

Epping Forest District Local Plan
Update to Accompany Submission
July 2018

EB121

1) *Introduction*

1.1 This update report has been produced to accompany the Submission of the Epping Forest District Local Plan, and to assist the Inspector appointed to undertake the Independent Examination (as well as participants) in understanding the latest position in relation to ongoing work to support the Local Plan.

1.2 The report provides a short summary of work which is ongoing in a number of areas, 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. The report includes updates on several areas of work being undertaken across local authority boundaries, as well as work to implement the Local Plan and ensure the timely delivery of 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).

2) *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)*

2.1 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 relevant local authorities, 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.

2.2 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. 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 mitigation strategy, which comprises

schemes which can be delivered in the short term, will be in place by September 2018 (subject to confirmation from the Conservators of Epping Forest and Natural England of the schemes and projects to be funded). A longer term strategy will be developed over the Autumn 2018 period. This will be informed by the current review of the Epping Forest Management Plan being undertaken by the Conservators.

- 2.3 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.
- 2.4 The output of the work is being used to inform both a revised Transport Assessment Report and further air quality modelling. Both the transport and the air quality modelling is being run with and without highway mitigation schemes within the Epping Forest SAC area, and will include the consideration of model 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 over the summer 2018.
- 2.5 In addition to the above, work has commenced 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 T1 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.
- 2.6 Alongside the work being undertaken by the Council with relevant partner authorities to develop the Mitigation Strategy for Epping Forest SAC, the Council is also producing a Statement of Common Ground to provide confirmation of progress and next steps. It is anticipated that the Statement of Common Ground will be available by early Autumn 2018 to further assist the Independent Examination.

3) *Memorandum of Understanding on the Distribution of Economic Need across the West Essex and East Hertfordshire Functional Economic Market Area (EB1203)*

3.1 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. An agreed MoU (EB1203) was signed in June 2018 by the respective local planning authorities.

4) *Relocation/redevelopment of Princess Alexandra Hospital*

4.1 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.

4.2 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.

4.3 Policy SP 5 of the Epping Forest District Local Plan 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 Local Plan also acknowledges that the site provides an opportunity to accommodate the relocation of the Hospital, subject to the completion of further technical assessment work.

4.4 The Hospital Trust is currently preparing an OBC in order to apply for the necessary funding from Government. Planning consultants, transport consultants and masterplanners 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 / August 2018.

- 4.5 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 will commence, and consider 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 is working closely with the Council and the site promoter in producing the Strategic Masterplan for the site.

5) *Harlow and Gilston Garden Town*

- 5.1 Since the production of the Duty to Cooperate Compliance Statement in December 2017, 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 total of twelve workstreams have been established which include Officers from across the Garden Town authorities (Epping Forest District Council, Harlow District Council, East Herts District Council, Essex County Council and Herts County Council) and support from Homes England representatives. The workstreams are as follows:
- Infrastructure;
 - Delivery model;
 - Quality design;
 - Delivery;
 - Health;
 - Community consultation, engagement and communications;
 - Economic development;
 - Strategic housing;
 - Stewardship;
 - Finance;
 - Management and governance; and
 - Air quality.
- 5.2 A Quality Review Panel has been established. Work continues to finalise the Spatial Vision and Design Charter, and the Sustainable Transport Corridor Study. 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. It is anticipated that the studies will be endorsed as a material planning consideration by the Garden Town Member Board and respective local authorities in September 2018.
- 5.3 Consultants have recently been commissioned to produce a Garden Town Infrastructure Delivery Plan. This will build upon the work already undertaken by respective local authorities, but ensure that further clarity is provided in relation to key infrastructure requirements across the Garden Town as a whole, in addition to future delivery and funding mechanisms (including the

need for cross-boundary apportionment of costs). Linked to this, consultants are also being commissioned to provide further viability evidence to support the delivery of the Garden Town. Inception meetings with the appointed consultants are expected to take place in July 2018. Initial outputs are anticipated by August 2018.

- 5.4 Through the Garden Town project, an updated Water Cycle Study for Harlow is currently being finalised. It is anticipated that this will be published in Summer 2018. In addition, the Council is working to agree a Statement of Common Ground with the Environment Agency and Thames Water.
- 5.5 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 in Section 6 below.

6) Local Plan Implementation and Delivery

- 6.1 The Council is making significant 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).
- 6.2 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.
- 6.3 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).

- 6.4 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). Subsequently, the Council agreed to set up a new 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.
- 6.5 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.
- 6.6 It is anticipated that the Council will be able to report progress on the development of Strategic Masterplans / Concept Frameworks as required to the Independent Examination, and where appropriate Strategic Masterplans/Concept Frameworks will be endorsed by the Council as material planning considerations from early 2019 onwards in order to guide and inform the submission of planning applications. The endorsement of Strategic Masterplans/Concept Frameworks by the Council will help to significantly front-load the planning process for individual sites, reducing the length and complexity of pre-application discussions, providing greater clarity to all parties on future requirements, engaging the local communities and key stakeholders from the outset, and ensuring timely delivery of housing and infrastructure.
- 6.7 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 Land North of Dowding Way – 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.
- 6.8 The Council is in the process of commencing discussions with relevant landowners/site promoters to agree Statements of Common Ground in relation to the delivery requirements for site allocations included within Masterplan/Concept Framework areas in the Local Plan. It is anticipated that Statements of Common Ground between the Council and relevant landowners / site promoters will be available by September 2018 where possible.
- 6.9 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.

7) *Infrastructure Planning and Delivery*

- 7.1 Building on the Infrastructure Delivery Plan (IDP) Parts A and B (EB1101A and EB1101B), a technical paper on infrastructure delivery has been produced (EB1101C). 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. A Statement of Common Ground is being produced with Essex County Council to reflect the outcomes from these discussions.
- 7.2 The technical paper includes 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 provides 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 also covers the potential contribution of the Community Infrastructure Levy (CIL) in funding infrastructure delivery.
- 7.3 The Council anticipates that a Statement of Common Ground between Epping Forest District Council and Essex County Council will be provided by September 2018. In addition, further outputs from ongoing discussions in relation to apportionment and pooling arrangements arising from the approach set out with the technical paper will be provided as appropriate over the coming months, linked to the progression of the Garden Town Infrastructure Delivery Plan and the progression of Strategic Masterplans and Concept Frameworks.

8) *Strategic Flood Risk Assessment*

- 8.1 In 2017 the Council commissioned AECOM to provide further site specific analysis of flood risk (EB913) 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 has been published in March 2018.
- 8.2 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.

- 8.3 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.
- 8.4 The Council is working to agree a Statement of Common Ground with the Environment Agency and Thames Water.