

Committee Agenda



**Epping Forest
District Council**

Local Plan Cabinet Committee Monday, 14th May, 2018

You are invited to attend the next meeting of **Local Plan Cabinet Committee**, which will be held at:

**Council Chamber, Civic Offices, High Street, Epping
on Monday, 14th May, 2018
at 7.00 pm .**

**Derek Macnab
Acting Chief Executive**

**Democratic Services
Officer**

Gary Woodhall
(Governance Directorate)
Tel: 01992 564470
Email: democraticservices@eppingforestdc.gov.uk

Members:

Councillors J Philip (Chairman), A Grigg, A Lion, S Stavrou and C Whitbread

PLEASE NOTE THE START TIME OF THIS MEETING

1. WEBCASTING INTRODUCTION

The Chairman will read the following announcement:

“I would like to remind everyone present that this meeting will be recorded for subsequent repeated viewing on the Internet and copies of the recording could be made available for those that request it.

By being present at this meeting it is likely that the recording cameras will capture your image and this will result in the possibility that your image will become part of the broadcast.

You should be aware that this may infringe your human and data protection rights. If you have any concerns please speak to the webcasting officer.

Please could I also remind members to put on their microphones before speaking by pressing the button on the microphone unit”

2. APOLOGIES FOR ABSENCE

(Assistant Director of Governance) To be declared at the meeting.

3. DECLARATIONS OF INTEREST

(Assistant Director of Governance) To declare interests in any item on the agenda.

4. MINUTES (Pages 5 - 12)

(Assistant Director of Governance) To confirm the minutes of the last meeting of the Cabinet Committee held on 25 March 2013 (previously circulated).

5. TERMS OF REFERENCE (Pages 13 - 14)

(Assistant to the Chief Executive) To note the Cabinet Committee's terms of reference, as agreed by the Leader of the Council in June 2012.

6. EPPING FOREST DISTRICT LOCAL PLAN SUBMISSION VERSION - REPORT ON THE REGULATION 19 PUBLICATION (Pages 15 - 68)

(Assistant Director of Neighbourhoods) To consider the attached report (LPC-001-2018/19).

7. EPPING FOREST DISTRICT LOCAL PLAN UPDATE (Pages 69 - 84)

(Assistant Director of Neighbourhoods) To consider the attached report (LPC-002-2018/19).

8. ANY OTHER BUSINESS

Section 100B(4)(b) of the Local Government Act 1972, together with paragraphs (6) and (24) of the Council Procedure Rules contained in the Constitution requires that the permission of the Chairman be obtained, after prior notice to the Chief Executive, before urgent business not specified in the agenda (including a supplementary agenda of which the statutory period of notice has been given) may be transacted.

In accordance with Operational Standing Order (6) (non-executive bodies), any item raised by a non-member shall require the support of a member of the Cabinet Committee and the Chairman of the Cabinet Committee. Two weeks' notice of non-urgent items is required.

9. EXCLUSION OF PUBLIC AND PRESS

Exclusion

To consider whether, under Section 100(A)(4) of the Local Government Act 1972, the public and press should be excluded from the meeting for the items of business set out below on grounds that they will involve the likely disclosure of exempt information as defined in the following paragraph(s) of Part 1 of Schedule 12A of the Act (as amended) or are confidential under Section 100(A)(2):

Agenda Item No	Subject	Exempt Information Paragraph Number
Nil	Nil	Nil

The Local Government (Access to Information) (Variation) Order 2006, which came into effect on 1 March 2006, requires the Council to consider whether maintaining the exemption listed above outweighs the potential public interest in disclosing the information. Any member who considers that this test should be applied to any currently exempted matter on this agenda should contact the proper officer at least 24 hours prior to the meeting.

Background Papers

Article 17 of the Constitution (Access to Information) define background papers as being documents relating to the subject matter of the report which in the Proper Officer's opinion:

- (a) disclose any facts or matters on which the report or an important part of the report is based; and
- (b) have been relied on to a material extent in preparing the report and does not include published works or those which disclose exempt or confidential information and in respect of executive reports, the advice of any political advisor.

The Council will make available for public inspection one copy of each of the documents on the list of background papers for four years after the date of the meeting. Inspection of background papers can be arranged by contacting either the Responsible Officer or the Democratic Services Officer for the particular item.

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EPPING FOREST DISTRICT COUNCIL COMMITTEE MINUTES

Committee: Local Plan Cabinet Committee **Date:** 25 March 2013

Place: Council Chamber, Civic Offices, High Street, Epping **Time:** 7.05 - 9.05 pm

Members Present: R Bassett (Chairman), W Breare-Hall, Mrs A Grigg, D Stallan and C Whitbread

Other Councillors: K Avey, J Philip, Mrs L Wagland, G Waller, Mrs E Webster, J M Whitehouse and D Wixley

Apologies: -

Officers Present: G Chipp (Chief Executive), J Preston (Director of Planning and Economic Development), K Polyzoides (Assistant Director (Policy & Conservation)), P Seager (Chairman's Secretary) and G J Woodhall (Democratic Services Officer)

32. WEBCASTING INTRODUCTION

The Chairman reminded everyone present that the meeting would be broadcast live to the Internet, and that the Council had adopted a protocol for the webcasting of its meetings.

33. DECLARATIONS OF INTEREST

There were no declarations of interest pursuant to the Council's Code of Member Conduct.

34. MINUTES

Resolved:

(1) That the minutes of the meeting held on 18 February 2013 be taken as read and signed by the Chairman as a correct record.

35. TERMS OF REFERENCE

The Cabinet Committee noted its terms of reference, as amended by the Leader of the Council in June 2012.

36. PORTFOLIO HOLDER DECISIONS AGREED SINCE THE LAST MEETING

The Cabinet Committee noted that no delegated decisions by the Portfolio Holder in relation to the Local Plan had been taken since the last meeting on 18 February.

37. FEEDBACK FROM THE LOCAL PLAN WORKSHOPS

The Assistant Director of Planning & Economic Development (Policy & Conservation) presented a report reviewing the first three Local Plan Member workshops.

The Assistant Director reported that three workshops were held on 26 January, 9 February and 9 March 2013 and were open to District, County, Parish and Town Councillors as well as the Youth Council. The workshops were designed to assist in considering the options for the future growth of the District and provide a more detailed deliberation of the local areas, through reducing the number of options for the next stage of the Local Plan – the Preferred Options stage or draft Plan. The Workshops were all well attended, with at least 31 District Councillors, one County Councillor, and 15 Town and Parish Councillors or Clerks present at each session. Feedback was increasingly positive as the event programme progressed, with the majority of responses rating the workshops as either quite or very useful.

The Assistant Director stated that the participants were interested to know more about:

- population projections and housing targets;
- brownfield sites;
- the ownership of certain sites;
- landscape appraisals; and
- the infrastructure required to support further development.

As a result, an additional workshop was planned for the summer to cover the issues of population projections and housing targets for the Plan. A report would then be submitted to the Cabinet Committee to decide which options should be tested further. A further workshop would then be held to consider the results of this further testing before the Cabinet Committee decided upon the Preferred Options and the draft Local Plan.

The Assistant Director informed the Cabinet Committee that the results of the workshops were being written up and would be used to test the options set out in the Community Choices consultation. In addition, answers were being prepared for the questions raised that could not be dealt with at the time. Experience so far indicated that the workshop format was a useful tool for Members in considering complex matters for the Local Plan. It was possible that other issues would arise during the future process that would be beneficial to consider in a workshop format and this would be given due consideration.

The Planning Portfolio Holder thanked the Officers for their efforts in organising the workshops, especially given the complex nature of the subject matter, and emphasised that no decisions had yet been taken in relation to the Local Plan as the workshops were intended to assist in shaping the Plan rather than determine it.

The Cabinet Committee was informed that no date had yet been set for the fourth workshop. The latest population data was due from the Government in April, which would then have to be analysed by the Council's consultant, so the next workshop would take place in the Summer. There was some concern expressed that Members might be on vacation and miss the workshop; could not some advance notice of the likely date be given now? The Planning Portfolio Holder stated that the population statistics would also be analysed by the Essex Planning Officers Association (EPOA), and it was hoped that the next workshop would be organised for late July. The Director of Planning & Economic Development stated that an item would be placed in the Council Bulletin advertising when the data became available.

The Cabinet Committee noted that the emphasis so far in the workshops had been on Housing, and perhaps this reflected the concerns of residents. The Director agreed that the previous workshops had concentrated on issues of concern to Members, but other issues could be examined in further workshops. The Portfolio Holder confirmed that work was progressing on other issues and an update would be given in due course. The Assistant Director stated that Officers wanted to publish a factsheet containing answers to the questions raised during the workshops held to date, and that there would be a number of key issues for Members to consider in further workshops such as employment.

The Cabinet Committee was told that many Local Plans currently in development would need to be revised when the 2011 census figures became available, which would incur further public expense. Given this problem, the current deadline appeared to be unfair, and maybe the Council should write to the Government highlighting this and requesting a relaxation of the deadline. The Chief Executive commented that this would be a worthwhile exercise, especially if the letter was jointly drafted and signed by other Essex authorities. The Portfolio Holder declared that the EPOA shared the concerns expressed regarding the late availability of the revised population figures, however the Director of Planning & Economic Development reminded the Cabinet Committee that the Government's focus at the moment was on promoting growth.

The Portfolio Holder reassured the Cabinet Committee that some discussions had taken place with neighbouring authorities, including the London Borough Councils of Redbridge and Waltham Forest; in addition, there were the ongoing discussions with the tri-council group that included Broxbourne Borough Council and the London Borough Council of Enfield. It was enquired as to whether the results of the Issues & Options consultation had been fed back to residents. The Assistant Director stated that Officers had replied to most of the respondents from the consultation, but the process was still on-going given the large volume of responses. The Leader added that the results of the consultation would be published on the Council's website and an article placed in the Forester magazine. The Portfolio Holder added that he intended to present an item to the Youth Council at one of their forthcoming meetings, in an effort to engage the younger residents of the District with the Local Plan process.

Finally, in respect of the infrastructure improvements required within the District, the Assistant Director explained that there was still much information and data to analyse before decisions could be made, as the ability to deliver infrastructure improvements would affect the growth possible within the District and could be a limiting factor.

Decision:

- (1) That the purposes of the workshops held to date and the activities undertaken be noted;
- (2) That the feedback from the workshops held to date be noted;
- (3) That the proposed actions in respect of the feedback received and the next steps proposed in the engagement of County, District, Town and Parish Councillors through additional workshops be noted; and
- (4) That Youth Council involvement in the Local Plan process be fostered by the Planning Portfolio Holder attending and presenting an item at one of their meetings in the near future.

Reasons for Decision:

An update and review report for noting.

To engage the Youth Council in the Local Plan process.

Other Options Considered and Rejected:

To revert to engagement with District, Town and Parish Councillors through the Council Bulletin, briefings and the Local Plan Cabinet Committee. However, the ability to consider matters in depth presented by a workshop format was considered highly beneficial.

38. LOCAL PLAN COMMUNICATIONS STRATEGY

The Assistant Director of Planning & Economic Development (Policy & Conservation) presented a report on the updated Local Plan Communications Strategy.

The Assistant Director reminded the Cabinet Committee that an early version of the Local Plan Communications Strategy had been approved as the Local Development Framework (LDF) Communications Strategy by the LDF Cabinet Committee in November 2010. Since then the Council had consulted on the Statement of Community Involvement (SCI), that set out the minimum consultation methods the Council would be required to undertake during the preparation of Local Plan. The Local Plan Cabinet Committee had approved the SCI in February 2012 to go to the Council meeting in April for adoption.

The Assistant Director reported that many recommendations and feedback received as a result of the SCI consultation between July and October 2012 were more relevant to the Communications Strategy and had been incorporated in the current draft document. The Strategy set out an approach for ongoing engagement with key stakeholders and interested parties, including the community, during the preparation of the Council's new Local Plan. The Communications Strategy outlined the engagement methods used for the Local Plan consultations to date. In looking forward, it also identified the previously successful approaches to continue with and additional methods of engagement and issues that should be resolved. The main aim was to provide an array of methods by which stakeholders could engage with the Council and for the Council to maximise the representations received during the preparation of the Local Plan.

The Assistant Director added that a series of principles of engagement had been developed, based on experience to date and best practice, aimed at providing clarity to stakeholders of the Council's intentions when performing consultations on the Local Plan, and to ensure a consistent approach was adopted. For the forthcoming Preferred Options consultation, it was intended to invest more in Public Relations with a greater emphasis on early engagement with local newspapers. Advertisement campaigns would also be a key focus. In addition to the engagement methods utilised for the Community Choices consultation, other methods might also be employed. These included better use of the Forester magazine, including a special edition to inform and engage with residents; a summary document of the Preferred Options accompanying the letter informing consultees of the consultation launch; area focused consultation activities, such as local workshops or community presentations, for directly affected communities; and detailed briefing packs to enable Town and Parish Councils and other groups to carry out their own detailed consultation event on the preferred options.

The Planning Portfolio Holder also stated that it was intended to invite the District's Members of Parliament and County Councillors to future Member workshops, of which a further two were already being planned. The Portfolio Holder intended to create a test group for the Preferred Options website to avoid the problems that had occurred with the Community Choices website. Consideration was also being given about how to provide residents with interim updates on the Local Plan.

It was suggested that bodies such as Transport for London, the Fire Service, the Ambulance Service and Sport for England should be added to the list of Local Plan Consultees at Appendix 2 of the draft Local Plan Communications Strategy. The Director of Planning & Economic Development responded that the highlighted Appendix contained the national list of compulsory consultees, the Council had a larger list of groups that it was already actively engaged with and this would be added to the Strategy.

Decision:

- (1) That the Local Plan Communications Strategy be noted as a dynamic document to be updated when necessary to meet the requirements of the Local Plan consultations;
- (2) That Appendix 2 of the Local Plan Communications Strategy be amended to include the groups that the Council was already actively engaged with in respect of the Local Plan; and
- (3) That the updated Local Plan Communications Strategy be agreed.

Reasons for Decision:

Effective communication was key in order to engage successfully with stakeholders, particularly with the general public where consultation fatigue and previous negative consultation experiences could act as a barrier. The Local Plan Communications Strategy would allow for more clarity and transparency in the Council's approach to community and wider stakeholder engagement.

Other Options Considered and Rejected:

To not approve the Local Plan Communications Strategy and rely on the Statement of Community Involvement should it be adopted by the Council in April 2013.

39. ANY OTHER BUSINESS

The Chairman announced that a Memorandum of Understanding for the Tri-Council Group, comprising Epping Forest District Council, Broxbourne Borough Council and the London Borough Council of Enfield, was in the process of being drawn up. When this process was complete then the Memorandum would be published in the Council Bulletin and reported to the Cabinet Committee for approval.

Resolved:

- (1) That, as agreed by the Chairman and in accordance with Section 100B(4)(b) of the Local Government Act 1972, together with paragraphs (6) and (24) of the Council Procedure Rules, the following item of urgent business be considered following the publication of the agenda:

- (a) The National Planning Policy Framework – One Year On.

40. THE NATIONAL PLANNING POLICY FRAMEWORK - ONE YEAR ON

The Director of Planning & Economic Development presented an update report on the National Planning Policy Framework, one year after its implementation.

The Director stated that the National Planning Policy Framework (NPPF) was a relatively short document which was issued by the Government following consultation and revisions to a consultation draft. It had replaced a large number of lengthy Policy Statements and Guidance Notes which were often duplicated or conflicted with one another, and which had been issued over a long period of time. It was highlighted that this first year had been a transition period, after which if Local Plan policies were not compliant with the Framework, then the Framework was likely to be given more weight in Development Control decisions. Particular attention was drawn to policy GB8a, Change of Use or Adaption of Buildings in the Green Belt, and that the criterion in paragraph (iv) of the policy was no longer compliant with the Framework.

The Director highlighted the local and national experience with the Framework, and the Cabinet Committee's attention was drawn to the issues that other Councils had experienced in bringing their new Local Plans forward. A number of Councils had run into significant problems at the Examination in Public stage, where Planning Inspectors had reached conclusions that had forced the submitted Plans back to a much earlier stage in the procedure. The key issues identified so far had included: the adequacy of population projections and the suggested housing numbers; review of the Green Belt; and failures over the duty to co-operate. The problems experienced by Dacorum Borough Council, Rushcliffe Borough Council and Coventry City Council were particularly emphasised.

The Cabinet Committee was asked to consider and agree a list of Local Plan policies which were now non-compliant with the Framework and which would not now be used in relation to development control management decisions; and a list of policies which were compliant and which could be used until they were superseded by the adoption of a new Local Plan, or until such time as appeal decisions warranted their discontinuation. The Council's existing policies had been examined by Development Control Officers, Forward Planning Officers and Legal Counsel in determining whether a policy was compliant, generally compliant, partially compliant or not compliant. The amended policy lists, if agreed, would be published on the Council's website and Member briefings would also be considered.

The Planning Portfolio Holder commented that the experience of other Councils had indicated the complexity of the Local Plan process, but that it was also important to study those Councils who had successfully passed their Examinations in Public to learn any lessons from their approach. It was clear that there were problems with Employment policies in other Districts being found unsound. The Assistant Director of Planning & Economic Development (Policy & Conservation) added that the Framework required Councils to be flexible over employment sites, especially when the emerging employment trends were considered. Officers were currently analysing the completed Town Centre Studies and other designated employment zones; more information would be available later in the year on Economic Forecasting from the Department of Communities & Local Government. The Director confirmed that the Framework gave greater emphasis to economic growth and employment.

The Cabinet Committee was advised that the Council should complete the work on its employment policies and that, as 92% of the District was designated as Green Belt, the Council should perform a strategic review of it as soon as possible. The

problems experienced by Rushcliffe Borough council also illustrated why accurate and relevant population data was critical to the success of the Local Plan. The opinion was expressed that the Framework could be more useful to the Council than first thought, as it set out the default position that would apply which the Local Plan would overrule if it was found sufficiently sound.

The Portfolio Holder reassured the Cabinet Committee that the Council was in discussions with neighbouring authorities over various issues, including Harlow District Council, although there was some uncertainty over the arbitration process. The Director of Planning & Economic Development clarified that the Council needed to co-operate with other Councils over the Local Plan, but that if one neighbouring Council was dissatisfied over a proposal then the onus was on the Councils involved to resolve it. The Council should not continue regardless and hope that the Planning Inspector would find in its favour at the Examination in Public, as experience so far had shown that the Planning Inspector would send the Council back to an earlier stage in the process to resolve the dispute.

Members expressed serious concerns about deleting planning policies which had been relied upon when making planning decisions. The Green Belt was the single, most important planning issue to residents, as borne out by the Issues & Options consultation and the recent Member workshops. It was felt that the Council should recognise the non-compliant policies but not delete them. The Leader of the Council agreed that the Council should not delete policies that had been used for many years with support from residents. The Leader proposed that the compliant, generally compliant and partially compliant policies should be agreed for continued use, whilst Officers should provide more information regarding the non-compliant policies and the decision on whether to delete them or not should be deferred to the meeting of the Cabinet scheduled for 10 June 2013. The Director of Planning & Economic Development undertook to review the conformity rating again for policy GB9a, Residential Conversions (in the Green Belt), before it was considered by the Cabinet, to provide more information about use of the policies at appeal during the last year and to provide more information in a table about the Plans submitted to Planning Inspectors in the last year which had been overturned; in particular were they Core Strategies, Development Plan Documents or Local Plans.

Recommended:

- (1) That the experience of other authorities in applying the National Planning Policy Framework over the last year, including any lessons learnt, be noted;
- (2) That, following comparison of the Council's existing policies against the National Planning Policy Framework, the policies rated as compliant, generally compliant or partially compliant be continued to be used until the adoption of the new Local Plan superseded them;
- (3) That those existing policies rated as non-compliant be subject to a further report to the meeting of the Cabinet scheduled for 10 June 2013; and
- (4) That the experience of other Councils when their Local Plans were Examined in Public be noted and measures taken to ensure this Council avoided the problems encountered to date.

Reasons for Decision:

It was now necessary to consider the degree of consistency of the Council's Local Plan policies by determining their degree of compliance with the National Planning

Policy Framework and give some prominence to those compliant policies which the Council would continue to use. It was sensible to draw on the experience of other authorities during the operation of the Framework and utilise any lessons for the benefit of the Council.

Other Options Considered and Rejected:

To simply rely on the National Planning Policy Framework until such time as a new Local Plan had gone through more of its procedural stages. However, this would mean that planning applications would be determined by nationally derived policies only rather than those developed at a District level through the preparation of the Local Plan.

CHAIRMAN

Local Plan Cabinet Committee – Terms of Reference

- 3.1 To oversee and submit recommendations to the Cabinet as appropriate on:
 - (a) agreement of documentation for consultation on the draft plan/preferred option and documentation to seek pre - submission representations on the proposed Local Plan;
 - (b) the final form of the Council's Local Plan (ie the version to be submitted to the Planning Inspectorate for Examination in Public); and
 - (c) responses that should be made to any representations received following consultation on the Local Plan and related documents and supplementary planning documents.
- 3.2 To be responsible for all aspects (except those matters specified in 3.1 above) including but not restricted to:
 - (a) monitoring of the achievement of milestones within the Local Plan and Community Infrastructure Levy preparation and review process;
 - (b) agreement of engagement strategies for consultation periods as necessary;
 - (c) agreement of documentation for consultation on the Issues and Options; and
 - (d) agreement of draft options and policy wording to be used as the basis for Sustainability Appraisal.
- 3.3 To note, receive and, if necessary, agree officer reports on consultants' studies which contribute to the establishment of an up-to-date evidence base to influence preparation of the Local Plan.
- 3.4 To agree options for joint or co-ordinated working with neighbouring Councils, which comply with the Council's duty to co-operate and which best meet the needs of this District.
- 3.5 To respond to the Planning Services Standing Scrutiny Standing Panel as appropriate.
- 3.6 To monitor within the budgetary provision for the Local Plan, as approved by the Cabinet and the Council.
- 3.7 That the membership of the Committee comprise of members of the Cabinet, the number to be determined by the Leader of the Council.
- 3.8 That the Committee will be chaired by the Portfolio Holder responsible for Planning matters.

N.B. (1) In the event that the Council's Cabinet is constituted according the pro rata membership requirements of the Local Government & Housing Act 1989, any political group not having representation on the Committee by virtue of one of the named Cabinet portfolios shall nominate one member of the Cabinet to serve on this Committee.

(2) In the event that seats on the Cabinet are allocated by the Leader of Council solely to one political group, or to an alliance of one or more groups forming an administration, seats on the Sub Committee shall only be allocated to members of that group or alliance who have seats on the Cabinet.

Report to the Local Plan Cabinet Committee



**Epping Forest
District Council**

Report reference: **LPC-001-2018/19**

Date of meeting: **14 May 2018**

Portfolio: **Planning and Governance**

Subject: **Epping Forest District Local Plan Submission Version – Report on the Regulation 19 Publication**

Responsible Officer: **Alison Blom-Cooper (01992 564066).**

Democratic Services: **Gary Woodhall (01992 564470).**

Recommendations/Decisions Required:

(1) That the report in Appendix I analysing the responses received to the Local Plan Submission Version Regulation 19 Publication be noted.

Executive Summary:

This report seeks to update members following the publication of the Local Plan Submission Version 2017 under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for a period of six weeks from 18 December 2017 to 29 January 2018 and provide an overview of responses received and the key issues raised by respondents. The Council received over 1,000 responses to the Local Plan Submission Version (LPSV) from a wide range of stakeholders. This report covers the number, format and subject of all representations received. An update to how the Council took into account representations made to the Draft Local Plan is also included as an appendix to the report.

Reasons for Proposed Decision:

To provide members with feedback from the recent publication of the Local Plan Submission Version

Other Options for Action:

Not to advise members of the key issues raised in relation to the Local Plan Submission Version

Background:

1. At the Extraordinary meeting of the Council on 14 December 2017 the Epping Forest District Local Plan Submission Version 2017 was agreed for publication for a period of six weeks from 18 December 2017 to 29 January 2018 in accordance with the regulations. The publication was in accordance with the Council's adopted Local Development Scheme and Statement of Community Involvement and complies with the relevant legislative requirement and is necessary before the Local Plan can be submitted to the Secretary of State for Independent Examination.

2. The Local Plan sets out the proposed strategy for meeting the District's needs for the

next 16 years and the planning framework to guide future development and the use of land in the District. It identifies how the District will grow and develop whilst at the same time maintaining its attractiveness as a place to live, work and visit. The Plan covers the period 2011-2033. Once adopted the policies in the Plan will replace all of the surviving policies of the Local Plan 1998 and the 2006 Local Plan Alterations. Minerals and Waste Policy remains the responsibility of Essex County Council. The Local Plan, together with the Essex Minerals Local Plan 2014, the Essex and Southend-on-Sea Waste Local Plan 2017 and any adopted Neighbourhood Plans form the Development Plan for the District. The Development Plan is the basis upon which planning applications are determined, unless there are material planning considerations that indicate otherwise. The policies of the Development Plan should be read as a whole.

Report:

3. The Local Plan Submission Version 2017 (LPSV) was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) following the decision of the Extraordinary Meeting of the Council on 14 December 2017. The purpose of this stage of the plan-making process is to enable any person to make representations (known as Regulation 20 representations) about the Local Plan Submission Version. Representations may be made about any aspect of the Local Plan and every duly made Regulation 20 representation will be submitted to the Secretary of State with the Local Plan and must be considered by the Local Plan Inspector appointed to carry out the examination. Reflecting the purpose of the examination, the focus of Regulation 20 representations should be whether the plan has been prepared in accordance with the Duty to Co-operate under section 33A of the 2004 Act, whether it complies with relevant legal (procedural) requirements, and whether it is sound. The tests of soundness are set out within paragraph 182 of NPPF and require that:

- the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- the Local Plan is consistent with national policy, and enables the delivery of sustainable development in accordance with policies within the NPPF.

4. In accordance with the Council's Statement of Community Involvement, the Plan was publicised in the following ways:

- Advert and public notice in the press
- Letters to statutory consultees and all those who have registered on the local plan database to advise them of the publication of the Submission Plan
- Copies of the Plan were made available in the Council's offices (including leisure centres) and libraries across the District
- Regularly updated website with all the background documents

www.eppingforestdc.gov.uk/planningourfuture

- Social media posts - @eppingforestdc and www.facebook.com/eppingforestdc and #EFDCLocalPlan

5. A form for completing representations was available on the website and in hard form. A frequently asked questions note explained the publication process, how long it lasts, how to make representations, document availability etc and was available on the website.

6. The Council collated and processed all the Regulation 20 representations received during the Regulation 19 publication stage ready for submission and these have been available on the website since 21 March 2018. A Regulation 22 Consultation Statement summarising the issues raised in the representations was prepared for submission and is available on the Council's website – it will be updated to reflect the findings set out in Appendix I to this report. This report, together with all the representations received during the representation period, the Plan and its supporting documents will be submitted to the Secretary of State for examination.

Summary of responses received:

7. The Council received over 1,000 responses during the publication period, with 28% of these submitted using the online form provided, 50% submitted in hard copy and 22% submitted through email. The majority of representations (75%) were from residents or members of the general public. The Council also received representations from statutory consultees, landowners and agents, residents associations, local organisations/businesses and some group responses.

8. Most of the comments received were in relation to the proposed site allocations in the LPSV, with residents and the public commenting most frequently on the Places policies. A large number of representations (379) have been received in relation to one site in North Weald Bassett (SR-0179) not proposed for allocation in the LPSV stating support for the development of the site. It should be noted however that 42% of these representations were from respondents living outside of the District, and the wording of each response was similar.

9. Other allocations frequently commented on included the proposed allocations in Epping, in particular the South Epping Masterplan Area and Epping Sports Centre. The key issues raised were the impact of the South Epping Masterplan Area on traffic and air quality and the loss of facilities at Epping Sports Centre. A group response was received objecting to Epping Sports Centre with over 800 signatures. Loughton and in particular LOU.R5 (Land at Jessel Green) also had a high level of response. Notably, there was a group response with over 4,600 signatures objecting to the allocation of the site on the basis of the impact of loss of open space. The settlement of Stapleford Abbots was also commented upon frequently, with the majority of comments objecting to STAP.R1 due to the site not appearing in the Draft Local Plan. Comments received in relation to other settlements are set out in Paragraphs 2.10 – 2.41 in Appendix I which is a full report on the responses received.

10. Alongside comments relating to specific settlements or allocations, the other key issues raised in relation to the Local Plan Submission Version are:

- (a) That the Council has not consulted fairly in the course of preparing the Local Plan Submission Version and not taken into account previous consultation responses.
- (b) That the Council's approach to infrastructure remains unclear in relation to where and when infrastructure will come forward and how it will be funded.

- (c) Objection to the level of Green Belt release and claims that the new Green Belt boundaries are not robust.
- (d) Objection to the Council not publishing the site selection appendices before the Regulation 19 publication period.
- (e) Concern over what the Council is doing to tackle the issue of air quality and representations from statutory bodies on how to strengthen the approach.

11. Appendix I to this report provides more detail on the issues raised in the representations from all stakeholders.

Resource Implications:

The budget for the Publication of the Local Plan Submission Version was approved as part of the Local Plan budget in December 2017. The Equality Act 2010 requires that the Public Sector Equality Duty is actively applied in decision-making. This means that the equality information provided to accompany this report is essential reading for all members involved in the consideration of this report. The equality information is provided at Appendix 2 to the report”.

Legal and Governance Implications:

The Council is required by national legislation to prepare and maintain an up to date Local Plan to set out the strategic priorities for the area and the policies that address these.

Safer, Cleaner and Greener Implications:

The delivery of a Local Plan, informed by a robust evidence base, will contribute to safer, cleaner, greener objectives by planning for sustainable development.

Consultation Undertaken:

All stakeholders including residents, local groups or businesses, statutory consultees and landowners were given the opportunity to make representations on whether the Local Plan Submission Version is legally compliant, sound and/or meets the Duty to Cooperate, in accordance with Regulation 19 of the Local Plan Regulations 2012 and in accordance with the Council’s Statement of Community Involvement.

Background Papers:

Statement of Community Involvement: <http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB104-Statement-of-Community-Involvement-EFDC-2013.pdf>
Local Plan Regulations 2012: <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

Risk Management:

The Council needs to be seen to make timely progress on the preparation of a Local Plan to avoid the risk of intervention by the Secretary of State.

Section 1: Identifying details
Your function, service area and team: Planning Policy, Neighbourhoods
If you are submitting this EqlA on behalf of another function, service area or team, specify the originating function, service area or team: N/A
Title of policy or decision: Epping Forest District Local Plan Submission Version 2017 – Report on the Regulation 19 publication
Officer completing the EqlA: Tel: Alison Blom-Cooper Email: ablomcooper@eppingforestdc.gov.uk
Date of completing the assessment: 1 May 2018

Section 2: Policy to be analysed	
2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? Change to existing project
2.2	Describe the main aims, objectives and purpose of the policy (or decision): To update members on the responses to the publication of the Local Plan Submission Version 2017. What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)? Members will have been provided feedback from the recent publication of the Local Plan Submission Version.
2.3	Does or will the policy or decision affect: <ul style="list-style-type: none"> • service users • employees • the wider community or groups of people, particularly where there are areas of known inequalities? <p>The Local Plan will have an impact on all residents, in the District as it will set out the proposals for growth to meet the objectively assessed housing and economic needs identified and the associated infrastructure.</p> <p>Will the policy or decision influence how organisations operate?</p> <p>Yes – it will allow those that have made representations to have them considered by the Inspector at the independent examination</p>
2.4	Will the policy or decision involve substantial changes in resources? No

2.5	<p>Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes?</p> <p>The Local Plan is one of three objectives in the corporate plan – the Local Plan will seek to meet the vision set out in the corporate plan to make best use of existing infrastructure to meet the district's need for development in the most sustainable locations with the least possible impact on our natural and historic environment.</p>
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Section 3: Evidence/data about the user population and consultation¹

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	<p>What does the information tell you about those groups identified?</p> <p>The identified need for economic and housing growth over the Plan period takes account of population growth and demographic changes and profile in the District and associated population projects.</p>
3.2	<p>Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?</p> <p>The Draft Local Plan was subject to consultation between 31 October and 12 December 2016. Leaflets were distributed to all households in the District. The comments were received have been analysed and reported to Cabinet and were used to inform the preparation of the Local Plan Submission Version (LPSV). The LPSV was published under Regulation 19 for a period of six weeks from 18 December 2017 to 29 January 2018. The comments received have been reviewed and collated ready for submission and have been available on the Council's website since 21 March 2018.</p>
3.3	<p>If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:</p>

Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	Positive – the evidence outlines the needs for housing provision for all age groups including the ageing population	Low
Disability	Positive - Housing standards to be applied will be in line with the lifetime homes standards which cater for ageing population, mobility needs and other disabilities. Where there is evidence pointing to other housing and employment needs these will be provided through the Plan.	Low
Gender	Neutral - The Plan will not be applying policies that are bias to any groups in terms of the provision of housing and job projection needs.	Low
Gender reassignment	Neutral - The Plan will not be applying policies that are bias to any groups in terms of the provision of housing and job projection needs.	Low
Marriage/civil partnership	Neutral - Population projection information based on census provides this information pointing toward changing household trends and future provision needs for existing families and new family unit trends.	Low
Pregnancy/maternity	Neutral - Population projection information based on census will provide this information pointing toward changing household trends and future provision needs. Need for clinics and specialist facilities are also in the scope of the plan and being addressed.	Low
Race	Neutral - Information collated through previous monitoring, population projection trends and consultation feedback will have provided some information. The need for community centres, places of worship and provision will be made accordingly. The Plan will not be applying policies that show bias to any group.	Low
Religion/belief	Neutral - Information collated through previous monitoring, population projection trends and consultation feedback will have provided some information. The need for community centres, places of worship and provision will be made accordingly. The Plan will not be applying policies that show bias to any group.	Low
Sexual orientation	Neutral - Information collated through previous monitoring, may have provided some information. The Local Plan will not be applying policies that are bias to any groups. If we have received and will receive information to support the need for development associated with specific groups we will address a part of the Plan, although policies and	Low

	development proposals in the plan will not be sex orientation related/dependant.	
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Section 5: Conclusion

		Tick Yes/No as appropriate	
5.1	Does the EqIA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	✓ No <input type="checkbox"/>	
		Yes <input type="checkbox"/>	If ' YES ', use the action plan at Section 6 to describe the adverse impacts and what mitigating actions you could put in place.

No actual or likely adverse impacts have come to light, just needs based assessments guiding the Planning Policy team to ensure that demands of the people working, living and visiting the district are met over the Plan period to 2033. The Local Plan must plan positively for future needs around housing and employment and is required to meet the needs that have been identified in the evidence base, including the consultations.

Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.

Section 7: Sign off

**I confirm that this initial analysis has been completed appropriately.
(A typed signature is sufficient.)**

Signature of Head of Service:

Date:

Signature of person completing the EqIA: Alison Blom-Cooper

Date: 1 May 2018

Advice

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqIA you undertake to the director responsible for the service area. Retain a copy of this EqIA for your records. If this EqIA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.

Appendix I to Local Plan Cabinet Committee report on 14 May 2018

**Report analysing responses received to the Regulation 19
publication of the Epping Forest District Local Plan Submission
Version 2017**

Contents

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1. Introduction

- 1.1 This note seeks to provide information on the responses received to the publication of Epping Forest District Council (EFDC) Local Plan Submission Version 2017 under Regulation 19 and a summary of the main issues raised. The Local Plan Submission Version (LPSV) was developed following the Draft Local Plan consultation in late 2016. A summary of how the Council has taken into account the issues raised in response to the Draft Local Plan is set out in Appendix I to this report. The Regulation 19 Publication period ran from 18 December 2017 to 29 January 2018. This stage is not a consultation but enables any interested persons to make representations about the soundness and legal compliance of the Plan and whether it has been prepared in accordance with the Duty to Co-operate under section 33A of the 2004 Act. The tests of soundness are set out within paragraph 182 of the National Planning Policy Framework (2012) and require that:
- i) the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - ii) the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - iii) the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - iv) the Local Plan is consistent with national policy, and enables the delivery of sustainable development in accordance with policies within the NPPF.
- 1.2 To facilitate representations a representation form was available that could be filled out either online or on paper. The form allowed respondents to specify which policy, site reference, paragraph number, settlement or map they were commenting on. Responses were also accepted in hard copy or email format. Please see the Council's Regulation 22 Consultation Statement for full details of how we consulted¹.
- 1.3 Following the close of the Regulation 19 publication period, the Council collated and coded the representations, recording which part of the Plan they were commenting and other key information such as site reference or evidence base document if referred to. This process sorted the responses in preparation for submission to the Planning Inspectorate in the format required for the Examination. This has enabled some analysis on the content of the representations, which is presented in Section Two.

¹ <http://www.efdclocalplan.org/local-plan/submission-documents/>

2. Overview of Representations

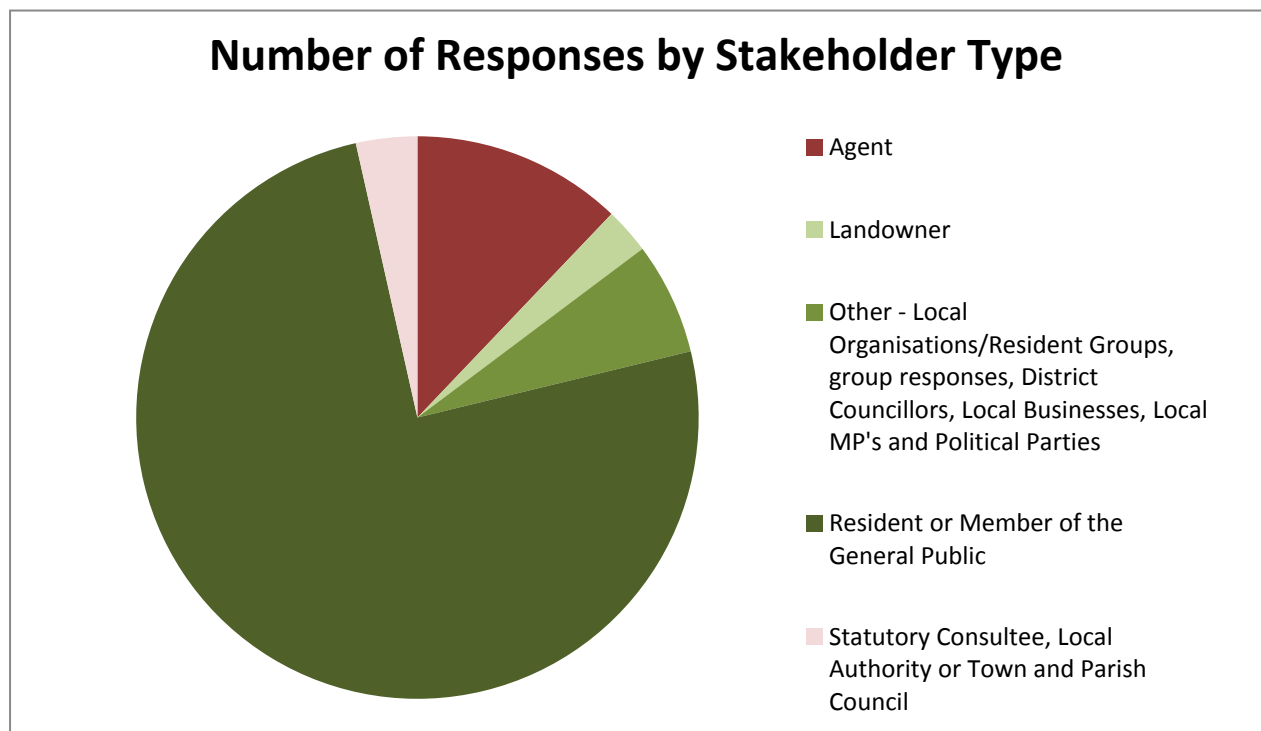
What did we receive?

- 2.1 A total of 1,022 individual submissions from 990 respondents were received to the Local Plan Submission Version. Approximately 28% (284) of responses were made using the online form, 50% (513) made through hard copy submissions and 22% (226) made via email.

Who did we receive representations from?

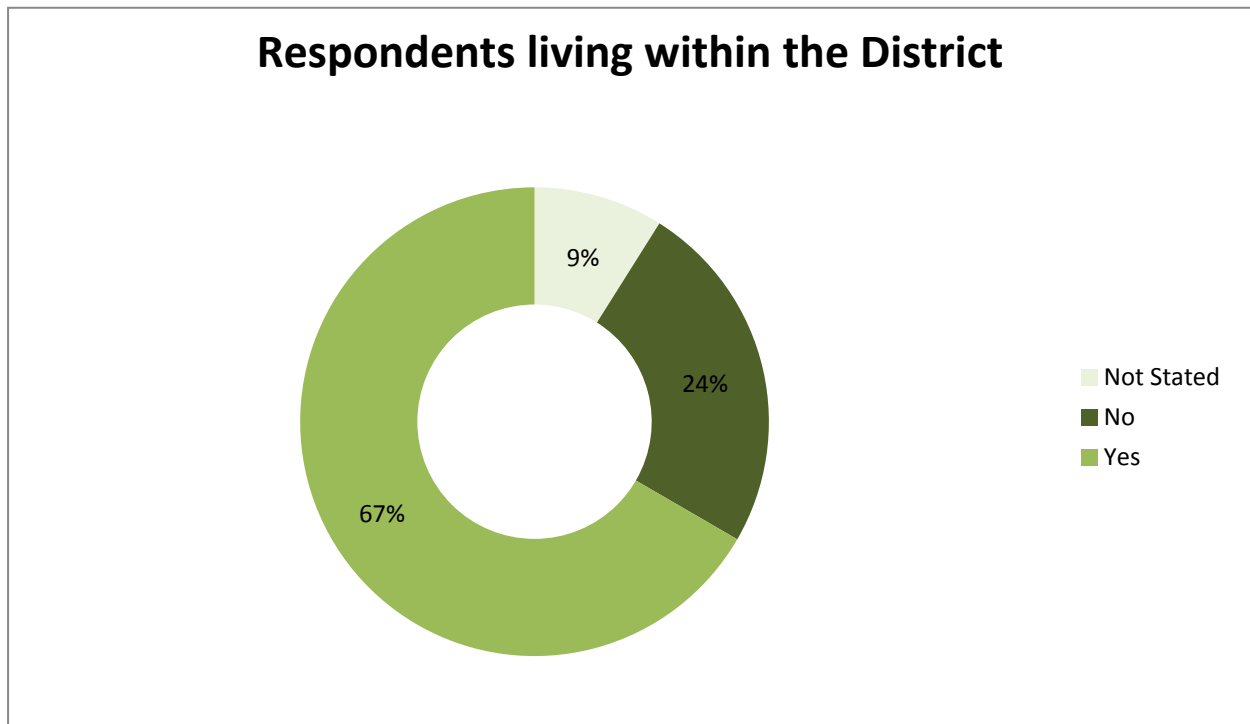
- 2.2 As shown in Figure 1, 75% (770) of responses were from residents or members of the general public, 4% (36) were from statutory consultees, 15% (151) were from agents or landowners and 6% (65) were from 'other' respondents. The 'other' category included organisations such as resident associations, political groups, group resident responses and local businesses. There were four group responses made, from the Harlow Alliance Group, Save Jessel Green Campaign, and two separate groups of residents in Epping.

Figure 1 Responses by Stakeholder Type



- 2.3 Figure 2 below shows level of respondents from within the District and therefore excludes agent's addresses. Nearly 70% of the responses were made by respondents living within the district. These figures vary by stakeholder group, with 75% of respondents overall received from the general public from residents living within the District and not surprisingly a larger proportion of landowners and agents residing outside of the District.

Figure 2 Responses from within the District



What did respondents comment on?

- 2.4 In accordance with the regulations, respondents were asked to comment on whether they felt the Plan was legally compliant, met the tests of soundness and complied with the Duty to Cooperate. A total of 51% (501) of respondents stated that in their view the Plan does not meet one or more of the tests of soundness, 15% (150) of respondents stated that the Plan was not legally compliant and 13% (128) of respondents stated that the Plan does not comply with the Duty to Cooperate.
- 2.5 A total of 1472 comments were received from 990 stakeholders on the LPSV's 62 policies. Appendix Two contains a list of the policies in the Local Plan Submission Version and the number of respondents that commented on each policy.
- 2.6 The Council received 821 responses from residents, including group responses, local businesses and local resident organisations. Overall, the key issues raised were:
- i) Comments relating to individual settlements, the issues of which are included in the settlement breakdowns in this section;
 - ii) That the publication of the LPSV was being conducted unfairly and had failed to take account of residents' comments made to the previous consultations;

- iii) The nature of proposed Green Belt release;
- iv) Concerns relating to the lack of clarity around where infrastructure such as schools and health provision would be provided and how it would be funded
- v) Objection to sites that are proposed for allocation in LPSV but were not included in the Draft Local Plan;
- vi) Concern over the implications of allocating sites in each settlement such as traffic congestion or strain on infrastructure and residents wellbeing;
- vii) Some of the sites proposed received a high volume of responses. These included:
 - Site SR-0179 – North Weald Bassett Golf Course – 398 responses out of 430 responses from all stakeholders in relation to North Weald Bassett, were received from residents or members of the public in support of development of the site (which was not included in the LPSV). Of these responses, 153 were sent from respondents living outside of the District and 245 within. This means that almost 40% of the responses were not from Epping Forest District residents. Almost all of the responses were in hard copy format. Additional similar responses were received however did not list an address or contact details and therefore have not been included as valid representations.
 - Site LOU.R5 – Land at Jessel Green – 105 residents or members of the general public commented on LOU.R5 in their response, the majority of which cited the impact on open space provision in the settlement. One response included a petition objecting to the allocation of this site for housing with over 4,600 signatures.
 - Site EPP.R5 – Epping Sports Centre – 17 residents or members of the general public commented on EPP.R5 in their response, the majority of which cited the loss of sports facilities. One response included a petition objecting to the allocation of this site for housing with over 800 signatures.
 - Site STAP.R1 – Land at Oakfield Road – 44 residents or members of the general public commented on STAP.R1 in their response, with many comments relating to its inclusion in the Local Plan Submission Version but not in the Draft Local Plan.
 - Sites EPP.R3, LOU.R1, LOU.R2, and THYB.R2 – 57 residents or members of the general public commented on one of these London Underground Car Park sites that are allocated for residential development in their response. Comments related to the potential loss of car parking.

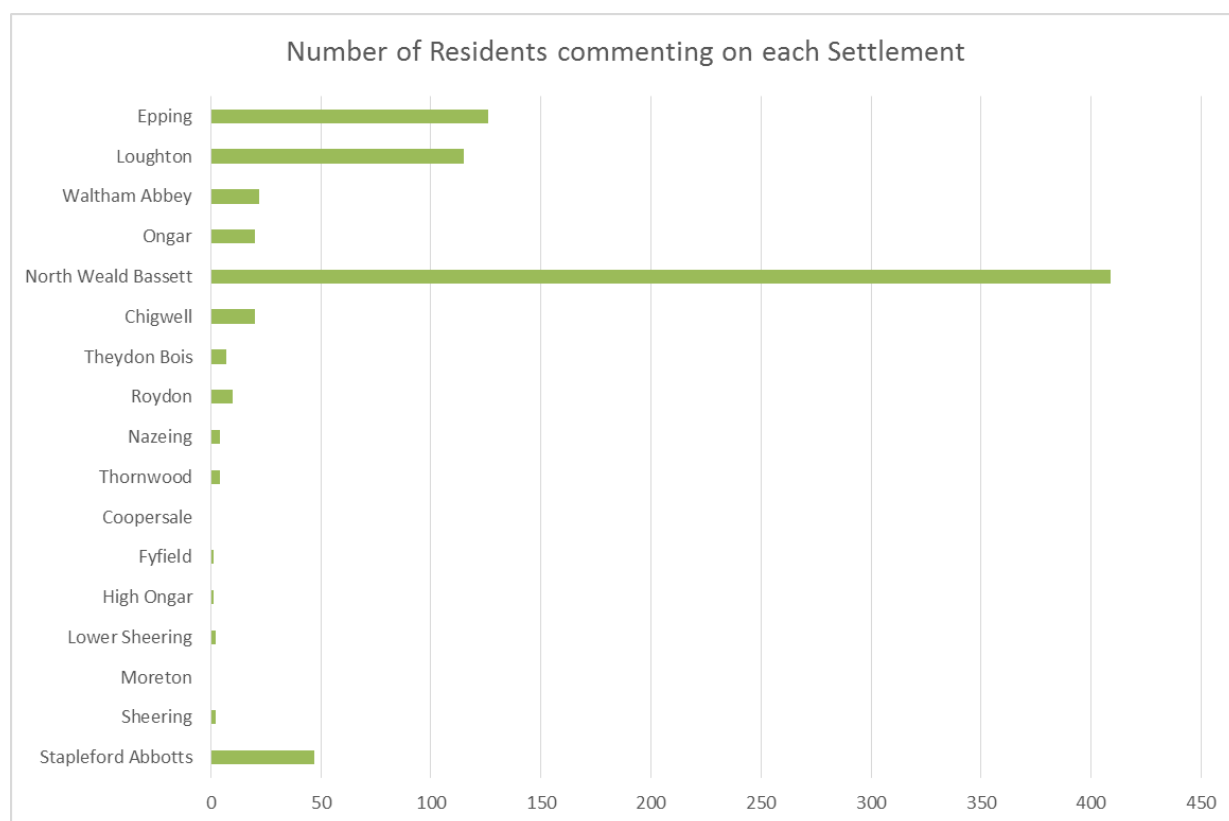
2.7 The top ten policies commented on by residents or members of the general public in their response were:

No.	Policy	Number of residents or members of general public who commented on the policy*
1	P 6 North Weald Bassett	402
2	P 1 Epping	125
3	P 2 Loughton	119
4	P 12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbots	48
5	SP 2 Spatial Development Strategy	34
6	P 7 Chigwell	23
7	P 3 Waltham Abbey	21
8	P 4 Ongar	18
9	SP 6 Green Belt and District Open Land	18
10	T 1 Sustainable Transport Choices	13

** including group responses, local businesses and local resident organisations*

2.8 The majority of these are the Places policies. Taking this into account, it is useful to compare the rate of response between settlements, as can be seen in Figure 3.

Figure 3 Number of residents or members of the general public commenting per Settlement



2.9 Many residents or members of the general public have commented on the sites included in the Places policies. Appendix Three contains a list of all the allocated sites in the LPSV and the number of respondents that commented on each site. The top ten sites commented on by stakeholders were:

No.	Site Reference	Number of residents or members of general public who commented on the policy*
1	LOU.R5 – Land at Jessel Green	105
2	EPP.R1 – Land at South of Epping – West	66
3	EPP.R2 – Land at South of Epping – East	56
4	NWB.R3 – Land South of Vicarage Lane	48
5	STAP.R1 – Land at Oak Hill Road	44
6	EPP.R3 – Epping London Underground Car Park	35
7	EPP.R6 – Cottis Lane Car Park	29
8	EPP.R7 - Bakers Lane Car Park	26
9	EPP.R5 – Epping Sports Centre	17

10	WAL.R5 – Waltham Abbey Community Centre, Saxon Way	16
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* including group responses, local businesses and local resident organisations

Epping

2.10 Representations were received from 126 residents or members of the general public relating to the settlement of Epping. Of these, the three sites that received the most comments were EPP.R1 (commented on by 66 respondents), EPP.R2 (commented on by 56 respondents) and EPP.R3 (commented on by 35 respondents). Respondents who commented on the sites access to local amenities, impacts on noise or air pollution, infrastructure provision and the impact on transport infrastructure.

2.11 A petition with over 800 signatures was received in relation to EPP.R5 citing the impact on sports facilities in the settlement.

2.12 In Table 1 below, the top issues raised by residents or members of the general public that commented on the settlement of Epping are listed.

Table 1 Resident Comments - Epping

Issues Identified	Number of residents or members of general public who commented on the issue*
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	76
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	53
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	46
There are other sites in the District that are not in the LPSV that are more suitable for allocation.	44
There is not sufficient evidence to justify the Green Belt alterations included in the LPSV. Exceptional circumstances have not been demonstrated as to why Green Belt alterations should be made.	21
The Council has not consulted fairly during the course of preparing the LPSV. The consultation has not been accessible by all stakeholders.	21
The Regulation 19 Publication is being conducted unfairly. For example, necessary evidence base documents have not been published yet.	18
Green Belt land should not be built on under any circumstances. The principle of developing in the	17

Green Belt is unacceptable.	
The Council has not adequately addressed the issue of air quality in the LPSV.	14
The Council has not duly taken into account comments received in previous consultations. Resident's views have not been taken into account when preparing the Local Plan.	13

** including group responses, local businesses and local resident organisations*

Loughton

2.13 Representations were received from 115 residents or members of the general public relating to the settlement of Loughton. Of these, the three sites that received the most comments were LOU.R5 (commented on by 105 respondents), LOU.R2 (commented on by nine respondents) and LOU.R1 (commented on by 10 respondents). Respondents who commented on these sites cited the impact development would have on open space and transport infrastructure in Loughton.

2.14 A petition with over 4,600 signatures was received in relation to LOU.R5, citing the impact of the allocation on the provision of open space.

2.15 In Table 2 below, the top issues raised by residents or members of the general public that commented on the settlement of Loughton are listed

Table 2 Resident Comments – Loughton

Issues Identified	Number of residents or members of general public who commented on the issue*
The impact of the LPSV proposals on open space is too great and cannot be properly mitigated/avoided.	101
The Council has not duly taken into account comments received in previous consultations. Resident's views have not been taken into account when preparing the Local Plan.	66
This policy does not comply with national guidance and should be changed.	50
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	43
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	40
The Council has not consulted fairly during the course of preparing the LPSV. The consultation has not been accessible by all stakeholders.	25
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great	24

and cannot be properly mitigated/avoided.	
There are other sites in the District that are not in the LPSV that are more suitable for allocation.	13
The impact of the LPSV proposals on education infrastructure is too great and cannot be properly mitigated/avoided.	8
The character of the settlement has not been taken into account when developing the Plan. The LPSV proposals will have a negative impact on the character of the settlement.	5

* including group responses, local businesses and local resident organisations

Waltham Abbey

2.16 Representations were received from 22 residents or members of the general public relating to the settlement of Waltham Abbey. Of these, the site that received the most comments were WAL.R5 (commented on by 16 respondents) . Respondents who commented on this site cited the impact on transport infrastructure, community facilities and the density of development.

2.17 In Table 3 below, the top issues raised by residents or members of the general public that commented on the settlement of Waltham Abbey are listed.

Table 3 Resident Comments - Waltham Abbey

Issues Identified	Number of residents or members of general public who commented on the issue*
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	16
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	7
There are other sites in the District that are not in the LPSV that are more suitable for allocation.	3
The density of proposed development is not appropriate for the settlement.	3
The Council has not adequately addressed the issue of flood risk in the LPSV.	2
The site requirements (as set out in Appendix 6) are unrealistic or inaccurate and will not be achievable for the allocation.	2
The impact of the LPSV proposals on health infrastructure is too great and cannot be properly mitigated/avoided.	2
The character of the settlement has not been taken into account when developing the Plan. The LPSV proposals will have a negative impact on the character of the settlement.	1
The Regulation 19 Publication is being conducted	1

unfairly. For example, necessary evidence base documents have not been published yet.	
The LPSV has not used all suitable available brownfield sites in the District before allocating greenfield or Green Belt sites.	1

* including group responses, local businesses and local resident organisations

Ongar

2.18 Representations were received from 20 residents or members of the general public relating to the settlement of Ongar. Of these, the three sites that received the most comments were ONG.R6 (commented on by six respondents), ONG.R5 (commented on by four respondents), ONG.R2 (commented on by five respondents). Respondents who commented on these sites cited the impact on the historical character of Ongar, transport infrastructure and infrastructure provision.

2.19 In Table 4 below, the top issues raised by residents or members of the general public that commented on the settlement of Ongar are listed.

Table 4 Resident Comments - Ongar

Issues Identified	Number of residents or members of general public who commented on the issue*
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	12
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	9
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	7
The LPSV proposals do not protect historical character and assets in the District	5
There are other sites in the District that are not in the LPSV that are more suitable for allocation	5
The LPSV's spatial strategy is unjustified and will not provide sustainable development.	4
The impact of LPSV proposals on sports facilities is too great and cannot be properly mitigated/avoided.	3
The Council has not consulted fairly during the course of preparing the LPSV. The consultation has not been accessible by all stakeholders.	3
The Sustainability Appraisal supporting the LPSV is inadequate. It does not justify why the	2

11

alternative options have not been chosen.	
The Regulation 19 Publication is being conducted unfairly. For example, necessary evidence base documents have not been published yet.	1

** including group responses, local businesses and local resident organisations*

Buckhurst Hill

2.20 Representations were received from 2 residents or members of the general public relating to the settlement of Buckhurst Hill. Of these, the three sites that received the most comments were BUCK.R1, BUCK.R2 and BUCK.R3 (all sites were commented on by two respondents). Respondents who commented on these sites focused on the impact on Green Belt land and site-specific constraints.

2.21 In Table 5 below, the top issues raised by residents or members of the general public that commented on the settlement of Buckhurst Hill are listed.

Table 5 Resident Comments - Buckhurst Hill

Issues Identified	Number of residents or members of general public who commented on the issue*
The Council has not consulted fairly during the course of preparing the LPSV. The consultation has not been accessible by all stakeholders.	1
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	1
The Regulation 19 Publication is being conducted unfairly. For example, necessary evidence base documents have not been published yet.	1
The Green Belt boundary alterations in the LPSV are not defensible or robust, and will lead to urban sprawl.	1
There is not sufficient evidence to justify the Green Belt alterations included in the LPSV. Exceptional circumstances have not been demonstrated as to why Green Belt alterations should be made.	1
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	1
The site selection process is not robust and should not be used to allocate sites in the LPSV.	1
The site requirements (as set out in Appendix 6) are unrealistic or inaccurate and will not be achievable for the allocation.	1

** including group responses, local businesses and local resident organisations*

North Weald Bassett

2.22 Representations were received from 409 residents or members of the general public relating to the settlement of North Weald Bassett. Of these the two sites that received the most comments were SR-0179 (commented on by 398 respondents) and NWB.R3 (commented on by 48 respondents). Respondents who commented on these sites stated that SR-0179 was a suitable site and expressed concern over future infrastructure provision in the settlement.

2.23 In Table 6 below, the top issues raised by residents or members of the general public that commented on the settlement of North Weald Bassett are listed.

Table 6 Resident Comments - North Weald Bassett

Issues Identified	Number of residents or members of general public who commented on the issue*
There are other sites in the District that are not in the LPSV that are more suitable for allocation	398
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	22
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	18
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	10
Greenfield and high quality agricultural land should not be built on.	6
Green Belt land should not be built on under any circumstances. The principle of developing in the Green Belt is unacceptable.	6
The LPSV proposals do not protect habitats and species and green infrastructure in the District.	5
The rural nature of the District will not be maintained through the LPSV.	4
The character of the settlement has not been taken into account when developing the Plan. The LPSV proposals will have a negative impact on the character of the settlement.	4
The housing policies in the LPSV will not deliver the affordable housing need in the District.	4

* including group responses, local businesses and local resident organisations

Chigwell

2.24 Representations were received from 19 residents or members of the general public relating to the settlement of Chigwell. Of these, the site that received the most comments were CHIG.R6 (commented on by 16 respondents). Respondents who commented on this site focused on the impact on open space and infrastructure provision.

2.25 In Table 7 below, the top issues raised by residents or members of the general public that commented on the settlement of Chigwell are listed.

Table 7 Resident Comments - Chigwell

Issues Identified	Number of residents or members of general public who commented on the issue*
The impact of LPSV proposals on open space is too great and cannot be properly mitigated/avoided.	13
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	12
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	11
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	10
The Council has not consulted fairly during the course of preparing the LPSV. The consultation has not been accessible by all stakeholders.	8
There are other sites in the District that are not in the LPSV that are more suitable for allocation.	4
The Council has not duly taken into account comments received in previous consultations. Resident's views have not been taken into account when preparing the Local Plan.	3
The character of the settlement has not been taken into account when developing the Plan. The LPSV proposals will have a negative impact on the character of the settlement.	3
The Regulation 19 Publication is being conducted unfairly. For example, necessary evidence base documents have not been published yet.	2
The LPSV has not used all suitable available brownfield sites in the District before allocating greenfield or Green Belt sites.	1

* including group responses, local businesses and local resident organisations

Theydon Bois

2.26 Representations were received from 6 residents or members of the general public relating to the settlement of Theydon Bois. Of these, the two sites that received the most comments were THYB.R1 (commented on by six respondents) and THYB.R2 (commented on by two respondents). Respondents who commented on these sites focused on the impact on infrastructure provision and Green Belt development.

2.27 In Table 8 below, the top issues raised by residents or members of the general public that commented on the settlement of Theydon Bois are listed.

Table 8 Resident Comments - Theydon Bois

Issues Identified	Number of residents or members of general public who commented on the issue*
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	4
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	4
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	3
The Green Belt boundary alterations in the LPSV are not defensible or robust, and will lead to urban sprawl.	2
Green Belt land should not be built on under any circumstances. The principle of developing in the Green Belt is unacceptable.	2
The density of proposed development is not appropriate for the settlement.	1
The LPSV's spatial strategy is unjustified and will not provide sustainable development.	1
The LPSV's spatial strategy in the Submission Plan is not proportionate and unfairly allocates housing.	1
This policy is too weak and should be strengthened.	1
This policy is not supported by evidence.	1

* including group responses, local businesses and local resident organisations

Roydon

2.28 Representations were received from 9 residents or members of the general public relating to the settlement of Roydon. Of these, the site that received the most comments were ROYD.R2 (commented on by two respondents). Respondents who commented on this site focused on the impact on habitats/diversity and the historical character of the settlement and on Green Belt land.

2.29 In Table 9 below, the top issues raised by residents or members of the general public that commented on the settlement of Roydon are listed.

Table 9 Resident Comments - Roydon

Issues Identified	Number of residents or members of general public who commented on the issue*
Green Belt land should not be built on under any circumstances. The principle of developing in the Green Belt is unacceptable.	3
The LPSV proposals do not protect habitats and species and green infrastructure in the District.	3
The LPSV proposals do not protect historical character and assets in the District	2
The Council has not duly taken into account comments received in previous consultations. Resident's views have not been taken into account when preparing the Local Plan.	1
The character of the settlement has not been taken into account when developing the Plan. The LPSV proposals will have a negative impact on the character of the settlement.	1
The Council needs to ensure that development is designed in a way that is sensitive and contributes to the principles of place shaping.	1
The Sustainability Appraisal supporting the LPSV is inadequate. It does not justify why the alternative options have not been chosen.	1
The Green Belt boundary alterations in the LPSV are not defensible or robust, and will lead to urban sprawl.	1
There is not sufficient evidence to justify the Green Belt alterations included in the LPSV. Exceptional circumstances have not been demonstrated as to why Green Belt alterations should be made.	1
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	1

* including group responses, local businesses and local resident organisations

Nazeing

2.30 Representations were received from 4 residents or members of the general public relating to the settlement of Nazeing. Of these, the three sites that received the most comments were NAZE.R4 (commented on by 3 respondents), NAZE.R2 (commented on by two respondents) and NAZE.R1 (commented on by two respondents). Respondents who commented on these sites focused on the impact on habitats/diversity and the historical character of the settlement and on Green Belt land.

2.31 In Table 10 below, the top issues raised by residents or members of the general public that commented on the settlement of Nazeing are listed.

Table 10 Resident Comments - Nazeing

Issues Identified	Number of residents or members of general public who commented on the issue*
The LPSV's spatial strategy is unjustified and will not provide sustainable development.	2
There are other sites in the District that are not in the LPSV that are more suitable for allocation	2
There is not sufficient evidence to justify the Green Belt alterations included in the LPSV. Exceptional circumstances have not been demonstrated as to why Green Belt alterations should be made.	2
The character of the settlement has not been taken into account when developing the Plan. The LPSV proposals will have a negative impact on the character of the settlement.	1
The rural nature of the District will not be maintained through the LPSV.	1
The LPSV has not used all suitable available brownfield sites in the District before allocating greenfield or Green Belt sites.	1
Green Belt land should not be built on under any circumstances. The principle of developing in the Green Belt is unacceptable.	1
Greenfield and high quality agricultural land should not be built on	1
The density of proposed development is not appropriate for the settlement.	1
The impact of LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	1

* including group responses, local businesses and local resident organisations

Thornwood

2.32 Representations were received from 4 residents or members of the general public relating to the settlement of Thornwood. Of these, the site that received the most

comments was THOR.R1 (commented on by two respondents). Respondents who commented on this site felt the site was unsuitable, expressed concern over the impact on infrastructure and Green Belt land.

2.33 In Table 11 below, raised by residents or members of the general public that commented on the settlement of Thornwood are listed.

Table 11 Resident Comments - Thornwood

Issues Identified	Number of residents or members of general public who commented on the issue*
Green Belt land should not be built on under any circumstances. The principle of developing in the Green Belt is unacceptable.	2
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	2
The Green Belt boundary alterations in the LPSV are not defensible or robust, and will lead to urban sprawl.	1
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	1
The impact of the LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	1
The impact of the LPSV proposals on education infrastructure is too great and cannot be properly mitigated/avoided.	1
There is a constraint on the site that has not been picked up through the site selection process.	1

* including group responses, local businesses and local resident organisations

Coopersale

No comments were received from residents or members of the general public in relation to Coopersale.

Fyfield

No comments were received from residents or members of the general public in relation to Fyfield.

High Ongar

2.34 Representations were received from 1 resident or member of the general public relating to the settlement of High Ongar. Of these, the site that received comments was HONG.R1 (commented on by one respondent). The respondent who commented on this site questioned the Sustainability Appraisal and the fairness of the Regulation 19 publication.

2.35 In Table 12 below, the top issues raised by residents or members of the general public that commented on the settlement of High Ongar are listed.

Table 12 Resident Comments - High Ongar

Issues Identified	Number of residents or members of general public who commented on the issue*
The Regulation 19 Publication is being conducted unfairly. For example, necessary evidence base documents have not been published yet.	1
The Sustainability Appraisal supporting the LPSV is inadequate. It does not justify why the alternative options have not been chosen.	1

* including group responses, local businesses and local resident organisations

Lower Sheering

2.36 Representations were received from 2 residents or members of the general public relating to the settlement of Lower Sheering. Of these, the site that received the most comments was LSHR.R1 (commented on by one respondent). Respondents who commented on this site felt there were site-specific constraints.

2.37 In Table 13 below, the top issues raised by residents or members of the general public that commented on the settlement of Lower Sheering are listed.

Table 13 Resident Comments - Lower Sheering

Issues Identified	Number of residents or members of general public who commented on the issue*
The Sustainability Appraisal supporting the LPSV is inadequate. It does not justify why the alternative options have not been chosen.	1
This policy is weak and should be strengthened.	1
There are other sites in the District that are not in the LPSV that are more suitable for allocation.	1
There is a constraint on the site that has not been picked up through the site selection process.	1
The LPSV's spatial strategy is unjustified and will not provide sustainable development.	1

* including group responses, local businesses and local resident organisations

Moreton

No comments were received from residents or members of the general public in relation to Moreton.

Sheering

2.38 Representations were received from 3 residents or members of the general public relating to the settlement of Sheering. Of these, the site that received the most comments was SHR.R1 (commented on by one respondent). Respondents who commented on this site focused on the impact on Green Belt land.

2.39 In Table 14 below, the top issues raised by residents or members of the general public that commented on the settlement of Sheering are listed.

Table 14 Resident Comments - Sheering

Issues Identified	Number of residents or members of general public who commented on the issue*
The Sustainability Appraisal supporting the LPSV is inadequate. It does not justify why the alternative options have not been chosen.	1
There is not sufficient evidence to justify the Green Belt alterations included in the LPSV. Exceptional circumstances have not been demonstrated as to why Green Belt alterations should be made.	1
This policy is weak and should be strengthened.	1
There are other sites in the District that are not in the LPSV that are more suitable for allocation.	1
There is a constraint on the site that has not been picked up through the site selection process. F	1
The LPSV's spatial strategy is unjustified and will not provide sustainable development.	1

* including group responses, local businesses and local resident organisations

Stapleford Abbots

2.40 Representations were received from 47 residents or members of the general public relating to the settlement of Stapleford Abbots. Of these, the two sites that received the most comments were STAP.R1 (commented on by 42 respondents) and STAP.R2 (commented on by 5 respondents). Respondents who commented on these sites felt the Regulation 19 publication was unfairly managed and the impact on Green Belt land.

2.41 In Table 15 below, the top issues raised by residents or members of the general public that commented on the settlement of Stapleford Abbots are listed.

Table 15 Resident Comments - Stapleford Abbotts

Issues Identified	Number of residents or members of general public who commented on the issue*
The Council has not consulted fairly during the course of preparing the LPSV. The consultation has not been accessible by all stakeholders.	25
There is not sufficient detail on the provision of infrastructure in the LPSV and Infrastructure Delivery Plan. The infrastructure detailed by the Council is too vague and does not clearly set out where and how the infrastructure will be delivered.	13
The site is unsuitable. There are site-specific impacts such as land contamination, noise, light and odour that will negatively impact the local community.	13
The Green Belt boundary alterations in the LPSV are not defensible or robust, and will lead to urban sprawl.	11
The impact of LPSV proposals on transport infrastructure (including car parking) is too great and cannot be properly mitigated/avoided.	11
The Regulation 19 Publication is being conducted unfairly. For example, necessary evidence base documents have not been published yet.	8
The impact of LPSV proposals on education infrastructure is too great and cannot be properly mitigated/avoided.	8
There is not sufficient evidence to justify the Green Belt alterations included in the LPSV. Exceptional circumstances have not been demonstrated as to why Green Belt alterations should be made.	7
Green Belt land should not be built on under any circumstances. The principle of developing in the Green Belt is unacceptable.	7
The impact on utilities is too great and cannot be properly mitigated/avoided.	7

* including group responses, local businesses and local resident organisations

Landowners and Agents

2.42 The Council received 150 responses from landowners and agents. The key issues raised were:

- i) Whether the level of Objectively Assessed Housing Need was correct in relation to the most up-to-date government evidence. This was often linked to meeting the Duty to Cooperate requirements in taking an equitable portion of housing need between the four Housing Market Area authorities.

- ii) The Council’s use of the “Liverpool” approach to calculating its five year housing land supply, with many respondents stating that the Council could not demonstrate a five year housing land supply.
- iii) Many landowners and agents commented on the approach to housing distribution and Green Belt release in the Local Plan Submission Version.
- iv) The availability of the appendices to the Report on Site Selection, and the impact that this has on the ability of respondents to make informed representations on the Plan. The soundness of the Plan itself was a central issue raised by most respondents.

Statutory Consultees

2.43 The Council received 36 responses from statutory consultees, as shown in Table 16. Of these, ten were from other local authorities, 15 were from statutory bodies and 13 were received from town and parish councils within the District.

Table 16 Statutory Consultees

Statutory Consultees
Local Authorities
Brentwood Borough Council
Chelmsford City Council
East Hertfordshire District Council
Essex County Council
Greater London Authority
Harlow District Council
Hertfordshire County Council
London Borough of Havering
London Borough of Newham
Uttlesford District Council
Town and Parish Councils
Buckhurst Hill Parish Council
Chigwell Parish Council
Epping Town Council
Loughton Town Council
Moreton, Bobbingworth and the Lavers Parish Council
Nazeing Parish Council
North Weald Bassett Parish Council
Ongar Town Council
Roydon Parish Council
Stanford Rivers Parish Council
Stapleford Abbots Parish Council
Theydon Bois Parish Council
Waltham Abbey Town Council
Statutory Bodies
Affinity Water

Anglian Water Services
Canal and Rivers Trust
Conservators of Epping Forest
Environment Agency
Highways England
Historic England
Lea Valley Growers Association
Lee Valley Regional Park Authority
National Grid
Natural England
Sport England
Thames Water
Theatres Trust
Transport for London

2.44 Key issues raised by town and parish councils are summarised in Table 17. Of the statutory bodies, local authorities and utility providers, the following responses raised particular objections to the legal compliance and soundness of the Plan:

- i) **Harlow District Council:** Harlow Council remain concerned in relation to transportation and infrastructure to support the sites to the South and West of Harlow, provision of affordable housing and distribution of employment provision in Epping Forest District.
- ii) **Essex County Council:** The County Council submitted detailed comments on the Local Plan Submission Version policies and proposed modifications to the Plan to make it 'sound'. The Council are working with Essex County Council to agree a Statement of Common Ground.
- iii) **Natural England:** Natural England have raised concerns over the delay in preparing a mitigation strategy for Epping Forest SAC as required by the Memorandum of Understanding. The Council is working with Natural England, the Conservators and neighbouring authorities to progress matters relating to air quality and recreational pressure on the Epping Forest SAC and agree an interim strategy.
- iv) **Environment Agency:** The EA expressed support for the strengthening of policies following their comments the Draft Local Plan and made further potential amendments to policy wording. The response drew attention to the need to demonstrate that there is sufficient capacity in the treatment works and network.
- v) **Transport for London:** Reiterated their response to the Draft Local Plan that Central Line capacity should not act as a constraint to development in Epping Forest District and expressed support for the Council's approach to sustainable transport choices.

- vi) **Conservators of Epping Forest:** Objected to the Plan on the grounds that they did not feel it addressed the Habitats Regulations 2017 or national policy to protect and enhance biodiversity in Epping Forest.

Table 17 Town and Parish Council Representations Overview

Town/Parish Council Name	Summary of Issues Raised
Epping Town Council	Main issues were infrastructure, particularly around transport infrastructure and the density of development
Loughton Town Council	Supported the overall vision of the Plan but raised a number of concerns and objections in relation to specific policies. Points raised were impacts of urban intensification, such as the loss of green space and inadequate infrastructure provision.
Ongar Town Council	The Plan does not provide strong enough Green Belt policies. Comments were also made in relation to current deficiencies in infrastructure and air quality concerns.
Waltham Abbey Town Council	No specific concerns and gave general support for the Local Plan.
Buckhurst Hill Parish Council	Disagreed with the number of windfall sites estimated in the housing trajectory and thought it should be increased, therefore reducing the number of sites to be allocated. Objections were made to all 3 allocated sites in Buckhurst Hill.
Nazeing Parish Council	No concerns raised over the soundness of the Plan and generally supported the allocations within the Parish.
Moreton Bobbingworth & The Lavers Parish Council	Raised some concern regarding the infrastructure to support development, they put forward no evidence relating to the soundness of the Plan and showed general support.
North Weald Bassett Parish Council	The main concern raised was the inadequate provision of transport infrastructure, bus routes in particular, to serve the additional population through development as well as the concern that the Plan was lacking details on how infrastructure is to be delivered.
Chigwell Parish Council	Expressed support over some aspects of the Plan and its policies however objected specifically to the allocation of CHIG.R7. The Parish Council also proposed suggested amendments to some of the policies included in the Plan.
Roydon Parish Council	Concerns raised include the allocation of gypsy and traveller sites in Roydon which would lead to a disproportionate concentration of sites in the Parish compared with the rest of the District. Others concerns raised include the effect of Garden Communities sites on transport infrastructure.
Stanford Rivers Parish Council	Some concerns raised regarding the infrastructure to support development, they put forward no evidence relating to the soundness of the Plan and showed general support.
Stapleford Abbots Parish Council	Specific objections were raised in response to the proposed allocation of STAP.R1 along with infrastructure and previous consultation concerns.

Theydon Bois Parish Council	Proposed suggested amendments to a number of Development Management policies and Appendix 6 site requirements included in the Plan.
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Other Respondents

2.45 The Council received 66 responses from 'other' respondents. This includes 28 Local Organisations/Resident Groups, 4 group responses, 7 from District Councillors, 16 Local Businesses, 1 Local MP and 2 Political parties.

2.46 Four group responses were received, as follows:

- i) Residents objecting to the inclusion of LOU.R5 Land at Jessel Green as an allocated site, due to the loss of open space and the expression by the community at previous consultations regarding the importance of open spaces. This response had over 4,600 signatures.
- ii) Residents objecting to the inclusion of EPP.R5 Epping Sports Centre as an allocated site, due to the concern that equivalent sports facilities would not be provided within the town of Epping. This response had over 840 signatures.
- iii) Harlow Alliance Group response objecting to SP 5.1 Latton Priory and SP 5.2 Water Lane Area Masterplan Areas primarily due to the impact on Green Belt land. This response had over 25 signatures.
- iv) Residents supporting the removal of Epping Sports Club that was included in the Draft Local Plan.

2.47 The Council received a number of responses from business owners based along Epping High Street, objecting to the loss of car parking and the impact of the construction of the car park sites on businesses.

2.48 A total of 26 local organisations submitted representations, shown in Table 18

Table 18 Local Organisations

Buckhurst Hill Residents Society
North Weald and District Preservation Society
Essex Bridleways Association
Roydon Country Care
The Loughton Broadway Association
Loughton Residents Association
The Roydon Society
Campaign for Rural Essex
Ongar Neighbourhood Plan Community Group
Chigwell Residents Association
Friends of Epping Forest
Limes Farm Residents Association

Protect Nazeing Greenbelt Group
Chigwell Village Protection Group
Theydon Bois and District Rural Preservation Society
Epping Society
North Weald Bassett Neighbourhood Plan Steering Group
Theydon Bois Action Group
Essex Playing Field Association
Lea Valley Growers Association
Restore Community Church
St Peters Church Roydon
Fyfield Pre-School Committee
Epping Forest Community Church
Tudor Cross Preschool
Ongar Primary School

2.49 The Lea Valley Growers Association provided a glasshouse industry response to Policy E 3 food production and glasshouses. The response stated that the Council's approach was not consistent with other neighbouring authorities and that it disadvantaged growers in Epping Forest District.

Appendix One: Epping Forest District Council Local Plan Submission Version (2017)

The Local Plan Submission Version (LPSV) is underpinned by a significant amount of technical work and justified by a comprehensive and robust evidence base, all available on the Council's website. The proposed Local Plan policies, spatial strategy and site allocations are supported by detailed supporting documents including the Sustainability Appraisal (2017), Habitat Regulations Assessment (2017) and Infrastructure Delivery Plan (2017) (amongst many others). Since the start of developing the Local Plan there have been three formal consultations: Community Visioning in 2010/11, Community Choices in 2012 and, most recently, the Draft Local Plan in 2016 (please refer to the Consultation Report for full details²). Since the Regulation 18 consultation, the Council has taken appropriate steps to inform the LPSV, including:

- Further work on site selection to evaluate additional or amended sites submitted as part of Regulation 18 or otherwise up to March 2017;
- Further evidence base documents including the updated Infrastructure Delivery Plan and Schedule, Highways Assessment Report, Employment Need Studies, Open Space Study, Built Facilities Strategy, Playing Pitch Strategy, Viability Study and others, the findings of which have all fed into the LPSV;
- Ongoing consultation with Town and Parish Councils and District Councillors;
- Working through the Cooperation for Sustainable Development Board with adjacent authorities and statutory consultees with a number of bodies to ensure the Duty to Cooperate; and
- Review of the Draft Local Plan to take account of comments and additional evidence to develop the Local Plan Submission Version.

In accordance with Regulation 22 (c) (iv) of the Town and Country Planning (Local Planning) (England) Regulation 2012, this section provides an overview of how the Council has taken into account representations made pursuant to the Draft Local Plan published in 2016 under Regulation 18. A summary of the key issues that were raised during the Regulation 18 Consultation and the Council's response to these issues was reported to the Cabinet on Tuesday 11 July 2017. It sets out the steps that the Council took to address comments received and how the work would feed into the Local Plan Submission Version. An updated version is set out in Table 19.

² <http://www.efdclocalplan.org/wp-content/uploads/2018/03/EB122-Draft-Local-Plan-Consultation-Report-Remarkable-Engagement-EFDC-2017.pdf>

Table 19 Table of Key Issues from Regulation 18

Key Issue	EFDC Response
<p>Meeting the requirements for providing land for custom and self-build housing.</p>	<p>Policy H 1 in the Local Plan Submission Version includes the Council's proposed policy for future housing mix and accommodation types, including self-build and custom-build housing. Point G of the policy states that the Council will support the development of self-build homes on appropriate sites, including encouraging self-build homes as part of larger development schemes.</p> <p>As required under Section 1 of the Self-build and Custom Housebuilding Act (2015), the Council currently maintains a register of individuals and associations of individuals seeking to acquire land for self- or custom- build housing. Should the SHMA be updated at a later date, this register will be used as evidence to identify the level of demand for custom and self-building housing.</p>
<p>Demonstrating a five year housing land supply and addressing an historic shortfall in housing delivery.</p>	<p>The Housing Implementation Strategy sets out how the Council has calculated its five year land supply. Appendix 5 to the Local Plan Submission Version sets out the trajectories for housing, employment and traveller allocations proposed. It has been demonstrated that the LPSV will be able to maintain five year housing land supply throughout the plan period, and shortfall from early years of the plan period will be addressed in the remaining plan period using the Liverpool Approach.</p>
<p>Identifying the District's full Objectively Assessed Housing Need.</p>	<p>The 2012 SHMA used as its starting point the DCLG household projections of 2012 to define the objectively assessed need for the West Essex/East Herts SHMA. This set out a combined level of housing need across the SHMA area of 46,058 homes for the period 2011-2033.</p> <p>Following the publication in July 2016 of the 2014 household projections updating the 2012 data the SHMA authorities undertook an update – see note on updating the overall housing need based on 2014 based projections (ORS August 2016). This note was used as the basis for preparing the Memorandum of Understanding (MoU) on the distribution of objectively assessed housing need across the West Essex/East Herts SHMA.</p> <p>A further update to the SHMA was undertaken in July 2017, commissioned by the HMA authorities, which considered the latest evidence including the DCLG 2014-based household projections.</p> <p>The Local Plan Submission Version based the level of housing growth on the work undertaken for the four authorities and provides for in excess of 11,400 homes (the OAN) over the plan period.</p>

<p>The appropriateness of the housing requirement set out in the Draft Local Plan.</p>	<p>As stated in paragraph 2.62 of the Draft Local Plan, the Council has made provision for sites above and beyond those required to meet the housing target of 11,400 dwellings. This is intended to provide flexibility in terms of managing economic cycles, factors relating to specific sites which may result in them being stalled or needing to be removed from the Plan, and to provide flexibility in case housing requirements increase prior to Examination. This demonstrates the Council's commitment to positive planning to meet the full Objectively Assessed Housing Need.</p>
<p>The Council's preferred Spatial Strategy and the proposed distribution of growth across the District, including the number of new homes identified for each settlement, and whether this is proportionate.</p>	<p>The Council's preferred spatial strategy as set out in the Local Plan Submission Version is to focus growth around Harlow, which represents the most sustainable location, with the remaining housing need distributed housing across the settlements of the District. This approach was based on the outcome of the 2012 Issues and Options consultation along with planning judgement, taking account of:</p> <ul style="list-style-type: none"> - impact on the Green Belt and landscape - accessibility to services, - the level of growth need to ensure infrastructure can be supported and any specific needs identified, - the mixture of suitable, available and achievable sites within each settlement, - maximising the development potential within existing settlements focussing on brownfield land with higher densities where possible, - maximising opportunities for growth of North Weald Bassett in line with the Masterplanning Study, and - that development proposals should support the realisation of the settlement visions. <p>Further testing of the proposed distribution of growth across the settlements in the District will be undertaken through options appraisal in the ongoing set out in the Sustainability Appraisal published alongside the Local Plan Submission Version.</p>
<p>Ensuring adequate provision for older persons in the District.</p>	<p>In preparing the Draft Local Plan, the Council has used up-to-date evidence on housing needs, including careful consideration of future population projections. This evidence (set out in the SHMA 2015) identifies the need for specialist housing to support an ageing population, including assisted living and care homes over the plan period, and this is included within the general housing requirement. Policy H 1 demonstrates that the Local Plan will require that future development includes an appropriate mix of housing to meet the needs of the ageing population in the District, and that development is located in the most sustainable locations and supported by the necessary infrastructure. Part C of Policy H 1 makes provision for specifically designed housing to meet these specialist needs, including older persons accommodation, where there is a proven identified need, the location is appropriate and the proposals are well designed.</p>
<p>The level of affordable housing provision required by Draft Policy H 2 and whether the approach provides sufficient flexibility, and is supported by evidence.</p>	<p>The Local Plan Submission Version sets out the approach to affordable housing in Draft Policy H 2. The approach to seeking a minimum of 40% affordable homes on sites of 11 or more dwellings is supported by evidence in the SHMA (2015) and the Viability Study Stage 2 (2017). This evidence suggests that the level of affordable housing is viable and deliverable.</p>

<p>The District's approach to managing impacts on Epping Forest Special Area of Conservation (SAC).</p>	<p>An HRA screening of the Draft Local Plan supported the approach outlined in the agreed Memorandum of Understanding (MoU) on managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation as a basis to achieve material improvements in air quality and nitrogen inputs to the Forest SAC by 2033. The Council is also working with Natural England and the Conservators of Epping Forest to produce a Mitigation Strategy for the Epping Forest SAC. It has been agreed that the Mitigation Strategy will comprise of two strands covering the management of visitor pressure and air quality. An interim strategy is expected to be in place by June 2018, with a longer terms strategy development over Summer/Autumn 2018.</p> <p>The Council is also progressing further transport assessment work including detailing highway mitigation schemes on junctions within the Epping Forest SAC area. This work will inform the revised Transport Assessment Report and further air quality modelling. In addition to this, a 9 month programme of air quality monitoring is commencing to assess current air quality with the Forest.</p>
<p>Satisfying the Duty to Cooperate.</p>	<p>The four districts in the HMA for West Essex/East Herts (Epping Forest DC, East Herts DC, Harlow DC and Uttlesford DC) have a substantial history of coordinated working on strategic cross boundary planning issues including housing need, employment, transport etc. The Councils together with other adjoining authorities and the two Counties (Herts CC and Essex CC) established the Cooperation for Sustainable Development Member Board in October 2014. This has been meeting monthly and is serviced by an officer group. The authorities through the Board have commissioned a number of pieces of evidence to support the identification of the objectively assessed employment and housing need; to review strategic options for accommodating residential growth across the area; and to assess the potential for delivery of strategic sites around Harlow. Further work is programmed. There are now three signed MOUs on distribution of housing need, highway impact and air quality impacts on Epping Forest. Following the completion of an Assessment of Employment Needs for the West Essex and East Hertfordshire Functional Economic Market Area, a fourth MOU on the distribution of economic growth across the FEMA has been produced and will be considered by the Cooperation of Sustainable Development Member Board in April 2018.</p> <p>The Council is satisfied that it is fulfilling the requirements of the Duty to Cooperate in the preparation of its Local Plan and continues to engage constructively, actively and on an on-going basis with relevant bodies on strategic planning matters.</p>
<p>Planning for the relocation / redevelopment of the Princess Alexandra Hospital.</p>	<p>The Princess Alexandra Hospital, which is located on a highly constrained site near Harlow town centre, faces a number of challenges in continuing to serve the needs of its catchment. The preferred option is to relocate to a new site, and two potential new sites have been identified, one of which is in Epping Forest District (East of Harlow allocation, SP5.3) and the other in East Herts District. The hospital identified these sites in its Strategic Outline Case as well as the potential to redevelop or refurbish the hospital on its current site. Both relocation and development in situ options are being considered further as part of the Trust's Outline Business Case process, with a preferred site expected to be formally identified by July 2018. In order to apply for the necessary funding from Government the outcome of this work will be required before a decision is made on the future of hospital provision in the area.</p>

Meeting the requirements for Sustainability Appraisal and Habitats Regulation Assessment.	The Sustainability Appraisal and Equalities Impact Assessment and the Habitats Regulation Assessment (along with Non-Technical Summaries of each report) were published alongside the Local Plan Submission Version and are available on the Council's website under 'Evidence Base'.
The assessment of Strategic Options and sites around Harlow.	The AECOM study (August 2016) for the West Essex and East Herts authorities considered the strategic options for residential growth around Harlow, and the result of this work informed the proposed strategic site allocations.
Consistency between the draft vision and objectives, draft policies and proposed site allocations in the Draft Local Plan.	Plan-making is an iterative process. The proposed vision and objectives, policies and site allocations have informed, and in turn have been informed, as the work to produce the Local Plan has progressed. Following Regulation 18 consultation, the vision and objectives, policies and site allocations were revisited as part of the preparation of the Local Plan Submission Version.
Infrastructure requirements and delivery, including provision for CIL charging schedule.	<p>The Infrastructure Delivery Plan Part A and B Reports were published alongside the Local Plan Submission Version. The reports reflect the Council's updated evidence base and modelling undertaken on the proposed site allocations and policies in the Local Plan. A schedule of expected infrastructure required to support the Local Plan Submission Version has been provided. A technical paper on infrastructure delivery is being produced to provide more information and certainty on infrastructure delivery and an update on work undertaken since the IDP was published. The Council is engagement with infrastructure providers to provide greater clarity on future infrastructure requirements. The technical paper will include a high level framework for apportionment and pooling arrangements to be taken forward for key infrastructure.</p> <p>A decision on whether to adopt a Community Infrastructure Levy (CIL) schedule for funding infrastructure has not yet been made. The Viability Study Stage 2 confirmed the potential of introducing a CIL charging schedule in Epping Forest District and the parameters through which this may be done.</p>
The identification of District Open Land in Draft Policy SP 5.	The rationale for identifying District Open Land is set out in the Green Belt and District Open Land Background Paper Update.
Concerns about traffic congestion and other transport issues (including cross-boundary issues), and how these are being addressed in the Plan.	The Council undertook number of transport studies to inform the Draft Local Plan. Information on these can be found in the Transport Background Paper and associated Technical Notes. The Highways Assessment Report (Jacobs, 2017) has been published and is available on the Council's website, under 'Evidence Base'. The evidence provided in this report fed into the final selection of sites in the Local Plan Submission Version. A joint Transport Memorandum of Understanding has been signed between the HMA district authorities, Essex County Council, East Hertfordshire County Council and Highways England. The MoU sets out the collaborative working approach between the authorities to addressing strategic and cross-boundary highway and transport issues around Harlow.

<p>The relationship between the Draft Local Plan and emerging and forthcoming Neighbourhood Plans.</p>	<p>There are currently ten designated neighbourhood plan areas in the District, so ten Parish and Town Councils within the District are preparing neighbourhood plans for their areas. The Council will continue to provide advice and assistance to ensure that the Neighbourhood Plans are in general conformity with the strategic policies contained in the Local Plan and in line with national planning policy guidance.</p> <p>Moreton, Bobbingworth and the Lavers Neighbourhood Plan was examined in 2016 but found to not meet all of the Basic Conditions. The Parish is currently preparing to finalise and submit a revised Plan. The Chigwell Neighbourhood Plan has recently been submitted to the Council for Regulation 16 publication, and preparations are being made for the Plan to be published after the local elections in May 2018. All other Neighbourhood Plans (Buckhurst Hill, Epping Town, Epping Upland, Loughton Town, North Weald Bassett, Ongar, Theydon Bois and Waltham Abbey) are at an early stage of preparation.</p>
<p>Development planned at North Weald Airfield.</p>	<p>In line with Policy SP 2 and Policy E 1, a parcel of North Weald Airfield is allocated as an employment site in the Local Plan Submission Version, Policy P 6. Policy P 6 also designates the entire Airfield as a Masterplan area, and sets out requirements for future development.</p>
<p>How the North Weald Bassett Masterplanning Study has informed the Draft Local Plan.</p>	<p>Allies and Morrisons Urban Practitioners (AMUP) were commissioned by the Council in 2014 to undertake a masterplanning study of North Weald Bassett which integrated the findings of earlier studies and public consultation to present a long term vision and aspirations for the village. The Study tested two spatial options to accommodate new homes, and concluded that Scenario B, which promotes development to the north of the settlement, was preferred.</p> <p>The outcome of the Study, using the higher growth option of 1,616 homes, was used to inform the selection and indicative capacity assessment of sites in North Weald Bassett, and to inform Policy P 6 and the settlement vision in the Local Plan Submission Version.</p>
<p>Consistency with the Housing White Paper.</p>	<p>Please see report to Neighbourhoods Select Committee on 21 March 2017, which includes as an appendix the Council's response to the Housing White Paper.</p>
<p>Suggested changes to the wording of policies in the Draft Local Plan.</p>	<p>All comments received at Regulation 18 were collated by policy and taken into account by the Council's technical specialists when re-drafting policies and preparing the Local Plan Submission Version.</p>
<p>Concerns regarding the capacity of the Central Line.</p>	<p>The Council is undertaking further work with Transport for London, LB Redbridge and LB Waltham Forest to ensure that there is sufficient capacity on the Central Line over the plan period. Transport for London confirmed in their response to the Local Plan Submission Version that Central Line capacity should not act as a constraint to development in the District.</p>
<p>The requirement to consider flood risk constraints through the Draft Local Plan.</p>	<p>The Council has undertaken an SFRA Stage 1, and used the Environment Agency's Flood Risk Zone mapping to assess sites proposed for allocation. The Council's strategy is to ensure that where possible all development is in Flood Zone 1 and only proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1.</p> <p>The Council commissioned AECOM to provide further site specific analysis for flood risk to supplement the SFRA Stage 1. This report assesses the flood risk posed to each of the development sites, and identifies which sites require</p>

	the Exception Test and any issues that will need to be addressed as part of a site specific Flood Risk Assessment at planning application stage. The report will be submitted alongside the Local Plan Submission Version.
Mitigating and managing the impacts of poor air quality.	Policy DM 22 is a targeted policy on air quality that has been proposed in the Local Plan Submission Version. The preparation of the Habitats Regulation Assessment (HRA, 2017) has informed the MoU on the impact of air quality on Epping Forest SAC, and the Council will be developing an action plan with neighbouring authorities, Natural England and the Conservators to mitigate any impacts on the Forest. Air quality was one of the assessment criteria undertaken at Stage 2 of the Site Selection process.
The Lee Valley Regional Park and meeting the requirements under Section 14(1) of the Park Act.	The requirements under the Park Act have been met in sections 2.18 – 2.24 of the Local Plan Submission Version. Should the Lee Valley Regional Park Authority publish an updated Plan, this will be considered where necessary.
Strategic Masterplanning for strategic sites and Planning Performance Agreements.	Please see report to Cabinet Committee 15 June 2017 which sets out the Council's approach to Strategic Masterplanning and PPAs.
Concerns regarding the proposed Green Belt boundary alterations.	The Council has undertaken a Green Belt Review as part of the preparation of the Local Plan. This was one of the pieces of evidence taken into account in the site selection process. Further work to define detailed Green Belt boundary alterations has been undertaken when preparing the Local Plan Submission Version and is presented in the Green Belt and District Open Land Background Paper Update (2018). The Update includes a breakdown of all of the Green Belt alterations in the Local Plan Submission Version with information and justification on the proposed changes to the boundary.
Requirement for further evidence on sports and recreation to support the policies in the Local Plan.	The Council has published the Built Facilities Strategy (4Global, 2018) and the Playing Pitch Strategy (4Global, 2018), both of which have fed into the Infrastructure Delivery Plan throughout their preparation. The reports have been signed off by national governing bodies and Sport England and therefore represent a robust and up-to-date evidence base on sports and recreation.
Concern that the policies and proposals in the Draft Local Plan will result in a loss of car parking spaces or insufficient provision of new parking spaces.	The redevelopment of car parks are expected to include new homes and retention of the current car parking provision, as set out in the site requirements for car park sites in Appendix 6 of the Local Plan Submission Version. The Council is pursuing a wider transport strategy that focusses on encouraging sustainable transport choices and reduction in car use; however it is committed to finding the right balance between accommodating the car and making the best use of land. For further information on the Council's approach to car parking standards, please see the Transport Background Paper.
Concern that the policies and proposals in the Draft Local Plan will result in a negative impact on the character of settlements.	The Site Selection Methodology had regard to settlement character under Stage 2 Criteria 5.2, which considered impact on heritage assets and their setting, Conservation Areas, landscape and built form amongst other factors, and these were also taken into account in the indicative capacity assessment. Additionally, Policies DM 7, DM 8 and DM 9 make provision to protect heritage assets and ensure high quality design.

<p>Concern that the Draft Local Plan will result in a loss of public open spaces.</p>	<p>A small number of sites were put forward for assessment for development on land that is currently classified as managed open space within settlements. The site selection process concluded that a small number of sites which involve the loss of an element of open space should go forward as proposed allocations and for all, it is assumed that a minimum of 25% of the open space would be retained. This includes two proposed allocations on managed open space in Loughton and one in Chigwell. For more information see Background Paper 3 on Open Space. In response to comments made to the Draft Local Plan and the suitability of new sites assessed through Tranche 2 of the site selection process, the number of units on managed urban open space sites was reduced in the Local Plan Submission Version.</p>
<p>Concern regarding the potential impact of proposed new traveller sites and expanded existing traveller sites.</p>	<p>The potential impact of traveller sites on was considered as part of the site selection process. This included looking at candidate sites' relationship to existing settlements, services and facilities, and neighbouring uses. Detailed assessment of the impact of development is considered through the planning application process at a later stage.</p>
<p>The principle of releasing Green Belt land proposed in the Draft Local Plan and demonstrating exceptional circumstances for doing so.</p>	<p>Government policy on the Green Belt, set out in the NPPF, is clear that Local Planning Authorities with Green Belts should establish Green Belt boundaries through their Local Plans. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Over 92% of Epping Forest District is designated as Green Belt and the Green Belt boundaries have not been reviewed since the existing Local Plan was adopted in 1998.</p> <p>The evidence base for the Local Plan (most importantly the Report on Site Selection 2016 and Report on Site Selection 2018) indicates that providing for the development needs to support long-term sustainability of the District requires a review of the Green Belt boundary. While the Council has pursued a strategy which seeks to minimise the use of Green Belt land for development, it is clear that insufficient land outside the Green Belt exists to meet the development needs of the District, and alterations to the Green Belt boundaries are necessary. These local conditions demonstrate exceptional circumstances that require the proposed release of Green Belt land.</p> <p>The Council has produced a Green Belt and District Open Land Background Paper Update (2018), this paper provides an update of the Green Belt and District Open Land Background Paper produced in October 2016. A detailed justification of the case for exceptional circumstances is set out here. The Update includes a breakdown of all of the Green Belt alterations in the Local Plan Submission Version with information and justification on the proposed changes to the boundary.</p>
<p>The estimated capacity and density of development on proposed allocation sites.</p>	<p>The Updated Site Selection Methodology (2018) sets out how the more detailed indicative capacity assessment was undertaken at Stage 3 of the site selection process. A further capacity assessment was undertaken at Stage 6.3 of the site selection process taking into account any updates from site promoters, on every site identified for further testing. The Updated Methodology can be found at the following link: http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB802A-Updated-Site-Selection-Methodology-2017-Arup-2017.pdf</p>
<p>Issues relating to Glasshouse evidence and policy in the Draft Local Plan.</p>	<p>All comments received at Regulation 18 in relation to Draft Policy E 3 were taken into account by the Council's technical specialists when re-drafting the policy to go into the Local Plan Submission Version.</p>

<p>Comments relating to the forthcoming identification of employment sites for allocation in the Plan, and further employment land evidence.</p>	<p>Prior to the consultation on the Draft Local Plan, the Council completed Stages 1 and 2 of the Site Selection Methodology for employment sites. The remaining stages of the Site Selection Methodology were completed in Tranche 2 of the site selection process and the outcomes of this are presented in the Site Selection Report and Appendices (Arup, 2018), which can be found on the Council's website under 'Evidence Base'. The outcomes of the Employment Land Supply were used to update and inform the employment sites assessed. The Employment Land Supply brings together, updates and supplements where necessary, the existing sources of evidence on existing and potential employment sites within the District in order to provide an updated baseline supply.</p>
<p>Suggestion for the need to undertake a Water Cycle Study.</p>	<p>Through ongoing engagement with neighbouring authorities, utility providers and the Environment Agency, the Council has taken the decision not to undertake a District-wide Water Cycle Study. The Environment Agency's Regulation 19 representation noted this approach and set out their recommended actions for the Council going forward. The Council will continue to work with Thames Water with regard to Waste Water Treatment Works capacity and phasing of development and continue to work with other local authorities and the Environment Agency going forward.</p>
<p>Concern regarding proposed allocations for development on community facility sites.</p>	<p>The IDP considers the need for community facilities alongside other infrastructure needs. Where the County Council has identified an existing community facilities site that it wishes to promote for development, this has been assessed through the site selection process. The Council will treat community facility sites as set out in Policy D 4. In line with this approach, we will work with ECC to identify and deliver replacement facilities where these are required.</p>
<p>Queries and objections raised regarding the site selection process.</p>	<p>The updated Site Selection Methodology can now be found on the Council's website under 'Evidence Base'. The SSM took account of the comments received at Regulation 18 and clearly outlines how the Council has assessed amended residential sites, employment sites and traveller sites. The Council has also published the Site Selection Report and Appendices (2018) that provides an overview of Tranche 2 of the site selection process. This is also on the website under 'Evidence Base'.</p>
<p>Deliverability of the proposed allocation sites in the Draft Local Plan, including the provision for Small Sites.</p>	<p>The Council has continued to work with promoters of sites proposed for allocation through the Developer Forum to ensure that the sites are deliverable. The Council has made provision for a substantial proportion of the allocation to be 'small sites' (under 10 dwellings).</p> <p>A new Implementation Team has been set up to provide the necessary skills and resources to deliver the Strategic Masterplans, Concept Frameworks and Planning Performance Agreements associated with Local Plan allocations, as set out in the report to Cabinet on 7 December 2017. The Council has already commenced discussions with a number of land owners and site promoters of allocated sites in relation to putting in place PPAs and to begin work on Strategic Masterplans and Concept Frameworks in accordance with policy requirements.</p>
<p>Concerns regarding how previous consultation has been taken into account in formulating the Draft Local Plan.</p>	<p>Previous consultation responses were considered throughout the plan-making process and informed the draft policies, proposed site allocations, visions and objectives and spatial strategy set out in the Local Plan Submission Version. Previous consultation feedback was balanced with other material planning considerations, such as satisfying national planning policy requirements and taking into account the findings of more recent evidence base documents, in order to ensure that the Local Plan Submission Version is robust and justified. For example, comments received on the Draft Local</p>

	Plan were assessed as part of the evidence when identifying sites for allocation in the Local Plan Submission Version as set out in the Site Selection Report (Arup, 2018) in Section 2.9.3.
Where new policies have been suggested, or changes to policy wording has been provided.	All comments received at Regulation 18 were collated by policy and taken into account by the Council's technical specialists when re-drafting policies and preparing the Local Plan Submission Version.
Concern that the Interim Sustainability Appraisal did not assessed enough reasonable alternative and that there is not sufficient justification for the spatial strategy.	The Sustainability Appraisal is an ongoing iterative process which informs and supports the Local Plan production. The Council published a Sustainability and Equalities Impact Appraisal alongside the Local Plan Submission Version in December 2017 that can be found at the following link: http://www.efdclocalplan.org/wp-content/uploads/2018/02/EB202-Sustainability-Appraisal-Report-for-the-EFD-LP-AECOM-2016.pdf
Places Policies	The Council reviewed in detail and took into account the comments submitted during the Regulation 18 Consultation period when identifying the proposed allocations in the Places policies in the Local Plan Submission Version. The Site Selection Report sets out the process of identifying sites for allocation, including taking into account all relevant updated evidence, in Section 2.9.3.

Appendix Two: Number of Stakeholder responses by Policy

Policy	Number of Stakeholders that commented on the policy*
P 6 North Weald Bassett	423
P 1 Epping	150
P 2 Loughton	136
SP 2 Spatial Development Strategy	101
P 12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbots	67
SP 6 Green Belt and District Open Land	48
P 7 Chigwell	46
P 3 Waltham Abbey	35
P 4 Ongar	31
SP 5 Garden Town Communities	28
DM 4 Green Belt	25
SP 3 Place Shaping	24
H 1 Housing mix and accommodation types	23
SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town	21
T 1 Sustainable transport choices	21
H 2 Affordable Housing	20
P 10 Nazeing	19
P 8 Theydon Bois	17
DM 9 High Quality Design	16
E 1 Employment Sites	15
P 9 Roydon	15
DM 20 Low carbon and renewable energy	11
DM 1 Habitat Protection and Improving Biodiversity	10
P 11 Thornwood	10
D 1 Delivery of Infrastructure	10
SP 7 The Natural Environment, Landscape Character and Green and Blue Infrastructure	9
D 4 Community, Leisure and Cultural Facilities	9
E 4 Visitor Economy	8
DM 2 Epping Forest SAC and the Lee Valley SPA	8
DM 7 Heritage Assets	8
DM 10 Housing Design and Quality	8
P 5 Buckhurst Hill	8
DM 5 Green and Blue Infrastructure	7
DM 6 Designated and Undesignated Open Spaces	7
DM 12 Subterranean, basement development and lightwells	7

SP 1 Presumption in Favour of Sustainable Development	6
DM 16 Sustainable Drainage Systems	6
D 2 Essential Facilities and Services	6
DM 19 Sustainable Water Use	5
D 3 Utilities	5
H 4 Traveller site development	4
E 2 Centre Hierarchy/Retail Policy	4
E 3 Food production and glasshouses	4
DM 18 On Site Management of Sustainable and Waste Water Supply	4
T 2 Safeguarding of Routes and Facilities	3
DM 3 Landscape Character, Ancient Landscapes and Geodiversity	3
DM 14 Shopfronts and on street dining	3
DM 15 Managing and Reducing Flood Risk	3
DM 21 Local environmental impacts, pollution and land contamination	3
P 13 Rural sites in the east of the District	3
D 6 Neighbourhood Planning	3
DM 11 Waste Recycling Facilities on New Developments	2
DM 22 Air Quality	2
P 14 Rural sites in the south of the District	2
H 3 Rural Exceptions	1
DM 8 Heritage at Risk	1
DM 17 Protecting and enhancing watercourses and flood defences	1
P 15 Rural sites in the south of the District	1
D 5 Communications Infrastructure	1
DM 13 Advertisements	0
D 7 Monitoring and Enforcement	0

**please note that this table includes comments from all stakeholder groups*

Appendix Three: Number of Stakeholder responses by Site Reference

Site Reference	Name	Total number of stakeholder that commented on the site*
LOU.R5	Land at Jessel Green	110
EPP.R1	Land South of Epping - West	67
EPP.R2	Land South of Epping - East	64
NWB.R3	Land South of Vicarage Lane	53
STAP.R1	Land at Oak Hill Road	47
EPP.R3	Epping London Underground Car Park	35
EPP.R6	Cottis Lane Car Park	29
EPP.R7	Bakers Lane Car Park	27
CHIG.R6	The Limes Estate	23
EPP.R5	Epping Sports Centre	19
WAL.R5	Waltham Abbey Community Centre, Saxon Way	16
SP 5.2	Water Lane Area	14
EPP.R11	Epping Library	12
LOU.R2	Debden London Underground Car Park	12
LOU.R1	Loughton London Underground Car Park	11
ONG.R6	Land between Stanford Rivers Road and Brentwood Road	9
THYB.R1	Land at Forest Drive	9
NAZE.R1	Land at Perry Hill	8
ONG.R2	Land at Bowes Field	8
ONG.R5	Land at Greensted Road	8
NWB.R1	Land at Blumans	7
ONG.R1	Land west of Ongar	7
SP 5.1	Latton Priory	7
SP 5.3	East of Harlow	7
EPP.R4	Land at St Johns Road	6
NWB.R2	Land at Tylers Farm	6
NWB.R4	Land at Chase Farm	6
ONG.R4	Land North of Chelmsford Road	6
STAP.R2	Land to the rear of Mountford & Bishops Brow, Oak Hill Road	6

EPP.R9	Land at Bower Vale	5
LOU.R4	Borders Lane Playing Fields	5
NWB.E4	North Weald Airfield	5
NWB.R5	Land at The Acorns, Chase Farm	5
ONG.R3	Land Southwest of Fyfield Road	5
ONG.R7	Land South of Hunters Chase and West of Brentwood Road	5
THOR.R1	Land at Tudor House	5
THYB.R2	Theydon Bois London Underground Car Park	5
CHIG.R7	Land at Chigwell Convent	4
NAZE.R2	The Fencing Centre at Pecks Hill	4
NAZE.R3	Land to the rear of Pound Close	4
NAZE.R4	Land at St Leonards Farm	4
EPP.R8	Land and part of Civic Offices	3
LOU.R3	Land at Vere Road	3
NWB.T1	Land West of Tylers Green	3
ONG.R8	The Stag Pub	3
ROYD.R2	Land at Kingsmead School	3
BUCK.R1	Land at Powell Road	2
BUCK.R2	Queens Road Car Park	2
CHIG.R2	Woodview	2
CHIG.R4	Land between Froghall Lane and Railway Line	2
CHIG.R8	Land at Fencepiece Road	2
EPP.E1	Land at Eppingdene	2
FYF.R1	Land at Gypsy Mead	2
HONG.R1	Land at Mill Lane	2
LOU.R7	Loughton Library	2
LOU.R8	Land West of High Road	2
LSHR.R1	Land at Lower Sheering	2
ROYD.R3	Land at Epping Road	2
ROYD.R4	Land at Parklands Nursery	2
RUR.T1	Land at Sons Nursery, Hamlet Hill	2
RUR.T2	Land at Ashview, Hamlet Hill	2
SHR.R1	Land at Daubneys Farm	2
SHR.R3	Land North of Primley Lane	2
WAL.E8	Land North of A121	2
WAL.T1	Land to the rear of Lea Valley Nursery, Crookied Mile	2
BUCK.R3	Stores at Lower Queens Road	1
CHIG.R11	Land at Hainault Road	1
CHIG.R5	Land at Chigwell Nurseries	1

EPP.R10	Land to rear of High Street	1
HONG.E1	Nash Hall Industrial Estate	1
LOU.R12	Land at 63 Wellfields	1
LOU.R13	Land at 70 Wellfields	1
LOU.R14	Land at Alderton Hill	1
LOU.R16	Land at Traps Hill	1
LOU.R6	St Thomas More RC Church	1
MORE.T1	Lakeview, Moreton	1
NAZE.E2	Land west of Sedge Green	1
NWB.E3	Bridge Works and Glassworks at Nazeing New Road	1
RUR.E1	Brickfield House, Thornwood	1
RUR.E10	Land at Little Hyde Hall Farm, Sheering	1
RUR.E11	Land at Quickbury Farm, Sheering	1
RUR.R1	Avenue Home, Latton Common	1
SHR.R2	Land East of the M11	1
STAP.R3	Land at The Drive	1
THOR.R2	Land east of High Road	1
THYB.R3	Land at Coppice Row	1
WAL.E2	Land at Breeches Farm	1
WAL.E6	Galley Hill Road Industrial Estate	1
WAL.R1	Land west of Galley Hill Road	1
WAL.R2	Lea Valley Nursery, Crooked Mile	1
WAL.R3	Land adjoining Parklands	1
WAL.R6	Waltham Abbey Swimming Pool, Roundhills	1

**please note that this table includes comments from all stakeholder groups*

Report to the Local Plan Cabinet Committee



**Epping Forest
District Council**

Report reference: **LPC-002-2018/19**

Date of meeting: **14 May 2018**

Portfolio: **Planning and Governance**

Subject: **Epping Forest District Local Plan Update**

Responsible Officer: **Alison Blom-Cooper (01992 564066).**

Democratic Services: **Gary Woodhall (01992 564470).**

Recommendations/Decisions Required:

- (1) That the update provided in relation to progress on the Local Plan be noted.

Executive Summary:

This report seeks:

- a) To update members on the work being undertaken to support the progression and implementation of the Local Plan.
- b) To update members on Neighbourhood Planning in the District.

Reasons for Proposed Decision:

To provide members with an update on work being undertaken to support the progression and implementation of the Local Plan.

Other Options for Action:

Not to advise members of the work being undertaken to support the progression and implementation of the Local Plan.

Introduction:

1. This report has been produced to update Members on the work being undertaken to support the progression and implementation of the Local Plan. The Local Plan Submission Version (LPSV) establishes the policies and allocations that will be subject to independent examination. However, plan-making is an ongoing and iterative process, and work continues to develop the evidence base to support the Plan, and to develop the implementation strategy.

2. This report provides a short summary of ongoing work and includes anticipated dates for the publication of further reports and information which will need to be taken into account during the Independent Examination process following the submission of the Plan. Updates are also provided on several areas of work being undertaken across local authority boundaries and work to implement the Local Plan and ensure the timely delivery of the housing and infrastructure planned. It should therefore be read in conjunction with the existing evidence base, particularly the Duty to Cooperate Compliance Statement (EB119)

and the Housing Implementation Strategy (EB410).

3. A summary update on the progression of Neighbourhood Plans in the District is also provided.

Report:

4. The following provides an update on the key areas of work in progress to support the Local Plan.

Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area (HMA) on Epping Forest Special Area of Conservation. Progress to develop a mitigation strategy following the signing of a Memorandum of Understanding (MoU) in February 2017 (EB1200)

5. Of particular importance within the HMA is the potential impact of growth on the Epping Forest Special Area of Conservation (SAC) as a result of increased pressure from visitors and air quality effects as a result of increases in traffic. The MoU, which has been agreed by the four authorities as well as Hertfordshire and Essex County Councils, Natural England and the City of London Corporation (Conservators of Epping Forest) requires the authorities to monitor any impact on the environmental quality of the Forest, and to introduce mitigation measures where these are necessary.

6. The governance arrangements for implementing the actions set out in the MoU have been established. It has been agreed that the Mitigation Strategy will comprise two strands covering the management of visitor pressure and the management of air quality. A visitor survey has been undertaken to update previous surveys using a more robust methodology that has been informed by best practice and surveys undertaken in other parts of the country. Revisions are currently being undertaken to the draft report and it is anticipated that the report will be 'signed off' by the relevant authorities by the end of April 2018. The report includes the identification of the Zones of Influence which will be used to clarify the extent to which contributions will be sought for the management of visitor pressures. The level of contributions will be determined by schemes that can be delivered by the Conservators of Epping Forest. It is anticipated that an interim visitor strategy, which comprises schemes which can be delivered in the short term, will be in place by June 2018). A longer term strategy will be developed over the Summer/Autumn 2018 period. This will be informed by the current review of the Epping Forest Management Plan being undertaken by the Conservators (a separate report from the Conservators is on the agenda for this meeting with progress in this area).

Transport Assessment Work

7. Further transport assessment work is currently being undertaken. This includes:

- developing in more detail a number of highway mitigation schemes, with a particular focus on junctions within the Epping Forest SAC area; and
- refining the transport modelling undertaken in support of the preparation of the Submission Local Plan Highway Assessment Report (EB502) (which identified that there was a need to refine a number of assumptions) and testing the more detailed highway scheme design.

8. The output of the work will be used to inform both a revised Transport Assessment Report and further air quality modelling. Both the transport and the air quality modelling will be run with and without highway mitigation schemes within the Epping Forest SAC area, but

will include the consideration of modal shift to be achieved through the implementation of sustainable transport schemes (as set out in Policy T 1 Sustainable Transport Choices) which forms part of the approach to mitigating the effects of development on air quality. Both strands of work are due for completion in May 2018.

9. In addition to the above, work is commencing on a 9 month programme of air quality monitoring to assess current air quality within the Forest. This will be used to provide a baseline to inform a longer term programme of air quality monitoring to be funded from developments over a certain size (as set out in Policy DM 22). It will also provide the opportunity to compare the predicted future air quality within the Forest derived from the modelling outputs referred to above with future data collected 'on the ground'. The approach to air quality monitoring has been supported by the relevant 'MoU authorities', as well as Natural England and the Conservators. It is anticipated that the modelling/monitoring work, together with Policies T 1 and DM 22 in particular, will form the basis of the air quality element of the Mitigation Strategy. It is the intention that the Mitigation Strategy will be in place by the end of 2018 and on-going outputs will be monitored through the Authority Monitoring report.

Proposed Memorandum of Understanding on the Distribution of Economic Need across the West Essex and East Hertfordshire Functional Economic Market Area

10. In 2017 Epping Forest District Council, Harlow Council, East Herts District Council and Uttlesford District Council commissioned Hardisty Jones Associates to produce an up to date Assessment of Employment Needs for the West Essex and East Herts Functional Economic Market Area (FEMA) (EB610). Following the completion of the study, the authorities have been working to produce a Memorandum of Understanding (MoU) that reflects the findings of the Assessment, and demonstrates an agreed approach to meeting future employment needs across the FEMA through emerging Local Plans. The MoU has been drafted and is to be considered by the Cooperation for Sustainable Development Member Board (which oversees cross boundary planning matters and ensures that Duty to Cooperate obligations are discharged across the HMA and FEMA area (and where appropriate beyond)).

Relocation/redevelopment of Princess Alexandra Hospital

11. The Cooperation for Sustainable Development Board (including Epping Forest District Council) continues to engage with senior representatives from the Princess Alexandra Hospital in Harlow. The Hospital, which is located on a highly constrained site near the town centre, faces a number of challenges in continuing to serve the needs of its catchment – the building needs major capital investment and there is no room to expand its services.

12. The preferred option is to relocate to a new site – two potential broad locations have been identified around Harlow: one within Epping Forest District (within the East of Harlow allocation – SP 5.3) and one in East Herts District (Gilston). The respective Local Plans for the two local planning authorities are currently showing potential provision for a hospital on these sites. In addition, the redevelopment/refurbishment of the Hospital at its current location is a further option which was identified in the Hospital Trust's 2017 Strategic Outline Case (SOC). Consequently, both relocation and development in situ options are being considered further as part of the Trust's current Outline Business Case (OBC) process.

13. Policy SP 5 of the Epping Forest District Local Plan Submission Version (LPSV) identifies that the East of Harlow allocation should include the provision of appropriate community and health facilities including approximately 14 hectares of land for a health and well-being hospital campus. Paragraph 2.131 of the LPSV also acknowledges that the site provides an opportunity to accommodate the relocation of the Hospital, subject to the

completion of further technical assessment work.

14. The Hospital Trust is currently preparing an OBC in order to apply for the necessary funding from Government. Planning consultants and transport consultants have been appointed by the hospital to assist with the work required to determine the preferred location for the new hospital campus and the preparation of the OBC. The Hospital Trust anticipates that a preferred site will be formally identified by July 2018.

15. The Council considers that the East of Harlow allocation can physically accommodate the relocation of the Hospital if required, and continues to work closely with representatives of the Hospital as work continues to select a preferred option. In the meantime, the process of producing a Strategic Masterplan for the East of Harlow site has commenced, and is considering how and where the hospital campus should be located on the site, subject to the outcome of the technical work being undertaken by the hospital and site promoter. The Hospital Trust intends to work closely with the Council and the site promoter in producing the Strategic Masterplan for the site. A meeting with the hospital and their consultants took place on 30 April 2018.

Harlow and Gilston Garden Town

16. Significant progress continues to be made in relation to the Harlow and Gilston Garden Town. A Project Director started in post in February 2018, and a Quality Review Panel has now been established. Work continues to finalise the Spatial Vision and Design Charter, and the Sustainable Transport Corridor Studies. It is anticipated that both studies will be considered by the Garden Town Board following consideration by the Quality Review Panel and developer/community engagement, and will directly inform Strategic Masterplans being produced for the Garden Town Communities in Epping Forest District.

17. Work is continuing with site promoters, Essex County Council and Harlow Council to put in place Planning Performance Agreements (PPAs) which will provide an agreed framework and project plan for the production of Strategic Masterplans for the Garden Communities. The PPAs and Strategic Masterplans will ensure that planning proposals for the sites will be 'front-loaded' and coordinated, whilst also ensuring the timely progression of planning applications and delivery. Further details in relation to implementation and delivery are set out below.

Local Plan Implementation and Delivery

18. The Council is making good progress in facilitating the timely delivery of housing and associated infrastructure in the District in accordance with the Housing Implementation Strategy (EB410). The Council is working with landowners and promoters of sites within 'Masterplan Areas' to develop Strategic Masterplans / Concept Frameworks in accordance with policy requirements. The Council fully recognises the importance of working proactively to deliver a significant step-change in the level of housing delivery in the District to meet objectively assessed needs over the Plan period, and to ensure that a five year supply of deliverable housing sites will be maintained, as illustrated by the Housing Implementation Strategy (EB410) and relevant Cabinet Reports (for example, EB107). An update on progress will be provided to the District Development Management Committee on 6 June 2018.

19. The Council established a Developer Forum in early 2017 (see EB1104 for the Terms of Reference) in order to provide a basis for the delivery of growth and infrastructure requirements identified within the Local Plan. The Developer Forum is split into two groups: the Garden Town Developer Forum; and the Developer Forum for other sites across the rest of Epping Forest District. The Developer Forum meets quarterly, and provides a basis for

ongoing discussions with relevant landowners, site promoters and stakeholders. It also helps to ensure that a joined up and 'frontloaded' approach is taken to the masterplanning, design, phasing and delivery of development of sites allocated within the Local Plan.

20. In June 2017 the Council agreed a Framework to guide the production of Strategic Masterplans (EB1106) and a Framework for Planning Performance Agreements (PPAs) (EB1105). In December 2017 the Cabinet considered the resources that would be required to implement the Local Plan and ensure the timely delivery of housing and infrastructure planned (EB113). Funding was agreed for the establishment of an Implementation Team to provide the necessary skills and resources to deliver the Strategic Masterplans, Concept Frameworks and Planning Performance Agreements associated with Local Plan allocations. A recruitment campaign has commenced to fill new posts created within the Implementation Team, and in the meantime, interim arrangements are in place to progress the work required.

21. Work to develop Strategic Masterplans / Concept Frameworks has commenced, and the Council is currently in discussions with a number of land owners / site promoters of allocated sites in relation to putting in place PPAs. Where appropriate, inputs from Essex County Council and Harlow Council will also be included within the PPAs in order to promote joined up and timely delivery.

22. The Council has established a Quality Review Panel. The first meeting of the Panel took place on 26 April 2018 to consider the pre-application proposal for Quinton Hill Farm – a site proposed for allocation in the LPSV (WAL.E8). The production of Strategic Masterplans, Concept Frameworks, Design Codes, and where appropriate, other planning proposals will be considered and informed through review at key stages by the Council's Quality Review Panel. In general, the Council will expect schemes of more than 50 homes or 5,000 square metres of commercial/other floorspace to be informed by review. Other smaller schemes which are complex or contentious may also be appropriate for review.

23. Following the submission of the Local Plan for independent examination, the Council will commence discussions with relevant landowners/site promoters through the Developer Forum to agree Statements of Common Ground in relation to the delivery requirements for key site allocations included within the Local Plan.

24. In March 2018 the Council published an updated Planning Policy Briefing Note (http://www.efdclocalplan.org/wp-content/uploads/2018/03/Planning-Policy-Briefing-Note_Mar-2018.pdf). The Briefing note is intended to inform the development management process and ensure that the Council takes a consistent approach to determining planning applications following the publication (and submission) of the Local Plan Submission Version 2017.

Infrastructure Planning and Delivery

25. Building on the Infrastructure Delivery Plan (IDP) Parts A and B (EB1101A and EB1101B), a technical paper on infrastructure delivery is being produced. The purpose of the technical paper is to provide more information and certainty on infrastructure delivery, as well as a more general update on the work undertaken since the IDP was published. Discussions are ongoing with infrastructure providers, and particularly Essex County Council, in order to provide greater clarity on future infrastructure requirements, and to respond to representations received as part of the Regulation 19 Publication period.

26. The technical paper will include a high level framework for apportionment and pooling arrangements to be taken forward for key infrastructure (highways, public transport, education, health (GP surgeries), and open space, sports, green infrastructure and community facilities). The paper will provide more information on those external funding

sources outlined in the IDP, including: which ones are being considered; work currently ongoing to progress/secure funding; and any risks of funding not being in place and contingency measures for this. The paper will also cover the potential contribution of the Community Infrastructure Levy (CIL) in funding infrastructure delivery.

Strategic Flood Risk Assessment

27. In 2017 the Council commissioned AECOM to provide further site specific analysis of flood risk (EB918) to supplement the Level 1 Strategic Flood Risk Assessment produced in 2015 to inform the Local Plan (EB909). The report has subsequently been finalised and will be submitted alongside the submission of the Local Plan.

28. As part of the Council's site selection process to identify future development sites for allocation in the Local Plan, the Council has taken a sequential approach to selecting sites, so that prioritisation has been given to those sites in Flood Zone 1. For a small number of sites, part of the site boundary is located in Flood Zones 2 and/or 3. However, for these sites, the indicative development capacity and the policy requirements associated with the site in the Local Plan make clear that development proposals should be located within Flood Zone 1.

29. The latest report assesses the flood risk posed to each of the development sites, based on available information and datasets. The report identifies which sites require the Exception Test and recommendations have been provided regarding the issues that will need to be addressed as part of a site specific Flood Risk Assessment (FRA) at the planning application stage.

Neighbourhood Planning

30. There are currently ten designated neighbourhood plan areas in the District, meaning that 10 parish councils have started to prepare their own Neighbourhood Plans. Moreton, Bobbingworth and the Lavers Neighbourhood Plan is the most advanced in terms of its stage in preparation. The Plan was examined in 2016 but the independent examiner concluded that Plan did not meet all of the Basic Conditions, meaning that it could not proceed to referendum and the Council making the plan. The Parish is currently preparing to finalise and submit a revised Plan.

31. The Chigwell Neighbourhood Plan has recently been submitted to the Council for (Regulation 16) publication. Preparations are being made for the Plan to be published after the local elections in May 2018 for a period of 6 weeks. The Council has formally consulted Natural England in accordance with the Conservation of Habitats and Species Regulations 2017 in order to inform our appropriate assessment of the implications for the Epping Forest SAC of the Chigwell Neighbourhood Plan. The response will be placed on the council's website. Following the Publication of the Plan, the Council must arrange for an independent examiner to undertake an examination of the Plan against the Basic Conditions. Subject to the outcome of the examination, the Plan would then proceed to a local referendum. If the referendum result is positive the Council will then need to determine whether the Plan meets the basic conditions and determine whether to make the plan.

32. All other neighbourhood plans in progress including those for Buckhurst Hill, Epping Town, Epping Upland, Loughton Town, North Weald Bassett, Ongar, Theydon Bois and Waltham Abbey, are in their early stages of preparation. Amongst these parishes, Ongar, North Weald Bassett and Epping Town are currently the most active and are planning to undertake public engagement exercises over the coming months.

33. The Planning Policy Team, together with the Rural Community Council for Essex

continues to provide support to Parish and Town Councils wherever possible.

Resource Implications:

The budget for the publication of the Local Plan Submission Version was approved as part of the Local Plan budget in December 2017. The Equality Act 2010 requires that the Public Sector Equality Duty is actively applied in decision-making. This means that the equality information provided to accompany this report is essential reading for all members involved in the consideration of this report. The equality information is provided at Appendix 2 to the report”.

Legal and Governance Implications:

The Council is required by national legislation to prepare and maintain an up to date Local Plan to set out the strategic priorities for the area and the policies that address these.

Safer, Cleaner and Greener Implications:

The delivery of a Local Plan, informed by a robust evidence base, will contribute to safer, cleaner, greener objectives by planning for sustainable development.

Consultation Undertaken:

All stakeholders including residents, local groups or businesses, statutory consultees and landowners were given the opportunity to make representations on whether the Local Plan Submission Version is legally compliant, sound and/or meets the Duty to Cooperate, in accordance with Regulation 19 of the Local Plan Regulations 2012 and in accordance with the Council’s Statement of Community Involvement.

Background Papers:

All relevant Submission documents, including the evidence base, are available to view from the EFDC Local Plan website at <http://www.efdclocalplan.org/>

Risk Management:

The Council needs to be seen to make timely progress on the preparation of a Local Plan to avoid the risk of intervention by the Secretary of State. In order to prepare statements of common ground further work is being undertaken by the team and discussions with key stakeholders. Work is also ongoing with the implementation of the local plan in order to provide evidence at the examination that the plan is deliverable and the Council can meet its five year land supply.

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Section 1: Identifying details
Your function, service area and team: Planning Policy, Neighbourhoods
If you are submitting this EqIA on behalf of another function, service area or team, specify the originating function, service area or team: N/A
Title of policy or decision: Epping Forest District Local Plan Update
Officer completing the EqIA: Tel: Alison Blom-Cooper Email: ablomcooper@eppingforestdc.gov.uk
Date of completing the assessment: May 2018

Section 2: Policy to be analysed	
2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? Change to existing project
2.2	Describe the main aims, objectives and purpose of the policy (or decision): To update members on the work being undertaken to support the progression and implementation of the Local Plan and Neighbourhood Planning. What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)? Members will have been provided an update on work being undertaken to support the Local Plan.
2.3	Does or will the policy or decision affect: <ul style="list-style-type: none"> • service users • employees • the wider community or groups of people, particularly where there are areas of known inequalities? <p>The Local Plan will have an impact on all residents, in the District as it will set out the proposals for growth to meet the objectively assessed housing and economic needs identified and the associated infrastructure.</p> <p>Will the policy or decision influence how organisations operate?</p> <p>Yes – it will help to update them on work being undertaken and evidence being produced.</p>
2.4	Will the policy or decision involve substantial changes in resources? Yes

2.5	<p>Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes?</p> <p>The Local Plan is one of three objectives in the corporate plan – the Local Plan will seek to meet the vision set out in the corporate plan to make best use of existing infrastructure to meet the district's need for development in the most sustainable locations with the least possible impact on our natural and historic environment.</p>
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Section 3: Evidence/data about the user population and consultation¹

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	<p>What does the information tell you about those groups identified?</p> <p>The identified need for economic and housing growth over the Plan period takes account of population growth and demographic changes and profile in the District and associated population projects.</p>
3.2	<p>Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?</p> <p>The Draft Local Plan was subject to consultation between 31 October and 12 December 2016. Leaflets were distributed to all households in the District. The comments were received have been analysed and reported to Cabinet and were used to inform the preparation of the Local Plan Submission Version (LPSV). The LPSV was published under Regulation 19 for a period of six weeks from 18 December 2017 to 29 January 2018. The comments received have been reviewed and collated ready for submission and have been available on the Council's website since 21 March 2018.</p>
3.3	<p>If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:</p>

Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	Positive – the evidence outlines the needs for housing provision for all age groups including the ageing population	Low
Disability	Positive - Housing standards to be applied will be in line with the lifetime homes standards which cater for ageing population, mobility needs and other disabilities. Where there is evidence pointing to other housing and employment needs these will be provided through the Plan.	Low
Gender	Neutral - The Plan will not be applying policies that are bias to any groups in terms of the provision of housing and job projection needs.	Low
Gender reassignment	Neutral - The Plan will not be applying policies that are bias to any groups in terms of the provision of housing and job projection needs.	Low
Marriage/civil partnership	Neutral - Population projection information based on census provides this information pointing toward changing household trends and future provision needs for existing families and new family unit trends.	Low
Pregnancy/maternity	Neutral - Population projection information based on census will provide this information pointing toward changing household trends and future provision needs. Need for clinics and specialist facilities are also in the scope of the plan and being addressed.	Low
Race	Neutral - Information collated through previous monitoring, population projection trends and consultation feedback will have provided some information. The need for community centres, places of worship and provision will be made accordingly. The Plan will not be applying policies that show bias to any group.	Low
Religion/belief	Neutral - Information collated through previous monitoring, population projection trends and consultation feedback will have provided some information. The need for community centres, places of worship and provision will be made accordingly. The Plan will not be applying policies that show bias to any group.	Low
Sexual orientation	Neutral - Information collated through previous monitoring, may have provided some information. The Local Plan will not be applying policies that are bias to any groups. If we have received and will receive information to support the need for development associated with specific groups we will address a part of the Plan, although policies and	Low

	development proposals in the plan will not be sex orientation related/dependant.	
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Section 5: Conclusion

		Tick Yes/No as appropriate	
5.1	Does the EqIA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	✓ No <input type="checkbox"/>	
		Yes <input type="checkbox"/>	If ' YES ', use the action plan at Section 6 to describe the adverse impacts and what mitigating actions you could put in place.

No actual or likely adverse impacts have come to light, just needs based assessments guiding the Planning Policy team to ensure that demands of the people working, living and visiting the district are met over the Plan period to 2033. The Local Plan must plan positively for future needs around housing and employment and is required to meet the needs that have been identified in the evidence base, including the consultations.

Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.

Section 7: Sign off

**I confirm that this initial analysis has been completed appropriately.
(A typed signature is sufficient.)**

Signature of Head of Service:

Date:

Signature of person completing the EqIA: Alison Blom-Cooper

Date: 1 May 2018

Advice

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqIA you undertake to the director responsible for the service area. Retain a copy of this EqIA for your records. If this EqIA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.