



The Epping Forest District Local Plan

Interim SA Report

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TABLE OF CONTENTS

1	INTRODUCTION	1
2	WHAT IS THE PLAN SEEKING TO ACHIEVE?.....	5
3	SCOPE OF THE SA.....	6
4	WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?'	29
5	HOW HAS THE APPRAISAL AT THIS CURRENT STAGE BEEN UNDERTAKEN?	34
6	WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?	35
7	WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?	115
	APPENDIX I - DRAFT SITES APPRAISAL METHODOLOGY FOR COMMENT	116

1 INTRODUCTION

1.1 Background

1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Epping Forest Local Plan. SA is a mechanism for considering the impacts of a draft plan approach, and alternatives to that approach, in terms of key sustainability issues, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of Local Plans is a legal requirement.¹

1.2 SA explained

‘SA Report focused’

1.2.1 It is a legal requirement that SA is undertaken in-line with the procedures prescribed by the EU Strategic Environmental Assessment (SEA) Directive.²

A key procedural requirement is that a report is published for consultation alongside the draft plan that identifies, describes and evaluates the likely significant sustainability effects of implementing the plan, and reasonable alternatives.

1.2.2 Subsequent to consultation the report (which we call the ‘SA Report’) must then be taken into account (alongside consultation responses) by the plan-makers when finalising the plan.

1.2.3 The Directive prescribes the information that must be contained within the SA Report. Providing this information involves answering a sequence of nine questions - see Table 1.1.

¹ The Town and Country Planning (Local Planning) Regulations 2012

² Directive 2001/42/EC

Table 1.1: Questions that must be answered (sequentially) within the SA Report

	SA QUESTION	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE (THE REPORT MUST INCLUDE...)
What is the scope of the appraisal?	What is the Plan seeking to achieve?	“an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes” (Annex I(a))
	What’s the sustainability ‘context’?	“an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes ” (Annex I(a)) “the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))
	What’s the sustainability ‘baseline’?	“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan” (Annex I(b)) “the environmental characteristics of areas likely to be significantly affected” (Annex I(c))
	How would the sustainability baseline evolve without implementation of the plan?	“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan ” (Annex I(b))
	What are the key sustainability issues that should be a particular focus of the appraisal?	“any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I(d))
What has Plan-making / SA involved up to this point?	“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation ” (Annex I(e)) “an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (Annex I(h))	
How has the appraisal at this current stage been undertaken?	“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (Annex I(h))	
What are the appraisal findings at this current stage?	“the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors” (Annex I(f)) “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan” (Annex I(g))	
What are the next steps (including monitoring)?	“a description of the measures envisaged concerning monitoring...” (Annex I(i))	

Iterative

- 1.2.4 Given that the SA Report published for consultation alongside the draft plan must answer the question ‘*What has Plan-making / SA involved up to this point?*’, it is understood that the plan must be developed alongside SA in an iterative fashion.³
- 1.2.5 An iterative approach to plan-making / SA is being followed as part of preparing the Epping Forest Local Plan. Preparation of this Interim Report forms part of the first iterative step along the plan-making / SA process - see Table 1.2.

Table 1.2: The anticipated iterative plan-making / SA process

	SA	PLAN-MAKING
Step one	<p>This Interim SA Report presents an appraisal of alternative approaches that might be taken to addressing key plan issues.</p> <p>This document is (voluntarily) published for consultation alongside the Local Plan ‘Community Choices’ document.</p>	The Council will take account of appraisal findings when preparing the Draft Local Plan.
Step two	<p>A second interim SA step will involve appraising site allocation options and any alternative approaches to addressing key issues that emerge subsequent to the ‘Community Choices’ consultation.</p> <p>Findings will be fed back to the Council internally, rather than published as part of a consultation and then taken onboard.</p> <p>(N.B. A suggested methodological approach to appraising site options is presented within Annex 1 of this report.)</p>	The Council will take account of appraisal findings when preparing the Draft Local Plan.
Step three	<p>The SA Report will present an appraisal of the approach set out within the Draft Local Plan document.</p> <p>Both documents will be published for consultation, as required by legislation.⁴</p>	The Council will take account of appraisal findings and prepare the Proposed Submission Local Plan.
Step four	<p>A revised version of the SA Report will present an appraisal of the approach set out within the Proposed Submission Local Plan.</p> <p>Both documents will be ‘Published’ so that representations can be received.</p>	The Council will take account of appraisal findings prior to ‘submitting’ the Local Plan.
Step five	<p>If significant changes have been made to the Local Plan subsequent to the Publication stage an addendum to the SA Report will be prepared.</p> <p>All documents will be Submitted to Government for Examination in Public overseen by a Government appointed Inspector.</p>	Those that comment on the plan post-submission (including at ‘Examination in Public’) will be able to draw on the findings and recommendations of the SA Report / revised SA Report.

³The Directive requires only that there is one ‘iteration’ prior to the preparation of the draft plan / SA Report (and that this includes a consideration of alternatives).

⁴ The SEA Directive requires that the SA Report be published for consultation alongside the ‘draft plan’.

1.3 Structure of this Interim SA Report

- 1.3.1 Despite the fact that this is an 'Interim' SA Report, and does not *need* to provide the information required of the SA Report (by the SEA Directive), it is helpful to also structure this report broadly according to the appraisal questions presented in Table 1.1. The structure of the report is summarised in Table 1.3.

Table 1.3: Structure of this Interim SA Report

APPRAISAL QUESTION		CHAPTER
What is the plan seeking to achieve?		Chapter 2
What's the sustainability 'context'?	What's the scope of the appraisal?	Chapter 3
What's the sustainability 'baseline'?		
How would the sustainability baseline evolve without implementation of the plan?		
What are the key sustainability issues that should be a particular focus of the appraisal?		
What has the Plan-making / SA process involved up to this point?		Chapter 4
How has the appraisal at this current stage been undertaken?		Chapter 5
What are the appraisal findings at this current stage?		Chapter 6
What are the next steps (including monitoring)?		Chapter 7

1.4 Secondary purposes of this Interim SA Report

- 1.4.1 Although the focus of this document is to present an appraisal of alternative approaches to addressing key plan issues, there are also a couple of secondary purposes:
1. An appraisal of approaches suggested within *Community Choices* as ways to address plan issues (but not presented as alternative approaches) is also presented within **Chapter 6**. The aim of the appraisal is to stimulate the Council and consultees to think about which of these suggested approaches should be taken forward and which should not, and how those approaches that are taken forward might be improved-on.
 2. **Appendix I** presents a suggested methodological approach to appraising site allocation options (which will be identified subsequent to the current consultation - see 'Step 2' in Table 1.2).

2

WHAT IS THE PLAN SEEKING TO ACHIEVE?

“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”

(SEA Directive, Annex I(a))

2.1 Introduction

2.1.1 The Local Plan (LP) will set out the planning policies that will guide development in Epping Forest District over the next 20 years. The LP will use the views of the local community and a robust evidence base to establish a vision for how the district will develop along with more detailed planning policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk management, and the provision of minerals and energy (including heat)
- the provision of health, security, community and cultural infrastructure and other local facilities;
- climate change mitigation and adaptation; and
- conservation and enhancement of the natural and historic environment, including landscape.

2.2 Aims of the Local Plan

2.2.1 The aims of the LP are:

- To protect and enhance the Green Belt and the natural and built heritage of the district;
- To manage sustainable growth in the district;
- To deliver the right number of houses in the right places;
- To support and enhance the economy of the district;
- To improve access and movement within and around the district; and
- To maintain safe, healthy and inclusive communities.

2.3 What's the plan not trying to achieve?

2.3.1 It is important to emphasise that decisions taken through policies set by the LP will be strategic. The LP will go as far as to allocate sites, but even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process).

2.3.2 The strategic nature of the LP is reflected in this SA (see further discussion within Chapter 5 under the heading *‘How has the appraisal at this current stage been undertaken’*).

3 SCOPE OF THE SA

3.1 Introduction

3.1.1 This chapter introduces the reader to the scope of the SA, i.e. those aspects of the sustainability baseline and identified issues that are a focus of the appraisal. Developing the scope of the SA has been a broadly **two step** process:

- Firstly, evidence was gathered and reviewed in relation to the 'sustainability context', 'sustainability baseline' and the 'likely future baseline without the plan'; and then
- Secondly, the evidence gathered was analysed and 'key sustainability issues' pulled out.

3.1.2 More specifically, a number of questions have been answered as part of the process of scoping - see Table 3.1

Table 3.1: Summary of the scoping process

BROAD STEP	QUESTIONS ANSWERED	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE MET (THE REPORT MUST INCLUDE...)
1) Evidence gathering and review	What's the sustainability 'context'?	"an outline of the contents, main objectives of the plan and <i>relationship with other relevant plans and programmes</i> " (Annex I(a)) " <i>the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i> " (Annex I(e))
	What's the sustainability 'baseline'?	" <i>the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</i> " (Annex I(b)) " <i>the environmental characteristics of areas likely to be significantly affected</i> " (Annex I(c))
	How would the baseline evolve without implementation of the plan?	" <i>the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</i> " (Annex I(b))
2) Identification of key issues	What are the key sustainability issues that should be a particular focus of the appraisal?	" <i>any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC</i> " (Annex I(d))

Consultation on the scope

3.1.3 The SEA Directive requires that: *'The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.'*

3.1.4 The authorities referred to in Article 6(3) are nationally designated authorities 'which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes.' In England, the nationally designated bodies are Natural England, The Environment Agency and English Heritage.

3.1.5 As such, these authorities were consulted on the scope of this SA in 2010. This consultation was achieved by providing a 'Scoping Report' for their comment. The general public were also consulted on the scope at this time. The document was amended to reflect consultation responses and is now available at:

http://www.eppingforestdc.gov.uk/Council_Services/planning/forward_planning/LDF/sustainability_appraisal_scoping_report.asp

3.2 What's the sustainability 'context'?

“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”

(SEA Directive Annex I(a))

“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”

(SEA Directive Annex I(e))

Introduction

- 3.2.1 An important step when seeking to establish the appropriate 'scope' of an SA involves reviewing 'sustainability context' messages (e.g. objectives or issues) set out within relevant published plans, policies, strategies and initiatives (PPSIs).
- 3.2.2 The sustainability context presented within the 2010 scoping report requires some updating. In particular, there is a need to reflect the National Planning Policy Framework (NPPF) which, read as a whole, constitutes *'the Government's view of what sustainable development in England means in practice for the planning system'*. Casting the net wider than the NPPF remains important, however, and so to this end a number of other recently published PPSIs are reviewed below (see Boxes 3.1 - 3.6).
- 3.2.3 Finally, this section presents sustainability context messages from the recent Harlow Core Strategy 'Issues and Options' Consultation Summary Report. Although Epping Forest has a 'Duty to Cooperate' with all neighbouring authorities on addressing key 'cross boundary' and/or 'larger than local' issues, there is a particular need to cooperate closely with Harlow given that the (albeit soon to be revoked) East of England Plan identified the need for Epping Forest to accept growth on the outskirts of Harlow in order to support regeneration of the town.

Contextual messages from the 2010 Scoping Report updated to reflect the NPPF

- 3.2.4 Air quality
- The National Planning Policy Framework (NPPF) states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. More specifically, it makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants. This includes taking into account the presence of Air Quality Management Areas (AQMAS) and cumulative impacts on air quality.
- 3.2.5 Biodiversity and green infrastructure
- Commitment to the UN 'Convention on Biological Diversity' led to the preparation of the 1994 UK Biodiversity Action Plan (UK BAP). The UK BAP identifies our most threatened biodiversity assets and includes action plans for the recovery of priority species and habitats.
 - More recently, at the European level, a new EU Biodiversity Strategy was adopted in May 2011 in order to deliver on the established Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'. The Strategy promotes the need to take an 'ecosystem services' approach to thinking about and conserving biodiversity, i.e. recognising the importance of biodiversity in terms of its role as 'our life insurance, giving us food, fresh water and clean air, shelter and medicine, mitigating natural disasters, pests and diseases and contribut[ing] to regulating the climate'.

- In order to contribute to the Government's commitment to halt the overall decline in biodiversity, the NPPF states that the planning system should look to minimise impacts on biodiversity, with net gains in biodiversity to be provided wherever possible.
- The NPPF calls upon local authorities to set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- To contribute to national and local targets on biodiversity, the NPPF states that planning policies should promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Positive planning for 'green infrastructure' is recognised as part of planning for ecological networks.
- The Lee Valley Regional Park's Development Framework sets out a number of strategic aims to deliver their vision for the park. It is recognised that the park should be maintained as one of the region's key green infrastructure resources.
- Furthermore, it is worthwhile taking note of the initiatives presented within the recent Natural Environment White Paper (Box 3.1) and the latest developments in relation to the Wildlife Trusts' 'Living Landscapes' initiative (Box 3.2).

Box 3.1: The Natural Environment White Paper

The Natural Environment White Paper sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It aims to facilitate greater local action to protect and improve nature; create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. The White Paper is also focused on strengthening the connections between people and nature to the benefit of both. It includes commitments to:

- Halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Work with local authority partnerships to identify and address barriers to using green infrastructure to promote sustainable growth.

The White Paper drew on the findings of the UK National Ecosystem Assessment (NEA), a major project that was able to draw conclusions on the 'substantial' benefits that ecosystems provide to society directly and through supporting economic prosperity. The NEA identified development as a key driver of ecosystem loss and biodiversity offsets as a possible means of increasing 'private sector involvement in conservation and habitat creation'.

The Government has also published Biodiversity 2020: A strategy for England's wildlife and ecosystem services, which builds on the Natural Environment White Paper and sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea and seeks to deliver a real step change in conservation.

Box 3.2: The Wildlife Trusts' 'Living Landscapes' initiative

The Wildlife Trusts 'Living Landscape' initiative focuses on the conservation of biodiversity over large areas of land where habitats are fragmented. This approach, which is essentially an alternative approach to focusing on conservation of protected areas, is thought to be necessary in order to reverse declines in biodiversity. Within Living Landscapes, a spatial approach to ecological restoration is applied with the aim of:

- Protecting and maximising the value of areas that are already rich in wildlife;

- Expanding, buffering, and creating connections and stepping stones between these areas; and
- Making the wider landscape more permeable to wildlife.

It is hoped that this restoration will both provide a healthy environment in which wildlife can thrive and enhance those natural processes that benefit people. A partnership approach is called for, with central and local government, agencies, the private sector and voluntary bodies required to act together to ensure ecological restoration, including through cross-boundary co-operation.

3.2.6 Climate change (mitigation and adaptation)

- The UN Climate Conference in Copenhagen in December 2009 brought together leaders from 186 countries. It recognised the scientific view that the increase in global temperature should be held below 2.0°C and that deep cuts in global emissions are required.
- The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.
- The UK National Strategy for Climate Change and Energy: Transition to a Low Carbon Society sets out plans to deliver emission cuts of 18% on 2008 levels by 2020 (and over a one third reduction on 1990 levels).
- The Renewable Energy Directive (2009) sets the UK a legally binding target to produce 15% of its energy needs from renewable sources by 2020.
- The NPPF identifies as a 'core planning principle' the need to 'support the transition to a low carbon future in a changing climate', including accounting for flood risk, reusing resources, converting existing buildings, and encouraging the use of renewable energy. A key role for planning in securing radical reductions in GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008.
- In terms of adaptation, the NPPF requires Local Plans to take account of the effects of climate change in the long term. New developments should be planned so that they avoid increased vulnerability to the impacts of climate change. Where new development is at risk to such impacts, this should be managed through adaptation measures.
- The Coalition Government has continued to support the previous Government's target that all new homes should be zero carbon from 2016. Step changes in Building Regulations Part L are leading to this, and authorities are encouraged to use the Code for Sustainable Homes (CSH) (CLG 2006) to increase energy efficiency standards in new development.
- Further information on climate change mitigation and adaptation can be found in recent guidance from the Committee on Climate Change, summarised below in Box 3.3.

Box 3.3: 'How local authorities can reduce emissions and manage climate risk'⁵

This guidance document highlights the important role that local authorities can play in delivering emission reductions and sets out benchmark ambitions for them. Planning functions are described as being a 'key lever in reducing emissions and adapting localities to a changing climate', with it considered particularly important that local authorities use these to:

- Enforce energy efficiency standards in new buildings and extensions;
- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
- Work with developers to make renewable energy projects acceptable to local communities;

⁵ How local authorities can reduce emissions and manage climate risk (2012). The Climate Change Commission [online] available @ <http://www.theccc.org.uk/reports/local-authorities> (accessed 06/12)

- Plan for infrastructure such as low-carbon district heating networks, green infrastructure and sustainable drainage systems; and
- Avoid increasing the area's risk to climate change impacts by locating new development in areas of lowest flood risk.

3.2.7 Community and wellbeing

- One Epping Forest is the Local Strategic Partnership for the district and has developed the District's Sustainable Community Strategy. It sets out key objectives relating to such issues as health inequalities, well being, and educational opportunities.
- The Equality Act and other equality legislation introduce specific measures to protect certain groups in society from discrimination and promote equality of opportunity.
- Fair Society, Healthy Lives ('The Marmot Review') lists as a key recommendation the need to 'fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality'.
- The social role of the planning system is defined in the NPPF as 'supporting vibrant and healthy communities', with a 'core planning principle' being to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'. It should aim to achieve places that promote social interaction, and which are safe and accessible.
- The NPPF advises that planning policies should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.
- Specific protection and promotion of town centres is also encouraged in the NPPF, with it stating that local planning authorities should 'define the extent of town centres', set 'policies that make clear which uses will be permitted in such locations', and 'promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres'
- The following is a summary of current Government policy on planning for gypsy, traveller, and travelling showpeople sites (Box 3.4):

Box 3.4: Planning policy for traveller sites

The Government's planning policy for travellers' sites has the overall aim of ensuring that travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites, using a robust evidence base and effective engagement with stakeholder groups and other local authorities. Pitch targets for gypsy and travellers, and plot targets for travelling show people should be set, with a five year supply of specific deliverable sites identified against these targets.

The governments aims in respect of planning for travellers sites include:

- Ensuring that local planning authorities work collaboratively to meet the need for sites;
- Promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites;
- Reducing the number of unauthorised development and encampments;
- Ensuring that Local Plans include, fair, realistic and inclusive policies;
- Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- Having due regard for the protection of local amenity and environment.

3.2.8 Economy and employment

- The NPPF highlights the contribution the planning system can make to ‘building a strong, responsive economy’, by ‘ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’.
- A commitment to securing economic growth is set out in the NPPF. This is in order to ‘create jobs and prosperity’, to build on ‘the country’s inherent strengths’ and to meet the ‘twin challenges of global competition and of a low carbon future’. This should include supporting existing, new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.
- The NPPF states that local plans should ‘support the sustainable growth and expansion of all types of business and enterprise in rural areas’ and ‘promote the development and diversification of agricultural and other land-based rural businesses’.
- One Epping Forest is the Local Strategic Partnership (LSP) for the district and has developed the district’s Sustainable Community Strategy. The Strategy includes the theme ‘Economic Prosperity’ with a vision for the district that:

“Epping Forest will be a district that has a thriving and sustainable local economy, which extends opportunity for local residents and promotes prosperity throughout the district.”
- The following summary of the most recent Government guidance on achieving locally-led economic growth (Box 3. 5).

Box 3.5: The Local Growth White Paper

Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. In some cases this means focusing investment at areas with long term growth challenges, so that these areas can undergo transition to an economy that responds to a local demand. Places that are currently successful may also wish to prioritise activity to maximise further growth by removing barriers, such as infrastructure constraints. However, the White paper also emphasises that: *This does not mean that every place will grow at the same rate or that everywhere will, or will want to, become an economic powerhouse. Long term economic trends make differences in economic performance inevitable and these can and do change over time.*

Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations.

Finally, the White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete with the best internationally.

3.2.9 Historic environment

- The NPPF states that local planning authorities should set out in their local plan a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. These assets should be recognised as being an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’.
- In relation to the historic environment, the NPPF calls upon local planning authorities to take account of the ‘the wider social, cultural, economic and environmental benefits’ that

conservation can bring, whilst also recognising the positive contribution new development can make to 'local character and distinctiveness'.

- According to the NPPF, considerations of the impact of a proposed development on a designated heritage asset should place great weight on the asset's conservation. In addition, the effect of proposed developments on the significance of non-designated heritage assets should be taken into account when determining applications.

3.2.10 Housing

- *Laying the Foundations: A Housing Strategy for England* states the Government's view that 'we need to get the housing market – and in particular new house building – moving again. This is central for our plans for economic growth – but more importantly, it is essential to the hopes and plans of young people, families and older households across the country'. The Strategy states in 2009/10, there were 115,000 new build housing completions in England while, the latest household projections suggest that the number of households will grow by 232,000 per year (average annual figure until 2033).
- The NPPF states that in order to 'boost significantly the supply of housing' local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area, so far as this is consistent with the policies set out in the NPPF. A 'supply of specific deliverable sites' should be identified, sufficient to provide five years' worth of housing against requirements, with an additional buffers set to ensure 'choice and competition in the market'.
- The NPPF also calls on local planning authorities to 'widen opportunities for homeownership' and to 'create sustainable, inclusive and mixed communities'. This includes ensuring the provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
- The NPPF states that empty housing and buildings should also be identified and brought back into residential use where appropriate. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes, with these to be developed in accordance with the 'principles of Garden Cities'.
- Of further interest is the following summary of progress on housing produced by the Chartered Institute of Housing, The National Federation of Housing, and Shelter (Box 3.6)

Box 3.6: 'The Housing Report'⁶

This report collates the official figures available on housing in order to establish whether the Government's approach to housing is succeeding. It analyses the Government's performance under a number of main headings, the following of which are of particular relevance:

- *Housing Supply*: A small increase of new build is recorded, but this is from a historically low base. The number of completions in 2011 was 38% below the 2007 peak and there has been a fall in overall starts.
- *Overcrowding*: This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
- *Homelessness*: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit during 2013.
- *Empty Homes*: Despite 720,000 homes currently being classed as empty, the situation seems to be an improving one. This is particularly the case with long-term empty homes, which are the major problem in this area.

⁶ The Housing Report: Edition 2 (2012). Chartered Institute of Housing, The National House Builders Federation and Shelter [Online] available @ http://www.housing.org.uk/publications/find_a_publication/general/housing_report_edition_2_may.aspx (accessed 06/12)

- *Home Ownership:* House prices are relatively steady, sales are up, and affordability is increasing. However, homeownership rates are falling and there is a decline in low cost ownership sales. Home ownership remains out of reach for most people.

A challenge identified for the Government is to produce a step change in housing in order to meet the nations needs and aspirations, especially given that:

'Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify over the coming years'

3.2.11 Land and waste

- There is no longer a national requirement to build at a minimum density, but there is a need to ensure that effective and efficient use of available land is made when permitting residential development; the NPPF allows local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- The NPPF emphasises the 'great importance' of Green Belts, with local planning authorities encouraged to 'plan positively to enhance the beneficial use of the Green Belt, with inappropriate development in these areas not to be approved 'except in very special circumstances'.
- According to the NPPF, planning policies and decisions should look to 'encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. The benefits of best and most versatile agricultural land should also be taken into account.
- The 1990 Environmental Protection Act requires local authorities to secure the appropriate remediation of contaminated land and to maintain a register of contaminated land. Epping Forest District Council published a Contaminated Land Strategy in 2006.
- Whilst the NPPF does not contain specific waste policies, local authorities should have regard to the framework's policies so far as relevant. The environmental role set out for planning includes a reference to minimising waste, whilst local planning authorities should set out strategic policies to deliver waste management infrastructure.
- Essex County Council has pledged to increase recycling of waste towards a long term aim of 60% by 2020. Epping Forest District Council is a member of the Essex Waste Partnership. The Essex Waste Strategy states that Essex authorities will work hard to reduce the amount of waste produced and to increase re-use of waste.

3.2.12 Landscape

- The UK Government is a signatory to the European Landscape Convention. This aims to encourage public authorities within member states to adopt policies and measures for the protection, management and planning of all landscapes, whether outstanding or ordinary, that determine the quality of people's living environment.
- The NPPF states that the planning system should protect and enhance valued landscapes. This should include setting criteria based policies against which proposals for development that affect landscape areas will be judged.

3.2.13 Transport

- One Epping Forest has developed the district's Sustainable Community Strategy. One of the guiding principles for the Strategy is that: *'Travel around the district, and transport links beyond, must be improved in a sustainable and accessible manner to enable everyone to benefit from community services, business opportunities and leisure activities'*.

- In terms of transport policies, the NPPF notes that these will have an important role in ‘contributing to wider sustainability and health objectives’. It calls for the transport system to be balanced ‘in favour of sustainable transport’, with developments to be located and designed to facilitate these modes of travel.
- The NPPF states that encouragement should be given to those solutions that ‘support reductions in greenhouse gas emissions and reduce congestion’, whilst strategies should be developed for the provision of ‘viable infrastructure necessary to support sustainable development’.
- In order to minimise journey lengths for employment, shopping, leisure and other activities, the NPPF calls for planning policies that aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.
- The Essex Transport Strategy (the Local Transport Plan for Essex) includes a series of priorities for West Essex of which Epping forms a part:
 - Improving access to and from the M11 corridor;
 - Tackling congestion and improving the management of traffic in Harlow town centre;
 - Providing the transport improvements needed to support housing and employment growth;
 - Improving the attractiveness of bus services;
 - Improving cycling networks and walking routes and encouraging their greater use;
 - Improving the attractiveness of public spaces and their ease of use;
 - Working with Transport for London to improve the journey experience of Essex residents using the Central Line underground services; and
 - Improving access to Stansted Airport by low carbon forms of transport.
- In addition, according to the Essex Transport Strategy, an Epping Forest Transport Strategy is being developed in partnership with the City of London and the London Boroughs of Redbridge and Waltham Forest. This strategy contains a series of realistic and sustainable measures to reduce the impact of traffic and to better protect the forest landscape.

3.2.14 Water

- The EU Water Framework Directive (WFD) requires all inland and coastal waters to achieve at least ‘good status’ by 2015 or, where this is not possible, by 2021 or 2027. The Environment Agency has prepared draft River Basin Management Plans that show how these requirements will be met by 2025.
- The Environment Agency highlights the importance of integrating development planning and water planning, including the need to adopt stringent water efficiency policies; take account of the findings of Water Cycle Studies; set policy relating to SuDS, contamination and ecological enhancement; and identify suitable development for groundwater sensitive areas.
- Future Water sets out the Government’s vision the water sector by 2030. The Strategy requires planning authorities to work closely with water companies and the Environment Agency on timing and numbers of new households in areas likely to see the greatest growth.
- Since 2010, all affordable housing is to be constructed to Code Level 3, which sets water consumption at 105 l/hd/d for internal use for an average year.
- The Environment Agency have developed Catchment Abstraction Management Strategies which consider how much water can be abstracted from watercourses without damaging the environment within a catchment.

- The NPPF states that local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.

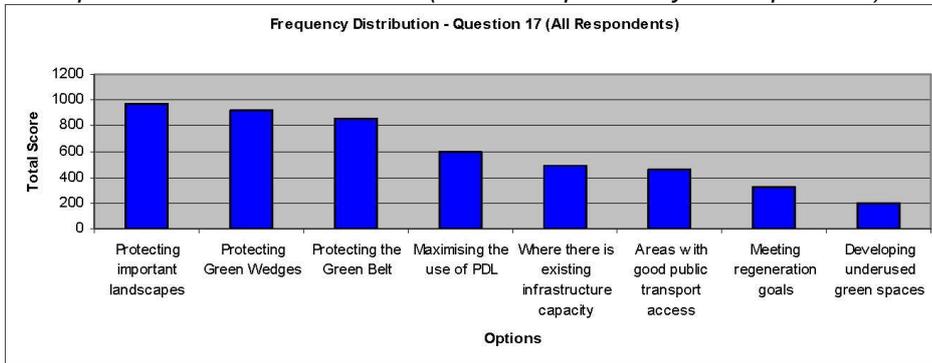
Messages from the Harlow Core Strategy ‘Issues and Options’ Consultation Summary Report

3.2.15

The Harlow Core Strategy ‘Issues and Options’ document was published for consultation from November 2010 - January 2011, and a Consultation Summary Report was published subsequently in February 2012. The Consultation Summary document highlights that:

- The majority of respondents did not appear to support the growth requirement for the Harlow Area set out in the East of England Plan (16,000 new homes).
 - The Council is verifying future needs through reviewing the evidence base and the development necessary to address regeneration objectives.
- Respondents sought more clarity on the areas in need of regenerating (in addition to the Town Centre) and for there to be more focus on the regeneration of small shopping areas (‘hatches’);
- The majority considered the range of issues that are relevant to regeneration had not been identified. The need for policies dealing with the urban fringe was identified.
- One consultation question suggested support for directing new development and housing growth towards areas that will maximise the overall regeneration benefits to the district; however, another question suggested that when compared to other objectives the need to support regeneration was not supported as a spatial driver of growth (see Figure 3.1)

Figure 3.1: ‘Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow’ (NB PDL = previously developed land)



- There was a lack of support for the development of green spaces and undeveloped land and these were not favoured to be developed before Green Belt. Specifically, respondents’ priorities were to firstly protect Harlow’s natural landscapes, then the Green Wedges and then the Green Belt.

3.3 What's the sustainability 'baseline'?

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”

(SEA Directive Annex I(b))

“the environmental characteristics of areas likely to be significantly affected”

(SEA Directive Annex I(c))

Introduction

3.3.1 Another important step when seeking to establish the appropriate 'scope' of an SA involves reviewing the situation now ('baseline') for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects.

3.3.2 The SA Scoping Report (2010) sets out a clear picture of baseline conditions in Epping Forest District for a range of sustainability issues. This Chapter presents a summary, updated to reflect current conditions where relevant. In particular, it is possible to draw on the findings of a number of evidence base studies, focused on Epping Forest and surrounding districts, that have been completed subsequent to the SA Scoping Report including: Employment Land Review; Strategic Flood Risk Assessment (Level 1, area wide); Strategic Housing Market Assessment (SHMA); Strategic Land Availability Assessment (SLAA); Sustainable Community Strategy 2010 - 2031; and Town Centres Study. Furthermore, the Council has completed two 'Annual Monitoring Reports' in the two years since the completion of the SA Scoping Report.

Key findings of the 2010 baseline review

3.3.3 *Air quality*

- The Council has designated one Air Quality Management Area (AQMA) due to pollution from traffic, at Bell Common just south of Epping. Loughton High Road and Epping High Street are also considered to be traffic pollution "hotspots" but have not so far been designated as AQMAs
- Poor air quality from vehicle emissions and the 'London plume' are affecting the Epping Forest Special Area of Conservation.
- There are long-standing problems of excessive HGV movements in the Roydon and Nazeing area which impact on local environmental quality. There are several likely causes: (a) "convenient" short route between Hoddesdon and Harlow; (b) "rat-run" link from the industrial areas of Hoddesdon to the M25 at Waltham Abbey; (c) traffic requiring access to the area, ie local industrial uses, the glasshouses and the associated packhouses; and (e) traffic generated by activities outside the district, eg Hoddesdon Business Park.

3.3.4 *Biodiversity and green infrastructure*

- Epping Forest is by far the largest public open space near to London, and is of international nature conservation value because of its veteran trees and mosaic of habitats. Lee Valley Regional Park is of international value as a SPA/Ramsar site due to its floodplain grassland, flooded gravel pits, wet woodland, and bird populations. Parts of the Roding Valley also have a high nature conservation value.
- Aside from the Epping Forest complex there are several other ancient woods in the district, including part of the remnants of Hainault Forest. Woodland and hedgerow tree pollards are a key landscape feature.

- The district has a total of 8 Sites of Special Scientific Interest (SSSIs) although some of these straddle the boundary with other authorities. There are 9 local nature reserves (LNRs) and over 220 local wildlife sites (LoWS).

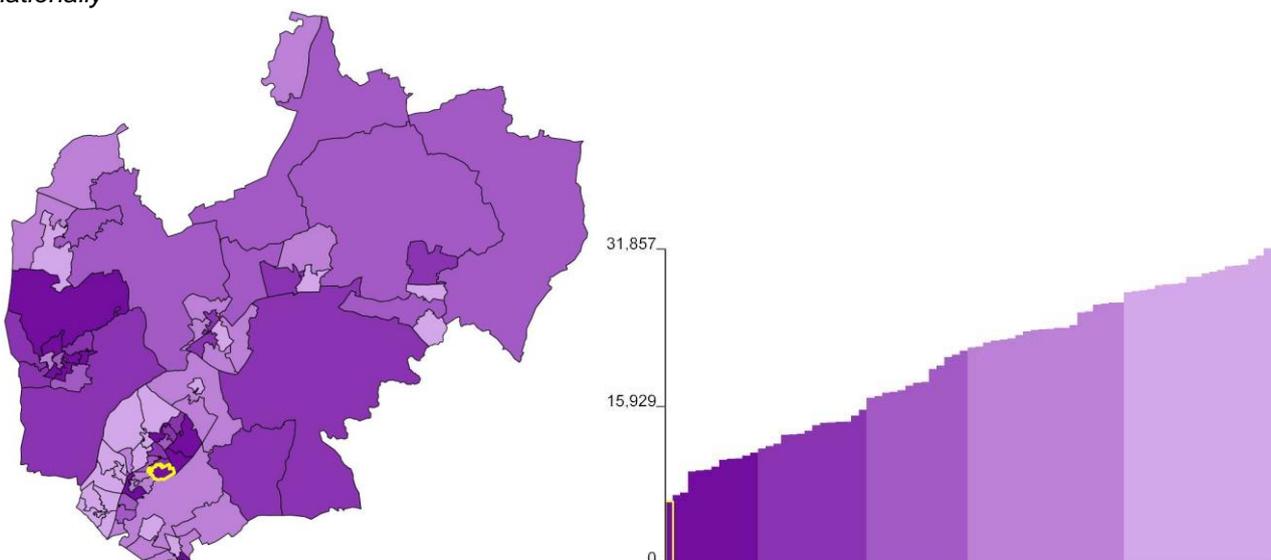
3.3.5 *Climate change (mitigation and adaptation)*

- Per person CO₂ emissions in the district are high, due to high car usage.
- There is only a negligible amount of renewable energy generation in the district.
- The western and southern parts of the district have areas of significant flood risk, linked to the Rivers Lee, Roding and Stort, and their tributaries. The district has a long history of flooding and, in recent years, the Council and Environment Agency have constructed a number of flood alleviation schemes to address identified problems.

3.3.6 *Community and wellbeing*

- The District's population is older than the regional or national average. The vast majority of the population (91.2%) was White British in 2001, meaning the proportion of 'non White British' people was 8.8%. This latter increased to an estimated 17.7% in 2009.
- The average gross weekly wage for a resident of the district in 2011 was higher than that for the East of England region (by approx. 14%), and even higher than average for Great Britain (by approx 19%).
- Although the district is on average fairly affluent, there are particular pockets of deprivation generally in the more urban areas, e.g. Waltham Abbey, Loughton Broadway and Grange Hill. This information comes from the Index of Multiple Deprivation (IMD) 2010 which combines a number of indicators, such as economic, social and housing issues. Figure 3.2 shows that worst performing (most deprived) 'Super Output Area' (SOA) within the district is ranked 6,345th out of 32,482 SOAs nationally. This SOA is located near to Debden Underground Station (Loughton). The least deprived SOA ranks 31,857th nationally. This SOA is near to Theydon Bois Underground Station. It is also notable that some of the rural areas in the district score more poorly in the IMD 2010 than urban areas, due to the lack of access to housing (taking into account affordability) and services such as shops and post offices. These areas include Passingford, High Ongar & Willingale, Moreton & Fyfield and Lower Sheering.

Figure 3.1: IMD 2010 for Super Output Areas in Epping Forest, disaggregated according to their rank nationally



- In terms of community facilities, the Council has identified (amongst other things) that there may be a need a GP surgery in Roydon.
- Protection and enhancement of green spaces is a top priority for residents of Buckhurst Hill, Chigwell, Epping, Loughton, Nazeing, Theydon Bois and Waltham Abbey.
- Vacancy rates within the town centres (which average 4.3%) are generally significantly lower than the national average of 9.3%. However, there are problems in terms of achieving the right 'balance'.
 - Currently all but one of the six main town centres (Loughton Broadway) has below 70% retail.
 - The average percentage of convenience retail shops (such as supermarkets and newsagents) for the district's six main town centres is 33.2%, almost double the national average (16.7%). The average percentage of comparison retail shops (e.g. clothes or gifts) is 32.6%, much lower than the national average (51.1%).

3.3.7 *Economy and employment*

- Unemployment has historically been slightly lower than the average for the East of England region (by approx. 0.25%), and significantly lower than the average for Great Britain (by approx. 1%)
- There are several designated employment areas throughout the district. Some have outdated and dilapidated facilities, and some areas originally designated for employment use either have buildings which stand empty, or were never developed for business use at all. The larger industrial estates are generally concentrated in Debden, Epping, Nazeing, North Weald (including the Airfield) and Waltham Abbey.
- The glasshouse industry is important in the Lea Valley area towards the West of the District.
- Finding suitable land for commercial development is difficult because land tends to be used for housing.
- A large proportion of businesses within the district are either 'micro' businesses (one to ten employees) or small businesses (eleven to forty-nine employees). These two together contribute a total of over 60.4% of jobs;
- The district also has high levels of entrepreneurship. Indeed self-employment has accounted for just over 15% of all employment in recent years and the proportion of business start-ups (new business ventures) in the district is much higher than the national rate. Recent work as part of the Employment Land Review has shown strong support for further facilities for small businesses/start-ups, and 'seedbed centres'.

3.3.8 *Historic environment*

- Waltham Abbey, Epping and Chipping Ongar are market towns of ancient origin, and the centres of several of the villages are also designated as conservation areas.
- The district contains over 1300 listed buildings as well as several 'protected lanes' and an important Roman Road.
- Along with the farmed landscape, built heritage is very important for the character of the district.

3.3.9 *Housing*

- The number of households (i.e. families/persons living alone or together in a dwelling) has risen steadily in the past 40 years, from 38,000 in the early 1970s to roughly 54,000 in 2011.

Estimates and projections show that the rise in the number of households is slightly lower than the Essex average.

- Many local people are priced out of the housing market and as such there is a large and growing need for various types of affordable housing within the district. The Council's housing waiting list for social housing increased by 183% between 2001 and 2010, although this is shortly to be reviewed under the provisions of the Localism Act. The Strategic Housing Market Assessment (SHMA) suggests there is also a high need for "intermediate housing", i.e. houses available for below market value.
- The results of the Council's "Community Visioning" exercise show that the provision of housing within the district was not identified as one of the top three priorities for the area. The provision of affordable housing is considered to be more of a priority by residents of Ongar and the rural areas.

3.3.10 *Land and waste*

- Epping Forest District abuts Greater London yet is dominated by open countryside. Over half of the approximately 124,700 residents live in the areas of Loughton, Buckhurst Hill, Chigwell and Waltham Abbey, amounting to only 5% of the area of the district.
- The results of the Council's "Community Visioning" exercise suggest that protection of the Green Belt is the top priority for the area.
- The district contains a mixture of Grade 2 and 3 agricultural land. In the Lea Valley area of the district significant areas are given over to growing salad vegetables in greenhouses, especially in Roydon and Nazeing.
- Most development in the district in the last decade has been on previously developed land.
- Epping Forest District is one of the highest producers of waste amongst Essex authorities.

3.3.11 *Landscape*

- Epping Forest is a largely rural district (over 92% Green Belt), with individually distinct towns and villages set in generally attractive countryside.
- The district's residents attribute very great importance to the character and appearance of the Green Belt.
- The district's landscape is varied, including river valleys, farmland plateaus, and wooded ridges and valleys. However it faces many pressures, including the, expansion of urban development and associated infrastructure..
- A Landscape Character Assessment study was completed in 2010. This differentiated between seven Landscape Character 'Types' and 33 Landscape Character 'Areas'.
- A Settlement Edge Sensitivity Study is near completion. This study aims to differentiate between the sensitivity of the land parcels surrounding the District's main settlements.
- The Council is developing a series of community-based tree strategies, which take a closer look at the trees of individual parishes in their historic and landscape context. So far strategies for Ongar, Roydon, Stapleford Abbots and Theydon Bois are complete.

3.3.12 *Transport*

- The district falls within the London Travel to Work Area which attracts a large proportion of the working age population. Only about 38% of residents live and work within the district.
- Chigwell, Buckhurst Hill, Loughton, Theydon Bois and Epping have excellent transport links (including into London) but suffer from problems relating to commuter parking and congestion at peak travel times. Chipping Ongar sits close to the A414, which is the main

east/west route linking St Albans to the Essex coast; however, public transport links are limited. At Waltham Abbey public transport accessibility from bus routes is limited.

3.3.13 *Water*

- Water quality (non-potable) in the district is poor: only 18% of water bodies in the London catchment area are at good status overall, and none of the water bodies in the Roding catchment area are at good status. Main reasons for this include diffuse agricultural sources, urbanisation and urban run-off, sewage works and flood protection works. Contaminated land also has an impact on both ground and surface waters in the district and nationally.
- The River Lee is used as a source of Drinking Water. Any significant impacts on its quality could place pressure on existing treatment works, especially those that are supporting a growing population or settlement.
- In some areas of the district the groundwater, largely due to geology, is vulnerable to contamination. Areas of concern in this respect include Nazeing and the Lee Valley.
- Glasshouses use a significant quantity of water. Many abstract their supplies from Private Wells or Boreholes.
- The district's residents use significantly more water per person than the national average and as such contribute to identified problems of water scarcity.

3.3.14 *Waltham Abbey & Nazeing Area*

- The Waltham Abbey and Nazeing area runs along the western boundary of the district, stretching to the north and south of Waltham Abbey. The western boundary is defined by the valley of the River Lee and its floodplain. The River Lee and associated floodplain is defined as its own Landscape Character Type (LCT), and is divided into three Landscape Character Areas (LCAs). The other two LCTs present within this functional area are the 'Ridges and Valleys' LCT to the south and the 'Farmland Plateau' LCT to the north around the large village of Lower Nazeing. The south-eastern boundary of this area is defined by the 'Wooded Ridge' LCT.
- Within this area, the majority of the River Valley Floodplain LCT is comprised of the 'Lee Valley Marshes' LCA, whilst the northern section is referred to as 'Nazeing Mead' LCA and the section to the south of Waltham Abbey is referred to as 'Rammey Marsh' LCA. The northern and southern LCAs are considered to have moderate sensitivity to change with the central section considered to have a moderate to high sensitivity. In terms of settlement edge sensitivity:
 - The majority of the landscape areas surrounding Waltham Abbey are described as having a moderate or high sensitivity to change, although there is one area that is identified as having a low sensitivity to change.
 - Of the two landscape areas surrounding Sewardstone, one is described as having high sensitivity to change and one is described as having low sensitivity to change.
- In the Farmland Plateau LCT, the area to the north of Lower Nazeing is associated with 'Roydon Hamlet Farmland Plateau' LCA, whilst the area to the south is associated with 'Nazeing Green Farmland Plateau' LCA. Both LCAs are considered to have moderate to high sensitivity to change.
 - Of the five landscape areas surrounding Lower Nazeing, three are described as having moderate sensitivity to change, and two as having low sensitivity to change.
- This is a very mixed area in terms of deprivation, with both quite deprived and quite wealthy areas adjacent to each other. It has a relatively high proportion of council rented properties. Waltham Abbey town centre has struggled in recent years to maintain its vitality and viability, although it is anchored by a Tesco supermarket – the largest in the district. This may be

partly because the town centre is now at the far west of the urban area with most development since the 1950s extending the town significantly to the east. This means that a lot of the population now live quite far away from the town centre and may therefore be less likely to use it. The area around the centre has been identified as one of general deprivation, particularly relating to income, health, education, skills and training, barriers to housing and services, crime, living environment, and employment. There are opportunities to pursue some development/regeneration projects in the town, to try to alleviate some of these problems. However these would need to respect the historical context of the centre, and be accommodated around existing environmental and other constraints. Waltham Abbey has significant potential for tourism, through the presence of the Abbey, the award winning Abbey Gardens, and the adjoining Lee Valley Regional Park. The new Olympic Lee Valley White Water Centre, for rafting, canoeing and kayaking is also within reach, just across the district border in Waltham Cross.

3.3.15 Rural North & Harlow

- This area skirts around three sides of Harlow and also extends some distance to the south, as far as Epping. Within this area six different Landscape Character Types (LCTs) can be identified and 14 different Landscape Character Areas (LCAs).
- The area to the west and south west of Harlow is associated with the Farmed Plateau LCT, which is sub-divided into four LCAs. The Epping Green Farmland Plateau LCA is considered to have a moderate sensitivity to change, where as the other areas that make up the 'farmed plateau' LCT to this side of Harlow all have a moderate to high sensitivity. In terms of settlement edge sensitivity:
 - Of the four landscape areas surrounding Roydon, all are described as having high sensitivity to change.
 - Of the two 'landscape setting areas' surrounding Epping Green, one is considered to have moderate sensitivity, whilst the other is considered to have high sensitivity.
- The area to the north and west of Epping, is associated with a 'Ridges and Valleys' LCT. This is a more strongly undulating landscape with frequent woodland blocks being highly visible. The area to the west (Upshire Ridges and Valleys LCA) has a rural feel, and is considered to have a moderate to high sensitivity to change. To the east, Cobbin's Bridge Ridges and Valleys LCA is less undulating and is dominated by 20th agricultural fields. It is considered to have a low to moderate sensitivity to change. In terms of settlement edge sensitivity:
 - All areas around Thornwood Common are considered to have a moderate or high sensitivity to growth.
 - Of the five landscape setting areas that surround North Weald Basset and North Weald Airfield, two are designated as highly sensitive, three as moderately sensitive and one a having a low sensitivity.
- The east of Harlow is dominated by the Sheering and Matching Farmland Plateau LCAs, and also includes a section of the River Stort Valley LCA. The Sheering Farmland Plateau LCA is described as having a moderate sensitivity to change. To the south, the Matching Farmland Plateau LCA has a moderate sensitivity to change overall, whilst the Stort Valley LCT has a high sensitivity to change
 - Of the five landscape areas surrounding Sheering, four are described as having a high sensitivity to change and one is described as having a moderate sensitivity to change.

3.3.16 *Central Line Settlements*

- The area is split by both the M25 and the M11, and has extensive areas of floodplain and nature conservation areas.
- The area is very varied, with (for instance) Theydon Bois having a much lower population density than Buckhurst Hill or Loughton; and Theydon Bois and part of Loughton being respectively the least and most deprived areas in the district.
- The town centre in Loughton is ranked first of the 6 main centres in the district, according to a UK-wide survey of major retail centres, but it has fallen slightly in the national ranking since 2000. The town has three conservation areas as well as many nationally and locally listed buildings.
- Growth of Loughton/Debden is wholly restricted by (i) Epping Forest along the north-western edge; (ii) the River Roding floodplain on the south-eastern boundary, the latter also containing the Roding Valley Meadows Local Nature Reserve (LNR), part of which is a Site of Special Scientific Interest (SSSI); and (iii) the narrow but important Green Belt gap between north-east Debden and Theydon Bois.
- Debden (which includes The Broadway town centre) is mostly made up of 1950/60s residential estates which were built to re-house displaced east Londoners. They include several open spaces and greens, which with the significant number of mature trees, contribute significantly to the character of the area. Areas of Loughton Broadway are some of the most deprived in the district according to the Indices of Multiple Deprivation, on issues such as education, income, employment, health and crime. Significant town centre enhancement works to the public realm on The Broadway have been undertaken in the last 5 years. These are the main areas covered by the Loughton Broadway Development Brief
- In terms of landscape character, it is notable that to the east of Epping is the Coopersale Wooded Ridges and Valleys Landscape Character Area (LCA). This area is designated as having a moderate to high sensitivity to change, despite being crossed by the M11. In particular, there are areas of ancient woodland and relics of Medieval Parkland, as well as the historic dispersed linear settlement of Coopersale Street. In terms of settlement edge sensitivity:
 - All areas around Chigwell / Chigwell Row are considered to have a moderate or high sensitivity to growth.
 - Loughton and Buckhurst Hill form an almost continuous urban area (separated by valued green spaces) running north-south, whilst Theydon Bois is a separate village which is situated to the northwest. Overall sensitivity to change is high adjacent to the edge of Epping Forest. Everywhere else around Theydon Bois and Loughton/Buckhurst Hill sensitivity is moderate.
 - The majority of areas around Epping/Coopersale Common are considered to have a moderate or high sensitivity to growth, although there is one area that is considered to have a low sensitivity.

3.3.17 *Rural South East*

- The majority of this functional area is associated with the Wooded Ridges and Valleys Landscape Character Type (LCT). Furthermore, the River Roding Valley LCT bisects the functional area, and an area to the north is associated with the Wooded Ridges LCT.
- North of the River Roding are four Landscape Character Areas (LCAs) associated with the Wooded Ridges and Valleys LCT. The northern most LCA is the Toot Hill Wooded Ridges and Valley LCA, which has a moderate sensitivity to change. South of this is the Stapleford Tawney and Stanford Rivers LCA, which is designated as having has a moderate to high sensitivity to change. To the west, the Theydon Garnon Wooded Ridges and Valleys LCA is

considered to have a low to moderate sensitivity to change. The 'Lower Forest to Beachet Wooded Ridge' LCA forms part of the Epping Forest SSSI.

- The area to the south of the River Roding consists of three separate LCAs. The two easternmost LCAs - Stapleford Abbots Wooded Ridges and Valleys and Lambourne Wooded Ridges and Valleys LCA – are both considered to have a moderate to high sensitivity to change. The western-most of the three LCAs is Chigwell Wooded Ridges and Valleys LCA is considered to have a low to moderate sensitivity to change. In terms of settlement edge sensitivity:
 - Of the three landscape setting areas surrounding Stapleford Abbots, one is described as having a high sensitivity to change, one is described as having moderate sensitivity and one is described as having low sensitivity.
- The River Roding flows south-westwards along the district boundary (where it is defined as the Middle Roding River Valley LCA), before turning westwards towards Loughton (the Lower Roding LCA). Both LCAs are considered to have a moderate to high sensitivity to change, but it is the Middle Roding LCA that has a stronger sense of enclosure and accessibility.

3.3.18 Ongar & Rural North East

- A dominant feature within this functional area is the River Roding Valley Landscape Character Type (LCT), which runs through the centre. Either side of the river valley are three different LCTs, which are sub-divided into nine different Landscape Character Areas (LCAs). At the south of the area is the town of Chipping Ongar.
- The River Roding Valley LCT is divided into two LCAs – one associated with the upper river valley, and one associated with the middle river valley. Both are important landscapes with a strong sense of enclosure, but the middle river valley is described as having a slightly higher sensitivity to change (moderate to high) than the upper valley (moderate).
- To the east of the river valley the Farmland Plateau LCT is subdivided into two LCAs. To the north, the Willingale Farmland Plateau LCA is considered to have a moderate to high sensitivity to change. Nine Ashes Farmland Plateau LCA to the south is considered to have a moderate sensitivity to change.
- To the west of the River Roding, the Abbess Farmland Plateau is considered to have a moderate to high sensitivity to change.
- The area of the Ridges and Valleys LCT that falls within this functional area is primarily associated with the Magdalen Laver and Moreton LCA. The area is considered to have a moderate sensitivity to change.
- In terms of settlement edge sensitivity:
 - Of the six landscape setting areas surrounding Chipping Ongar and High Ongar, three are described as having high sensitivity, one is described as moderate and two are described as low.
 - Of the four landscape setting areas around Moreton, three are described as having a high sensitivity and one as having a moderate sensitivity.
 - Of the three landscape setting areas around Fyfield, all are described as having high sensitivity.

3.4 How would the sustainability baseline evolve without implementation of the plan?

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”

(SEA Directive Annex I(b))

- 3.4.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might ‘evolve’ in the future under the ‘no plan’ / ‘business as usual’ scenario. The following bullets list a range of ‘future baseline’ issues that should be a focus of planning now:
- In the future, were the Local Plan not to be implemented, it can be assumed that **housing** development would come forward (to meet market demand) in a way that would erode local environmental quality in numerous ways. For example, settlement edge development would change local landscape character, valued urban green spaces would be lost (given the presence of the Green Belt designation) and there would also be a gradual loss of mature trees within built-up areas.
 - It is also likely that the network of **Local Wildlife Sites** would come under increased pressure given that the NPPF advises (para 113) that local wildlife sites cannot automatically receive much protection under the planning system.
 - The ‘**ageing population**’ trend will create a need for additional healthcare provision and for different types of housing. In particular, there will be a need for ‘Lifetime Homes’ which can be adapted for those with disabilities, and sheltered or extra-care accommodation.
 - There is a significant trend towards **single person households** due to people choosing to live alone and also outliving a partner. This has important implications for the number and type of homes that are needed.
 - **Town Centres** may struggle to maintain their function and vitality due to a lack of investment. The town centres which are predicted to need the most additional floorspace compared to their current size are Loughton High Road (34.1%) and Epping (26.1%).
 - Over roughly the next 20 year period, predictions are that more traditional **employment sectors** such as manufacturing will decline sharply, and most business services such as real estate and research and development will experience a small increase. To enable maximum growth in these sectors within Epping Forest District it may be necessary to plan for more modern facilities.
 - The South East Local Enterprise Partnership was successful in its bid for a two part Local Enterprise Zone in Harlow to be created. There are plans for a 126-acre development at the ‘Enterprise West Essex @ Harlow’ site, to support high tech and medical technology companies which could create up to 5,000 new jobs.
 - Without the designation of much larger areas, it is suspected that much of the **glasshouse** (horticultural) **industry** will become unviable creating significant problems of dereliction (given that it is expensive to bring such sites back into productive use).
 - In terms of **transport** patterns, there is evidence of higher rates of working from home in the more rural wards of the district and it is likely that this trend will continue. Importantly, it is also expected that the Central Line from Stratford south will reach capacity at peak travel times within the plan period. London Underground has advised that there are no plans to re-open the Epping to Ongar link as part of the Central Line, so it is likely that its immediate future rests on the success of its operation as a heritage/tourist attraction, with a possible expansion as a commuter service at some time in the future

3.5 What are the key issues that should be a focus of the appraisal?

“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC”

(SEA Directive Annex I(d))

Introduction

- 3.5.1 Drawing on the review of the sustainability context and baseline, the 2010 SA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of appraisal. The issues have been drawn-on and used as a methodological ‘framework’ for structuring this appraisal presented within the subsequent chapter *‘What are the appraisal findings and recommendations at this current stage’*. Given that this list of key issues has been consulted upon, and agreed as the methodological framework for structuring the appraisal, it shouldn’t be altered significantly. However, it is appropriate to supplement this framework in light of recent understanding.

Air quality

- 3.5.2 There is a need to...
- Avoid worsening of existing issues through minimising **traffic congestion**

Biodiversity and green infrastructure

- 3.5.3 There is a need to...
- Avoid **direct impacts** to important biodiversity sites and linear features
 - Avoid more **indirect impacts** (e.g. through pollution or development preventing adaptation of biodiversity to climate change)
 - Carefully plan and implement multifunctional **green infrastructure**
 - Support initiatives that seek to achieve **biodiversity benefits**, including through targeted habitat creation and enhancement
 - Plan for biodiversity at a **‘landscape scale’**

Climate change (mitigation and adaptation)

- 3.5.4 There is a need to...
- Lower **greenhouse gas** emissions
 - Increase the amount of **renewable and decentralised energy** generation
 - Drawing on the SFRA, take a pro-active approach to reducing **flood risk** and mitigate risk associated with new development where it occurs

Community and wellbeing

- 3.5.5 There is a need to...
- Address pockets of **deprivation**
 - Meet the health and social needs of a **growing and ageing population**, including through ensuring good access to community infrastructure
 - Address all aspects of **equality**, where relevant to spatial planning

- Address issues specific to **rural communities**
- Provide facilities and infrastructure to support **active living**

Economy and employment

3.5.6 There is a need to...

- Maintain a **diverse economy** including through supporting existing sectors (including rural)
- Taking a long term view, support initiatives that **capitalise on local strengths**, including tourism potential (e.g. resulting from attractive towns and countryside)
- Ensure local **job creation** in line with local housing growth
- Maintain the key functions of **local centres** (also a 'community and wellbeing' issue)
- Address **deprivation** issues through targeted economic growth

Historic environment

3.5.7 There is a need to...

- Protect the district's **heritage assets** and their settings from inappropriate development
- Ensure that development respects wider **historic character**

Housing

3.5.8 There is a need to...

- **Meet identified needs** through providing new housing of the appropriate type (e.g. to reflect the ageing population and trend towards more single person households)
- Increase the provision of **affordable housing**
- Meet the needs of **Gypsies and Travellers**

Land and waste

3.5.9 There is a need to...

- Protect **Green Belt** that meets the nationally established objectives
- Make **efficient use of land** (including through re-use of previously developed land)
- Support good **waste management**

Landscape

3.5.10 There is a need to...

- Direct development away from the most **sensitive landscapes** and landscape features
- Maintain and enhance **characteristic landscapes** and landscape features

Transport

3.5.11 There is a need to...

- Bring about a **modal shift** in terms of commuting patterns, away from car dependency
- Promote and support investment in **sustainable transport infrastructure**, including in rural areas where access to services and employment is an issue

Water

3.5.12 There is a need to...

- Minimise **water use** to mitigate the existing and worsening problem of 'serious water stress'
- Maintain and improve **water quality** within water courses in line with legislative requirements
- Direct development to areas with **sewerage infrastructure** capacity

Waltham Abbey & Nazeing Area

3.5.13 There is a need to...

- Address pockets of socio-economic **deprivation** within Waltham Abbey
- Protect landscape **character** and the integrity of the historic settlements
- Support the stewardship of **Epping Forest**
- Support the objectives of the **Lee Valley** Regional Park
- Address **flood risk** (including through supporting any necessary flood alleviation measures)
- Avoid and mitigate **traffic** congestion on the rural road network
- Meet **housing** needs, including affordable housing
- Enable good '**access**' through a range of modes of transport
- Support existing local **businesses** and industry

Rural North & Harlow

3.5.14 There is a need to...

- Support the objectives of the Green Infrastructure Plan for the **Harlow** Area which builds upon Gibberd's original masterplan for Harlow new town
- Support the objectives of the **Lee Valley** Regional Park;
- Avoid and mitigate **traffic** congestion on the rural road network
- Meet **housing** needs, including affordable housing
- Enable good '**access**' through a range of modes of transport
- Support existing local **businesses** and industry
- Recognise the sensitivities that would make expansion of **Harlow** a challenge

Central Line Settlements

3.5.15 There is a need to...

- Address pockets of socio-economic **deprivation**, particularly within Loughton
- Protect settlement boundaries and accessible **greenspace**
- Support the stewardship of **Epping Forest**
- Work to minimise **flood risk**
- Address congestion and avoid worsened **air quality**
- Meet **housing** needs, including affordable housing

- Enable good '**access**' through a range of modes of transport
- Support existing local **businesses** and industry

Rural South East

3.5.16 There is a need to...

- Protect landscape **character** and the integrity of the historic settlements
- Manage the floodplain of the River Roding as well as land use across the wider catchment in order to reduce downstream **flood risk**
- Avoid and mitigate **traffic** congestion on the rural road network
- Meet **housing** needs, including affordable housing
- Enable good '**access**' through a range of modes of transport
- Support existing local **businesses** and industry

Ongar & Rural North East

3.5.17 There is a need to...

- Protect landscape **character** and the integrity of the historic settlements
- Manage the floodplain of the River Roding as well as land use across the wider catchment in order to reduce downstream **flood risk**
- Avoid and mitigate **traffic** congestion on the rural road network
- Meet **housing** needs, including affordable housing;
- Enable good '**access**' through a range of modes of transport
- Support existing local **businesses** and industry

4 WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?’

*“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and **the way those objectives and any environmental considerations have been taken into account during its preparation**”* (SEA Directive Annex I(e))

“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (SEA Directive Annex I(h))

4.1 Introduction

4.1.1 As described within Chapter 1, the process of preparing this report, presenting it to the Council and the Council then taking appraisal findings on-board represents the first major ‘step’ in the iterative plan-making / SA process. As such, there is little ‘plan-making / SA ‘story’ to tell at this point in time.

4.1.2 The one thing that *has* happened to date is that alternative approaches have been identified for addressing key plan issues. Set out below are ‘outline reasons’ for selecting these alternatives.

N.B. The SEA Directive requires that the range of alternatives considered is ‘reasonable’, taking account of the ‘objectives and geographical scope of the plan’. As such, the discussion of ‘outline reasons’ equates to an explanation of ‘reasonableness’.

What will be included within this Chapter at the SA Report stage?

Within the SA Report (published for consultation alongside the Proposed Submission Plan), as well as presenting outline reasons for selecting the alternatives considered / explaining ‘reasonableness’, this chapter will also present outline reasons for selecting *preferred* alternatives. As part of this, there will be an explanation of the way in which sustainability ‘objectives and considerations’ have been reflected, i.e. the findings of the interim SA have been taken into account.

4.2 Outline reasons for selecting alternatives

4.2.1 Table 4.1 summarises the alternative approaches that are presented within the ‘Community Choices’ consultation document. For some of the issues, the justification for the selection of alternatives is self-explanatory and there is little to be gained from providing ‘outline reasons’.

Table 4.1: Alternative approaches presented within the ‘Community Choices’ consultation document.

Issue	Alternatives	Is there a need to outline reasons for selecting this range of alternatives?
Alternatives for spatial issues		
Housing target	Total population trend (11,448 new homes 2011-2033)	Yes
	Combined Derived Regional Spatial Strategy target / updated population trend (10,128 new homes 2011-2033)	
	Adopted Regional Spatial Strategy target (7,700 new homes 2011-2033)	
Employment land	Regional Spatial Strategy (28.5ha)	Yes
	Need identified by Evidence Base (21.5ha)	
Growth around	Pursue development around the boundaries of Harlow to meet some of the	No

Harlow	housing & employment needs of Epping Forest district	
	Do not pursue development around the boundaries of Harlow to meet some of the housing & employment needs of Epping Forest district	
Distribution of growth around the remainder of Epping Forest	Proportionate distribution	Yes
	Transport focus - Proportionate distribution	
	Transport focus - Equal distribution	
	Development away from the Central Line – Proportionate distribution	
	Development away from the Central Line – Equal distribution	
	Large settlements - Proportionate distribution	
	Large settlements - Equal distribution	
Directions for growth beyond existing boundaries	<p>Alternative directions for growth beyond existing boundaries are presented for</p> <ul style="list-style-type: none"> • Harlow; • Chigwell; • Ongar, Epping; • Nazeing; • Lower Sheering; • Sheering; • North Weald Basset; • Roydon; • Theydon Bois; • Thornwood Common; and • Waltham Abbey. 	Yes
North Weald Airfield	Maintain existing policies & approach to use of the airfield including encouraging existing operators to expand their business and small new operators to start business within current policy parameters	No
	Moderate expansion of commercial activity around the NWA, with retention of current level of aviation use	
	Active development of commercial aviation	
	Cease aviation uses – pursue alternative use for NWA.	
Alternatives for thematic issues		
The Lea Valley Glasshouse Industry	Introduce a policy of 'managed decline' for the industry	No
	Put in place measures to support the industry, including potentially: permitting larger, higher glasshouses within designated areas, expanding existing areas designated for glasshouses, and designating new sites for glasshouse development.	
Managing existing employment sites	Resist redevelopment of designated employment sites for uses other than employment	No
	Allow the redevelopment of existing sites which are vacant/derelict and have been for some time, for other uses e.g. housing	
Balance of retail shops and other services	Reduce the 70% minimum retail frontage threshold to e.g. 50%	No
	Relax the existing policy completely to allowing changes of use to non-retail uses within key frontages	
	Re-classify the towns and relax the existing policy within the small district centres only (Waltham Abbey, Loughton Broadway, Chipping Ongar, and Buckhurst Hill)	
	Maximise the individual strengths of each centre, i.e. have a different approach for each of the 6	
	Keep the current policy approach	
Dwelling size	Adopt policy which dictates the proportions of different size dwellings to be	No

and design	achieved in various locations around the district	
	Leave the market to determine the most appropriate houses to be built	
Green Belt and density	Encourage high density development (50 dph or more) to reduce the amount of land that will need to be released from the Green Belt	Yes
	Seek development of around 30dph to allow larger residential gardens and space for car-parking, meaning that more land will be released from the Green Belt	

Outline reasons for selecting the 'Housing target' alternatives

- 4.2.2 Population and household estimates have been prepared on behalf of the authorities in Essex, and nine housing growth options were presented for Epping Forest District. The NPPF requires that authorities must identify the scale and mix of housing and the range of tenures that meets housing and population projections, taking account of migration and demographic change.
- 4.2.3 Three reasonable alternatives (derived from four tested scenarios) have been included in the Community Choices document These are:
- A: Official population projections
 - B: Combined East of England Plan / Update of official population projections
 - C: East of England Plan target updated for 2011-33

The remaining five tested scenarios were not considered reasonable alternatives for the following reasons:

- Zero (overall) migration – does not assess the implications of migration so would not meet the policy requirements of the NPPF
- Revised East of England Plan target – review of the East of England Plan was not adopted, and has therefore not been subject to public scrutiny
- Adopted East of England Plan target (excluding proposed growth at Harlow) – does not make adequate provision for housing growth to meet the population needs of the district
- Revised East of England Plan (excluding proposed growth at Harlow) – does not make adequate provision for housing growth to meet the population needs of the district, nor was this target subject to public scrutiny
- Employment – derived from an economic growth forecast, this scenario does not take into account the number of the working age population that leave the district for work, and seeks the balance housing and local job supply. Given the proximity to London, and ease of access via the Central Line it is not considered that this level of growth would be reasonable in a primarily Green Belt authority.

Outline reasons for selecting the 'Employment land' alternatives

- 4.2.4 Two potential job growth targets are included in the Community Choices document. These are derived from an analysis of the Employment Land Review (Atkins 2010) and the Town Centres Study (Roger Tym & Associates 2010), and secondly from the proposed review of the East of England Plan. Although the review was not completed, nor were these figures subject to public consultation and scrutiny, this is the most up-to-date data available at a district level on potential job growth.

Outline reasons for selecting the 'Distribution of growth around the remainder of Epping Forest' alternatives

- 4.2.5 The Community Visioning exercise made clear that residents favour a development pattern which focuses development “close to public transport links” and “around or within existing towns”. In recognising that the largest towns have the greatest range of services and facilities, and also give rise to the largest level of population growth, a proportionate distribution pattern was considered at the outset. However, the initial analysis showed that the largest town, Loughton, is the most constrained area and only has identified capacity for a small number of dwellings. The same issue applies to Buckhurst Hill. Therefore the proportionate distribution pattern has been amended to allocate the growth that would be within/around these two towns under the original distribution pattern, to the other towns and villages in the district. All subsequent growth options also take into account the constrained capacity of Loughton and Buckhurst Hill.
- 4.2.6 Four options have been developed around the existing public transport network, which also take advantage of good access to the motorway network. There are two pairs of options; the first focuses development in and around all towns that have good access to the public transport network; and the second which recognises that capacity on the Central Line is a particular issue and could constrain development in those towns that have an station on the underground network. Options are presented for growth which is proportionate to the population of the existing town, and which spreads development equally around the various transport nodes.
- 4.2.7 Finally, the eight largest towns and villages in the district have been identified, and in recognising that these towns have the largest number of services and facilities, growth could be distributed around these towns/villages. As above, growth could be distributed proportionately in accordance with the existing population or equally. This option could also be considered more flexibly, with growth occurring in some or all of the eight towns, potentially leading to a significant proportion of the necessary growth being within/around only one or two settlements.
- 4.2.8 The community choices document also seeks further suggestions for spatial distribution patterns across the district.

Directions for growth beyond existing boundaries

- 4.2.9 All of the main towns and villages have been analysed, to identify the opportunities for growth or change within the settlement boundaries. This has been followed by an analysis for the potential directions for growth outside of the existing boundaries. All of these possible directions for growth are within the Green Belt. At this early stage, the only areas which have been excluded have:
- Been scored “red” by the Strategic Land Availability Assessment (SLAA)
 - Are within a proposed Strategic Green Belt Gap; or
 - Are a significant distance from existing settlements, or those in rural villages that have not yet been assessed in detail.

Outline reasons for selecting the 'Green Belt and density' alternatives

- 4.2.10 92.4% of Epping Forest District is within the Green Belt. Analysis of the existing towns and villages has shown that there is not sufficient capacity to accommodate even the lowest alternative for growth outside of the Green Belt. It is therefore necessary to carefully plan for some release of land from the Green Belt.

- 4.2.11 Of the main principles of including land within the Green Belt, preventing the coalescence of settlements is one of the key issues at this stage. Areas that could be allocated as Strategic Green Belt gaps have been identified for comment where the area of Green Belt that currently separates settlements from each other is at its narrowest.
- 4.2.12 The density of development in the district will have an impact on the area of land that will need to be released from the Green Belt. In very crude terms, higher density development would mean that less land would need to be released from the Green Belt. The Community Choices document suggests an appropriate density range could be adopted within the Local Plan to ensure that efficient use of land is made.

5 HOW HAS THE APPRAISAL AT THIS CURRENT STAGE BEEN UNDERTAKEN?

“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”

(SEA Directive Annex I(h))

5.1 The approach to appraisal

Alternatives

5.1.1 For the alternatives discussed in Chapter 4 the appraisal seeks to predict ‘significant effects’ on the baseline, particularly focusing on the sustainability issues identified in Section 3.5.

5.1.2 Every effort has been made to predict effects accurately, taking into account the potential for the effects to vary in terms of timescale, and impact in different ways on a baseline that is dynamic and variable in terms of its sensitivity. However, predicting significant effects accurately is inherently difficult given the nature of the alternatives presented within *Community Choices*. In particular:

- Uncertainty exists regarding how the alternative policy approaches would be delivered as part of the final Local Plan, i.e. supported by other Local Plan policies; and
- Even where it is possible to be certain how a policy approach will be realised in the Local Plan, uncertainty still remains regarding how this will be interpreted as part of the Development Management and will lead to actual effects ‘on the ground’.

5.1.3 Because of these inherent uncertainties there is a need to exercise caution when appraising significant effects of alternative approaches. In light of the need to exercise caution:

- Where effects have been predicted this has been done so alongside an explanation of the assumptions made; and
- In many instances it has not been possible to predict significant effects, but it has been possible to comment on the relative merits of alternatives in more general terms.

Suggested approaches

5.1.4 Although the focus of the SA at this stage is to present an appraisal of the alternative approaches to addressing key plan issues, a more informal ‘commentary’ has also been made regarding the various policy approaches that are ‘suggested’ within the *Community Choices* document.

6

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

“the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors”

(SEA Directive Annex I(f))

“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”

(SEA Directive Annex I(g))

6.1 Introduction

6.1.1 Within this chapter:

- Sections 6.2 - 6.5 present an appraisal of alternative approaches to addressing a range of overarching spatial issues;
- Section 6.6 presents an appraisal of the alternative ‘potential directions for growth’ for a range of the towns and villages within the District;
- Sections 6.7 - 6.12 present an appraisal of the alternative approaches to addressing a range of thematic issues;
- Section 6.13 presents an appraisal of the suggested approaches presented within *Community Choices*; and

6.2 'Housing target' alternatives

6.2.1 The table below presents an appraisal of alternative approaches to addressing the 'Housing target' issue.

SA Topic	Alternatives and rank of preference			Discussion of significant effects
	(A) Total population trend 11,448 new homes	(B) Combined Derived Regional Spatial Strategy target / updated population trend - 10,128 new homes	(C) Adopted Regional Spatial Strategy target 7,700 new homes	
Air quality	3	2	★ 1	<p>There are existing problems of air quality which, it is assumed, will be made worse as a result of growth. And as such:</p> <p style="text-align: center;">All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan.</p> <p>A high growth strategy would make avoiding or mitigating significant effects more of a challenge.</p>
Biodiversity and green infrastructure	3	2	★ 1	<p>It is assumed that growth on this scale will place pressure on sites that are important for biodiversity as well as areas of urban greenspace (locally important for biodiversity) and greenfield land outside settlement boundaries that contributes to the functioning of the 'ecological network' within the district. There could also be some secondary effects associated with growth, such as through recreational use of important sites. And as such:</p>

				<p>All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan.</p> <p>A high growth strategy would make avoiding or mitigating significant effects more of a challenge.</p>
Climate change (mitigation and adaptation)	3	2	★ 1	<p>Growth at any of these scales would lead to greater total energy use and traffic movements within the district, with resultant increases in terms of greenhouse gas emissions. Total CO₂ emissions within the district are monitored, and considered to be an important indicator. However, climate change mitigation is a 'global issue', i.e. it ultimately doesn't matter where emissions occur. As such, more important is that the Plan has the effect of reducing <i>per capita</i> CO₂emissions. In this sense, it is not suggested that any of the alternatives would lead to significant effects.</p> <p>In terms of climate change adaptation, however, there is more of an argument for limiting growth in the district in order to reduce effects in terms of identified local issues, in particular issues relating to water scarcity. And as such:</p> <p>All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan that ensures water efficiency measures are designed into new developments.</p> <p>A high growth strategy would make avoiding or mitigating significant effects more of a challenge.</p>
Community and wellbeing	★ 1	2	3	<p>It is assumed that an overriding priority is the need to deliver growth that will in turn facilitate regeneration in those parts of the District that suffer from problems of relative deprivation and also support regeneration within Harlow. And as such:</p> <p>All alternatives would lead to significant positive effects</p> <p>... and growth on a larger scale would allow opportunities to be capitalised on to the greatest extent.</p> <p>Having said this, effects would of course be mixed. In terms of some community and well-being issues growth will lead to negative effects and a high growth strategy would make avoiding or mitigating significant effects more of a challenge. For example, it will be difficult to avoid</p>

				instances where existing 'community identity and cohesion' is eroded if it is the case that a high growth strategy is supported.
Economy and employment		2	3	<p>Opportunities for economic growth in the district have been identified, and as such it is important that this is enabled by sufficient housing growth.</p> <p>A study undertaken in 2010 suggested that a housing target of 14,256 would be necessary to maximise economic growth potential; however, it is likely that the highest of the 'Community Choices' growth options (11,448 homes) would suffice given that the 14,256 figure included provision for commuters (i.e. sought to maximise economic growth at a regional scale, whilst for our purposes here it is probably helpful to focus on maximising growth at the district scale). And as such:</p> <p style="text-align: center;">Alternatives (A) and (B) would lead to significant positive effects</p> <p>... whilst alternative (C) would fall short, leading to significant opportunities being missed.</p>
Historic environment	?	?	?	Despite the sensitive nature of the historic environment within the district, it is not possible to conclude that housing growth would result in significant negative effects. This reflects the fact that it should be possible to direct growth away from areas with a sensitive historic character, and away from particular historic environment assets and their settings; and in some instances there is the potential for growth/regeneration and conservation of the historic environment to go hand in hand.
Housing		2	3	<p>There are existing problems of unmet housing demand and affordable housing needs (i.e. need for both social rented and 'intermediate' affordable housing). As such:</p> <p style="text-align: center;">All alternatives would lead to significant positive effects.</p> <p>... and growth on a larger scale would allow opportunities to be capitalised on to the greatest extent.</p>
Land and waste	3	2		<p>All of the alternatives would require release of land from the Green Belt and, it is assumed, loss of productive agricultural land. As such:</p> <p style="text-align: center;">All alternatives would lead to significant negative effects.</p>

				... and a higher growth strategy would lead to effects that are more negative.
Landscape	3	2	★ 1	<p>Although some of the new housing would be on land with low landscape value, much of it would be on Green Belt land or other land with landscape value. And as such:</p> <p>All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan.</p> <p>A high growth strategy would make avoiding or mitigating significant effects more of a challenge.</p>
Transport	3	2	★ 1	<p>There are existing problems of traffic congestion that, it is assumed, would be worsened as a result of growth. And as such:</p> <p>All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan.</p> <p>A high growth strategy would make avoiding or mitigating significant effects more of a challenge (although growth can also result in more funding available for improvements to the transport infrastructure).</p>
Water	3	2	★ 1	<p>Although some of the new housing would be for existing residents whose households are getting smaller (e.g. due to divorce), much of the new housing would be for an increasing population and so total water use is likely to increase (even if per capita water use decreases) as a result of growth. Growth will also affect water quality by increasing run-off and sewage that will need treatment. As such:</p> <p>All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan.</p> <p>A high growth strategy would make avoiding or mitigating significant effects more of a challenge.</p>

Waltham Abbey & Nazeing Area	★ 1	2	3	<p>Opportunities for growth and town centre regeneration have been identified for Waltham Abbey. As such:</p> <p style="text-align: center;">All alternatives would lead to significant positive effects.</p> <p>... and growth on a larger scale would lead to a greater chance of opportunities being capitalised on.</p>
Rural North & Harlow	3	2	★ 1	<p>The communities within this part of Epping Forest district are relatively affluent and so have less to gain from growth. And as such:</p> <p style="text-align: center;">Alternatives (A) and (B) would lead to significant negative effects</p> <p>... whilst alternative (C) would lead to significant affects being avoided</p>
Central Line Settlements	3	2	★ 1	<p>The communities within this part of Epping Forest district are relatively affluent and so have less to gain from growth. And as such:</p> <p style="text-align: center;">Alternatives (A) and (B) would lead to significant negative effects</p> <p>... whilst alternative (C) would lead to significant affects being avoided</p>
Rural South East	?	?	?	<p>There identified problems of rural deprivation in parts of this area that could potentially be addressed through growth. However, in the long term growth could lead to an erosion of rural character with significant negative implications.</p>
Ongar & Rural North East	3	2	★ 1	<p>The communities within this part of Epping Forest district are relatively affluent and so have less to gain from growth. And as such:</p> <p style="text-align: center;">Alternatives (A) and (B) would lead to significant negative effects</p> <p>... whilst alternative (C) would lead to significant affects being avoided</p>

Summary

Environmental effects

The scales of growth under consideration could lead to significant effects in terms of a range of environmental sustainability issues. Having said this, there is the

potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan.

A low growth strategy is preferable given that a high growth strategy would make avoiding or mitigating significant effects more of a challenge.

Socio-economic effects

Growth at the scales under consideration would lead to mixed socio-economic effects, but on balance it is suggested that growth should be seen in a positive light given the overriding priority of needing to encourage investment and regeneration within certain parts of the district (in particular town centres) and also the (assumed) need to support regeneration within Harlow.

It is suggested that if the scale of employment attracted to the district is to be maximised then the higher growth alternatives (A) and (B) would be preferable to (C).

It is also apparent that communities within some parts of the district have more to gain from growth than others. Waltham Abbey and the surrounding rural area is 'relatively deprived', and so would benefit from growth and associated investment/regeneration.

Overall summary of effects

In terms of how much new housing development is necessary, the Council has put forward three alternatives ranging from 7,700 to 11,448 new homes over the plan period. The former is the current official housing target for the district (while the RSS remains in place) while the latter is based on the Government's most recent projections of population change based on a 'business-as-usual' scenario. The arguments in favour of higher levels of new housing are social and economic and relate to peoples' wellbeing and maintaining a competitive economy. However, from an environmental point of view new housing development can be damaging, particularly if it is poorly located. While all new housing is likely to give rise to increased traffic congestion and waste arisings for example, impacts on wildlife, the landscape and the historic environment are heavily dependent on precisely where new housing is located. Epping Forest District is 92.4% Metropolitan Green Belt, which is indicative of the degree to which the district is constrained environmentally. The NPPF emphasises that the Government attaches great importance to Green Belts and that, once established, Green Belt boundaries should only be altered in exceptional circumstances. Moreover, the District is dominated by attractive open countryside which is arguably a defining feature and Epping Forest is a vital asset (as is, amongst other things, the network of 25 Conservation Areas and over 1,300 listed buildings. The Issues and Options paper acknowledges that some release of Green Belt land will be necessary to meeting housing and employment needs. The key question for the District is around which settlements should land be released and to what extent.

6.3 'Employment land' alternatives

6.3.1 The table below presents an appraisal of alternative approaches to addressing the 'Employment land' issue.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	(A) Regional Spatial Strategy 28.5ha	(B) Need identified by Evidence Base 21.5ha	
Air quality	?	?	Depending on their location, new employment sites could generate more traffic movements, increasing air pollution, or help to reduce out-commuting, decreasing it.
Biodiversity and green infrastructure	2		<p>It is assumed that both alternatives would place pressure on sites that are important for biodiversity, areas of urban greenspace (locally important for biodiversity) and/or greenfield land outside settlement boundaries that contributes to the functioning of the 'ecological network' within the district. And as such:</p> <p style="text-align: center;">All alternatives would lead to significant negative effects.</p> <p>Having said this, there is the potential to avoid and/or mitigate effects through setting stringent policy within the Local Plan. A high growth strategy would make avoiding or mitigating significant effects more of a challenge.</p>
Climate change (mitigation and adaptation)	?	?	<p>Focusing on the issue of climate change mitigation:</p> <p>Depending on their location, the new employment sites could generate more traffic movements, increasing air pollution, or help to reduce out-commuting, decreasing it.</p>

Community and wellbeing			<p>Employment opportunity is important for community and wellbeing. As such:</p> <p>Both alternatives would lead to significant positive effects.</p> <p>A more ambitious target could help to ensure that opportunities are capitalised upon. However, a lower need / demand has been identified by the Council's Employment Land Review and Town Centres Study. As such, it is not clear which approach would lead to greater benefits.</p>
Economy and employment			<p>Finding suitable land for commercial development is currently difficult (because land tends to be used for housing) yet there is an identified need to deliver the modern facilities needed to support service businesses. A more ambitious target could help to ensure that opportunities are capitalised upon. However, a lower need / demand has been identified by the Council's Employment Land Review and Town Centres Study. As such:</p> <p>Both alternatives would lead to significant positive effects.</p> <p>... and it is not clear which approach would lead to greatest benefits.</p>
Historic environment	-	-	It is assumed that employment sites would be located away from important heritage assets and areas of important historic character. And as such, neither alternative would lead to significant effects.
Housing	-	-	It is not assumed that development of land for employment would be at the expense of developing land for housing. And as such, neither alternative would lead to significant effects.
Land and waste	2		<p>It is assumed both alternatives would lead to development of greenfield land (and possibly loss of productive agricultural land). As such:</p> <p>All alternatives would lead to significant negative effects.</p> <p>... and a higher growth strategy would lead to effects that are more negative.</p>
Landscape	-	-	It is assumed that employment sites would be located away from important landscape features and areas that are important in terms of landscape character. And as such, neither alternative would lead to significant effects.
Transport	-	-	It is assumed that employment sites would be situated so as to avoid worsened traffic congestion, or would be brought forward alongside necessary improvements to the transport infrastructure.

Water	-	-	It is assumed that employment growth on this scale would not lead to significant effects on the water environment (in terms of water quality or quantity).
Waltham Abbey & Nazeing Area		2	<p>Opportunities for growth and town centre regeneration have been identified for Waltham Abbey. It is assumed that employment sites would be targeted to this area. As such:</p> <p style="text-align: center;">Both alternatives would lead to significant positive effects.</p> <p>... and growth on a larger scale would lead to a greater chance of opportunities being capitalised on.</p>
Rural North & Harlow		2	<p>The Kent and Greater Essex Local Enterprise Partnership was successful in its bid for a two part Local Enterprise Zone in Harlow to be created. There are plans for a 51ha development at the 'Enterprise West Essex @ Harlow' site, to support high tech and medical technology companies which could create up to 5,000 new jobs. It is assumed that employment sites would come forward in Epping Forest district in close proximity to Harlow in order to capitalise on the 'cluster' effect. As such:</p> <p style="text-align: center;">Both alternatives would lead to significant positive effects.</p> <p>... and growth on a larger scale would lead to a greater chance of opportunities being capitalised on.</p>
Central Line Settlements	?	?	It is unclear whether employment sites would be targeted to this area.
Rural South East	?	?	It is unclear whether employment sites would be targeted to this area.
Ongar & Rural North East	?	?	It is unclear whether employment sites would be targeted to this area.

Summary

Environmental effects

Employment development on the scales under consideration would lead to significant negative effects in terms of 'biodiversity' and 'land'. Having said this, there is the potential to avoid and mitigate the effects through the Local Plan. In terms of environmental considerations the lower growth strategy (B) would be preferable.

Socio-economic effects

Employment opportunity is important for community and wellbeing. As such, both alternatives would lead to significant positive effects.

A more ambitious target could help to ensure that opportunities are capitalised upon. However, a lower need / demand has been identified by the Council's Employment Land Review and Town Centres Study. As such, it is not clear which approach would lead to greater benefits.

Overall summary of effects

Employment development on the scales under consideration could lead to significant negative effects in terms of 'biodiversity' and 'land'. As such, in terms of these environmental considerations the lower growth strategy (B) would be preferable. In terms of socio-economic considerations, both approaches would lead to significant positive effects and it is not clear which approach is preferable.

6.4 'Growth around Harlow' alternatives

6.4.1 The table below presents an appraisal of alternative approaches to addressing the 'Growth around Harlow' issue.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	(A) Pursue development around the boundaries of Harlow to meet some of the housing & employment needs of Epping Forest district (as well as within the remainder of Epping Forest district)	(B) Pursue development only within the remainder of Epping Forest district	
Air quality	 1	2	<p>Neither approach to spatial distribution would avoid the problem of growth worsening air quality (see discussion in 6.2, above). As such:</p> <p style="text-align: center;">Both alternatives would lead to significant negative effects.</p> <p>However, assuming that development around Harlow would result in new mixed use communities large enough to support the delivery of local services and also viable public transport into Harlow, it is possible to say that (A) would be the preferable approach to spatial distribution.</p>
Biodiversity and green infrastructure	 1	2	<p>Neither approach to spatial distribution would avoid the problem of growth negatively affecting biodiversity (see discussion in 6.2, above). As such:</p> <p style="text-align: center;">Both alternatives would lead to significant negative effects</p> <p>Development around Harlow might well result in development that affects important wildlife sites, or</p>

			<p>at least impacts on the ecological connectivity between important wildlife sites. However, it is not assumed that this area is any more or less sensitive than land surrounding towns and villages elsewhere in the district.</p> <p>Large scale development (which might be more likely to occur on the edge of Harlow) could result in greater opportunities for designing in effective green infrastructure and so it is suggested that (A) would be preferable.</p>
Climate change (mitigation and adaptation)		2	<p>Focusing on climate change mitigation:</p> <p>Neither approach to spatial distribution would avoid the problem of growth negatively affecting efforts to adapt to climate change (see discussion in 6.2, above). As such:</p> <p style="text-align: center;">Both alternatives would lead to significant negative effects</p> <p>Meeting some of Epping Forest's housing needs through development around Harlow would have positive effects relative to the alternative approach, assuming development of new mixed use communities large enough to support the delivery of local services and also viable public transport into Harlow.</p>
Community and wellbeing		2	<p>It is assumed that an overriding issue is the need to bring about regeneration in those parts of the district that suffer from problems of relative deprivation and also support regeneration of Harlow. As such:</p> <p style="text-align: center;">Both alternatives would lead to significant positive effects</p> <p>(A) is preferable given that (B) would result in opportunities for supporting regeneration in Harlow being missed. This reflects the fact that development on the edge of Harlow could support regeneration within the town assuming development comes forward at a sufficient scale and in the right location (and Harlow Council identifies expansion as a suitable strategy for addressing regeneration needs).</p> <p>Having said this, it can also be assumed that development around Harlow would adversely affect some existing communities.</p>
Economy and employment		2	<p>It is assumed that both approaches would result in new housing in close proximity to new or expanding employment sites can support economic objectives. As such:</p>

			<p>Both alternatives would lead to significant positive effects</p> <p>It is suggested that focusing housing in close proximity to Harlow could be beneficial. This reflects the assumptions that employment sites will come forward in Epping Forest district in close proximity to Harlow. This is likely to be the case given that the Kent and Greater Essex Local Enterprise Partnership was successful in its bid for a two part Local Enterprise Zone in Harlow (at the 51ha 'Enterprise West Essex @ Harlow' site, which is expected to up to 5,000 new jobs with high tech and medical technology companies).</p>
Historic environment	?	?	<p>Despite the sensitive nature of the historic environment within the district, it is not possible to conclude that either approach to distributing growth would result in significant negative effects.</p> <p>Focusing development around Harlow could potentially reduce the need to develop around the edge of the district's historic settlements; however, there could still be negative effects on historic landscapes and so it is not clear that this approach is preferable.</p>
Housing	?	?	<p>Both approaches to distributing growth would ensure existing problems of unmet housing demand and affordable housing needs are addressed. As such:</p> <p>Both alternatives would lead to significant positive effects</p> <p>It is not possible to differentiate between the alternatives in terms of their ability to meet housing demand/need.</p>
Land and waste	2		<p>Neither approach to spatial distribution would avoid the problem of growth leading to loss of greenfield land (see discussion in 6.2, above). As such:</p> <p>Both alternatives would lead to significant negative effects</p> <p>Development on the edge of Harlow would most likely be on greenfield land and so (B) is preferable.</p>
Landscape	?	?	<p>Neither approach to spatial distribution would avoid the problem of growth effecting landscape (see discussion in 6.2, above). As such:</p> <p>Both alternatives would lead to significant negative effects</p> <p>It is unclear whether the landscape surrounding Harlow is, as a rule, any more or less sensitive in</p>

			terms of landscape.
Transport	★ 1	2	<p>Neither approach to spatial distribution would avoid the problem of growth leading to worsened traffic congestion (see discussion in 6.2, above). As such:</p> <p style="text-align: center;">Both alternatives would lead to significant negative effects</p> <p>However, meeting some of Epping Forest's housing needs through development around Harlow would have positive effects relative to the alternative approach assuming development of new mixed use communities large enough to support the delivery of local services and also viable public transport into Harlow.</p>
Water	-	-	<p>Neither approach to spatial distribution would avoid the problem of growth leading to negative effects on the water environment (see discussion in 6.2, above). As such:</p> <p style="text-align: center;">Both alternatives would lead to significant negative effects</p> <p>It is unlikely that there is any significant difference between the alternatives in terms of their ability to avoid / mitigate effects.</p>
Waltham Abbey & Nazeing Area	2	★ 1	There is a need to focus growth at Waltham Abbey. It is assumed that focusing growth at Harlow could lead to less growth targeted at Waltham Abbey, where there is an identified need for regeneration.
Rural North & Harlow	2	★ 1	<p style="text-align: center;">(A) would result in significant negative effects</p> <p>... although there could also be some benefits (e.g. access to services and facilities funded as part of the new development).</p>
Central Line Settlements	?	?	It is unclear which of the two approaches would be preferable.
Rural South East	?	?	It is unclear which of the two approaches would be preferable.
Ongar & Rural North East	?	?	It is unclear which of the two approaches would be preferable.

Summary

Environmental effects

Neither approach to spatial distribution would avoid the significant negative environmental effects that would result from growth. Focusing development around Harlow would be preferable in terms of some environmental issues, most notably those that relate to patterns of travel given that development around Harlow would result in new mixed use communities large enough to support the delivery of local services and also viable public transport into Harlow.

Social effects

Focusing growth around Harlow is the preferred approach given that it would support regeneration within the town. This reflects the assumption that development would come forward on a sufficient scale and in the right location (and Harlow Council identifies expansion as a suitable strategy for addressing regeneration needs). Having said this, it can also be assumed that development around Harlow would adversely affect some existing communities.

Overall summary of effects

The socio-economic benefits associated with focusing growth at the Harlow urban edge probably outweigh the environmental negatives. However, there is also a need to factor in the socio-economic negatives.

6.5 ‘Distribution of growth around the remainder of Epping Forest’ alternatives

6.5.1 The table below presents an appraisal of alternative approaches to addressing the ‘Distribution of growth around the remainder of Epping Forest’ issue.

SA Topic	Alternatives and rank of preference							Discussion of significant effects
	(A) Proportionate distribution	(B) Transport focus - Proportionate distribution	(C) Transport focus - Equal distribution	(D) Development away from the Central Line – Proportionate distribution	(E) Development away from the Central Line – Equal distribution	(F) Large settlements - Proportionate distribution	(G) Large settlements - Equal distribution	
Air quality	3	1	2	2	2	2	2	<p>None of the approaches to spatial distribution will avoid the problem of growth leading to worsened air quality (see discussion in 6.2, above). As such:</p> <p style="text-align: center;">All alternatives would lead to significant negative effects</p> <p>It is not possible to differentiate further between the alternatives accurately without more detailed transport modelling. However, it may be that (B) performs best as it will enable more residents to live in close proximity to public transport links and also direct growth ‘proportionately’ (i.e. to larger settlements where it can be assumed more services and facilities will be within walking or cycling distance).</p> <p>(A) may perform the worst on the basis that it will lead to greater development in rural areas, where residents will be highly dependent on the private car.</p>
Biodiversity and green	?	?	?	?	?	?	?	None of the approaches to spatial distribution will avoid the problem of growth negatively

infrastructure								<p>affecting biodiversity (see discussion in 6.2, above). As such:</p> <p>All alternatives would lead to significant negative effects</p> <p>It is not possible to differentiate further between the alternatives given that sensitive sites and areas are spread around the district and associated with the edges of most settlements.</p>
Climate change (mitigation and adaptation)	3	★ 1	2	2	2	2	2	<p>None of the approaches to spatial distribution would avoid the problem of growth negatively affecting efforts to adapt to climate change (see discussion in 6.2, above). As such:</p> <p>All alternatives would lead to significant negative effects</p> <p>Focusing on climate change mitigation:</p> <p>(B) may perform best as it will enable more residents to live in close proximity to public transport links and also direct growth 'proportionately' (i.e. to larger settlements where it can be assumed more services and facilities will be within walking or cycling distance).</p> <p>(A) may perform the worst on this basis given that it will lead to the development in rural areas, where residents will be highly dependent on the private car.</p>
Community and wellbeing	3	4	1	2	1	1	1	<p>All alternatives would target growth to parts of the district where there is a need to attract investment in order to fund town centre improvements and/or community services and infrastructure. As such:</p> <p>All alternatives would lead to significant positive effects</p> <p>However, the choice of a broad spatial approach to growth does have important implications. The two towns that are most in need of investment / regeneration are Waltham Abbey and Chipping Ongar. In this respect, it is noted that:</p> <ul style="list-style-type: none"> (B) would not direct any growth to Chipping Ongar; (F) focuses a considerable amount of growth at Waltham Abbey which could enable regeneration of the town centre. <p>It is also noted that (A) and (D) would lead to growth at smaller settlements that could cause community and social facilities that are already nearing their current capacity to</p>

								exceed those limits, whilst not providing sufficient funds from development to invest in significant improvement, upgrades or new facilities.
Economy and employment	?	?	?	?	?	?	?	<p>It is assumed that all approaches would result in new housing in close proximity to new or expanding employment sites can support economic objectives. And as such:</p> <p style="text-align: center;">All alternatives would lead to significant positive effects</p> <p>It is not possible to differentiate between the alternatives with any great accuracy, although it is important to note that employers may wish to locate in close proximity to existing centres and the transport network.</p> <p>It might also be the case that, from a perspective of wishing to maximise the potential for attracting investment into the district, there is a need to focus growth away from those areas that are in need of regeneration.</p>
Historic environment	2	2	2	2	2		2	<p>Despite the sensitive nature of the historic environment within the district, it is not possible to conclude that any alternative would result in significant negative effects. This reflects the fact that it should be possible to direct growth away from areas with a sensitive historic character, and away from particular historic environment assets and their settings.</p> <p>It is noted that the historic centre of Waltham Abbey would likely benefit if growth and investment were to be targeted at the town. As such, it suggested that (F) performs relatively well.</p>
Housing	?	?	?	?	?	?	?	<p>All alternatives would direct growth in a way that helps to address existing problems of unmet housing demand and affordable housing needs. As such:</p> <p style="text-align: center;">Both alternatives would lead to significant positive effects</p> <p>It is unclear whether any of the broad spatial options would have particular benefits in terms of meeting housing needs. There is certainly an identified problem of affordability in rural areas and so it could be that focusing growth away from the Central Line settlements could be beneficial.</p>
Land and waste	?	?	?	?	?	?	?	None of the approaches to spatial distribution would avoid the problem of growth leading

								to loss of greenfield land (see discussion in 6.2, above). As such: All alternatives would lead to significant negative effects It is unclear whether any of the broad spatial options would lead to particular problems.
Landscape	?	?	?	?	?	?	?	None of the approaches to spatial distribution would avoid the problem of growth leading to loss of greenfield land (see discussion in 6.2, above). As such: All alternatives would lead to significant negative effects It is unclear whether any of the broad spatial options would lead to particular problems or opportunities to avoid/mitigate effects.
Transport	3	★1	2	2	2	2	2	None of the alternative approaches to spatial distribution would avoid the problem of growth leading to worsened traffic congestion (see discussion in 6.2, above). As such: All alternatives would lead to significant negative effects Having said this, (B) may perform best because it will enable more residents to live in close proximity to public transport links and also direct growth 'proportionately' (i.e. to larger settlements where it can be assumed more services and facilities will be within walking or cycling distance). (A) may perform worst on this basis given that it will lead to development in rural areas, where residents will be highly dependent on the private car.
Water	-	-	-	-	-	-	-	None of the approaches to spatial distribution would avoid the problem of growth leading to negative effects on the water environment (see discussion in 6.2, above). As such: Both alternatives would lead to significant negative effects It is unlikely that there is any significant difference between the alternatives in terms of their ability to avoid / mitigate effects.
Waltham Abbey & Nazeing Area	?	?	?	?	?	?	?	<ul style="list-style-type: none"> (F) and (G) would result in no development being targeted at Lower Nazeing. (B) and (F), and to a lesser extent (A) would result in a particularly large amount of growth being allocated to Waltham Abbey.

Rural North & Harlow	?	?	?	?	?	?	?	<ul style="list-style-type: none"> Under (F) and (G) only North Weald would receive housing development.
Central Line Settlements	?	?	?	?	?	?	?	<ul style="list-style-type: none"> No development would be targeted to this area under (D) and (E).
Rural South East	?	?	?	?	?	?	?	<ul style="list-style-type: none"> No development would be targeted to this area under (D) and (E). Chigwell would receive the most housing under (F).
Ongar & Rural North East	?	?	?	?	?	?	?	<ul style="list-style-type: none"> (A) would result in a relatively modest scale of growth at Chipping Ongar (7.8%). (B) and (C) would result in no housing being allocated to this area.

Summary

Environmental effects

An overriding consideration is the degree to which the alternative approaches to distributing growth would support efforts to reduce reliance on the private car and increase the number of trips made by sustainable modes of transport. In this respect, it is notable that:

- ‘Transport focus - Proportionate distribution’ may perform **best** as it will enable more residents to live in close proximity to public transport links and also direct growth ‘proportionately’ (i.e. to larger settlements where it can be assumed more services and facilities will be within walking or cycling distance).
- ‘Proportionate distribution’ may perform the **worst** on the basis that it will lead to greater development in rural areas, where residents will be highly dependent on the private car.

Socio-economic effects

All alternatives would target growth to parts of the district where there is a need to attract investment in order to fund town centre improvements and/or community services and infrastructure. As such, all alternatives would lead to significant positive effects. However, the choice of a broad spatial approach to growth does have important implications. The two towns that are most in need of investment / regeneration are Waltham Abbey and Chipping Ongar. In this respect, it is noted that:

- ‘Transport focus - Proportionate distribution’ would not direct any growth to Chipping Ongar;
- ‘Large settlements - Proportionate distribution’ focuses a considerable amount of growth at Waltham Abbey which could enable regeneration of the town centre.

It is also noted that ‘Proportionate distribution’ and ‘Development away from the Central Line – Proportionate distribution’ would lead to growth at smaller settlements that could cause community and social facilities that are already nearing their current capacity to exceed those limits, whilst not providing sufficient funds from development to invest in significant improvement, upgrades or new facilities.

Overall summary of effects

Given the environmental and social effects highlighted above it is suggested that the preferred approach should reflect more than one of the alternative approaches considered. In particular, it is suggested that the preferred approach should direct growth towards those areas where there is the greatest potential to support efforts to reduce reliance on the private car / increase the number of trips made by sustainable modes of transport and also those areas where there is a need to attract investment in order to fund town centre improvements and/or community services and infrastructure.

6.6 'North Weald Airfield' alternatives

6.6.1 The table below presents an appraisal of alternative approaches to addressing the 'North Weald Airfield' issue.

SA Topic	Alternatives and rank of preference				Discussion of significant effects
	Alternative A: Maintain existing policies & approach to use of the airfield including encouraging existing operators to expand their business and small new operators to start business within current policy parameters	Alternative B: Moderate expansion of commercial activity around the NWA, with retention of current level of aviation use	Alternative C: Active development of commercial aviation	Alternative D: Cease aviation uses – pursue alternative use for NWA.	
Air quality		2	2	2	<p>It is not possible through this assessment to conclude that any of the alternatives would lead to development that would have significant effects.</p> <p>More widely, it is worth noting that the intensive commercial development proposed for the southern end of the runway would result in concentrations of commercial premises and general aviation facilities next to the M11 motorway. Development of the airfield as a mixed use development would also lead to the motorway running along the south western edge of the site. Commercial aviation developments meanwhile would increase ground and air traffic with associated increases in</p>

					pollution.
Biodiversity and green infrastructure		2	2	3	<p>It is not possible through this assessment to conclude that any of the alternatives would lead to development that would have significant effects.</p> <p>It is possible that those options that preserve the largest swathes of open land will result in less impact to the biodiversity baseline. Limiting air traffic, and development at the south of the airfield, may also help to reduce indirect impacts, especially given the nearby Wintry Wood, part of the Epping Forest SSSI.</p>
Climate change (mitigation and adaptation)	-	-	-	-	Given the global nature of climate change, the limited scope of this assessment and the wide variety of sources of greenhouse gas emissions it is not possible to conclude that any of the alternatives under consideration would have a significant effects under this theme.
Community and wellbeing		3	4	2	<p>The development of commercial aviation at the sight could have negative implications in terms of noise, light and traffic in the locality. With this being the case, it is assumed that:</p> <p style="text-align: center;">Alternative (C) would lead to significant negative effects.</p> <p>...whilst alternatives (A), (B) and (D) would avoid these significant effects.</p> <p>As a wider consideration, the suggested development of general aviation uses in an area next to the settlement of North Weald Basset may also increase the level disturbances in the locality.</p> <p>It may also be the case that the continued use of existing multi-functional recreation, leisure and showground space at the airfield is preferable to a mixed use development that may incorporate community facilities and open space, but could also place additional pressure on local services.</p>
Economy and employment	3		2	2	A moderate expansion of commercial activity around the airfield, coupled with the retention of current level of aviation use offers a balanced approach, preserving the current employment opportunities that the airfield provides, whilst building upon these. With this being the case, it is assumed that:

					<p>(C) would lead to significant positive effects on the local 'economic' baseline</p> <p>...whilst the other alternatives considered could result in this opportunity being missed.</p> <p>In terms of the other alternatives, it is worth noting that the active development of commercial aviation could bring new business to the area, including the employment opportunities that new supporting facilities could offer. However given the need for high investment and further investigations, the feasibility of this alternative as a deliverer of economic benefits is matter of debate.</p> <p>The allocation of the airfield as a mixed use development could result in a net gain of employment, but only if the chosen mix is tailored to replace the loss of airfield related jobs.</p> <p>Operation of the airfield as it is presently is not considered to be economically viable in the long term due to over dependency on the onsite open-air market for profitability.</p>
Historic environment		2	2	3	<p>Although specific historical features could be protected and retained, the end of aviation uses and the allocation of the land for alternative purposes would likely have a significant impact on the historical character of the area. As such, it is assumed that:</p> <p style="text-align: center;">(D) would lead to significant negative effects</p> <p>...with the other alternatives considered avoiding these significant negative effects.</p> <p>It is considered likely that those alternatives proposing smaller amounts of development will have the least impact on historic character.</p>
Housing	2	2	2		<p>Under the scope of this appraisal, it is not possible to conclude that the any of the development alternatives considered at this location would have significant effects on water quality or availability. With regards to the relative merits of the alternatives under consideration the allocation of the airfield land to mixed use development could provide an opportunity for housing provision.</p>

Land and waste		2	2	2	Any intensified use of the site will potentially have implications for areas of designated green belt land. With this being the case, it is assumed that: Alternatives (B), (C) and (D) would lead to significant negative effects. ...with alternative (A) offering the best chance of avoiding significant impacts through a more restricted approach to new development.
Landscape		2	4	3	None of the alternatives under consideration will impact negatively on areas of high overall landscape sensitivity or any important landscape features. As such, no significant negative effects are recorded. However, with respect to the relative merits of the alternatives, the establishment of commercial aviation on the site would require additional development space to be allocated on the airport periphery. The area provisionally proposed for this use crosses the airfield boundary into an area of medium overall landscape sensitivity. It is predicted that those alternatives proposing smaller amounts of development will have the least impact on the local landscape.
Transport		3	2	3	Through this appraisal it has not been possible to determine that any of the alternatives will result in significant effects in terms of transport. As a wider consideration active development of the airfield for commercial aviation could provide additional transport services for some; but equally, intensified development on the site could result in increased demands on local roads. Due to lower proposed development levels, the continuation of existing policies for the airfield would result in lesser impacts on the road network.
Water	-	-	-	-	It is not possible to conclude that the any of the development alternatives considered at this location would have significant effects on water quality or availability.

Summary

Environmental effects

A single significant negative effect was recorded under the historic environment theme. This would result from alternative (D) which proposes a reallocation of the airfield away from aviation uses / towards a mixed-use development. Whilst some historical features could be retained, it seems likely that such a development would result in a large scale change to the historical character of the area.

When more generally considering the relative merits of the alternatives, the continuation of the airfield in its current use under alternative (A) potential offers the best choice in terms of limiting negative environmental effects. This can be attributed to the comparatively low levels of development proposed under this plan.

Social effects

The active development of commercial aviation under alternative (C) would result on a significant negative impact on community and well being. This is due to the potential impact of increased noise, light and traffic in the locality that such development could bring.

The existing use of the airfield as multi-functional community space could continue to deliver benefits and so this is considered the best option in this respect. It is also regarded as the best transport option, due to the lesser demands it would potentially place on the local road network.

In terms of housing, only reallocation of the airfield as a mixed use development offers the opportunity for new homes to be built, although these are of an unspecified number.

Economic effects

In terms of economic development and employment, it is considered the approach proposed under alternative (C) will potentially lead to significant positive effects. By allowing for a moderate expansion in commercial activity the airport could diversify economic activity, moving away from reliance on the open-air market for profitability. The other alternatives under consideration involve a higher degree of risk and so are considered less economically robust.

Overall summary of effects

Maintaining the existing policies and approach to use of the airfield under alternative (A) would offer the best choice environmentally, especially with regards to the historical character of the area and the protection of Green Belt. It offers good existing community facilities and would avoid the significant negative impact on wellbeing that could result from the development of commercial aviation. However, the choice of moderate expansion of commercial activity under alternative (C) would offer a better choice in terms of the long term economic viability of the site.

6.7 Potential direction of growth alternatives

Harlow

6.7.1 The table below presents an appraisal of alternative potential directions of growth around Harlow.

SA Topic	Alternatives and rank of preference					Discussion of significant effects
	HAR1	HAR2	HAR3	HAR4	HAR5	
Air quality	?	?	?	Not appraised as being considered for employment	?	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • Opportunities to access public transport are greatest at HAR 3, and 5. In particular, HAR5 benefits from good access to a railway station. • HAR 5 is near to the motorway, which could have implications in terms of exposure to air pollution.
Biodiversity and green infrastructure	★1	2	2	n/a	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • The HAR3 area includes the Mark bushes and Latton Park replanted ancient woodland, and so development here could have a direct negative effect on biodiversity. • HAR2 is within 500m of the Harlow Woods SSSI and HAR3 is also in relatively close proximity. • HAR5 could affect a grazing marsh BAP site.
Climate change (mitigation and adaptation)	★1	★1	2	n/a	2	<p>Meeting some of Epping Forest's housing needs through development around Harlow would have positive effects assuming development of new mixed use communities large enough to support the delivery of local services and also viable public transport into Harlow. As such:</p> <p style="text-align: center;">All alternatives would result in significant positive effects</p> <p>In terms of the relative merits of the alternatives:</p> <ul style="list-style-type: none"> • HAR3 is in close proximity to Junction 7 of the M11, and so this could encourage private car use.

						<ul style="list-style-type: none"> HAR1 and 2 would give rise to problems relating to the capacity of the local road network, although they do have good access to the town centre & green infrastructure. <p>In terms of climate change adaptation:</p> <ul style="list-style-type: none"> A small proportion of HAR5 is in flood zone 2a.
Community and wellbeing	2	2	2	n/a	★ 1	<p>All would have the potential to support targeted neighbourhood renewal initiatives within Harlow. As such:</p> <p style="text-align: center;">All would result in significant positive effects</p> <p>The degree to which this 'potential' might vary is currently somewhat unclear, although it is noted that:</p> <ul style="list-style-type: none"> HAR 1 and 2 have good access to the town centre & green infrastructure. HAR5 also has good access to Harlow town centre. Development at HAR5 would be at a scale that supports the integration of green infrastructure. There is an identified need for a GP surgery in Roydon, so HAR1 and 2 may place extra strain on these community facilities. However, this is uncertain given that there may be potential for development to result in funding for a new surgery.
Economy and employment	★ 1	★ 1	2	2	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives:</p> <ul style="list-style-type: none"> HAR 1 and 2 would result in housing in close proximity to the Pinnacles industrial area. HAR5 would result in housing in close proximity to Templefields industrial area. HAR1 would replace some glasshouses with homes, with some negative implications for local employment opportunity.
Historic environment	?	?	?	?	?	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> HAR5 may affect (the settings of) High House and the listed buildings at Churchgate Street. The area also includes a tumulus.

Housing	3	2	3	n/a	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • HAR5 would involve 6,500 - 7,300 dwellings, including employment and green spaces. • HAR2 would involve 1,100 – 1,350 dwellings • HAR1 would involve 400 - 800 dwellings • HAR3 would involve 400 - 800 dwellings
Land and waste	2	2	2	n/a	★ 1	<p>All would result in development within the Green Belt and so result in significant negative effects.</p> <p>In terms of the relative merits of the alternatives:</p> <ul style="list-style-type: none"> • HAR5 is mostly outside the Green Belt.
Landscape	2	2	3	n/a	★ 1	<p>The landscape ridge to the south of Harlow is an integral and vital feature that should not be breached by development or associated infrastructure. As such:</p> <p style="text-align: center;">HAR3 would result in significant negative effects</p> <p>In terms of the relative merits of the other alternatives:</p> <ul style="list-style-type: none"> • HAR5 is large and topographically varied, but does not seem to be particularly visible from outside. Overall, it is considered to have relatively low landscape sensitivity. • HAR1 and 2 potentially represent creeping coalescence between Harlow and Roydon.
Transport	2	2	★ 1	n/a	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives the following is noted:</p> <ul style="list-style-type: none"> • HAR1 and 2 would give rise to problems relating to the capacity of the local road network
Water	2	2	★ 1	n/a	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • HAR1, 2 and 5 are to some degree constrained by sewerage capacity

Summary	
Environmental effects	Perhaps the strongest consideration is the need to avoid impacts to biodiversity and important landscapes. In terms of biodiversity, it is suggested that HAR1 and HAR2 perform best; whilst in terms of landscape it is suggested that HAR5 performs best. HAR3 would detract from the landscape ridge to the south of Harlow, which is an integral and vital feature that should not be breached by development or associated infrastructure.
Socio-economic effects	Leaving aside the issue of 'how many houses' that could be delivered at each of the alternative locations, perhaps one of the most important considerations relates to 'proximity to existing employment areas'. In this respect, it is notable that: HAR 1 and 2 would result in housing in close proximity to the Pinnacles industrial area; whilst HAR5 would result in housing in close proximity to Templefields industrial area.
Overall summary of effects	Meeting some of Epping Forest's housing needs through development around Harlow would have positive effects assuming development of new mixed use communities large enough to support the delivery of local services and also viable public transport into Harlow. The appraisal has not highlighted any one of the alternative locations as being clearly preferable, but does note strongly that HAR3 would impact on the integrity of the 'landscape ridge' to the south of Harlow.

Chigwell

6.7.2 The table below presents an appraisal of alternative potential directions of growth around Chigwell.

SA Topic	Alternatives and rank of preference				Discussion of significant effects
	CHG-A	CHG-B	CHG-C	CHG-D	
Air quality	★ 1	2	2	★ 1	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> A & D are closest to the underground station which could encourage walking and cycling as opposed to car journeys.

Biodiversity and green infrastructure	?	?	?	?	It is not clear that any of the alternatives have implications in terms of biodiversity.
Climate change (mitigation and adaptation)		2	2		It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> A & D are closest to the underground station which could encourage walking and cycling as opposed to car journeys.
Community and wellbeing		2	2		It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> A is well related to the existing settlement, and is near to Chigwell's shops and services. It is also noted that the suggested use includes enhanced recreation and social facilities. C is fairly close to shops and services, and next to Chigwell Primary School. It is noted that a number of key pedestrian routes could be affected. B is fairly close to shops and services D is near to Chigwell's shops and services. It is also noted that the suggested use includes a community facility to serve the housing
Economy and employment	2	2	2		It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> Mixed use is suggested for D, potentially providing 1.18ha for employment uses
Historic environment	2	2			It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> A includes Chigwell Hall grade II listed building. Furthermore, the area includes several protected trees (although development could be designed to avoid these); and a small part along the eastern boundary is within the Conservation Area. B is entirely within the Conservation Area C cuts across the 'Green Lane' right of way. The area also includes some protected trees although impacts could be mitigated

					<ul style="list-style-type: none"> D could affect the settings of the listed buildings of Hainault Road. The area also includes some protected trees although impacts could be mitigated.
Housing	★ 1	4	3	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A: has a potential capacity for 575 homes; however the likely total would be less, as the Listed Building onsite would need to remain. D has a potential capacity for 355 homes C has a potential capacity for 291 homes B has a potential capacity for 54 homes
Land and waste	2	★ 1	★ 1	2	<p>All would result in development within the Green Belt and so result in significant negative effects.</p> <p>In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> B & C include land that is potentially contaminated. Development would be an opportunity to enhance.
Landscape	★ 1	2	2	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A could lead to erosion of the local urban greenspace baseline. B; C and D are areas where there is a high sensitivity to change
Transport	★ 1	2	2	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A & D are particularly close to the London Underground station. Local road improvements needed by all alternative, but in particular potential need to improve roundabout junction of High Road and Vicarage Lane at B&C.
Water	-	-	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

Perhaps the most significant concern relates to effects on the historic environment and landscape. In terms of historic environment related issues, it seems that areas C and D are preferable as effects on the Conservation Area and particular heritage assets would mostly be avoided. In terms of landscape issues, A is perhaps preferable, although development here could lead to erosion of the local urban greenspace baseline.

It is also important to note that development at B and C would be an opportunity to enhance land that is currently contaminated.

Socio-economic effects

Leaving aside the issue of 'how many houses' that could be delivered at each of the alternative locations, perhaps the most significant factor is that D would come forward as a mixed use development that includes 1.18ha of employment land.

Overall summary of effects

The appraisal has not highlighted any one of the alternative locations as being clearly preferable. Area D performs well in terms of most sustainability issues considered, although this area is identified as having a high sensitivity to change by the Settlement Edge Sensitivity Study.

Ongar

6.7.3 The table below presents an appraisal of alternative potential directions of growth around Ongar.

SA Topic	Alternatives and rank of preference							Discussion of significant effects
	ONG-A	ONG-B	ONG-C	ONG-D	ONG-E	ONG-F	ONG-G	
Air quality	?	?	?	?	?	?	?	<p>Public transport links are limited in Ongar and so development at any of these locations could potentially result in increased car dependency. However, it is not clear that this would lead to significant effects in terms of air quality.</p> <p>It is noted that</p> <ul style="list-style-type: none"> C & D could result in particular problems of local traffic congestion.

Biodiversity and green infrastructure		3	3	2	2	4	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • B is adjacent to a Biodiversity Action Plan (BAP) woodland • C is almost wholly under agri-environment management, and has a wooded valley running along its eastern border. • F is bisected by a strip of deciduous woodland BAP habitat. • E contains two thin woodland corridors • D's north eastern corner is adjacent to two small woodland blocks • G is adjacent to a small woodland block
Climate change (mitigation and adaptation)			3	2	2	3		<p>Public transport links are limited in Ongar and so development at any of these locations could potentially result in increased car dependency. However, it is not clear that this would lead to significant effects in terms of climate change mitigation. This is particularly the case given that current patterns of movement involve a high degree of car dependency (including the bussing of children to secondary schools some distance away) and there may be the potential for development at Ongar to support delivery of local services and facilities that allow residents to meet more of their needs locally (including potentially educational needs given that there could be potential to deliver a secondary school).</p> <p>Focusing on the relative merits of the alternative areas, it is noted that</p> <ul style="list-style-type: none"> • If constructed, new bypasses built to serve C, D, E, & F may increase car dependence. <p>Furthermore, in terms of climate change adaptation:</p> <ul style="list-style-type: none"> • F includes an area of flood zone 3 • C includes an area o flood zones 2 and 3a
Community and wellbeing	2	3	2	2	2		2	All would have the potential to support targeted town centre improvements within Ongar. This could benefit residents of the rural area to the north and east, where



								<p>there are identified problems relating to access to services. However, it is not clear that effects would be significant.</p> <p>Focusing on the relative merits of the alternatives, it is noted that:</p> <ul style="list-style-type: none"> F would support a community facility and potentially a new secondary school (if brought forward as mixed use) B would affect Great Stony Park, an important area of greenspace
Economy and employment	2	7	3	4	6	★1	5	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A, if mixed use, could include 5.3ha employment land B would include roughly 1ha employment C, if mixed use, would include 4.8ha employment D would include 4.48 ha employment E would include 1.44ha employment F, if mixed use, would include 6.7 ha employment G, if mixed use, would include 1.68ha employment
Historic environment	2	2	2	★1	★1	3	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A could affect the setting of the Wantz Farmhouse C & F could affect (the settings of) listed buildings on the High Street. F could affect (the setting of) the listed buildings and scheduled monument (motte & baileys) at the Castle Farm complex. TPOs also present. Part of B is within the Great Stony School Conservation Area

Housing	4	7	2	3	6		5	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • A has potential capacity roughly 795 homes, but if developed as mixed use this may be reduced to 635 • B could prove 345 homes • C could prove 1805 homes, or if developed as mixed use 1445 • D could prove 1,344 homes • F could prove roughly 2,530 homes, or if developed as mixed use 2,015 • E could prove 432 homes • G could prove 630 homes, or 504 if developed as mixed use
Land and waste	1	1	1	1	1	1	1	All would result in development within the Green Belt and so would lead to significant negative effects
Landscape	?	?	?	?	?	?	?	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <p>All would result in development of land with high or moderate sensitivity to change. There is some suggestion that E is less sensitive, although this requires further investigation.</p>
Transport	?	?	?	?	?	?	?	Public transport links are limited in Ongar and so development at any of these locations could potentially result in increased car dependency. However, given that current patterns of movement involve a high degree of car dependency (including the bussing of children to secondary schools some distance away) and there may be the potential for development at Ongar to support delivery of local services and facilities that allow residents to meet more of their needs locally (including potentially educational needs given that there could be potential to deliver a secondary school), the effect of development could be <i>positive</i> .

								In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> C, D, E & F would possibly require a new bypass south from the A414 due to the scale of development.
Water	-	-	-	-	-	-	-	No implications in terms of water resources or the water environment.
Summary								
Environmental effects								
Focusing on the relative merits of the alternative areas, it is noted that all appear to be constrained in terms of either landscape, the historic environment or the need to protect locally important habitat. It is not clear whether any one area is preferable.								
Socio-economic effects								
Focusing on the relative merits of the alternative areas, and leaving aside the issue of 'how many houses' could be delivered at each location, it is notable that the potential for areas A-C to be developed as mixed use is uncertain. Given the relatively isolated location of Ongar it is probably important that mixed use development comes forward.								
It is notable that F would support a community facility and potentially a new secondary school. However, this of course relates to the scale of the area, which should not be a foremost consideration as we consider the relative merits of alternative locations.								
Overall summary of effects								
Public transport links are limited in Ongar and so development at any of these locations could potentially result in increased car dependency. However, given that current patterns of movement involve a high degree of car dependency (including the bussing of children to secondary schools some distance away) and there may be the potential for development at Ongar to support delivery of local services and facilities that allow residents to meet more of their needs locally (including potentially educational needs given that there could be potential to deliver a secondary school), the effect of development could be <i>positive</i> in this respect. However, not all effects resulting from development around Ongar would be positive. In particular, it is clear that all potential locations for growth are constrained in terms of one or more environmental consideration of local importance.								

Epping

6.7.4 The table below presents an appraisal of alternative potential directions of growth around Epping.

SA Topic	Alternatives and rank of preference								Discussion of significant effects
	EPP-A	EPP-B	EPP-C	EPP-D	EPP-E	EPP-F	EPP-G	EPP-H	
Air quality	★ 1	2	2	2	4	3	3	★ 1	<p>In terms of significant effects:</p> <ul style="list-style-type: none"> Epping includes a designated Air Quality Management Area (AQMA) and new development could contribute to this. In particular, E&F&G are close to (although not in) the Bell Common AQMA. As such, development here is predicted to result in significant negative effects. <p>It is also worth noting that:</p> <ul style="list-style-type: none"> F&G are adjacent the M25 and so air pollution from motorway traffic could be an issue. A & E & H are close to Epping Central line station. This may promote public transport, especially given high commuting rates to London. However, there are congestion issues associated with the line.
Biodiversity and green infrastructure	2	3	3	3	2	3	★ 1	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> B & D are adjacent to Local Wildlife Sites C is adjacent to a small deciduous woodland BAP site; and the Epping Forest SSSI (Wintry Wood) F is within 500m of the Epping Forest Special Area of Conservation (SAC). B & E include a major woodland block



									<ul style="list-style-type: none"> H & A contain a number of fragments of woodland <p>It is also noted that most of the areas under consideration around Epping are under some form of agri-environment management scheme.</p>
Climate change (mitigation and adaptation)	★1	2	2	2	★1	2	3	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A, E and H are close to Epping Central line station potentially promoting public transport, especially given high commuting rates to London. However, there are congestion issues associated with the line <p>In terms of climate change adaptation:</p> <ul style="list-style-type: none"> G is bisected by a stream, and so development here could exacerbate downstream flooding
Community and wellbeing	3	3	3	★1	3	2	4	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> The development of D & H could provide substantial mixed use development, providing community facilities and open space. However, its size could result in the need for significant wider infrastructure investment, including education facilities F & G have good primary school access, but capacity would need to be extended Development at G could affect a particularly large number of footpaths
Economy and employment	2	2	2	★1	2	2	2	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p>



									<ul style="list-style-type: none"> • D&H would be substantial mixed use developments providing employment space (unspecified amount) • If housing is developed without an additional rise in employment space there may be shortage of local employment. However, the area is on the Central Line which may mitigate this. There are also concentrations of industrial estates in the area.
Historic environment	2	★1	2	2	★1	★1	2	3	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • B includes a number of preserved trees • Development at D & E could affect historic rights of way • Development at H would affect the setting of listed buildings on Stonards Hill and Coopersale Street, and the Essex Way right of way • G is adjacent to two listed buildings
Housing	2	4	★1	6	5	★1	3	6	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • C & F could potential provide a maximum of 350 homes • A could provide 300 homes • G could provide 250 homes • B could provide 230 homes • E could provide 60 homes • D & H could provide an unspecified amount of housing, with the areas being substantial mixed use extensions • At D & H, the size of the proposed developments could require significant investment, including affordable housing

Land and waste	1	1	1	1	1	1	1	1	All would result in development within the Green Belt and so would lead to significant negative effects
Landscape	5	4	3	3	2	★1	★1	5	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • F & G are in areas of low landscape sensitivity • A & H both include a visually significant slope • F, G and H are on a slope overlooking many dwellings • H would involve significant development in an area of high sensitivity • A & B included areas of sensitive pre-18th century landscape
Transport	★1	3	3	4	★1	3	3	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • The area has generally excellent transport links (including into London) but suffers from problems relating to commuter parking and congestion at peak travel times • A, E and H are close to Epping Central Line station • The potential size of development at D & H could require significant infrastructure investment, including transport
Water	-	-	-	-	-	-	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

Epping includes a designated Air Quality Management Area (AQMA) and new development could contribute to this. In particular, E&F&G are close to (although not in) the Bell Common AQMA, and hence development could exacerbate air pollution problems there.

The area generally has excellent transport links, including to London, but traffic issues can occur at peak times. A, E and H are the locations with the best access to the Central Line tube station.

In terms of landscape and biodiversity it appears that area (G) is least constrained. However, this area is adjacent to listed buildings.

Socio-economic effects

The substantial development that could be delivered at D & H could provide a range of community facilities and open space. The large mixed use developments proposed at D&H could also provide local employment space, boosting the local economy.

Overall summary of effects

Overall, it is suggested that an overriding concern is the need to avoid worsening air quality within the AQMA, and as such areas in close proximity should be avoided.

Nazeing

6.7.5 The table below presents an appraisal of alternative potential directions of growth around Nazeing.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	NAZ-A	NAZ-B	
Air quality	★ 1	2	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> Any commercial development at B could worsen the existing environmental quality issues resulting from HGV movements
Biodiversity and green infrastructure	★ 1	2	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> B contains or adjoins a small woodland block

Climate change (mitigation and adaptation)			<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> No flood risk issues are recorded
Community and wellbeing	2		<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> B is nearest to the existing settlement centre, although both are local to it. <p>It is also noted that:</p> <ul style="list-style-type: none"> Further capacity at a local primary school may be required if development goes ahead at A or B. There is an identified need for a secondary school for Lower Nazeing and additional development at A or B may increase this necessity.
Economy and employment	2		<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> B could potentially provide around 3.2ha of employment related development The development of A would result in the loss of existing Fencing Centre business Development of A alone could place strain on the rural economy, with demand for local jobs potentially being higher than supply, although there are concentrations of larger industrial estates in the Nazeing area.
Historic environment		2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A small part of area B is in a conservation area and could affect the settings of listed buildings on Middle Street and Perry Hill.
Housing		2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A could provide around 690 homes B could provide around 450 homes

Land and waste			All would result in development within the Green Belt and so would lead to significant negative effects
Landscape		2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • B: contains some veteran trees <p>It is also noted that</p> <ul style="list-style-type: none"> • A & B are on a slope and would be visible from many dwellings • Both A & B are in areas of moderate landscape sensitivity
Transport		2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • Any commercial development at B could worsen the existing highways issues regarding HGV movements
Water	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

Focusing on the relative merits of the alternative locations it is notable that a small part of (B) is within a Conservation Area and could affect the settings of listed buildings on Middle Street and Perry Hill. Other than this, there appears to be little to choose between the locations.

Socio-economic effects

Nazeing is a small settlement, some distance from the nearest town of Harlow which give rise to some potential problems associated with growth. However, focusing on the relative merits of the alternative locations it is notable that employment development would be brought forward as part of development at (B).

Overall summary of effects

Given the evidence available it appears that there is little inherent difference between these two locations. However, there are concerns about Nazeing as a sustainable location for growth.

Lower Sheering & Sheering

6.7.6 The table below presents an appraisal of alternative potential directions of growth around Lower Sheering & Sheering.

SA Topic	Alternatives and rank of preference					Discussion of significant effects
	LSH-A	LSH-B	SHE-A	SHE-B	SHE-C	
Air quality	★ 1	2	4	4	3	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> All of the SHE areas are in close proximity to M11, especially A&B LA is close to a rail station and so may help to limit road traffic emissions
Biodiversity and green infrastructure	2	★ 1	★ 1	2	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> There is a large area of woodland to the north of the SB and to the south of SC LA contains a woodland block
Climate change (mitigation and adaptation)	2	★ 1	2	2	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> LA is close to rail station and so may promote sustainable transport modes. However it is also mostly or wholly in flood zone 2 All of the SHE areas are in close proximity to M11, especially A & B, possibly promoting car travel and so higher emissions
Community and wellbeing	2	★ 1	2	★ 1	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> LB, SB and SC could be appropriate for mixed-use, including community uses

Economy and employment	2		2			<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • LB, SB and SC could be appropriate for mixed-use, including employment • Development of housing alone could place strain on the rural economy, with demand for local jobs potentially being higher than supply.
Historic environment	4	2		3	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. However, it is noted that development within all of the areas could affect the setting of one or more listed building.</p> <p>In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • LA could directly affect two listed buildings at The Maltings. Onsite trees are not currently subject to TPOs, but these need investigation. The area is also located in a Conservation Area. • LB would affect two footpaths, including the Three Forests Way. • SB could directly affect Daubneys Farmhouse and its barn. • SC is possibly adjacent to a number of listed buildings.
Housing	3	4	2		4	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • LA could provide 14 homes (subject to tree cover) • LB, SB and SC could be appropriate for mixed-use, including residential • SA could provide 71 homes • SB could provide 420 homes
Land and waste			2	2	2	<p>All SHE areas are within the Green Belt and so would lead to significant negative effects.</p> <ul style="list-style-type: none"> • LA & LB are not within the Green Belt
Landscape	2	3	2		2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p>

						<ul style="list-style-type: none"> LB contains a visually significant slope All in areas with high sensitivity to change, with the exception of SB (moderate)
Transport	3	3		2	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> All of the SHE alternatives are located close to the M11 motorway, particularly SA.
Water	-	-	-	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

Focusing the relative merits of these alternative locations, perhaps most notable is that the Sheering areas are within the Green Belt whilst the Lower Sheering areas are not. It is also notable that 'A' in Lower Sheering is largely or wholly in flood zone 2.

Furthermore, two of the alternative locations in the Sheering area could cause indirect negative effects on biodiversity due to their proximity to a large woodland; and all of the potential development areas could affect the setting of one or more listed buildings.

Finally, it is worth noting that none of the potential development areas are in landscapes with 'medium or high sensitivity to change'.

Socio-economic effects

Several of the potential locations could be used for mixed use, including the provision of community facilities and/or employment. Mixed use development will be important given the relatively rural nature of these towns and known problems in terms of access to services.

Overall summary of effects

Development in a rural area such as Sheering and Lower Sheering could result in increased dependence on motorised transport, leading to increased emissions. A small proportion of the locations could have an indirect effect on biodiversity and Green Belt land is used by a number of sites, although the landscape is not regarded as being highly sensitive to change. Community and employment space could be provided at a number of the potential locations. This will be important if housing growth is not to place a strain on existing local services.

North Weald Basset

6.7.7 The table below presents an appraisal of the single potential direction of growth proposed for around North Weald Basset.

NWB-A
Summary
<p>Environmental effects</p> <p>A number of negative environmental effects could result from the development here. Its potential affect on the historical environment is a particular matter of concern given that the site includes a listed building, and development here could affect the settings of further listed buildings. Direct and indirect effects on biodiversity could also occur as this area is in close proximity to Church Lane Flood Meadow Local Nature Reserve and contains a small block of woodland.</p>
<p>Socio-economic effects</p> <p>This site could accommodate mixed-use development, including community facilities, employment area and open space. Given an appropriate mix this could provide socio-economic gains. In this respect, care would need to be taken as an over emphasis on housing could place strain on services given the somewhat rural nature of the settlement. It should also be noted that the area under consideration includes an existing area of greenspace.</p>
<p>Overall summary of effects</p> <p>If developed with a mix of uses well tailored to the rural setting of North Weald Basset this site could provide socio-economic benefits to the area. However, the development of this site could result in a number of negative effects on the environment, particularly in terms of historic character.</p>

Roydon

6.7.8 The table below presents an appraisal of alternative potential directions of growth around Roydon.

SA Topic	Alternatives and rank of preference			Discussion of significant effects
	ROY-A	ROY-B	ROY-C	
Air quality	★ 1	2	★ 1	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> Proximity to a rail station may reduce car dependence, especially A & C which are closest.
Biodiversity and green infrastructure	2	★ 1	3	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> A is within 500m of the Hunsdon Mead SSSI. C is adjacent to the Lee Valley Regional Park
Climate change (mitigation and adaptation)	★ 1	2	★ 1	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> Proximity to a rail station may reduce car dependence, especially A&C which are closest There are no issues of flood risk.
Community and wellbeing	★ 1	2	★ 1	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> All locations could potentially deliver mixed use development, including community uses. A high number of key pedestrian routes cross B. A GP surgery is currently required in Roydon, and population growth through housing could exacerbate current shortages of this service, especially so with larger numbers of dwellings. However, this effect is

				uncertain given that there may be potential for development to result in funding for a new surgery.
Economy and employment	1	1	1	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> All alternatives are potential areas for mixed use development, including commercial uses.
Historic environment	2		2	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> Development at A may affect the settings of some listed buildings on Roydon High Street. Development at C could affect the settings of one or two listed buildings, notably Old Plough Cottage.
Housing	3	2		It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> A could provide 289 homes B could provide 330 homes C could provide 766 homes, although this would be reduced dependent on other proposed uses
Land and waste	1	1	1	All would result in development within the Green Belt and so result in significant negative effects.
Landscape		2	2	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> At C a visually significant slope crosses the site. This area also contains a number of veteran trees. B contains a number of veteran trees. The development of A or B could potentially represent creeping coalescence between Harlow/Roydon All of the land around Roydon is considered to be of high overall landscape sensitivity.
Transport		2		It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:

				<ul style="list-style-type: none"> A & C are in close proximity to a railway station.
Water	-	-	-	No implications in terms of water resources or the water environment.
Summary				
Environmental effects				
<p>A major area of concern in this area is the presence of the Lee Valley Regional Park, which is of high biodiversity and green infrastructure value. 'C' is adjacent to this area and so there is the potential for development here to result in negative effects. 'A' is also located within 500m of Hunsden Mead SSSI. In terms of the landscape around Roydon, all is regarded as being of a high overall sensitivity.</p>				
Socio-economic effects				
<p>Development at any of the locations could potentially contribute to community/wellbeing and local employment through the delivery of new community facilities as part of a mixed use development. The extent that this is the case will depend on the scale of the development undertaken. Proximity to Harlow and transport links would help to ensure economic sustainability at these potential growth areas.</p>				
Overall summary of effects				
<p>All of the suggested locations could provide housing, employment and community facilities, and so would potentially offer a balanced form of growth from a socio-economic perspective. However, equally all of the locations face environmental constraints, particularly in relation to impacts on biodiversity and sensitive landscapes. In particular, the potential scale of development at 'C', coupled with its proximity to the Lee Valley Regional Park could result in negative effects.</p>				

Theydon Bois

6.7.9 The table below presents an appraisal of alternative potential directions of growth around Theydon Bois.

SA Topic	Alternatives and rank of preference			Discussion of significant effects
	THB-A	THB-B	THB-C	
Air quality		2	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A & C are close to Central Line services. This proximity may reduce car dependence and so emissions. C is close to the M11 motorway, potentially resulting in cumulative negative effects on air quality.
Biodiversity and green infrastructure		3	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> B is surrounded on three sides by the Epping Forest SAC C has two large ponds on site and contains a large block of woodland
Climate change (mitigation and adaptation)		2		<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A & C are close to Central Line services. This proximity may reduce car dependence and so emissions. There are no areas of high flood risk across all of the sites
Community and wellbeing		2	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A: Close to village centre services and primary school C is a potential area for mixed use development, including community facilities. It is however the furthest site from village services.

				<ul style="list-style-type: none"> The local primary school is likely to be near full capacity and so would need investment or expansion if any of these sites were to be brought forward for development.
Economy and employment	2	2	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> C is a potential area for mixed use development, including commercial uses
Historic environment	★1	★1	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> Development at C could affect the setting of Parsonage Farmhouse
Housing	2	3	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A could provide 198 homes B could provide 68 homes C could provide 1000 homes, dependent on the balance of its development as mixed-use
Land and waste	1	1	1	All would result in development within the Green Belt and so result in significant negative effects.
Landscape-	1	1	1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A is on a slope overlooking many dwellings A visually significant slope crosses site B C contains a number of veteran trees All of the locations are associated with moderate landscape sensitivity
Transport	2	2	★1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> The area features excellent transport links (including into London) but suffers from problems relating to

				<p>commuter parking and congestion at peak travel times</p> <ul style="list-style-type: none"> • A&C are Close to central line services • C is close to the M11 motorway
Water	-	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

Proximity to the Central Line could result in positive environmental effects in terms of supporting sustainable travel patterns, especially in the case of 'A', which is also distant from the motorway.

In relation to the Forest, 'B' may represent a particular concern due to indirect impacts on biodiversity as it is bordered by it on three sides. 'C' meanwhile contains woodland and water features. The protection and enhancement of green spaces is a top priority of residents in this area.

In terms of the historic environment, 'C' could affect the setting of a listed building and also contains a number of veteran trees. Further landscape impacts could be felt through development at 'A' or 'B', which are in visually significant areas.

Socio-economic effects

With regards to access to community facilities and services, 'A' is the closest. However, whilst 'C' is the furthest from these community assets, it could provide new facilities as part of its mixed use designation, helping to boost provision in a lesser served area of the settlement. This location could also provide large quantities of housing.

Overall summary of effects

If the balance of mixed use development proposed for site 'C' is delivered with sensitivity to local conditions then this could certainly offer a good choice in terms of socio-economic development. However, housing alone at site 'A' could likely be absorbed without economic detriment given its proximity to the central line and a local centre. All of the locations are subject to environmental constraints. Of particular concern is the proximity of 'B' to Epping Forest. Although individually small, development at 'C' could result in a number of negative environmental effects on the historic environment, landscape, and biodiversity.

Thornwood Common

6.7.10 The table below presents an appraisal of alternative potential directions of growth around Thornwood Common.

SA Topic	Alternatives and rank of preference			Discussion of significant effects
	TW-A	TW-B	TW-C	
Air quality	1	1	1	Car travel for employment and services seems likely given the rural location and proximity to the M11 motorway, potentially leading to increased emissions. It is not thought that this effect will necessarily be significant.
Biodiversity and green infrastructure	 1	2	 1	All of the sites are within 500m of the Epping Forest SSSI, which could result in indirect negative effects on biodiversity. It is not thought that this effect will necessarily be significant given that there could be potential to mitigate effects through Local Plan policy. It is also noted that: <ul style="list-style-type: none"> 'B' contains a small block of woodland
Climate change (mitigation and adaptation)	 1	2	 1	Car travel for employment and services seems likely given the rural location and proximity to the M11 motorway, potentially leading to increased emissions. It is not thought that this effect will necessarily be significant. It is also noted that: <ul style="list-style-type: none"> 'B' is mostly or wholly in flood zone 2
Community and wellbeing	 1	2	3	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> 'A' could potentially could be linked to the improvement of existing community facilities 'C' includes land of urban greenspace character
Economy and employment	 1	2	2	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> 'A' would potentially provide 11400m² of commercial space

Historic environment		2		It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> 'B' is located near to a listed building
Housing		3	2	It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that: <ul style="list-style-type: none"> 'A' could provide 231 homes 'B' could provide 19 homes 'C' could provide 125 homes
Land and waste	1	1	1	All would result in development within the Green Belt and so result in significant negative effects.
Landscape	1	1	1	All areas around Thornwood Common are considered to have a moderate or high sensitivity to growth. It is not thought that this effect will necessarily be significant given that there could be potential to mitigate effects through Local Plan policy.
Transport			2	Out commuting for employment seems likely given the rural location, potentially placing strain on the local road network. . It is not thought that this effect will necessarily be significant. It is also noted that: <ul style="list-style-type: none"> 'A' & 'B' are located particularly close to the M11.
Water	-	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

For a number of environmental issues there is little to distinguish the performance of the potential areas for growth. Development at any of these locations could potentially foster car dependency given the relatively isolated position of Thornwood Common and its proximity to the M11 motorway. Thornwood Common is also in close proximity to Epping Forest.

It is also noted that Beyond 'B' is mostly or wholly in flood zone 2, is located near to a listed building and contains a small block of woodland.

Socio-economic effects

'A' could support a larger amount of housing growth and could also lead to provision of improved services and facilities for the local community. 'C', on the other hand, would be less likely to support provision of new or enhanced community assets. In terms of transport, all locations have good access to the M11, especially 'A' & 'B'.

Overall summary of effects

All of the areas under consideration around Thornwood Common would potentially have negative effects in terms of emissions, biodiversity and landscape. Whilst sites A and B could provide the largest quantities of housing, there would be need to give further consideration to the effects of growth at this scale on the local community.

Waltham Abbey

6.7.11 The table below presents an appraisal of alternative potential directions of growth around Waltham Abbey.

SA Topic	Alternatives and rank of preference							Discussion of significant effects
	WAL-A	WAL-B	WAL-C	WAL-D	WAL-E	WAL-F	WAL-G	
Air quality	3	2	3	★1	★1	★1	3	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> A & G are adjacent to Beechfield Walk, which has existing air quality problems. A,G,C and to some extent B are close to the motorway network and so there is the potential for cumulative negative effects
Biodiversity and green infrastructure	★1	2	5	4	3	3	3	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p>



								<ul style="list-style-type: none"> • C is within 500m of Epping Forest, contains several significant water bodies and features a wooded corridor and scattered small blocks • E & D are adjacent to LWS • F & G are nearby to the Lee Valley Regional Park • D features several small blocks of woodland • B features a block of woodland
Climate change (mitigation and adaptation)	★ 1	2	★ 1	★ 1	3	★ 1	★ 1	<p>In terms of significant effects:</p> <ul style="list-style-type: none"> • E is mostly in the floodplain, including zone 3a. As such, development here is predicted to result in significant negative effects. <p>In terms of the relative merits of the other alternatives it is noted that:</p> <ul style="list-style-type: none"> • B is partly in flood zone 2
Community and wellbeing	2	★ 1	★ 1	2	★ 1	★ 1	2	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • F & E & G are closest to town centre services and the Lee Valley Regional Park • A,D,E would involve mixed-use development, including the potential for community facilities • F will possibly be mixed-use, including community facilities • B & C could help to provide better access to facilities for residents in the eastern side of the town. The current town centre and associated facilities are to the far west. These developments would be supplemented with a range of community facilities. However, the scale of these developments could require investment in infrastructure, including education, health and open space.
Economy and employment	2	5	★ 1	4	6	4	3	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is</p>

								<p>noted that:</p> <ul style="list-style-type: none"> • A will be a mixed-use development, potentially including commercial uses, which would be well located in proximity to the M25 (20000m² proposed) • C will be a mixed-use development, potentially including commercial uses (54,500 m²) • D & F will be mixed developments, potentially including commercial uses (unspecified amount) • G is considered to be suitable for mixed use development given good access to the motorway network (potential capacity 104,000m²) • D & E & F would involve development that replaces some greenhouses with dwellings • F has an existing allocation for horticultural glasshouse use. This land been allocated for 6 years, but the majority of it has not yet come forward for such development.
Historic environment	★ 1	2	2	2	★ 1	★ 1	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • At B & C development could affect the settings of Upshire Hall, Southend Farmhouse and the lodge at Upshire Hall • At 'D', development could affect the settings of Warlies Park House and listed buildings on Horseshoe Hill.
Housing	2	3	★ 1	★ 1	4	3	4	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • A could provide 685 homes • B could provide 500 homes, but space would also be required for a range of community facilities. • C could provide 950 homes

								<ul style="list-style-type: none"> • D could provide 967 homes (but may be reduced if mixed use) • E is potentially a mixed-use development, including the potential for residential development (unspecified numbers) • F could provide 5-600 homes (but may be reduced if mixed use) • G is suitable for mixed use development given good access to the motorway network (unspecified numbers)
Land and waste	★ 1	2	2	2	2	2	2	<p>A number of the locations would result in development within the Green Belt. With this being the case, it is assumed that:</p> <p>B, C, D, E, F and G would lead to significant negative effects.</p> <p>...with 'A' avoiding significant negative effects due to its location outside of the Green Belt.</p>
Landscape	★ 1	5	4	3	2	2	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • B is on a slope overlooking many dwellings and the site contains a small cluster of veteran trees • The western side of site G features a visually significant slope • At 'C' a visually significant slope crosses the site • A features a large number of veteran trees • B, C and D are in areas of high overall landscape sensitivity; E & F moderate; and A & G low
Transport	★ 1	2	2	★ 1	3	★ 1	★ 1	<p>It is not the case that development at any of these locations would necessarily lead to significant effects. In terms of the relative merits of the alternatives it is noted that:</p> <ul style="list-style-type: none"> • At B & C the scale of development could create demands on infrastructure, including the need for highways improvements

								<ul style="list-style-type: none"> There is poor existing road access at site D and any upgrade may be difficult due to presence of Epping Forest
Water	-	-	-	-	-	-	-	No implications in terms of water resources or the water environment.

Summary

Environmental effects

All of the potential areas for growth in the Waltham Abbey area have the potential to cause negative environmental effects. No location is noticeably preferable, although site 'A' would avoid development on Green Belt land and could have the least effects on biodiversity. Having said this, 'A' contains a large number of veteran trees and, along with 'G', performs worst for air quality.

Socio-economic effects

Of particular note in respect of community and well being are 'B' & 'C'. The current town centre is located to the west of the settlement and so development in those locations could provide better access to facilities and services in the eastern side. 'E' & 'F' meanwhile are close to existing services and greenspace, and could include new community facilities. A number of the locations also offer the opportunity to provide large quantities of housing, particularly 'C' & 'D'.

Given the right balance of uses, the mixed use proposals should bring economic and social gains. 'A' & 'C' offer an opportunity to build large quantities of employment space that may help to boost the local economy. This may be particularly important given the pockets of deprivation that exist around Waltham Abbey.

A particular consideration relates to the town centre, which has struggled in recent years to maintain its vitality and viability. This may be partly because the town centre is now at the far west of the urban area with most development since the 1950s extending the town significantly to the east. The development of employment space away from this centre may further draw away investment. On the other hand, the west of the town is constrained by the Lee valley Regional Park, and so such development to the west may represent a wiser choice in terms of the long term economic future of the settlement.

Loss of glasshouses may occur through the development of some sites, and care would need to be taken to ensure that employment gains in these cases outweigh any losses. There are concentrations of larger industrial estates around Waltham Abbey and this may aid economic stability.

Overall summary of effects

Given an appropriate choice of housing, commercial and employment mix, development at a number of the growth areas suggested for the Waltham Abbey area could bring about positive socio-economic effects. If those sites providing high levels of employment space were to be brought forward, then care would need to be taken not to exacerbate existing economic problems. All of the sites will potentially result in some negative environmental effects, with a particular concern being the indirect effects development might have on areas of biodiversity interest in the area.

6.8 'The Lea Valley Glasshouse Industry' alternatives

6.8.1 The table below presents an appraisal of alternative approaches to addressing the 'The Lea Valley Glasshouse Industry' issue.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	(A) Introduce a policy of 'managed decline' for the industry	(B) Put in place measures to support the industry, including potentially: permitting larger, higher glasshouses within designated areas, Considering expanding existing areas designated for glasshouses, and designating new sites for glasshouse development, not restricted to the Lea Valley	
Air quality	?	?	It is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives: Studies have shown that HGV movements associated with the glasshouses do contribute to problems of environmental quality within parts of the district. However, it is not clear that air quality issues are a consideration.
Biodiversity and green infrastructure	-	-	It is not thought that the choice of alternative has significant implications.
Climate change (mitigation and adaptation)		2	In terms of climate change mitigation, it is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives: It is thought that glasshouses are an energy intensive means of growing food, even taking into account the potential for reducing 'food miles'. However, it may be the case that the industry would locate elsewhere if not within Epping Forest. As such, it is not thought that the choice of alternative has significant implications.

			<p>In terms of climate change adaptation, it is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>It may be that (A) is preferable given that this means of growing food is also water intensive.</p>
Community and wellbeing		2	<p>It is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>Leaving aside the role of the glasshouses as an important source of employment for local residents, it is likely that local communities would prefer these sites to be redeveloped for uses other than glasshouses.</p>
Economy and employment	?	?	<p>It is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>It is not clear which would perform better in terms of economy and employment issues. Although it is often the case that the planning system should act to protect long-established industries, in the case of the glass houses it appears that merely protecting them will not be enough; rather, there is a need to allow expansion if the industry is to remain viable. Doing so could have significant ramifications for surrounding areas.</p>
Historic environment	-	-	It is not thought that the choice of alternative has significant implications.
Housing		2	<p>It is assumed that glasshouses sites could, in time, be redeveloped for housing. And as such:</p> <p>(A) would result in significant positive effects</p> <p>However, it is noted that redeveloping these sites can often be costly given issues of ground contamination. These cost implications can deter developers.</p>
Land and waste		2	<p>It is assumed that glasshouses sites could, in time, be redeveloped for housing or employment uses, reducing the need for greenfield land take in the district. As such:</p> <p>(A) would result in significant positive effects</p> <p>However, it is noted that redeveloping these sites can often be costly given issues of</p>

			ground contamination. These cost implications can deter developers.
Landscape		2	<p>It is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>It is likely that the visual amenity of local communities would be improved if glasshouse sites were to be redeveloped for other uses. However, it is noted that there is the potential to put in place Local Plan policy to mitigate the visual amenity effects of continued support for the glasshouse industry.</p>
Transport	-	-	It is not thought that the choice of alternative has significant implications.
Water		2	<p>In terms of managing scarce water resources, it is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>It may be that (A) is preferable given that this means of growing food is water intensive.</p>
Waltham Abbey & Nazeing Area		2	<p>It is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>Studies have shown that HGV movements associated with the glasshouses do contribute to problems of environmental quality within this part of the district. Having said this, the glasshouses are also an important source of employment for local residents.</p>
Rural North & Harlow		2	<p>It is not thought that either approach would result in significant effects. Focusing on the relative merits of the alternatives:</p> <p>Studies have shown that HGV movements associated with the glasshouses do contribute to problems of environmental quality within the Roydon area. Having said this, the glasshouses are also an important source of employment for local residents.</p>
Central Line Settlements	-	-	It is not thought that the choice of alternative has significant implications.
Rural South East	-	-	It is not thought that the choice of alternative has significant implications.

Ongar & Rural North East	-	-	It is not thought that the choice of alternative has significant implications.
Summary			
Environmental effects			
In terms of a range of environmental issues it is suggested that an approach of supporting managed decline of the glasshouse industry would be preferable.			
Socio-economic effects			
First and foremost is the need to consider that the industry is an important source of local employment, although alongside this is the need to question whether in the long run support for the glasshouse industry could act to deter other industries.			
The other important consideration is the effect that the effect that the glasshouse industry has on existing communities in terms of visual amenity and environmental quality.			
Finally, it is important to note that the glasshouse sites could potentially be used for housing or employment development, although in practice redevelopment of these sites can be problematic because of problems relating to ground contamination.			
Overall summary of effects			
Managed decline of the glasshouse industry would appear to be preferable in terms of a number of sustainability issues; however, this does not mean that the preferred choice of alternative is clear cut given that this industry is an important source of employment for local residents.			

6.9 'Managing existing employment sites' alternatives

6.9.1 The table below presents an appraisal of Alternative approaches to addressing the 'Managing existing employment sites' issue.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	(A) Resist redevelopment of designated employment sites for uses other than employment	(B) Allow the redevelopment of existing sites which are vacant/derelict and have been for some time, for other uses e.g. housing	
Economy and employment	★ 1	2	It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives: There is a deficit of employment floorspace within the district, and so in the short term it would appear sensible (from an economy and employment perspective) to take approach (A). However, in the long run, there is a need to attract new types of industry and business to the district, which may not wish to locate to the existing employment sites.
Housing	2	★ 1	It is assumed that sites would be redeveloped for housing. And as such: (A) would result in significant positive effects
Land and waste	2	★ 1	It is assumed that sites would be redeveloped for housing or employment, reducing the need for greenfield land take in the district. And as such: (A) would result in significant positive effects
N.B. It is not thought that these alternatives have significant implications in terms of sustainability topics other than the three presented above.			

Summary

Environmental effects

It is assumed that allowing the redevelopment of existing employment sites which are vacant/derelict and have been for some time, for other uses e.g. housing would reduce the need for greenfield land take in the district.

Socio-economic effects

There is a deficit of employment floorspace within the district, and so in the short term it would appear sensible (from an economy and employment perspective) to allow the redevelopment of existing employment sites which are vacant/derelict and have been for some time, for other uses e.g. housing. However, in the long run, there is a need to attract new types of industry and business to the district, which may not wish to locate to the existing employment sites. At the same time, there could be socio-economic benefits associated with redeveloping the existing sites for uses other than employment.

Overall summary of effects

Viewing the choice of alternative with a long term perspective, it may well be the case that it makes sense to allow the redevelopment of existing sites which are vacant/derelict and have been for some time, for other uses e.g. housing. However, this approach would need to be implemented carefully, recognising that some industries that contribute to the diversity of the local economic baseline could potentially lose out.

6.10 'Balance of retail shops and other services' alternatives

6.10.1 The table below presents an appraisal of alternative approaches to addressing the 'Balance of retail shops and other services' issue.

SA Topic	Alternatives and rank of preference					Discussion of significant effects
	(A) Reduce the 70% minimum retail frontage threshold to e.g. 50%	(B) Relax the existing policy completely to allowing changes of use to non-retail uses within key frontages	(C) Re-classify the towns and relax the existing policy within the small district centres only (Waltham Abbey, Loughton Broadway, Ongar, and Buckhurst Hill)	(D) Maximise the individual strengths of each centre, i.e. have a different approach for each of the 6	(E) Keep the current policy approach	
Air quality	2	3	2	★ 1	2	It is not thought that any of the alternatives would result in significant effects. In terms of the relative merits of the alternatives: There is a need to maintain the popularity of town centres so that they can continue to be a focus of journeys made by public transport. (D) could help to achieve this aim, whilst it is suggested that (B) would could have a detrimental effect.
Biodiversity and green infrastructure	-	-	-	-	-	It is not thought that these alternatives have significant implications.

Climate change (mitigation and adaptation)	2	3	2	★1	2	It is not thought that any of the alternatives would result in significant effects. In terms of the relative merits of the alternatives: There is a need to maintain the popularity of town centres so that they can continue to be a focus of journeys made by public transport. (D) could help to achieve this aim, whilst it is suggested that (B) would could have a detrimental effect.
Community and wellbeing	2	3	2	★1	2	The ability to access retail by public transport is important for those who do not have access to a private car, which will include a large proportion of the elderly population. Were retail to move to locations other than within town centres it would be likely that it would become less easily accessible by public transport. As such: (B) would result in significant negative effects.
Economy and employment	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Historic environment	?	?	?	?	?	The need to maintain vibrant town centres is important from a perspective of conserving the historic environment. However, it is not clear which of these approaches would perform best in this respect.
Housing	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Land and waste	2	3	2	★1	2	It is not thought that any of the alternatives would result in significant effects. In terms of the relative merits of the alternatives: Were retail to move to locations other than within town centres it could lead to the development of greenfield sites. In this respect, (B) would could have a detrimental effect, whilst (D) would be preferable.
Landscape	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Transport	2	3	2	★1	2	It is not thought that any of the alternatives would result in significant effects. In terms of the relative merits of the alternatives: There is a need to maintain the popularity of town centres so that they can continue to be a focus of

						journeys made by public transport. (D) could help to achieve this aim, whilst it is suggested that (B) would could have a detrimental effect.
Water	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Waltham Abbey & Nazeing Area	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Rural North & Harlow	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Central Line Settlements	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Rural South East	-	-	-	-	-	It is not thought that these alternatives have significant implications.
Ongar & Rural North East	-	-	-	-	-	It is not thought that these alternatives have significant implications.

Summary

Environmental effects

There is a need to maintain the popularity of town centres so that they can continue to be a focus of journeys made by public transport.

'Maximise the individual strengths of each centre, i.e. have a different approach for each of the 6' could help to achieve this aim, whilst it is suggested that 'Relax the existing policy completely to allowing changes of use to non-retail uses within key frontages' would could have a detrimental effect.

Socio-economic effects

The ability to access retail by public transport is important for those who do not have access to a private car, which will include a large proportion of the elderly population. Were retail to move to locations other than within town centres it would be likely that it would become less easily accessible by public transport. As such, it is suggested that 'Relax the existing policy completely to allowing changes of use to non-retail uses within key frontages' would result in significant negative effects.

Overall summary of effects

'Maximise the individual strengths of each centre, i.e. have a different approach for each of the 6' is the preferred approach. It is assumed that this approach would be followed in light of the overarching need to ensure that retail is focused in town centres in order to ensure it is easily accessed by those without access to a car as well as the need to avoid retail development putting pressure on scarce land resources.

6.11 'Dwelling size and design' alternatives

6.11.1 The table below presents an appraisal of alternative approaches to addressing the 'Dwelling size and design' issue.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	(A) Adopt policy which dictates the proportions of different size dwellings to be achieved in various locations around the district	(B) Leave the market to determine the most appropriate houses to be built	
Summary			
N.B. It is not thought that these alternative approaches have implications for sustainability topics other than 'community and wellbeing'.			
Environmental effects			
It is not suggested that these alternatives have significant environmental implications.			
Socio-economic effects			
A good mix of dwelling sizes and types is an important element of a vibrant community. Leaving the market to determine the most appropriate houses to be built would result in pockets of the same types of housing, which in turn would make it more likely that some areas would prosper and others would not.			

Overall summary of effects

See above.

6.12 'Green Belt and density' alternatives

6.12.1 The table below presents an appraisal of Alternative approaches to addressing the 'Green Belt and density' issue.

SA Topic	Alternatives and rank of preference		Discussion of significant effects
	(A) Encourage high density development (50 dph or more) to reduce the amount of land that will need to be released from the Green Belt	(B) Seek development of around 30dph to allow larger residential gardens and space for car-parking, meaning that more land will need to be released from the Green Belt	
Air quality		2	It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives: High density development can make it easier to provide viable public transport services, and can encourage walking / cycling.
Biodiversity and green infrastructure		2	It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives: Lower density development would result in larger gardens and also (possibly) greater potential for 'designing-in' green infrastructure; however, more significant is the fact that less dense development would result in less efficient use of greenfield land with resulting negative effects for biodiversity.

Climate change (mitigation and adaptation)		2	<p>It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives:</p> <p>High density development can make it easier to provide viable public transport services, and can encourage walking / cycling. This is important from a perspective of wishing to reduce per capita carbon emissions.</p>
Community and wellbeing	2		<p>It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives:</p> <p>It is increasingly recognised that people desire lower density living, despite there being an alternative argument that higher density living is beneficial from the perspective of creating 'sense of community' (particularly given it can enable more funds to be made available for the delivery of community services and facilities within easy walking distance of where people live). As such, from a community and wellbeing perspective it is suggested that 30dph is preferable to the 50dph..</p>
Economy and employment	-	-	It is not thought that these alternatives have significant implications.
Historic environment	-	-	It is not thought that these alternatives have significant implications.
Housing	?	?	<p>It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives:</p> <p>Requiring lower density development could decrease the financial viability of development, and hence discourage house building. However, this effect is far from certain.</p>
Land and waste		2	<p>Higher density development would result in less need to develop on greenfield land. As such</p> <p>(B) would result in significant negative effects</p>

Landscape		2	It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives: Higher density development would result in less need to develop on greenfield land and hence decreased likelihood of detrimental effects to landscape.
Transport		2	It is not thought that either alternative would result in significant effects. In terms of the relative merits of the alternatives: High density development can make it easier to provide viable public transport services, and can encourage walking / cycling.
Water	-	-	It is not thought that these alternatives have significant implications.
Waltham Abbey & Nazeing Area	-	-	It is not thought that these alternatives have significant implications.
Rural North & Harlow	-	-	It is not thought that these alternatives have significant implications.
Central Line Settlements	-	-	It is not thought that these alternatives have significant implications.
Rural South East	-	-	It is not thought that these alternatives have significant implications.
Ongar & Rural North East	-	-	It is not thought that these alternatives have significant implications.

Summary

Environmental effects

Higher density development is preferable in terms of a range of environmental considerations. In particular, high density development can make it easier to provide viable public transport services, and can encourage walking / cycling; and would reduce the need for greenfield land-take. It is noted, however, that lower density development would result in larger gardens and also (possibly) greater potential for 'designing-in' green infrastructure.

Social effects

It is increasingly recognised that people desire lower density living, despite there being an alternative argument that higher density living is beneficial from the perspective of creating 'sense of community' (particularly given it can enable more funds to be made available for the delivery of community services and facilities within easy walking distance of where people live). As such, from a community and wellbeing perspective it is suggested that 30dph is preferable to the 50dph

Economic effects

It is suggested that the choice of alternatives in this instance does require a trade-off to be made between the achievement of environmental objectives on the one hand and community and wellbeing objectives on the other. Having said this, whichever approach is taken forward, there will be the potential to address drawbacks through supporting policy within the Local Plan.

6.13 Suggested approaches

6.13.1 The table below presents an informal appraisal of the approaches 'suggested' within the Community Choices document.

SA Topic	Commentary
Air quality	<p>Numerous approaches suggested for addressing the following issues are likely to have the effect of ensuring the effects of growth in terms of air quality, are avoided or mitigated.</p> <ul style="list-style-type: none"> • Carbon reduction • Congestion / air quality • Reduce commuting / facilitate new ways of working • General rural economy • Support small businesses / entrepreneurship <p>In particular, suggested approaches that would encourage alternatives to private car use will be beneficial, including those in support of home-based working, car sharing / car clubs and the provision of services in easily accessible locations.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • If the suggested approach '<i>Develop some urban green spaces in association with replacement of the space on the boundaries of the settlement</i>'

	<p>is taken forward this should be done so in a way that recognises the importance of urban green space in terms of mitigating the effects of air pollution.</p> <ul style="list-style-type: none"> The Local Plan sets policy that will ensure car free developments come forward in areas well served by public transport.
Biodiversity and green infrastructure	<p>Given the scope of policy approaches that are suggested as ways to manage future growth and change, there can be little certainty that negative effects will be avoided or mitigated. This conclusion reflects the fact that those optional approaches that aim to enhance biodiversity are phrased in an exploratory manner (e.g. 'assess different approaches', 'monitor the outcome') rather than a definitive manner (e.g. 'provide x hectares of green infrastructure per 1000 new population').</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> If the suggested approach '<i>Develop some urban green spaces, or parts of them, in association with replacement of the space on the boundaries of the settlements</i>' is taken forward this should be done so in a way that recognises the importance of urban green space in providing 'permeability' for biodiversity.
Climate change (mitigation and adaptation)	<p>Numerous approaches suggested for addressing the following issues are likely to have the effect of ensuring the effects of growth in terms of private car use (and hence per capita greenhouse gas emissions), are avoided or mitigated.</p> <p>In terms of climate change adaptation there is good potential to mitigate the effects of growth by designing water efficiency measures into new developments and it appears that the Local Plan will attempt to realise this potential. For example, a suggested approach is to '<i>Incorporate rain water harvesting into new developments, both domestic and commercial</i>'.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> As far as possible, develop Local Plan policies that can be applied at the development management stage of planning (i.e. when determining planning applications and setting planning conditions) to ensure that carbon emissions from the built environment are minimised. Rather than making a commitment to 'Assess locations for larger renewable and low carbon energy schemes' the Local Plan should put in place a mechanism to 'designate locations for larger renewable and low carbon energy schemes'. As a condition of future planning applications, require that glasshouses meet their energy needs through Combined Heat and Power (CHP).
Community and wellbeing	<p>Whichever spatial approach to growth is followed, it seems likely, given the approaches that are suggested as ways to manage growth and change, that the Local Plan will put in place measures to ensure that negative effects to community and wellbeing are avoided and opportunities realised. In particular, it is clear that careful thought is being given to the most suitable approach to delivering community facilities where needed given limited funds, delivering specialist housing, ensuring high standards of design and delivering pitches for Gypsies and Travellers in the right location and in a timely way.</p>

	<p>It is recommended that:</p> <ul style="list-style-type: none"> • If the suggested approach <i>'Investigate the potential for the relocation of extensive uses such as schools to land on the edge of settlements to free up urban land for development'</i> leads to a policy approach, ensure that this recognises the importance of schools and other such facilities as 'community hubs'. • Define more specifically what 'designing new development to encourage social contact' should mean in practice. • Set out, within the Local Plan, a strategy for the management of urban open space and a mechanism for delivery.
Economy and employment	<p>Given the approaches that are suggested as ways to manage growth and change, it is likely that the Local Plan will: encourage growth in modern employment sectors, support small businesses / entrepreneurship, facilitate new ways of working and support employment in the rural area.</p> <p>Numerous suggested approaches would lead to employment opportunities in the rural area. This is important in or to maintain rural vitality, although it is important to give consideration to the importance of maintaining rural landscapes as primarily agricultural in the long term.</p> <p>It is also notable that the following approach is suggested:</p> <p><i>'Maximise the potential benefit of the new Local Enterprise Zone site in Harlow by encouraging high tech and medical technology businesses into Epping Forest District as well, by planning to provide and support high quality facilities in 'clusters' near Harlow.'</i></p>
Historic environment	<p>Given the approaches that are suggested as ways to manage future growth and change it seems likely that the Local Plan will result in significant benefits in terms of a range of historic environment issues. In particular, carefully targeted development and tourism should help to rejuvenate the historic character of town centres and fund the maintenance of historic assets that are in poor condition or under-used. It is noted that the Local Plan is likely to provide a mechanism for capitalising on the historic character of Waltham Abbey and promoting the town as a tourist centre for heritage and leisure (and recognises that doing so might involve taking measures such as relaxing retail requirements to allow more cafes and restaurants in the centre).</p>
Housing	<p>Levels of housing need in Epping Forest are high; the Council's housing waiting list for social housing has increased significantly in recent years, and the Strategic Housing Market Assessment (SHMA) for the London Commuter Belt (East) / M11 Sub-Region concluded that there is virtually a complete absence of market housing options affordable to households with incomes less than £30,000. As such, there is a large and growing need for various types of affordable housing within the District. Affordable housing is generally delivered as part of open market housing developments (by private developers subsidising its delivery) and it follows that the more market housing is developed, the more affordable housing can potentially be provided. However, much depends on the stringency of Local Plan policies regarding how much affordable housing is sought as part of new developments and the thresholds which trigger its provision (e.g. developments under a certain number of homes are often exempt). In light of the current economic conditions, private sector housing developers may also argue that delivering affordable housing is not financially viable (i.e. that a given development is not sufficiently profitable to allow for the delivery of affordable housing). Overall, the level of affordable housing need in Epping</p>

	<p>points to the need for a significant level of market housing development accompanied, however, by stringent Local Plan policies which require a significant proportion of new housing to be affordable (the current target is 40%) as well as policies which limit the number of developments which are exempt from providing affordable housing.</p> <p>In terms of delivering affordable housing, it is encouraging that an approach is suggested that would involve decreasing the threshold level(s) for seeking affordable housing in urban areas.</p> <p>In terms of the suggested approach - <i>'Review the 40% affordable housing target on all appropriate development sites in the light of the emphasis on viability of development schemes'</i> - it is not suggested that this will necessarily have negative implications in terms of the delivery of affordable housing.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • Should there be a need to reduce the 40% affordable housing target, this should not be reduced any further than is absolutely necessary to reflect viability considerations.
Land and waste	<p>It is notable that the following approach is suggested:</p> <p><i>'Assess the number, type, size and location of urban and rural brownfield sites and their suitability for redevelopment for housing and employment uses. Although the official definition of "previously developed land" (Annex 2 of the NPPF) specifically excludes land that has been occupied by agricultural or forestry buildings, investigate the potential for applying this approach to some of the derelict glasshouse sites in the Lea Valley.'</i></p> <p>If the Local Plan can result in better use being made of derelict sites then this will represent a highly efficient use of land, although it is recognised that this will be a challenge not least because the sites can suffer from problems of contamination that make them expensive to bring back into use. In addition, many areas of the Lea Valley are in areas of flood risk and / or levels of high ground water. The proximity of many glasshouse sites to the Lea Valley Park could also result in opposition to their development for housing or employment purposes.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • The Local Plan should define more specifically what 'making provision for waste storage' and 'promoting recycling' should be taken to mean in practice (i.e. by those involved in the development management process).
Landscape	<p>The 'Community Choices' consultation document suggests numerous approaches for managing growth in a way that should ensure that negative effects are avoided or mitigated. In particular, it is clear that the designation of 'Strategic Green Belt gaps' could help to ensure that negative effects to the landscape baseline are mitigated.</p> <p>It is also noted that the Community Choices document suggests that the Local Plan focuses on regeneration of under-used or derelict land, managing aspects of design such as signage and tree planting, and controlling the visual impacts of the glasshouse industry. Having said this, approaches that would involve overturning several decades of development management, for instance encouraging large out-of-town retail development or allowing</p>

	<p>the market to determine housing density, are likely to have negative effects.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • Consider whether to require that design standards for any development that requires planning permission (existing and new), for instance CABE/Design Council's 'Building for Life' standard. • Ensure that any 'regeneration' focused development enhances the townscape/landscape.
Transport	<p>Through making improvements to the transport infrastructure there is the potential to mitigate the problem of growth resulting in worsened traffic congestion. Numerous suggested approaches would have benefits in this respect. In particular, it is clear that the Local Plan will ensure that the issue of adequate car parking is addressed in town centres where problems currently exist.</p>
Water	<p>Numerous suggested approaches to managing growth and change would help to reduce the negative implications of growth in terms of the water environment. For example:</p> <ul style="list-style-type: none"> • 'Incorporate rain water harvesting into new developments, both domestic and commercial' • 'Managing surface water drainage through the introduction of Sustainable Drainage Systems (SUDS) in all new development.' • 'Requiring that 'all brownfield development should show an improvement in surface water runoff'.' <p>It is recommended that:</p> <ul style="list-style-type: none"> • Broaden out the requirement that 'all brownfield development should show an improvement in surface water runoff' to also apply to greenfield development, for instance: 'For greenfield development, surface water runoff rates post-development should be no greater than pre-development' • More clearly link the enhancement of walking and cycling routes with improvement of biodiversity and Sustainable Urban Drainage. This could be achieved through carefully worded policy on green infrastructure.
Waltham Abbey & Nazeing Area	<p>Several specific redevelopment initiatives are proposed for Waltham Abbey. It is also suggested that the Local Plan should</p> <p><i>'Capitalise on the heritage nature of the town and promote Waltham Abbey as a tourist centre for heritage and leisure – this could involve relaxing retail requirements to allow more cafes and restaurants to promote tourism'</i></p> <p>As such, it can be seen that considerable change for the town is being suggested.</p>
Rural North & Harlow	<p>Aside from suggested approaches that relate to the rural area in general, there is not a focus on this area.</p>
Central Line	<p>Specific policy approaches are suggested for Buckhurst Hill (Queen's Road East), Loughton Broadway, Loughton High Road and Epping. These</p>

Settlements	include specific suggested redevelopment initiatives.
Rural South East	Aside from suggested approaches that relate to the rural area in general, there is not a focus on this area.
Ongar & Rural North East	One specific redevelopment initiative is suggested. Aside from this, and the suggested approaches that relate to the rural area in general, there is not a focus on this area.

7 WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

“a description of the measures envisaged concerning monitoring...”

(SEA Directive Annex I(i))

7.1 Next steps in the iterative appraisal of the draft plan

- 7.1.1 Subsequent to the consultation on ‘Community Choices’, which is supported by the publication of this Interim SA Report, the Council will take onboard consultation responses and the appraisal findings set out within this report, and will then begin develop a ‘preferred approach’.
- 7.1.2 Once a preferred broad spatial approach has emerged, the Council will determine a range of site allocation options for delivering this. These site allocations will then be subjected to SA, with findings fed back to the Council.
- 7.1.3 The Council will then be in a position to prepare the Draft Local Plan. This will then be subjected to SA and published for consultation. Appraisal findings will be presented, as part of the consultation, within an SA Report.
- 7.1.4 The Council will take account of consultation responses and the findings of the SA Report when preparing the ‘Proposed Submission Local Plan’. A revised version of the SA Report will present an appraisal of the approach set out within the Proposed Submission Local Plan and both documents will be ‘Published’ so that representations can be received.
- 7.1.5 The Council will then finalise the plan for Submission to Government. The SA Report or a revised version will also be submitted. Those that comment on the plan post-submission (including at ‘Examination in Public’) will be able to draw on SA findings.

7.2 Plan adoption and monitoring

- 7.2.1 Subsequent to Examination in Public it is the hope that the plan will be found to be ‘Sound’ by the Government appointed Inspector overseeing the Examination and will be formally adopted by the Council.
- 7.2.2 At the time of Plan Adoption a ‘Statement’ must published that sets out (amongst other things) *‘the measures decided concerning monitoring’*. In relation to monitoring, it is also important to note that the SA Report (published alongside the draft plan) must present *‘a description of the measures envisaged concerning monitoring’*. This reflects the fact that the draft plan should be near finalised, and so there should be a reasonable understanding of the likely residual sustainability effects. At this current stage, the appraisal has highlighted the potential for a range of effects that *could* give rise for a need for monitoring, but there is no way of being sure what the residual effects will be at the end of the planning process (that *will* give rise to a need for monitoring).

APPENDIX I - DRAFT SITES APPRAISAL METHODOLOGY FOR COMMENT

Introduction

As explained in Chapter 1 'Introduction' and Chapter 7 'Next steps', the next plan-making / SA 'step' will involve appraising a range of potential sites for development.

It is likely that alternative sites will be considered for each settlement; however, it may be the case that all potential development sites across the district are considered against one another as alternatives.

Either way, a large number of alternatives will be appraised and so there is a need to ensure consistency / avoid potential for criticism by site objectors (who may be unhappy if a site is shown to perform favourably relative to alternatives) and promoters (who may be unhappy if a site is shown to perform poorly relative to alternatives).

There may be some potential for professional judgement (drawing on a qualitative analysis of issues / baseline understanding identified through SA scoping) to inform the appraisal of significant effects for site alternatives. This will to a large extent be dependent on the number of alternatives that are under consideration.

However, to ensure consistency, there will primarily be a need to apply quantitative (or at least 'factual') analysis with significant effects identified the basis of strict decision-rules.

Set out below is a series of criteria for which the performance of sites can (given the data-sets available) and, it is suggested, should be quantified with a view to identifying significant effects. The criteria are grouped under 'sustainability topic' headings and have been developed to reflect the sustainability issues identified through SA scoping as far as possible.

For each criteria, significant effect 'decision rules' are suggested. It is suggested that a simple traffic light system be used to categorise effects as either significant adverse (**red**), adverse (**amber**) or non-adverse (**green**).

Air quality

There is a need to...

- Avoid worsening of existing issues through minimising **traffic congestion**

Suggested criteria

Suggested decision rules

Effects on air quality

- Adjacent to an AQMA
- <1km of an AQMA
- >1km of an AQMA

Biodiversity and green infrastructure

There is a need to...

- Avoid **direct impacts** to important biodiversity sites and linear features
- Avoid more **indirect impacts** (e.g. through pollution or development preventing adaptation of biodiversity to climate change)
- Carefully plan and implement multifunctional **green infrastructure**
- Support initiatives that seek to achieve **biodiversity benefits**, including through targeted habitat creation and enhancement
- Plan for biodiversity at a '**landscape scale**'

Suggested criteria	Suggested decision rules
Effects on a Site of Special Scientific Interest (SSSI)	<p><400m of a SSSI</p> <p>400m - 800m of a SSSI</p> <p>>800m of a SSSI</p>
Effects on a Local Nature Reserve, Local Wildlife Site, or area of Biodiversity Action Plan Priority Habitat?	<p>Adjacent to a designated area</p> <p><400m of a designated area</p> <p>>400m of a designated area</p>
Effects on the Lee Valley Regional Park (LVRP)?	<p>Within boundary of the LVRP</p> <p>Adjacent to the boundary of the LVRP</p> <p>Not adjacent to the boundary of the LVRP</p>
Effects on Protected Trees	<p>Site includes more than one tree protected by a Preservation Order</p> <p>Site includes one tree protected by a Preservation Order</p> <p>Site does not include trees protected by a Preservation Order</p>

Climate change (mitigation and adaptation)

There is a need to...

- Lower **greenhouse gas** emissions
- Increase the amount of **renewable and decentralised energy** generation
- Drawing on the SFRA, take a pro-active approach to reducing **flood risk** and mitigate risk associated with new development where it occurs

Suggested criteria	Suggested decision rules
Accessibility to a bus stop (with at least hourly service)	<p>>800m distant</p> <p>400 - 800m distant</p> <p><400m distant</p>
Accessibility to a Central Line station or rail station	<p>>1600m distant</p> <p>800 - 1600m distant</p> <p><800m distant</p>
Accessibility to a principal/smaller/district centre (as defined in the Local Plan Alterations)	<p>>1600m distant</p> <p>800-1600m distant</p> <p><800m distant</p>
Accessibility to a local centre (as defined in the Local Plan Alterations)	<p>>800m distant</p> <p>400-800m distant</p> <p><400m distant</p>
Flood Risk	<p>Site is within Flood Risk Zone 3b (Functional Floodplain)</p> <p>Site is within Zone 2 (low to medium risk) or Zone 3a (high risk - exception test required)</p> <p>Site is within Zone 1 (little or no risk)</p>

Community and wellbeing

There is a need to...

- Address pockets of **deprivation**
- Meet the health and social needs of a **growing and ageing population**, including through ensuring good access to community infrastructure
- Address all aspects of **equality**, where relevant to spatial planning
- Address issues specific to **rural communities**
- Provide facilities and infrastructure to support **active living**

Suggested criteria

Suggested decision rules

Accessibility to a principal/smaller/district centre (as defined in the Local Plan Alterations)	<p>>1600m distant</p> <p>800-1600m distant</p> <p><800m distant</p>
Accessibility to a local centre (as defined in the Local Plan Alterations)?	<p>>800m distant</p> <p>400-800m distant</p> <p><400m distant</p>
Accessibility to a health centre or GP service?	<p>>1600m distant</p> <p>800-1600m distant</p> <p><800m distant</p>
Accessibility to a secondary school	<p>>2400m distant</p> <p>1600 - 2400m distant</p> <p><1600m distant</p>
Accessibility to a primary school?	<p>>1600m distant</p> <p>800 - 1600m distant</p> <p><800m distant</p>
Accessibility to an existing (village) shop / post office	<p>>1600m distant</p> <p>800 - 1600m distant</p> <p><800m distant</p>
Loss of Urban Open Space (as shown on the Local Plan Proposals Map)?	<p>Will result in loss of the majority of an area of open space</p> <p>Will result in some loss of an area of open space</p> <p>Will not result in loss of open space</p>
Within (a) 30m of an underground electricity transmission cable; (b) 100m of an electricity transmission overhead line; or (c) 150m of a high pressure gas pipeline?	<p>Yes - the site scores 'High' on relevant National Grid risk table</p> <p>Yes - the site scores 'Moderate' on relevant National Grid risk table</p> <p>No</p>
Contamination	<p>Known problems on site</p> <p>Potential problems on site</p> <p>No potential problems on site</p>
Noise problems	<p>Known noise problems</p> <p>Potential noise problems</p> <p>No</p>

Economy and employment

There is a need to...

- Maintain a **diverse economy** including through supporting existing sectors (including rural)
- Taking a long term view, support initiatives that **capitalise on local strengths**, including tourism potential (e.g. resulting from attractive towns and countryside)
- Ensure local **job creation** in line with local housing growth
- Maintain the key functions of **local centres** (also a 'community and wellbeing' issue)
- Address **deprivation** issues through targeted economic growth

Suggested criteria

Suggested decision rules

Accessibility to local employment provision (ie employment sites and principal, smaller or district centres as defined on the Local Plan and Alterations Proposals Maps)

> 2400m distant
1600 - 2400m distant
<1600m distant

Loss of Employment Land

Site identified in the Employment Land Review
Site not identified in the Employment Land Review

Historic environment

There is a need to...

- Protect the district's **heritage assets** and their settings from inappropriate development
- Ensure that development respects wider **historic character**

Suggested criteria

Suggested decision rules

Effect on Listed Buildings, Scheduled Ancient Monuments or Historic Parks & Gardens?

Site includes a heritage asset or is adjacent
Site is within 50m of a heritage asset
Site is >50m from a heritage asset

Effect on locally listed buildings (e.g. Buildings of Local Interest)?

Site includes a heritage asset or is adjacent
Site is within 50m of a heritage asset
Site is >50m from a heritage asset

Effect on a Conservation Area?

Site includes a Conservation Area or is adjacent
Site is within 50m of a Conservation Area
Site is >50m from a Conservation Area

Effect on Common Land?

Site includes Common Land or is adjacent
Site is within 50m of Common Land
Site is >50m from Common Land

Effect on archaeological remains and their settings?

Site includes archaeological remains or is adjacent
Site is within 50m of archaeological remains
Site is >50m from archaeological remains

Effects on a Protected Lane (as defined by the Local Plan Proposals Map)?

Site includes Protected Lane
Site is within 50m of a Protected Lane
Site is >50m from a Protected Lane

Housing

There is a need to...

- Meet **identified needs** through providing new housing
- Increase the provision of **affordable housing**
- Meet the needs of **Gypsies and Travellers**

Suggested criteria

Suggested decision rules

N/a

Its not possible to distinguish between alternative potential site allocations in terms of their potential to support housing.

Land and waste

There is a need to...

- Protect **Green Belt** that meets the nationally established objectives
- Make **efficient use of land** (including through re-use of previously developed land)
- Support good **waste management**

Suggested criteria

Suggested decision rules

Effect on the Green Belt?

Site is within Green Belt
Site is adjacent to the Green Belt
Not adjacent

Efficient use of land

Greenfield site not within or adjoining an existing settlement boundary
Brownfield site⁷ adjoining an existing settlement boundary;
brownfield site not within or adjoining an existing settlement boundary; or greenfield site within or adjoining an existing settlement boundary
Brownfield site within an existing settlement boundary

N.B. It is not possible to appraise alternative locations in terms of their potential to support good waste management.

Landscape

There is a need to...

- Direct development away from the most **sensitive landscapes** and landscape features
- Maintain and enhance **characteristic landscapes** and landscape features

Suggested criteria

Suggested decision rules

Landscape character?

Within an area identified as sensitive
Within an area identified as moderately sensitive
Within an area identified as less sensitive

Transport

There is a need to...

- Bring about a **modal shift** in terms of commuting patterns, away from car dependency
- Promote and support investment in **sustainable transport infrastructure**, including in rural areas where access to services and employment is an issue

Suggested criteria

Suggested decision rules

⁷ Brownfield or previously developed land as defined in Annex B of PPS3 Housing

Accessibility to a bus stop (with at least hourly service) **>800m distant**
 400 - 800m distant
 <400m distant

Accessibility to a Central Line station or rail station **>1600m distant**
 800 - 1600m distant
 <800m distant

Water⁸

Suggested criteria

Suggested decision rules

N/A

N/A

⁸ Water Resources are not an issue when differentiating between site locations. Water supply in Epping Forest is part of a very large 'Essex wide' Water Resource Zone managed by Essex and Suffolk Water. Whilst there are some small scale groundwater abstractions, the majority of water supplied to Essex is supplied by transfer from Abberton reservoir which is being increased in capacity to cope with the growth planned in the Thames Gateway and South Essex. Therefore, raw water resource availability isn't affected by location as all growth on the Essex zone has the same risk in terms of the supply and demand balance.