

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**

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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

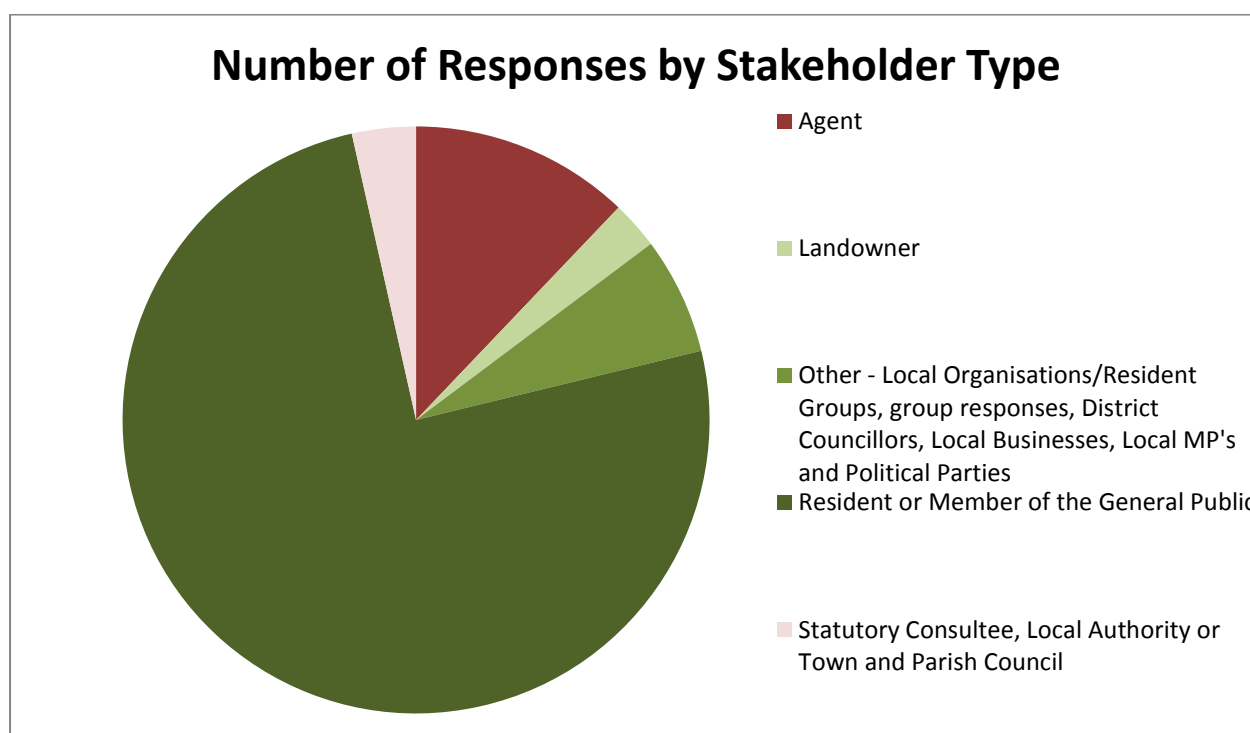
What did we receive?

- 2.1 A total of 1,024 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% (228) made via email.

Who did we receive representations from?

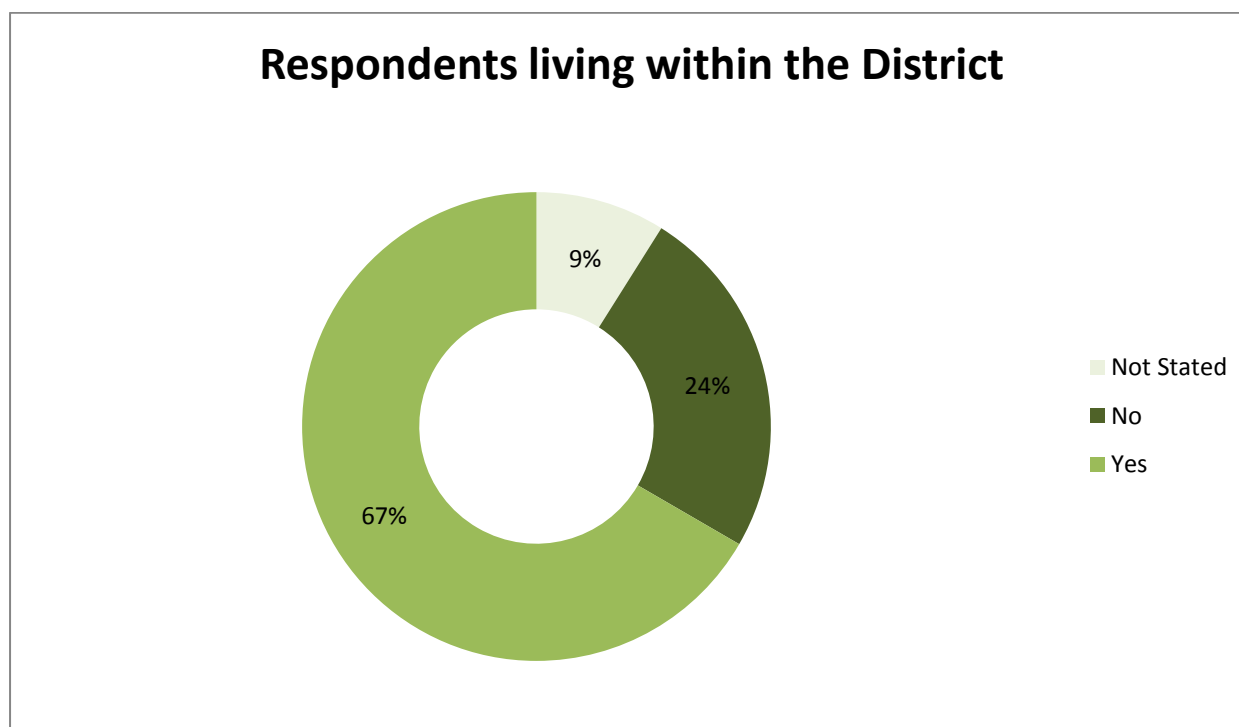
- 2.2 As shown in Figure 1, 75% (770) of responses were from residents or members of the general public, 4% (38) were from statutory consultees, 15% (151) were from agents or landowners and 6% (65) were from 'other' respondents. The 'other' category included organisations such as resident associations, 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.

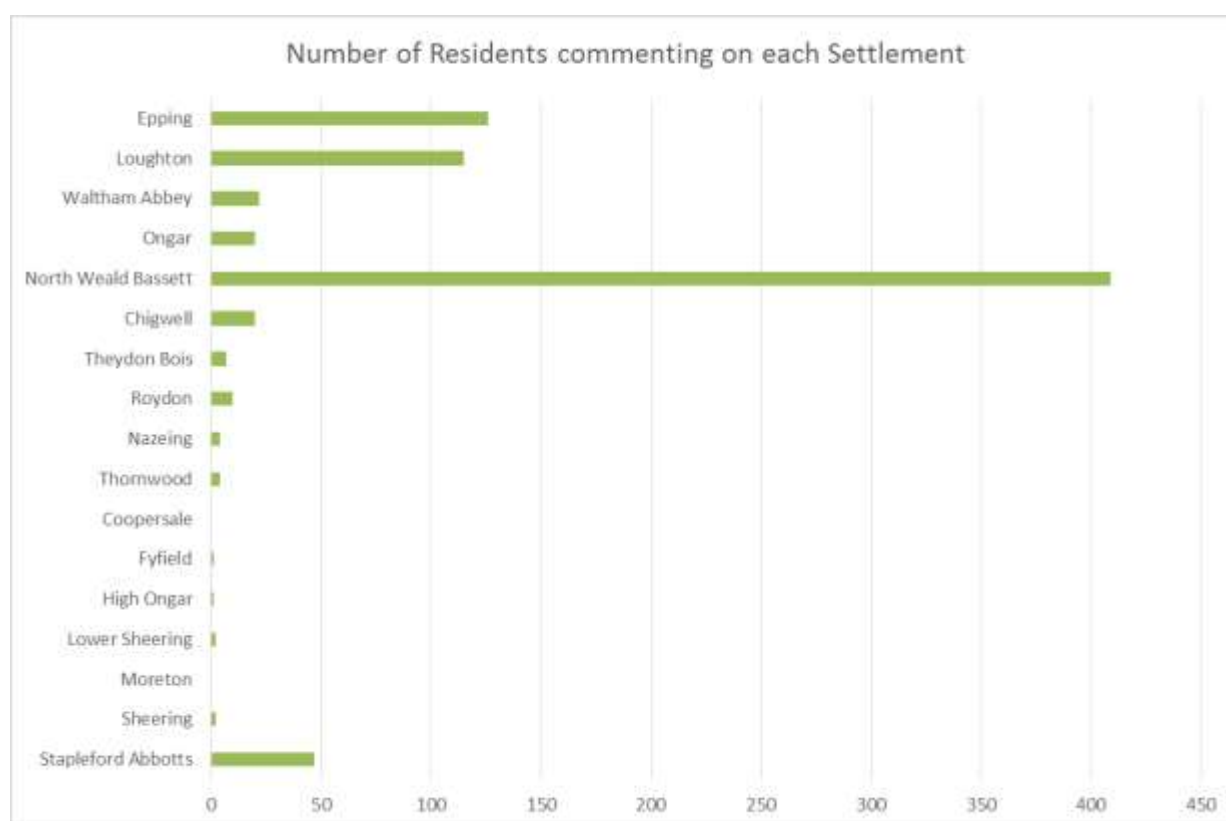
2.7 The top ten policies commented on by residents or members of the general public in their response were:

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

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 38 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
Meeting the requirements for providing land for custom and self-build housing.	<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>
Demonstrating a five year housing land supply and addressing an historic shortfall in housing delivery.	<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>
Identifying the District's full Objectively Assessed Housing Need.	<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.

The relationship between the Draft Local Plan and emerging and forthcoming Neighbourhood Plans.	<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>
Development planned at North Weald Airfield.	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.
How the North Weald Bassett Masterplanning Study has informed the Draft Local Plan.	<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>
Consistency with the Housing White Paper.	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.
Suggested changes to the wording of policies in the Draft Local Plan.	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.
Concerns regarding the capacity of the Central Line.	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.
The requirement to consider flood risk constraints through the Draft Local Plan.	<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.	<p>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.</p> <p>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.</p>
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.

Concern that the Draft Local Plan will result in a loss of public open spaces.	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.
Concern regarding the potential impact of proposed new traveller sites and expanded existing traveller sites.	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.
The principle of releasing Green Belt land proposed in the Draft Local Plan and demonstrating exceptional circumstances for doing so.	<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>
The estimated capacity and density of development on proposed allocation sites.	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
Issues relating to Glasshouse evidence and policy in the Draft Local Plan.	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.

Comments relating to the forthcoming identification of employment sites for allocation in the Plan, and further employment land evidence.	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.
Suggestion for the need to undertake a Water Cycle Study.	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.
Concern regarding proposed allocations for development on community facility sites.	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.
Queries and objections raised regarding the site selection process.	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'.
Deliverability of the proposed allocation sites in the Draft Local Plan, including the provision for Small Sites.	<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>
Concerns regarding how previous consultation has been taken into account in formulating the Draft Local Plan.	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

	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*