be found in Background Paper 2 and associated Technical Notes. Further transport modelling work has been commissioned to understand the detailed impacts of the draft local plan site allocations and identify interventions that may be required to mitigate any adverse impacts. The evidence produced as part of this further transport modelling will feed into final selection of sites in the Pre-Submission Publication Plan. A joint Transport Memorandum of Understanding has been signed between the HMA district authorities, Essex County Council, East Hertfordshire County Council and Highways England. The MoU sets out the collaborative working approach between the authorities to addressing strategic and cross-boundary highway and transport issues around Harlow.</p>
<p>The relationship between the Draft Local Plan and emerging and forthcoming Neighbourhood Plans.</p>	<p>We are aware that a number of Parish and Town Councils within the District are preparing neighbourhood plans for their areas. The Council will continue to provide advice and assistance to ensure that the Neighbourhood Plans are in general conformity with the strategic policies contained in the Local Plan and in line with national planning policy guidance.</p>

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Development planned at North Weald Airfield.	The employment use(s) on North Weald Airfield over the Plan period, include the continued operation of the airfield, will be part of the further employment review work being undertaken by the Council.
How the North Weald Bassett Masterplanning Study has informed the Draft Local Plan.	<p>Allies and Morrisons Urban Practitioners (AMUP) were commissioned by the Council in 2014 to undertake a masterplanning study of North Weald Bassett which integrated the findings of earlier studies and public consultation to present a long term vision and aspirations for the village. The Study tested two spatial options to accommodate new homes, and concluded that Scenario B, which promotes development to the north of the settlement, was preferred.</p> <p>The outcome of the Study, using the higher growth option of 1,616 homes, was used to inform the selection and indicative capacity assessment of sites in North Weald Bassett, and to inform Draft Policy P 6 and the settlement vision in the Draft Local Plan.</p>
Consistency with the Housing White Paper.	Please see report to Neighbourhoods Select Committee on 21st March 2017, which includes as an appendix the Council's response to the Housing White Paper.
Suggested changes to the wording of policies in the Draft Local Plan.	Detailed comments on the wording of Development Management policies are noted and will be considered further by the Council's technical specialists in preparing the Regulation 19 Pre-Submission Local Plan.
Concerns regarding the capacity of the Central Line.	The Council is undertaking further work with Transport for London, LB Redbridge and LB Waltham Forest to ensure that there is sufficient capacity on the Central Line over the plan period.
The requirement to consider flood risk constraints through the Draft Local Plan.	The Council has undertaken an SFRA Stage 1, and used the Environment Agency's Flood Risk Zone mapping to assess sites proposed for allocation. The Council's strategy is to ensure that where possible all development is in Flood Zone 1 and only proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1.
Mitigating and managing the impacts of poor air quality.	The Habitats Regulation Assessment (HRA) has informed the MoU on the impact of air quality on Epping Forest SAC, and the Council will be developing an action plan with neighbouring authorities to mitigate any impacts on the Forest. Air quality was one of the assessment criteria undertaken at Stage 2 of the Site Selection process.

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The Lee Valley Regional Park and meeting the requirements under Section 14(1) of the Park Act.	The requirements under the Park Act have been met in sections 3.17 to 3.23 of the Draft Local Plan. Should the Lee Valley Regional Park Authority publish a updated Plan, this will be considered where necessary.
Strategic Masterplanning for strategic sites and Planning Performance Agreements.	Please see report to Cabinet Committee 15 June 2017 which sets out the Council's approach to Strategic Masterplanning and PPAs.
Concerns regarding the proposed Green Belt boundary alterations.	The Council has undertaken a Green Belt Review as part of the preparation of the Local Plan. This was one of the pieces of evidence taken into account in the site selection process. Further work to define detailed Green Belt boundary alterations will be undertaken prior to the Pre-Submission (Regulation 19) version of the Plan.
Requirement for further evidence on sports and recreation to support the policies in the Local Plan.	The Council is undertaking Open Space, Playing Pitch and Indoor Sports Studies in order to understand the current level of provision, and identify any additional requirements to provide sports and recreation facilities to meet the needs of the current and future population. This evidence will inform further site selection work, and any additional sports provision or policy will be set out in the Pre-Submission (Regulation 19) version of the Plan and the IDP.
Concern that the polices and proposals in the Draft Local Plan will result in a loss of car parking spaces or insufficient provision of new parking spaces.	As stated in the Draft Local Plan, the redevelopment of car parks are expected to include new homes and retention of the current car parking provision. The Council is pursuing a wider transport strategy that focusses on encouraging sustainable transport choices and reduction in car use, however it is committed to finding the right balance between accommodating the car and making the best use of land. For further information on the Council's approach to car parking standards, please see the Transport Background Paper.
Concern that the polices and proposals in the Draft Local Plan will result in a negative impact on the character of settlements.	The Site Selection Methodology had regard to settlement character under Stage 2 Criteria 5.2, which considered impact on heritage assets and their setting, Conservation Areas, landscape and built form amongst other factors, and these were also taken into account in the indicative capacity assessment. Additionally, Draft Policies DM 7, DM 8 and DM 9 make provision to protect heritage assets and ensure high quality design. Comments made will be considered further in preparing the Pre-Submission (Regulation 19) version of the Plan.

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<p>Concern that the Draft Local Plan will result in a loss of public open spaces.</p>	<p>A small number of sites were put forward for assessment for development on land that is currently classified as managed open space within settlements. The site selection process concluded that a small number of sites which involve the loss of an element of open space should go forward as proposed allocations and for all, it is assumed that a minimum of 25% of the open space would be retained. This includes two proposed allocations on managed open space in Loughton and one in Chigwell. For more information see the background paper 3 on Open Space. Comments made will be considered as part of preparation of the Pre-Submission (Regulation 19) version of the Plan.</p>
<p>Concern regarding the potential impact of proposed new traveller sites and expanded existing traveller sites.</p>	<p>The potential impact of traveller sites on was considered as part of the site selection process. This included looking at candidate sites' relationship to existing settlements, services and facilities, and neighbouring uses. Detailed assessment of the impact of development is considered through the planning application process at a later stage.</p>
<p>The principle of releasing Green Belt land proposed in the Draft Local Plan and demonstrating exceptional circumstances for doing so.</p>	<p>Government policy on the Green Belt, set out in the NPPF, is clear that Local Planning Authorities with Green Belts should establish Green Belt boundaries through their Local Plans. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Over 92% of Epping Forest District is designated as Green Belt and the Green Belt boundaries have not been reviewed since the existing Local Plan was adopted in 1998.</p> <p>The evidence base for the Local Plan (most importantly the Report on Site Selection 2016) indicates that providing for the development needs to support long-term sustainability of the District requires a review of the Green Belt boundary. While the Council is pursuing a strategy which seeks to minimise the use of Green Belt land for development, it is clear that insufficient land outside the Green Belt exists to meet the development needs of the District, and alterations to the Green Belt boundaries are necessary. These local conditions demonstrate exceptional circumstances that require the proposed release of Green Belt land. For further information, please see Background Paper 4.</p>
<p>The estimated capacity and density of development on proposed allocation sites.</p>	<p>The Site Selection Methodology (2016) sets out how the more detailed indicative capacity assessment was undertaken at Stage 3 of the site selection process. More work will be undertaken on the proposed allocation sites in preparing the Pre-Submission version of the Plan (Regulation 19) and a revised site capacity may be included in site guidance</p>

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Issues relating to Glasshouse evidence and policy in the Draft Local Plan.	Responses to the consultation generally supported the inclusion of Draft Policy E 3, whilst raising some concerns around managing the impact of HGV traffic on local roads particularly in Nazeing and Roydon. Comments will be considered and amendments will be made to Draft Policy E 3 where appropriate and supported by the evidence.
Comments relating to the forthcoming identification of employment sites for allocation in the Plan, and further employment land evidence.	Prior to the consultation on the Draft Local Plan, the Council completed Stages 1 and 2 of the Site Selection Methodology for employment sites. The remaining stages of the Site Selection Methodology will be completed prior to the Council publishing its Pre-Submission (Regulation 19) version of the Plan. To ensure that the consideration and assessment of known and potential employment sites within the District is up-to-date (in accordance with requirements in the National Planning Policy Framework), the Council has commissioned an Employment Review. This will review and, where relevant, update evidence currently held by the Council on the existing and potential future employment land supply in the District and the demand for employment land that is likely to arise over the Plan period. The outcomes from this work will inform further site selection work.
Suggestion for the need to undertake a Water Cycle Study.	The Council are currently discussing with neighbouring authorities, utility providers and statutory consultees including the Environment Agency, Thames Water and Affinity Water whether additional evidence to support the Local Plan is required.
Concern regarding proposed allocations for development on community facility sites.	The IDP will consider the need for community facilities alongside other infrastructure needs. Where the County Council has identified an existing community facilities site that it wishes to promote for development, this has been assessed through the site selection process. The Council will work with ECC to identify and deliver replacement facilities where these are required.
Queries and objections raised regarding the site selection process.	The Council is updating the Site Selection Methodology to take account of comments received and to set out clearly how it will consider new residential sites submitted, the reassessment of amended residential sites, employment sites and traveller sites. The updated methodology will be published on the Council's website.
Deliverability of the proposed allocation sites in the Draft Local Plan, including the provision for Small Sites.	The Council will be working with promoters of sites proposed for allocation in the Draft Local Plan through the Developer Forum to ensure that the sites are deliverable. The Council has made provision for a substantial proportion of the allocation to be 'small sites' (under 10 dwellings).

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<p>Concerns regarding how previous consultation has been taken into account in formulating the Draft Local Plan.</p>	<p>Previous consultation responses, in particular the 'Community Choices' consultation carried out in 2012, were considered throughout the plan-making process and informed the draft policies, proposed site allocations, visions and objectives and spatial strategy set out in the Draft Local Plan. Previous consultation feedback was balanced with other material planning considerations, such as satisfying national planning policy requirements and taking into account the findings of more recent evidence base documents, in order to ensure that the Draft Local Plan is robust and justified.</p>
<p>Where new policies have been suggested, or changes to policy wording has been provided.</p>	<p>Comments received will be considered in the preparation of the Pre-Submission (Regulation 19) version of the Plan.</p>
<p>Concern that the Interim Sustainability Appraisal did not assessed enough reasonable alternative and that there is not sufficient justification for the spatial strategy.</p>	<p>The Sustainability Appraisal is an ongoing iterative process which informs and supports the Local Plan production. Comments received in relation to the scope of the Sustainability Appraisal will be considered and taken into account as the Sustainability Appraisal process continues.</p>

Summary by Settlement - comments on proposed allocations		
Settlement	Summary of Comments	EFDC Response
Epping	SR-0113B (land to the south of Brook Road, Epping) and SR-0059 (land at Ivy Chimneys Road) were the two most frequently commented upon sites in Epping. Comments centred around concerns that the sites would result in higher levels of traffic on surrounding roads. There was also a relatively high number of comments relating to SR-0132Ci (Epping Sports Club and land west of Bury Lane, Lower Bury Lane). Residents expressed concern over the potential loss of a community facility on this site and wider impacts on healthy living. Other specific sites in Epping received comparatively fewer comments.	<p>The Council has reviewed in detail all of the comments submitted during the Regulation 18 consultation in relation to the proposed site allocations included in the Draft Local Plan. Many of the concerns raised related to: lack of clarity in relation to future infrastructure provision; concern in relation to future traffic congestion; concern in relation to potential loss of car parking facilities; and concern in relation to potential loss of leisure provision or open space. The Council is now undertaking further work which will directly address a number of the concerns raised. This includes the production of a number of studies which will inform and support the Pre-Submission (Reg 19) Local Plan, such as the Infrastructure Delivery Plan, Transport Assessment, Open Space, Built Facility and Playing Pitch Strategies. The Council is also considering comments received in relation to the proposed site allocations through further site selection work.</p>
Loughton	SR-0361 (Colebrook Lane / Jessel Drive Amenity Open Space) had a high frequency of comments, with residents expressing opposition to the loss of managed public open space in Loughton. SR-0226 (Loughton London Underground Car Park) and SR-0227 (Debden London Underground Car Park) were also frequently commented upon, with many expressing concern over the loss of car parking spaces and impact on commuter parking. SR-0356 (Borders Lane Playing Fields) and SR-0358 (Sandford Avenue/Westall Road Amenity Open Space) also received relatively high numbers of comments. Other specific sites in Loughton received comparatively fewer comments.	
Waltham Abbey	A relatively high number of comments were received in relation to SR-219 (Fire Station, Sewardstone Road) and SR-0541 (Waltham Abbey Community Centre, Saxon Way). Residents raised concerns that the Fire Station was an important emergency response service. Concern was expressed over the potential loss of a community facility at SR-0541. SR-0099 (Lea Valley Nursery, Crooked Mile) also received a similar level of comments, with respondents commenting that it was located on a dangerous road. Other proposed sites in Waltham Abbey received comparatively fewer comments.	
Chipping Ongar	The most frequently referenced site was SR-0848 (Chipping Ongar Leisure Centre), with many comments opposing the potential loss of this community facility that is in close proximity to the local community and Ongar Academy. Other proposed sites in Ongar received a relatively lower level of comments.	
Buckhurst Hill	All of the proposed sites in Buckhurst Hill received approximately similar levels of comments. SR-0176 (St Just, Powell Road) and SR-0225 (Lower Querens Road Car park) were commented on in relation to concern over the increase in traffic congestion and loss of car parking spaces. SR-0813 (stores at Lower Queens Road) received comments relating to the potential disruption to the local businesses currently on site.	
North Weald Bassett	The most frequently commented on site was SR-0119 (land at North Weald Airfield). Many comments were supportive of the employment designation as an opportunity to expand the offer of the airfield. The number of comments on other specific sites was relatively lower, with the next highest comments received relating to SR-0158A (land north of Vicarage Lane).	
Chigwell	By far the most comments were received on SR-0557 (the Limes Estate), with respondents concerned over the loss of open space and impact on local roads. Other proposed sites in Chigwell had a lower number of comments, with SR-0551 (Olympic Compound Site) and SR-0560 (Chigwell Civic Amenity Site) receiving the least.	
Theydon Bois	The sites in Theydon Bois all received similar levels of comments in the course of the Regulation 18 consultation. Key issues raised by respondents included the loss of Green Belt land and concern that the sites proposed in particular to the east of the railway line would feel separate to the existing settlement.	

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Roydon	SR-0197 (land adjacent to Kingmead, Epping Road) was the most frequently commented on proposed site in Roydon, with respondents commenting on the loss of Green Belt land and the lack of pavements for pedestrians to use to get to the centre of Roydon. Other proposed sites received a relatively low level of comments.	
Nazeing	SR-0011 (St Leonards Road) and SR-0300 (land south of Nazeing) received a similar level of comments, with other proposed sites in Nazeing receiving comparatively few comments. Respondents commented on their experiences of the St Leonards Road site flooding, and the impact of future planned development on traffic congestion. Comments regarding SR-0300 mainly related to the loss of Green Belt land.	
Thornwood	Thornwood has one proposed residential site allocation of SR-0149 (Tudor House, High Street), with respondents primarily commenting on the increase in traffic congestion from the site.	
Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonebury, Sheering and Stapleford Abbots	Sites that received a high frequency of comments included SR-0405 (Coopersale Cricket Club and Coopersale and Theydon Garnon Primary School Playing Fields), with respondents concerned over the potential loss of open space and a well-used community facility. Other sites were SR-0073 (east of the M11) in Sheering due to the current levels of traffic congestion, and SR-0394 (land to east of High Ongar) with respondents commenting that High Ongar did not have the demand for such a large employment site.	