

Developer Forum

28 July 2021

EFDC Planning Update

- In February 2021 the Council adopted the Interim Air Pollution Mitigation Strategy for the Epping Forest Special Area of Conservation (EFSAC), December 2020
- Development Management has set out a protocol for issuing planning decisions that have been held in abeyance as a result of the EFSAC
- Cabinet endorsed District Sustainability Guidance (Major Developments and Minor Developments) as a material planning consideration in March 2021, with householder guidance to follow. Garden Town Board endorsed the Harlow and Gilston Garden Town Sustainability Guidance in March also.
- EFDC Green Infrastructure Strategy agreed by Cabinet as a material planning consideration in April 2021, subject to liaison with the Woodland Trust

Local Plan Examination

- We are at an advanced stage in the Plan-making process:



- Local Plan Submission Version (LPSV) submitted for Examination September 2018 and Inspector appointed
- Examination hearing sessions February 2019 – June 2019
- Inspector issued her post Examination hearing advice August 2019
- Council undertaken further work to address the Inspector's Actions
- This work has led to proposed Main Modifications (MMs) to the LPSV
- MMs Consultation will run from 15 July to 23 September 2021
- Easiest way to make representations is via online form

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Main Modifications stage

- What is the MM Stage about?
 - Inspector has identified that a number of MMs to the LPSV 2017 are required to address issues of soundness and/ or legal compliance.
 - This stage is an opportunity for people to make representations on the changes proposed to the published LPSV 2017, including the supporting documents that have informed these changes.
- What it is not:
 - an opportunity to make representations about parts of the Plan that are not proposed to be modified and such representations will not be considered by the Inspector
 - an opportunity to repeat comments already made on other aspects of the Plan as these are already being considered by the Inspector

Main Modifications stage

- The MMs include:
 - Changes to some of the supporting text and Policies within the Plan
 - Deletion and the amendment to some site allocations
 - Updated Housing Supply data to March 2020
 - Associated changes to mapping
 - Drafting inaccuracies or factual updates
- The MMs do not alter the strategy in the LPSV and do not propose any new residential, traveller or employment site allocations to the LPSV

Main Modifications stage – what is being consulted upon

- Schedule of Main Modifications
- Mapping subject to Main Modification
- Supporting documents (Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the Main Modifications):
 - Council’s response to Inspector’s Actions
 - Sustainability Appraisal Addendum
 - 2021 Habitats Regulations Assessment
 - Epping Forest Interim Air Pollution Mitigation Strategy
 - Green Infrastructure Strategy
 - Latton Priory Access Strategy Assessment Report
 - Revised Appendix 2 to the Open Space Strategy
 - IDP: Part B Infrastructure Delivery Schedule 2020 Update
 - EFDC Consolidated and Updated Viability Evidence 2020
 - Statement of Common Ground Addendum East of Harlow
 - South Epping Masterplan Area Capacity Analysis
 - Other Examination Documents

Inspector's Actions

- 39 Actions within the Inspector's post Examination hearings advice
- Essential to note that the Inspector's advice also confirmed acceptance of a number of key elements of the Plan e.g. the Plan's housing requirement at a minimum of 11,400
- Summary response to each of the 39 Actions is supporting document ED133
- Helpful to reflect on Action 9

Inspector's Action 9

- ***“In light of my advice concerning the Special Area of Conservation and specific allocations, to seek alternative sites to meet the housing requirement, firstly within the Council’s preferred strategic growth options. If no such sites can be found, to explore amendments to the spatial strategy through the SA process.”***
- The Council has undertaken work to determine implications of the Inspector’s advice on:
 - Strand 1: specific site allocations contained within the LPSV;
 - Strand 2: Epping Forest SAC; and
 - together what the two strands of work mean for the Council’s ability to meet its housing requirement of a minimum of 11,400 new homes by 2033.

Inspector's Action 9

- **Strand 1: Amendments to and Deletions of Site Allocations**

- Several of the Inspector's Actions relate to the removal of site allocations from the LPSV or amendments in terms of site capacity/ likely delivery trajectory
- In addition, the Council proposes MMs to the capacities of a number of other site allocations in the LPSV
- Taking into account the combined effect of these changes it is determined that the Council has sufficient sites to meet its housing requirement

Inspector's Action 9

- **Strand 2: Implications of the Revised Site Allocations for Epping Forest SAC**
 - In response to Inspector's Actions the Council has undertaken further work on the implications of the revised levels of proposed development on the integrity of Epping Forest Special Area of Conservation.
 - This work has concluded that adverse impacts on Epping Forest SAC for both air quality and recreational pressure can be appropriately mitigated, subject to the implementation of:
 - an Air Pollution Mitigation Strategy
 - a Strategic Access Management & Monitoring Strategy
 - provision of Suitable Alternative Natural Greenspace (SANG) and the implementation of infrastructure enhancement projects
 - Further details on the assessment undertaken and strategies proposed by the Council to manage the impacts are set out in:
 - Epping Forest District Local Plan 2021 Habitats Regulations Assessment
 - Epping Forest Interim Air Pollution Mitigation Strategy
 - Interim Approach to Managing Recreational Pressures on the Epping Forest Special Area of Conservation
 - Epping Forest District Council Green Infrastructure Strategy

Inspector's Action 9

- **Conclusion:** Taking account of amendments to or deletions of site allocations contained within the LPSV, the Council can meet its housing requirement without the need to allocate additional sites *and/or* implement an amended spatial strategy which will mitigate any adverse effects on the integrity of Epping Forest SAC. The Council therefore does not propose to remove any further sites to those already identified or allocate any additional sites in the Local Plan.

Inspector's Action 9

• Returning to Amendments to and Deletions of Site Allocations

Outcomes of Inspector's Actions	
Main Modifications	Inspector's Action
Delete EPP.R3 (Epping London Underground Car Park), LOU.R1 (Loughton London Underground Car Park) and LOU.R2 (Debden London Underground Car Park).	Action 18
Reduce the capacity at EPP.R1 and EPP.R2 (South Epping Masterplan Area) to 450 homes. MM to housing trajectory to show delivery commencing from 2028 onwards.	Action 19
Delete LOU.R5 (Jessel Green).	Action 22
To reduce the capacity of LOU.R14 (Land at Alderton Hill) to reflect amended site area.	Action 23
Delete CHIG.R6 (Limes Farm).	Action 26
Delete CHIG.R7 (Chigwell Convent).	Action 27
Delete ROYD.R3 (Land at Epping Road).	Action 28
Reflect delivery of East of Harlow Garden Community allocation from 2025/26 onwards.	Action 16
Reflect housing supply position at 1 April 2020. A number of site allocations proposed for deletion since they have now been built out.	Action 10
Additional site capacity changes	
Main Modifications	
Increase the capacity of CHIG.R11 (Land at Hainault Road) in response to matters raised during the Hearing Sessions.	
Reduce the capacity of the following sites:	
EPP.R5 (Epping Sports Centre)	
NAZE.R2 (The Fencing Centre)	
WAL.R5 (Waltham Abbey Community Centre)	

Trajectory

- Revised trajectory published as part of the MMs Consultation - see MM115 in the Schedule
- As required by the Inspector, there is also an MM to set the level of housing required in each year of the Plan period in Policy as follows (MM15):

<u>Period</u>	<u>Projected housing requirement</u>
<u>2011/12 – 2019/20</u>	<u>2,497 (277 per annum)</u>
<u>2020/21 – 2024/25</u>	<u>2,750 (550 per annum)</u>
<u>2025/26 – 2032/33</u>	<u>6,153 (769 per annum)</u>
<u>Total</u>	<u>11,400 (518 per annum)</u>

Questions?

- Strategic Context
- Housing, Economic and Transport
- Development Management
- Places
- Infrastructure & Delivery