



2017

**EPPING FOREST DISTRICT COUNCIL:  
DRAFT LOCAL PLAN  
CONSULTATION REPORT**

# 1 Executive Summary

Epping Forest District Council is producing a new up-to-date Local Plan, which will set out the plans and policies that will guide development in Epping Forest District up until 2033. A Community Visioning Consultation in 2010 and 2011, followed by subsequent evidence gathering and an Issues and Options consultation (Community Choices) undertaken in 2012, has informed the Draft Local Plan. Following agreement by Epping Forest District's Full Council on the 18th October, the Draft Local Plan was published for a six-week consultation between 31st October and 12th December 2016.

The Draft Local Plan is being reviewed and revised against the feedback received to this consultation and further evidenced gathered. The Local Plan that Epping Forest District Council intend to submit for external examination will then be published for a six-week period. There will be an opportunity at this stage to make representations on the 'soundness' of the Local Plan. The Council will then submit the Draft Local Plan to the Planning Inspector for Independent Examination, before it is adopted by Epping Forest District Council.

Epping Forest District Council undertook a number of consultation activities to let people know about the Draft Local Plan, the public consultation, and how they could get involved. Promotion of the Draft Local Plan took place between 15th September – 7th November 2016 and consultation and feedback during 31st October – 12th December 2016. As such, the following engagement was achieved:

- 3,387 responses were received from 3,082 respondents.
- 7% of feedback was received through the hardcopy questionnaires; 22% by letter, 23% by email and 48% by online questionnaires.
- 1,233 people attended the six staffed exhibition events.
- Nine e-bulletins were issued with an 'open rate' of 6,327 in total, along with 3177 direct engagements on Twitter and 1,211 engagements on Facebook.

This document provides quantitative and qualitative analysis of the feedback received to the consultation. Whilst this document will go into detail regarding the different policy areas of the Draft Local Plan, the ten most frequent comments made are listed below.

## 1.1 Ten frequent comments overall – all forms of feedback

- The policies and proposals of the Draft Local Plan will result in an increase in traffic congestion on local roads
- An overall opposition to principle of development in the Green Belt
- The policies and proposals of the Draft Local Plan will result in a negative impact on local schools
- The policies and proposals of the Draft Local Plan will result in increased pressure on the local healthcare provision
- The policies and proposals of the Draft Local Plan will result in a loss of car parking spaces, and increased car parking pressure
- Comments regarding Draft Policy P 2 Loughton/Loughton Broadway.
- The Draft Local Plan lacks sufficient information about the infrastructure requirements of Epping Forest District

- The policies and proposals of the Draft Local Plan will result in a negative impact on the character of the settlement
- The policies and proposals of the Draft Local Plan will result in increased overcrowding on the Central Line
- The policies and proposals of the Draft Local Plan will result in a loss of open space in the urban areas of the District

## 1.2 Overall vision, spatial strategy and distribution of housing – summary of issues raised

There was a low level of objection to the Draft Local Plan’s vision and objectives within the Draft Local Plan. Generally, respondents supported the vision and objectives outlined, but did not consider the Draft Local Plan policies would deliver on these. Comments most frequently made were that the Draft Policies would not deliver on the intended protection of the Green Belt and the environment, would increase pressure on what is perceived to be overstretched local infrastructure, would damage the character of the area, and did not reflect the reality that residents experience in the District.

Many felt that the proposed distribution of housing would not deliver on the vision and objectives of the Draft Local Plan, and instead was looking at short term, easy solutions. It was also suggested that there was insufficient justification to ‘breach’ the Green Belt boundaries, and some settlements had been overlooked at the expense of sites promoted by developers, Green Belt sites and public open spaces. There was support in principle for the allocation of brownfield sites that are located in sustainable locations, particularly those with strong existing transport connectivity.

Other comments considered the Draft Local Plan would not deliver on sustainability. Some respondents felt that developing in the Green Belt and on public open spaces is not sustainable, as they are further away from settlements with sufficient facilities, and it could damage wildlife habitats. This was coupled with the concern that Draft Policies proposed to deliver new homes without a clear plan on how and where new infrastructure to support the growth will be delivered.

Responses from Statutory Consultees and local organisations were generally supportive of the values represented in the Draft Vision and Objectives and Draft Policies SP 1 and SP 2. Many Town and Parish Councils did not agree with the distribution of housing set out in the Council’s spatial strategy. The loss of green belt land was commented upon by the London Green Belt Council and Campaign for Rural England.

Responses from site promoters expressed the view that further site allocations would be needed to meet the full Objectively Assessed Housing Need (OAHN) as set out in the Strategic Housing Market Assessment (SHMA). There were some queries regarding how the distribution of growth was informed by the Council’s evidence base such as the Settlement Hierarchy Technical Paper, Green Belt Stage 2 and responses to the Community Choices consultation.

## 1.3 Green Belt and District Open Land – summary of issues raised

The Green Belt was one of the most frequent issues raised, and was an opposing argument of respondents across the majority of the policies proposed. The main concern was over the principle of development in the Green Belt. Residents highlighted the importance of the Green Belt to them, arguing that, not only does the Green Belt help to protect the District’s rural character (a key attraction to living in the area), it also prevents the merging of settlements and becoming another suburb of London.

Although there was recognition that there is a need for new homes, respondents suggested there were alternatives available (such as a ‘new town’ or exhausting all Brownfield sites).

There was some concern expressed over the approach to and loss of green belt land, the demonstration of exceptional circumstances and the District Open Land designation by the London Green Belt Council and

Town and Parish Councils. Statutory Consultees and local organisations that stated support for Draft Policy SP 5 noted that it was in clear compliance with the NPPF.

Responses from site promoters stated support for limited Green Belt release to support the housing need in the district. Some respondents felt that the Council should release further Green Belt land to meet the full OAHN identified in the SHMA. Many site promoters provided alternative Green Belt reviews for their site and felt that the Green Belt Review Stage 2 was not robust or consistent.

#### **1.4 Housing and Traveller site development – summary of issues raised**

The main focus of comments on housing were in relation to Draft Policy H 4 Traveller Site Development. Respondents were of the view that proposed new traveller sites are overly concentrated in North Weald Bassett and Roydon.

Statutory Consultee and local organisation comments were generally supportive of the housing policies included in the Draft Local Plan, with many respondents making suggestions as to how the policies could be strengthened further to support a sustainable housing mix and tenure in Epping Forest District. In relation to Draft Policy J 4, Essex County Council suggested referencing transit site provision and the Lee Valley Regional Park questioned the sequential approach in relation to the pressure on traveller sites in the Green Belt.

The majority of site promoter responses were in relation to draft Policy H 2. The majority supported the affordable housing requirement set out in the policy, however those who disagreed with the requirement felt it was too high and that 40% should be a target and not a minimum.

#### **1.5 The Economy and Town Centres – summary of issues raised**

Draft Policy E 1 received some support for the local job opportunities it represents, but, this was tempered by the concern that there could be an increase in traffic on local roads, especially HGVs on rural roads. Respondents generally welcomed the support Draft Policy E 2 offered to local shops and services, especially in Waltham Abbey, Loughton Broadway and Epping. These towns were considered to need additional investment. Concerns were raised about the potential negative implications of the wider Draft Local Plan proposals on local shops; increased traffic on high streets and reduced car parking numbers which could make town and district centres unattractive places to visit.

Statutory Consultees and local organisations drew attention to the importance of retaining current employment sites and ensuring that new employment provision is joined up with housing provision. The Lee Valley Task Force commented that unsuitable employment sites should not be expanded. Draft Policy E 3 was welcomed by the Lea Valley Growers Association, Essex County Council and the Lee Valley Regional Park Authority in particular. Draft Policy E 4 was welcomed by some Town and Parish Councils and tourist attractions such as the Royal Gunpowder Mills.

Responses from site promoters were mainly in relation to Draft Policy E 1, with comments outlining that more information was needed on the amount of employment floorspace needed and the locations of future employment sites.

#### **1.6 Transport – summary of issues raised**

Transport and increased traffic was a common concern raised with many commenting on the need for adequate transport links and services to be in place before new development in the District is complete. Many responses to Draft Policy T 1 recognised the District's position in proximity to London, and the subsequent transport links that it is afforded due to its location, making it a desirable place to live.

The need to provide improved infrastructure for cycling and additional public transport was generally supported but there was criticism the policies and proposals in the Draft Local Plan do not do enough to

improve roads and cater for the high number of car users in the District. Responses to Draft Policy T 2 were supportive of Epping Forest District Council investment in key highway measures to meet future demand.

Essex County Council, Highways England and Transport for London all supported the commitment to encouraging a modal shift in the district. Transport for London confirmed that Central Line capacity should not act as a barrier to future housing development in Epping Forest district. Town and Parish Councils and local organisations expressed concern that there were no parking standards included in the Draft Local Plan.

There were relatively few comments from site promoters on Draft Policies T 1 and T 2, the details of the comments are set out in Chapter 10.

### **1.7 Natural Environment and Green Infrastructure – summary of issues raised**

There was a low response rate to the policies for natural environment and green infrastructure. Responses to Draft Policy SP 6 generally supported the importance of the natural environment to the District, particularly the positive impacts these have on mental and physical wellbeing. Many comments focussed on the impact of the proposals to develop on public open space in the District, particularly in urban areas.

Statutory Consultees and local organisations welcomed the inclusion of policies relating to the natural environment and green infrastructure in the Draft Local Plan. In particular, the Lee Valley Regional Park Authority suggested a standalone policy that incorporated the strategic policies set out in the Authority's plan. The Environment Agency advised that there should be further mention of blue infrastructure.

Responses from site promoters expressed the view that it needed to be clearer what the requirements were for Suitable Accessible Natural Greenspaces and open spaces. Responses were generally supportive of policies on the Natural Environment included in the Draft Local Plan.

### **1.8 Historic Environment, Design and Place Shaping – summary of issues raised**

Comments received on the Historic Environment, Design and Place Shaping highlighted the importance of heritage assets to the community of Epping Forest District, and the need to ensure that the design of new development considers their context and architectural style, particularly in conservation areas.

Draft Policy SP 4 was welcomed in particular by Sport England and Harlow District Council for its promotion of healthy and active lifestyles and garden city principles. The Campaign for Rural England suggested the inclusion of a Design Review Panel, and Essex County Council suggested that more mention was given to zero carbon buildings in the design policies included in the Draft Local Plan.

There were relatively few comments from site promoters on policies in Chapter 12. Site promoters outlined that more detail was needed on what requirements there are for developers in relation to Draft Policy DM 9; and that the requirements set out in Draft Policy DM 10 should only apply where the impact on viability has been considered. The majority of respondents that commented on Draft Policy SP 4 indicated they were supportive and intended to work positively with the Council to bring forward place shaping principles.

### **1.9 Climate Change and Environmental Policies – summary of issues raised**

This chapter included responses to the Interim Sustainability Appraisal (SA), which was felt to be important to ensuring sustainable development in the District. Key topics in the responses regarding the SA focussed on the impact of new development on the local transport infrastructure. It was also felt, by some, that development on the Green Belt and on open public spaces contradicted the approach that Epping Forest District Council was seeking to take towards sustainability – although there was some recognition of the need to balance the need to protect the Green Belt and provide new homes.

There was general agreement with Epping Forest District Council's stated approach to flood management and drainage systems within the Draft Local Plan. There was also general support regarding the approach to

renewable energy technologies, but with clarification that the approach might be too prescriptive for future developers of a site.

North Weald Bassett Parish Council and Moreton, Bobbingworth and the Lavers Parish Council stated their support for the flood risk policies included in the Draft Local Plan in the context of a history of flood related issues in their respective areas. Thames Water and Anglian Water expressed support for Draft Policy DM 18 and Draft Policy DM 16 in particular. The Environment Agency gave policy wording suggestions to many of the policies in this section.

There were relatively few comments from site promoters on the policies on climate change and the environment, the details of the comments can be found in Chapter 13.

### 1.10 Infrastructure Delivery – summary of issues raised

Concern regarding existing infrastructure, and the impact on it of future development, was one of the most frequent comments raised, with respondents agreeing that it is important to ensure that ‘necessary’ infrastructure is provided to support new development. Traffic congestion concerns ranked highly, alongside increased pressure on schools, capacity of GP surgeries, lack of car parking spaces and increased overcrowding on the Central Line.

It was felt that there needs to be more information within the Draft Local Plan about when infrastructure would be delivered, where and how. It was felt there needed to be more certainty and consistency for each allocation to allow respondents to feel confident that infrastructure would be provided to support the increase in population in each settlement.

It was widely appreciated among Statutory Consultees and local organisations that there is further work to be completed on infrastructure that will detail the infrastructure required to support the draft site allocations. Essex County Council and neighbouring authorities welcome future co-operative working on infrastructure matters.

Responses from site promoters commented that there was not enough detail on infrastructure in the Draft Local Plan in relation to Draft Policy D 1. In particular it was felt that the infrastructure needed for each site should be outlined. Many site promoters commented on Draft Policy D 6, with the majority commenting in relation to the Chigwell Neighbourhood Plan.

### 1.11 Places – summary of issues raised

Amongst the 12 ‘place’ policies within the Draft Local Plan, Loughton received the highest number of comments, followed by Theydon Bois, Epping, North Weald Bassett and Chigwell. Statutory Consultees and local organisations made comments in relation to some of the Places policies, of which the key points have been presented in Chapter 15. The themes within the feedback to Draft Policy SP 3, Draft Policy P 1 to P 12 were:

**Draft Policy SP 3** received a proportionally higher level of support amongst respondents compared to the other ‘place’ policies. Respondents generally supported the proposals for development around Harlow, viewing it as a suitable location to absorb growth. Respondents also considered the strategic sites around Harlow as being a better alternative than increased housing figures within the settlements of Epping Forest District.

General concerns were centred on an overall objection to development within the Green Belt and the impact upon the surrounding villages, which could result in merging of Roydon, Nazeing and North Weald Bassett with Harlow.

Some respondents stated they would prefer growth to be accommodated within a new town, rather than across multiple development sites and that this would be a more sustainable form of development.

**Draft Policy P 1 Epping** responses related to traffic congestion and how this would be exacerbated when the proposed allocated sites in Epping are developed. Epping High Street, Brook Road, Bridge Hill, Ivy Chimneys Road were referenced as roads that experience high levels of traffic. The proposed allocation site of SR-0113B, land to the south of Brook Road, Epping and SR-0069, Land at Ivy Chimneys Road raised concerns due to potential impacts on the local highways network. Some respondents felt there was a disproportionate level of growth being placed in Epping.

**Draft Policy P 2 Loughton** received a large number of comments. The most frequent comments were related to the concern that there would be an increase in traffic congestion within Loughton, and about the loss of public open space with the proposed site allocation of SR-0361, Colebrook Lane / Jessel Drive Amenity Open Space. It was felt that the loss of this open space could result in a negative impact on the quality of life of residents.

**Draft Policy P 3 Waltham Abbey** received a low level of response. The sites most frequently commented on were SR-0219 (Fire Station, Sewardstone Road) and SR-0541 (Waltham Abbey Community Centre, Saxon Way). Respondents were concerned that the Fire Station and Community Centre would not be replaced within Waltham Abbey once developed.

**Draft Policy P 4 Chipping Ongar** responses focused on the view that the proposed allocations in Chipping Ongar were disproportionate in comparison to other settlements. Many comments expressed a view that that this could lead to a change in character of the settlement, would impact on the Green Belt and there was a perceived lack of infrastructure or facilities to accommodate such a large increase in population. The site most frequently referenced was proposed allocation site SR-0848, Chipping Ongar Leisure Centre, with many opposing the loss of this community facility.

**Draft Policy P 5 Buckhurst Hill** responses related to the proposed allocation of sites SR-0176 (St Just, Powell Road) and SR-0225 (Lower Queens Road Car Park). Respondents felt that development of these sites would increase the pressure on car parking in Buckhurst Hill, and there was concern about the impact of this, alongside the construction disruption to shops on Lower Queens Road, which was felt to have a long lasting negative impact on their customer base.

**Draft Policy P 6 North Weald Bassett** responses included views that the level of growth proposed was disproportionate in comparison to the size of North Weald Bassett, and the level of development proposed in other settlements. Respondents disagreed with development on the Green Belt in North Weald Bassett, suggesting that it would negatively impact the character of the settlement and damage the quality of life of residents. In addition, it was raised the Green Belt acts as a buffer to flooding in the settlement, and it was felt that increased hardstanding could increase the likelihood of flooding.

**Draft Policy P 7 Chigwell** many responses referenced the site selection of SR-0557 (the Limes Estate). Respondents were concerned about the loss of open space on the Limes Estate and felt that managed public open space in Chigwell was being selected at the expense of other rural sites in the District. Some responses stated a preference for the direction of growth set out in Chigwell Parish Council Neighbourhood Plan.

**Draft Policy P 8 Theydon Bois** responses included views that the number of homes was too high for the village and would significantly increase the local population, with comments suggesting that local infrastructure is unable to cope with the current population. Some questioned why there was such a focus on the towns along the Central Line and queried the sustainability of developing on Green Belt sites in settlements without adequate infrastructure or facilities.

**Draft Policy P 9 Roydon** There were fewer comments on this policy in comparison to other place policies. Responses picked up on concerns regarding increased traffic congestion in the village, which would be exacerbated by the level crossing in the village and the use of rural roads by HGVs. The potential merging of Roydon with Harlow was also a key concern.

**Draft Policy P 10 Nazeing** response included a high frequency of comments that raised concerns regarding the traffic impact of the proposals. Concerns centred on congestion being exacerbated due to the population growth, but also the recent removal of bus services and the lack of a train station. Pressure on utilities was also raised as an ongoing issue in the village, in the context that it would not be able to cope with increased use.

**Draft Policy P 11 Thornwood** Some respondents saw an increase in population as an opportunity to deliver facilities for the village and to encourage a balanced community through delivery of homes for the retention of younger residents. A concern suggested that the village already experiences high levels of congestion due to the proximity to Harlow, the M11 and the M25, and as such, suffers from pollution because of this proximity.

**Draft Policy P 12 other settlements** Responses expressed some concern that the proposed site allocations represented a large increase in population for the villages, which was not felt to have the infrastructure to cope with this increase; that development on Green Belt sites does not reflect the objectives of the Draft Local Plan to protect the Green Belt and environment; and that the scale of development and its location on Green Belt sites would change the character of the villages and could lead to the eventual merging of settlements. However, it was also felt that this growth could promote self-sustainability of local businesses in the villages from an increased population.