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Mr H Stamp
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Dear Mrs Perceval-Maxwell

Response to Draft List of Matters and Participants for Examination in Public

This response to the draft list covers 4 subjects:

- (a) Local and other representation on Matter 8H
- (b) Venue for 8H
- (c) District Council representation on Matters 1-7+9
- (d) Draft List of Matters

(a) Local and Other Representation on Matter 8H

I understand the purpose of the Examination (in the Panel's Notes for Participants). But also the Panel is correct to note that RSS "is more location specific than previous Structure Plans" (3.22 of Notes of the First Preliminary Meeting on 14/6/5). There are also issues of fairness to be taken into account. Because of this location specificity and the approved LDS timescales for LDD adoption in 2009/2011 (with prospects of developers making major planning applications before 2009/1011 with Government encouragement in order to achieve delivery early in the RSS period), the Examination in Public (EiP) may well be the only meaningful chance for local interests to put forward views, be examined by the Panel upon, and be party to structured discussion on, very significant proposals for their areas. It is therefore worrying, and in principle unfair, that three Parish Councils and one group (PORA) affected by draft RSS proposals for 2,700 homes to the south and west of Harlow have no representation at the EiP; and that North Weald Parish Council is not included (given draft RSS proposals for a 6,000 home new settlement at North Weald. The opportunity to provide a 2,000 word written submission on Matter 8H is welcome, especially as this will be after one can view other objections/representations (when these are placed on the Internet). But being excluded from the list of participants in structured discussion before such statements have been made (and they may include responses to other parties representations) is not right.

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There is also unfairness given those groups/interests who are included in the Draft List of Participants. Developers are well represented. Local interests in Hertfordshire/north of Harlow are also well represented. But those affected by draft RSS proposals for south and west of Harlow are not. North Weald is proposed to be locally addressed by an “and/or” situation of a users group and/or an action group.

One question arises following the above: how were developer interests selected?

Local representation needs re-consideration here. At the least: representation for three parishes adjoining Harlow to the south and west (Roydon, Nazeing and Epping Upland) and PORA; and adding North Weald Parish Council to the Airfield Users Group and Bassett Community Action Group. This would not have a large effect on the number of participants.

It seems that public transport (especially rail) and Highways Agency representation is missing from Matter 8H, given the nature of the issues around the major growth of Harlow in draft RSS and our experience of these issues. In saying this I note items (v) and (vi) of 8H in the Draft List of Matters.

(b) Venue for 8H

It is of course right that the EiP is in public. I note a desirable general trend towards seeking the inclusion of the public and stakeholders in decisions that affect them. While I appreciate that the scale of the draft regional plan does not allow direct inclusion at EiP; at least allowing easy access for people who want to see the Panel carrying out its valuable “inquisitorial approach” and “public debate” (2.2 of Notes of the First Preliminary Meeting on 14/6/5) will help engagement and inclusion. Ely is too remote for those concerned with matter 8H. Whereas Harlow is fairly central to the area under consideration at 8H and is itself the location of major growth proposals in draft RSS.

(c) District Council Representation on Matters 1-7 + 9

I know Ian Vipond (Colchester and RTAG) has been in contact with your office and written yesterday about this difficult subject. He has put forward several options. From his letter he seems to see all as sub-optional.

This District Council has participated in the various studies leading up to both draft RPG14 and draft RSS, taking into consideration both strategic and local issues. On some matters it has come to different views than the County Council for the area. Its strategic views are reflected (specifically or not) in its representations on the draft RSS. While the opportunity to make written submissions is welcome, the Draft List of Participants does not allow this District to be part of the public debate on the non-local aspects of the draft RSS; or for the Panel to question the contents of written statements and the broader thinking behind them.

Epping Forest District Council is in a unique position in the region: major draft RSS growth proposals against a history of low housing allocations; immediately adjacent both to London, with commuting implications, and the Harlow major regeneration and growth centre; the target of a significant proposed new settlement and subject to a major new transport proposal; and a district with great, and still as yet unanswered (even at this stage), concerns about draft RSS as it affects the southern part of the London-Stansted-Cambridge-Peterborough Growth Area. We therefore feel we need to have the opportunity to be part of the public debate, raising questions

(via the Panel) as part of that debate and allowing questions to be asked of our views. I am not suggesting a major input, time-wise, but the opportunity to participate in the examination on particular strategic issues that this District Council's position and experience means it has a valid and useful contribution to make.

From the Draft List of Matters 1-7 + 9 as it stands I currently think that this District would have some such a contribution to:

- Matter 1, including bullets;
- Matter 1A;
- Matter 1B (iv+v);
- Matter 1C;
- Matter 2A;
- Matter 2B;
- Matter 2C;
- Matter 3;
- Matter 4 (particularly iii);
- Matter 5A;
- Matter 5B;
- Matter 9A; and
- Matter 9C.

The widening of debate on Matter 8 by the Panel in recognition of local authorities receiving their district housing numbers from RSS (e.g. 3.11 of Notes of the First Preliminary Meeting on 14/6/5) is, of course, welcomed. But it would be unfortunate, to say the least, if this District were restricted to only being heard under Matter 8, and then if wider views this District would wish to put forward were to be not allowed by the Panel, on the basis that they should have been debated/discussed under matters 1-7+9.

(d) Draft List of Matters

- Matter 1. Travel needs/demands/infrastructure and relationship with London are not obviously reflected in sub-matters 1A, 1B, and 1C.

- Matter 4. I am not clear on how the potential needs of Gypsies and Travellers is to be addressed. I understand that GO-East have made representations about this subject. If the Panel are going to recommend the RTAG position as I understand it (that RSS should include a general statement about provision being made after surveys of need), then the matter could be dealt with by Written Submissions. If the Panel might recommend allocations by District then a debate to reflect the debate regarding District housing allocations, as with Matter 8, seems required.

- Matter 5A. It could be made clear that this covers water resources and water conservation.

- Matter 8H (ii). The Green Arc, Epping Forest itself and its SAC designation, and the Habitats Directive need specific consideration under this sub-matter.

- Matter 8H (iii). As the draft RSS is proposing maximum use of one runway at Stansted Airport, is mention of the airport's expansion in line with the Airports White Paper beyond the remit of the draft RSS? At least some explanation of the Panel's thoughts seems to be needed here.

Please do not hesitate to contact me with any queries regarding the above points.

Yours sincerely

Henry Stamp

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