

Formal Comments Received and Officer Responses to Housing Strategy 2009-2012 Consultation

Name of Respondent	Summary of Response(s)	Director of Housing’s Comments	Changes made to Final Version
Abbess Beauchamp and Berners Roding Parish Council	(1) The actions in the Action Plan are not numbered	It is agreed that it would be clearer if the actions were numbered	All actions in Action Plan numbered
	(2) Only one action relating to rural housing – action is long out of date. Add an action: “Fulfil the proven affordable housing need in Abbess Beauchamp and Berners Roding by pro-actively assisting Hastoe Housing Association and the Parish Council to obtain planning approval for the chosen site”	The proposal is agreed in principle – EFDC has been working with the Parish Council and Hastoe to provide a rural housing scheme in the Parish and warrants specific reference, since a site has been identified.	An additional action has been added to Action Plan: “Work with Abbess Beauchamp and Berners Roding Parish Council and Hastoe Housing Association to provide an affordable rural housing scheme in the Parish, utilising EFDC’s Planning Exceptions Policy”
North Weald Bassett Parish Council	(1) Section 1.5 (Consultation and Partnerships) omits reference to residents groups or associations	Recognised tenants and leaseholders associations, the Epping Forest Tenants and Leaseholders Federation, voluntary organisations and Voluntary Action Epping Forest were all consulted, and included in the list at Section 1.5. It was not felt necessary to extend the consultation further	No change.
	(2) There is no mention of village design statements, even though they are recognised by EFDC	It is agreed that village design statements (sometimes referred to as Community Led Plans) are relevant to the Housing Strategy.	An additional Section added within Section 5.2 - “Housing Growth in the District” on “Community Led Plans and Village Design Statements”, which includes reference to the Thornwood Village Design Statement.
	(3) The 5 key objectives are endorsed	No comment	No change.

	<p>(4) Section 3.2 (Affordable Housing) - allows <i>on an exceptional basis</i> certain planning applications which infringe the Green Belt. EFDC should define the trade-off</p>	<p>It is not thought necessary to set out in the Strategy when such developments will be agreed. The Strategy explains that it will be on an exceptional basis and only if high levels of affordable housing (at least 80%) is provided and it is considered suitable for residential development. The reports to EFDC's Area Plans Sub-Committees will explain in detail the proposed reasons</p>	<p>No change.</p>
	<p>(5) Section 3.5 (Gypsies and Travellers):</p> <ul style="list-style-type: none"> • The aims are acceptable • The stated objective to “minimise the impact of the sites on the countryside and the settled communities” should be a prime consideration • Objective (e) should be deleted, as it is included in (c) 	<p>Whilst the sentiment about impact is understood and acknowledged, a number of the other objectives are considered to be equally important. In any event, none of the objectives stated throughout the Strategy are ranked, and such an approach in this section would be inconsistent.</p> <p>Objective (e) is considered to be quite separate from Objective (c)</p>	<p>No change.</p>

	<p>(6) Section 3.5 (Gypsies and Travellers) – Key Issues:</p> <ul style="list-style-type: none"> • The data on existing sites are incomplete • The Area Suitability Study has been heavily criticised on the grounds of flawed methodology, due to almost exclusive reliance on a few relatively unimportant criteria, to which a numerical value can be attached, at the expense of Objective (d) • The “Call for Sites” was directed at all developable sites and not focussed on G&T potential. The Myriad consultation with travellers has not produced any statistically valuable data. The outcome measure of reduced evictions is valid 	<p>The information on the numbers of existing sites and pitches has been updated in the Housing Strategy.</p> <p>Although criticism has been received, EFDC does not agree that the Area Suitability Study was flawed</p> <p>It is agreed that it should be made clear that the “Call for Sites” was for any proposed development sites, and that this was also used to identify potential gypsies and travellers sites.</p>	<p>Reference in the Key Issues section to the “Call for Sites” has been clarified to explain that it was made for any proposed development sites, but that this was also used to identify potential gypsies and travellers sites.</p>
	<p>(7) Section 3.6 (Supported Housing for Older People and Other Vulnerable People) – Commended</p>	<p>No comment</p>	<p>No change</p>
	<p>(8) Section 3.10 (Rural Housing) – This envisages small scale incursion into the Green Belt; probably in-fill into historic irregularities. Important to recognise that green field is not necessarily synonymous with Green Belt. The need to involve parish councils is commended</p>	<p>The planning exceptions policy does (only) relate to Green Belt sites (which may be “brownfield” or “greenfield” sites).</p>	<p>No change</p>
	<p>(9) Section 5.3 (Housing Mobility) - Commended</p>	<p>No comment</p>	<p>No change</p>

	(10) Appendix 1 (Key Action Plan) – The Director of Planning and Economic Development appears to have minimal involvement in the Key Action Plan	The responsibilities relate to the officers who have responsibility to lead the identified projects. The Director of Planning and Economic Development’s responsibility is more usually to respond to land-related proposals and to advise members of EFDC’s Area Plans Sub Committees.	No change
Parish Councillor Richard Spearman – North Weald Parish Council	(1) Found the Consultation Conference useful and informative	No comment	No change.

	<p>(2) Section 3.2 (Affordable Housing) – The proposed 80% affordable housing (on exceptional Green Belt sites) is extremely high; land-owners would have difficulty meeting, accepting the economic consideration</p>	<p>The proposed objective can be economical to the developer. EFDC has received a number of proposals from developers proposing the provision of 80%-100% affordable housing in the Green Belt. EFDC has accepted two to date – 80% affordable housing at White Lodge / The Limes, Sewardstone Road and 100% at Albion Terrace, Sewardstone Road.</p> <p>In the former case, the developer has also agreed to provide a number of other community benefits (including a shop, community centre, free bus passes and donation of land to the Corporation of London)</p>	<p>No change.</p>
	<p>(3) The completed Thornwood Common Village Design Statement has been approved by Essex County Council, which desires an expansion in the number of homes within the village confines, to help bring improved facilities. This cannot happen with the existing level of housing in the village – only a sensible and relatively substantial expansion of development will enable this to happen. Any development within Thornwood Common would require the release of Grant Belt land – Therefore, suggest an exemption from the 80% special exemption requirement and require a 40% provision</p>	<p>For the reasons given above, it is unnecessary to reduce the required affordable housing provision on Green Belt sites.</p> <p>It should be noted that this is a separate issue to the need to allocate land for residential housing within the new Local Development Plan. This process may result in some land being removed from the Green Belt in a planned way (especially around Harlow to assist with the Town's growth). The requirement for such land would be the provision of 40% affordable housing, as set out in the Housing Strategy</p>	<p>No change.</p>

<p>Fyfield Parish Council</p>	<p>(1) Principally agrees with the Housing Strategy, but is concerned at the lack of policy to meet rural housing needs (no mention of Fyfield or Willingale).</p> <p>The need for affordable housing for local people in rural areas is ever growing and is vital to protect village life for the future.</p>	<p>There is a whole section (Section 3.10) in the Strategy that sets out the proposed approach to rural housing. Completed schemes at Willingale and Fyfield are referred to.</p> <p>The last paragraph of this section explains that EFDC is working with Hastoe Housing Association and a number of parish councils to help assess their local housing needs and to provide more rural housing schemes. It is not considered necessary to list these parish councils, since they may change over the period of the Strategy.</p> <p>The need for affordable housing in villages is accepted and recognised within the Housing Strategy.</p>	<p>No change.</p>
	<p>(2) The Strategy is generalised and has an emphasis on urban-based development. There is insufficient potential for rural areas and village residents.</p> <p>The Strategy should reflect a better balance in the communities or rural areas to mitigate against the demise of rural communities.</p>	<p>It is not accepted that the Strategy has an emphasis on urban-based development. Indeed, whilst there is a section on Rural Housing in the Strategy, there is no specific section on Urban Housing.</p> <p>However, it is inevitable that the majority of new development will be in urban areas, due to the Green Belt constraints around villages.</p> <p>It is felt that the section on Rural Housing demonstrates EFDC's commitment to increasing the provision of affordable housing in rural areas.</p>	<p>No change.</p>

	(3) Young people born into rural communities need to become independent within their own communities and should be able to find affordable homes and not be forced to move away. This is a vital component of protecting village life for future generations	This is accepted. Hence the reason for EFDC adopting its Planning Exceptions Policy in rural areas, which (unlike in urban areas) requires that the affordable housing is allocated to local people from within the village or surrounding villages.	No change
Protection of the Roydon Area (PORA)	(1) Not qualified to comment in general on the document – which seems thorough and sound	No comment	No change
	(2) Fear that because the early provision of infrastructure to meet the perceived need for more housing, including the extension of Harlow, is unlikely, it will lead to piecemeal developments. Areas on the borders of Harlow will be most vulnerable where housing within Harlow come close to the border. Such tacking onto existing estates would be tempting but in total contradiction of the principles of sustainable communities.	The East of England Plan makes it clear that Epping Forest District must provide an unspecified number of homes to contribute towards the expansion of Harlow. The Housing Strategy explains that EFDC will work with Harlow DC to ensure that such homes are provided in the most appropriate location.	No change
	(3) One of the aims of the Growth Fund Programme is to uphold the alignment of housing, employment and infrastructure. We urge that this principle be honoured.	The Housing Strategy refers to the Government's Growth Fund. The allocation of funding for Harlow will be utilised by Harlow DC and Harlow Renaissance. However, EFDC will endeavour to influence how and where the money is spent.	No change
Adult Health and Community Wellbeing - Essex County Council	(1) Very accessible format and presentation	No comment	No change

	<p>(2) Section 3.6 (Supported Housing for Older and other Vulnerable People) notes that there is no need for any more rented accommodation for older people in the District, but that there may be a need for an extra care scheme. Would welcome further discussion on (the future of) Jessopp Court</p>	<p>EFDC Housing is already in discussion with Adult Health and Community Wellbeing about the future of Jessopp Court, which is referred to in the Action Plan.</p>	<p>No change.</p>
	<p>(3) Suggest that more than one extra care housing scheme would be needed in the District, as we seek to enable more older people to live independently in their own home, rather than registered care. These people are unlikely to be reflected in housing need surveys and Epping Forest currently has 5.4% of the over-65 population living in registered care, compared to the national average of 2.5%. Extra care schemes can assist with the predicted rise in older people with dementia.</p>	<p>The need is uncertain, but there may be a need for more than one extra-care scheme</p>	<p>The useful statistical information provided by Essex County Council has been included in Section 3.6.</p> <p>Reference to extra-care housing now refers to the possibility of a need for “one or more” such schemes to be provided</p>
	<p>(4) Note that there is no reference to people with mental health problems</p>	<p>This is because there appears to be limited information available on the housing need for people with mental health problems in the District, and no proposals have been provided by the North Essex Partnership NHS Foundation Trust to meet the housing need.</p>	<p>A new sub-section has been added within Section 3.6, referring to the limited information available and the need to liaise with the NHS Foundation Trust on the current position and future housing needs.</p> <p>A new action has also been added to the Key Action Plan</p>
<p>Epping Town Council</p>	<p>The Committee has considered the consultation document and resolved that no comment be made</p>	<p>No comment</p>	<p>No change.</p>