

Interim Consultation Statement for Regulation 19 Submission Version of the Epping Forest District Local Plan 2017

December 2017

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1. Introduction

- 1.1 This Interim Consultation Statement describes the processes followed by Epping Forest District Council in undertaking community participation and stakeholder involvement in the production of the Epping Forest District Local Plan (Submission Version) and sets out how the main issues raised through consultation have helped shape the Plan. The Statement has been prepared to comply with the requirements of Regulation 19 and Regulation 22 (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (referred to throughout this Consultation Statement as ‘the Regulations’). The Consultation Statement will assist the Inspector at the Examination to determine whether the processes that the Council followed leading to the Submission of the Local Plan comply with government guidance and requirements for public participation.
- 1.2 In detailing the requirements for the ‘Submission of documents and information to the Secretary of State’ are, Regulation 22 (1) part (c) directs the Council to prepare a statement which sets out:
- i) which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;
 - ii) how those bodies were invited to make representations;
 - iii) a summary of the main issues raised in those representations;
 - iv) how those main issues have been taken into account;
 - v) if there are representations made under Regulation 20, the number made and a summary of the main issues raised in those representations; and
 - vi) if there are no representations made under Regulation 20, that no such representations were made.
- 1.3 The Local Plan has currently reached the Regulation 19 stage; therefore, this Interim Consultation Statement covers points ‘i) to ‘iv)’ above and the following sections detail how the Council has complied with its obligations for each criterion. It is intended that the Consultation Statement will be revised, post-Regulation 19 publication stage, to reflect any representations made under Regulation 20, thus complying with criteria ‘v)’ and ‘vi)’ detailed above.
- 1.4 In carrying out its consultation processes, it should be noted that, in addition to complying with the Regulations, the Council has also complied with the provisions of its Statement of Community Involvement (SCI) adopted in 2013. This document sets out the Council’s approach to public engagement in the planning system and how it seeks to involve the local community in Epping Forest District. The SCI may viewed on the Council’s website: www.eppingforestdc.gov.uk/planningourfuture

2. Overview of Consultations prior to 2016

- 2.1 The Council has consulted extensively at each stage of the preparation of the Local Plan. To aid the consultation process the Council maintains a live consultee database which has been continuously updated at each event and as and when notified of changes by consultees. As of November 2017, there are 16,157 contact details that have been registered in the database.
- 2.2 The Community visioning consultation in 2010/11 was a public engagement exercise undertaken by the Council to understand views on the issues within the District as well as the priorities for the next 20 years. The outcome of visioning exercise can be found on the Council's website.¹
- 2.3 The Issues and Options (Community Choices) consultation between 30 July and 15 October 2012 sought views on a range of different options to gauge public opinion on issues such as housing targets, green infrastructure and transport. The questionnaire which accompanied the consultation document contained a range of questions. A 'Community Choices Consultation Report' (2013) was completed, which can also be found on the Council's website.²
- 2.4 For statutory consultees a formal letter was sent. This set out the subject of the consultation and invited comments. For the general public a series of information drop in sessions took place at various locations around the District. All documents were made available at the Council Offices, at libraries within the District and on the Council's website. The consultation was also advertised via local media, including local papers and social media forums such as Twitter. Documents could be provided in other formats where required, including large print.
- 2.5 The Council received responses from nearly 6,000 people. Most of these were from individuals but replies were also received from national bodies, adjoining local authorities, town and parish councils, landowners and developers. The most frequently mentioned and important issues were identified as:
- i) Need to protect the Green Belt;
 - ii) Make use of brownfield (previously developed land) before releasing Green Belt;
 - iii) Prevent London from sprawling into the district and prevent larger urban areas from merging with nearby villages;
 - iv) Ensuring accurate forecasts for population/job growth and related housing targets and employment forecasts;
 - v) Ensuring that local services/infrastructure has the capacity to cope e.g. schools, GPs, public transport;

¹ <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/109-community-visioning>

² www.eppingforestdc.gov.uk/planningourfuture

- vi) Protecting the countryside and landscape including Epping Forest; and
- vii) Protecting the heritage and character of the District's towns and villages.

2.6 The consultation results were reported to Cabinet on 10 June 2013³ and have been used to determine the strategic direction for the District and the specific development management policies included in the Draft Local Plan. These issues were used to inform the approach set out in the Draft Local Plan consultation in 2016, as outlined in Section 3.

³ <http://rds.eppingforestdc.gov.uk/documents/s49377/C-006%20IO%20Responses%20Rpt.pdf>

3. Draft Local Plan (Regulation 18) Consultation October-December 2016

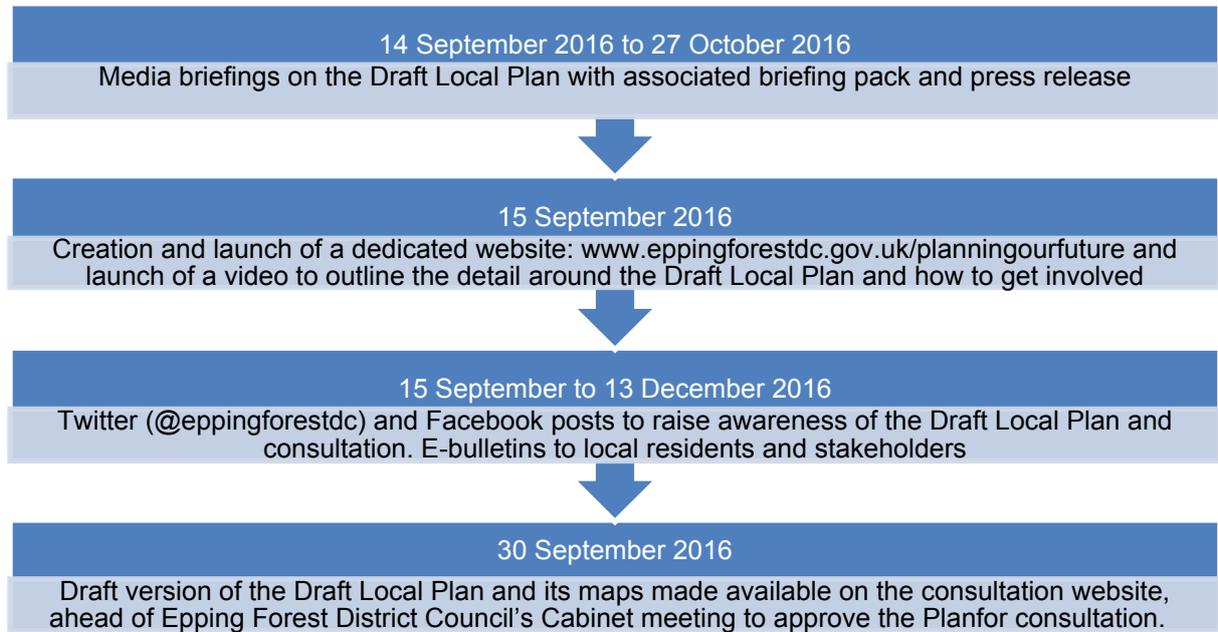
- 3.1 The following section sets out the Council's approach and compliance with the Regulations. It sets out the bodies and persons invited to make representations and the mechanisms used to invite comments on the Draft Local Plan.
- 3.2 The consultation strategy for the Draft Local Plan was prepared in accordance with the Local Plan Communications Strategy and the adopted Statement of Community Involvement. A report setting out the consultation strategy was approved by Cabinet on 1 September 2016⁴. The principles of consultation for the Draft Local Plan were as follows:
- i) Public involvement should be transparent and accessible and seek to reach as many residents and businesses as possible.
 - ii) Engagement with the local community should form part of a continuous programme of engagement activities, not be a one-off event.
 - iii) Consistent branding should be used across all Local Plan media e.g. the Planning Our Future logo
 - iv) Consultation and communication methods used should be appropriate to the communities concerned.
 - v) Work closely with other Directorates within the Council. There may be opportunities to link in with other consultation activities and use the feedback received.
 - vi) Information gathered through other consultations should be used wherever possible.
 - vii) The level of community involvement should be appropriate to the role of the plan or study in question.
 - viii) Accessible report summaries of planning documents should be produced where appropriate.
 - ix) Any consultation method should be designed to ensure that meaningful feedback is achievable within the Council's resources and Local Plan timescales.
 - x) All communication throughout the Local Plan consultation should be directed through generic telephone and email contacts rather than named team members.
- 3.3 In addition to specific and general consultees (as identified under Part 1 of the Regulations), all consultees on the consultee database (which includes those who

⁴ <http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?CIId=295&MIId=8648>

have previously commented and/or expressed an interest in being notified) a total of 15,336 people were contacted on 28 October 2016 advising them of the forthcoming consultation.

- 3.4 A series of activities were completed to raise awareness of the Draft Epping Forest District Local Plan and the consultation, as shown in Figure 1.

Figure 1 Activities to raise awareness of consultation



- 3.5 Following the Full Council⁵ meeting on 18 October 2016 where the Draft Local Plan was approved for a six-week consultation, a series of activities were completed to secure engagement in the process from the public and local stakeholders. These are shown in Figure 2.

⁵ <http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?CIId=296&MIId=8894>

Figure 2 Activities to secure engagement



3.6 The formal six week consultation took place from 31 October – 12 December 2016. In addition to the notification of all those on the database and to ensure widespread awareness of the consultation, the Council arranged for every household in the district to be delivered a newsletter (approximately 57,000 addresses) with details of the Draft Local Plan and consultation events. Where gaps were identified in delivery these were monitored and follow up deliveries were arranged. Adverts were placed in the local newspapers and commuter postcards were distributed at peak hours at 11 tube/rail stations throughout the District. Static exhibitions with copies of questionnaires were available at 12 venues across the District and one in Harlow:

- i) Buckhurst Hill Library
- ii) Bumbles Green Leisure Centre, Nazeing
- iii) Chigwell Library
- iv) Epping Civic Offices and Epping Library

- v) Latton Bush Centre, Harlow
- vi) Loughton Library
- vii) North Weald Library
- viii) Ongar Library
- ix) Roydon Village Hall
- x) Sheering Village Hall
- xi) Theydon Bois Village Hall
- xii) Waltham Abbey Library

3.7 A dedicated Local Plan website was created and was designed to ensure people could find and download the relevant information. A video was produced and launched with the new consultation website and shared across the Council's twitter and facebook accounts. The website address received 13,818 unique visitors between its launch in September 2016 and the end of the consultation period. Throughout the consultation period e-bulletins were issued to all email addresses on the Council's database, Council Members, Parish and Town Councils and residents associations. Statutory consultees were sent a letter on 28 October 2016 advising them of the consultation and were invited to a workshop which was held on 7 December 2016.

3.8 In addition six staffed public exhibitions were held in November 2016 to give the local community the opportunity to find out more about the Draft Local Plan and speak to the Planning Policy Team. The attendance at these is shown in the Table below.

Exhibition Venue	Attendees (approx.)	Date
North Weald Village Hall	259	5 November 2016
Lopping Hall, Loughton	207	7 November 2016
Chigwell Hall, High Road	107	8 November 2016
Budworth Hall, Ongar	258	9 November 2016
Epping Hall	277	11 November

		2016
Waltham Abbey Town Hall	125	14 November 2016
Total	1,233 attendees	

3.9 Hard copies of the full suite of consultation documents were made available at the Council's offices, Town and Parish Council offices, libraries and at the static exhibition points.

Other Forms of Engagement

3.10 Alongside formal consultation on the Draft Local Plan under Regulation 18, the Council has engaged with a variety of stakeholders during the production of the Draft and Submission Plans to ensure that the approach taken in the Plan is robust and fully takes into account issues that have been raised. This included meetings where necessary and regular communication with statutory consultees such as Natural England and Sport England, infrastructure providers such as Thames Water and other key organisations such as the Lea Valley Growers Association. During the Regulation 18 consultation period the Council held a meeting with the Epping Forest District Youth Council giving an overview of the Local Plan and a platform for questions. Town and Parish Councils were invited to come to the Council offices for a meeting to discuss any issues or matters they were looking to raise on the Draft Local Plan.

3.11 The Council held a Developer briefing on 9 September 2016 and set up a Developer Forum in December 2016⁶, and from then on has held regular meetings for landowners and promoters to discuss relevant updates to the Plan and evidence base documents. The quarterly meetings have been used as a platform to seek engagement when needed on key issues, for example such as viability.

3.12 As part of the Duty to Co-operate, the Council is a member of the Co-operation for Sustainable Development Member Board set up in 2014. This holds separate monthly officer and member meetings to discuss key cross-boundary strategic issues and aid joined-up working and approach between the member authorities.

3.13 Town and Parish Councils have been engaged through a number of events, not only with the purpose of receiving updates through Local Plan briefings on the Local Plan and workshops to explore evidence based documents such as the Open Space Strategy. Three briefings (arranged by area) were organised with Town and Parish Councillors and Council Members to feedback the main themes from the Regulation 18 Consultation in April 2017. The following workshops were held during

⁶ Terms of Reference can be found at www.eppingforestdc.gov.uk/planningourfuture

the preparation of the Draft Local Plan and the Submission Version of the Local Plan:

- i) 26 January 2013 – *Evidence and its implications for development of the Local Plan*
- ii) 9 February 2013 – *The vision and objectives: local vision and priorities*
- iii) 9 March 2013 – *Planning your places: using your vision*
- iv) 5 October 2013 – *Population Projections and Housing Need*
- v) 2 November 2015 – *Historic and Natural Environment*
- vi) 10 November 2015 – *Economic Strategy*
- vii) 24 November 2015 – *Affordable Housing, Older Persons' Housing, Specialist Housing and Custom Build*
- viii) 28 January 2016 – *High Quality Design*
- ix) 24 May 2016 – *Update on Local Plan timetable and Climate Change*
- x) 25 February 2016 – *Green Belt Review Stage 2*
- xi) 31 May 2016 – *Transport: accessibility and residential car parking considerations*
- xii) 16 July 2016 – *Development Management Policies*
- xiii) 18 May 2017 – *Sports Facilities and Open Space*
- xiv) 8 July 2017 – *Infrastructure Delivery Plan*

Summary of the Draft Local Plan 2016 Consultation

- 3.14 The Council received 3,387 responses from 3,082 respondents to the Draft Local Plan consultation. 7% of feedback was received through the hardcopy questionnaires; 22% by letter, 23% by email and 48% by online questionnaires. 1,233 people attended the six staffed exhibition events. Nine e-bulletins were issued with an 'open rate' of 6,327 in total, along with 3177 direct engagements on Twitter and 1,211 engagements on Facebook.
- 3.15 An initial analysis of the results of the public consultation was reported to Cabinet on 9 March 2017.⁷ A more detailed analysis of the comments was undertaken and reported to Cabinet on 11 July 2017⁸, with a table of key issues included as an appendix to the Cabinet Report. The full Consultation Report and an Executive Summary are available on www.eppingforestdc.gov.uk/planningourfuture.

⁷ <http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?CId=295&MIId=8653>

⁸ <http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?CId=295&MIId=9079>

- 3.16 The ten most frequent comments received from all forms of feedback to the Draft Local Plan were that the policies and proposals would result in:
- i) an increase in traffic congestion on local roads;
 - ii) a negative impact on local schools;
 - iii) increased pressure on the local healthcare provision;
 - iv) a loss of car parking spaces, and increased car parking pressure;
 - v) negative impact on the character of the settlement;
 - vi) an overall opposition to principle of development in the Green Belt;
 - vii) increased overcrowding on the Central Line;
 - viii) a loss of open space in the urban areas of the District;
 - ix) development on sites set out in Draft Policy P 2 Loughton/Loughton Broadway to which there was disagreement;
 - x) development in the Green Belt to which many respondents were opposed;
and
 - xi) insufficient information about the infrastructure requirements of Epping Forest District.
- 3.17 Details of those people and organisations who responded to the Draft Local Plan are available on the Council's website.⁹
- 3.18 All comments that were received from the range of stakeholders were taken into account in the preparation of the Submission Plan. The Council has considered the comments from consultees when preparing the policies and allocations for the Submission Plan, for example when looking at settlement specific policies and visions and selecting sites. The creation of a master database containing all of the comments received during the consultation period, which could be sorted by policy number or by theme, allowed the Council to efficiently and comprehensively consider the consultation feedback at every decision-making stage.

⁹ http://www.eppingforestdc.gov.uk/index.php?option=com_content&view=article&id=1377

4. Conclusion

- 4.1 In carrying out its consultation processes, the Council considers that it has complied with both the Regulations and with the provisions of its Statement of Community Involvement. An overview of how the Council has complied with the Statement of Community Involvement can be found in the table below. It should be noted that this document is an Interim version of the consultation statement, which will be updated post Regulation 19 publication.

Approach set out in Statement of Community Involvement (up to Submission Plan publication, stage six)	Compliance with approach
Contacting/Engagement of statutory consultees such as the Environment Agency and Thames Water.	All statutory consultees were contacted for comment on the Draft Local Plan as part of the Regulation 18 Consultation, with those who submitted representations listed on the Council's ¹⁰ website. If there was need for further engagement on key issues, further meetings and written contact were employed.
Contacting/Engagement with general consultees such as community and amenity groups, resident associations, business sector, developers, landowners and other agencies.	All general consultees were contacted for comment on the Draft Local Plan as part of the Regulation 18 Consultation, with those who submitted representations listed on the Council's ¹¹ website. If there was need for further engagement on key issues, further meetings and written contact were employed. The developer forum was also a useful platform for engagement. Throughout the plan making process town and parish council representatives were involved in briefings and workshops.
Local Plan and supporting information to be displayed on the Council's website and in print copy at the Council offices.	The Draft Local Plan and all supporting technical evidence were and are still available on the Council's website. Printed copies of the Plan were available at the Council's offices, Town and Parish Council offices, libraries and at the static exhibition points. Copies of the Plan were also available to purchase.
Stakeholder briefings/workshops with a variety of stakeholders as part of evidence base gathering and workshops.	Engagement with relevant stakeholders was sought during the production of evidence base documents where necessary, with several workshops held at the Council offices.

¹⁰ http://www.eppingforestdc.gov.uk/index.php?option=com_content&view=article&id=1377

¹¹ *ibid*

<p>Letter/emails to existing consultees to notify of the Draft Local Plan consultation.</p>	<p>All contacts listed in the consultee database were contacted to notify them that the consultation period was taking place and to inform them of how to provide a representation.</p>
<p>Comments made on the Draft Local Plan to be able to be viewed via the Council's website.</p>	<p>All representations to the Regulation 18 Consultation are on the Council website.¹²</p>
<p>Duty to assist the development of Neighbourhood Development Plans.</p>	<p>The Council held several meetings with Town and Parish Council's on the status and intention of their Neighbourhood Plans, providing guidance and informing Councils of the requirements in relation to the Local Plan. The Council has a Service Level Agreement with the Rural Community Council of Essex to provide some dedicated support to Town and Parish Council's preparing Neighbourhood Plans</p>

¹² ibid