Regulation 22 Consultation Statement of the Epping Forest District Local Plan Submission Version 2017





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1. Introduction

- 1.1 This Interim Consultation Statement describes the processes followed by Epping Forest District Council in undertaking community participation and stakeholder involvement in the production of the Epping Forest District Local Plan Submission Version 2017 and sets out how the main issues raised through consultation have helped shape the Plan. The Statement has been prepared to comply with the requirements of Regulation 19 and Regulation 22 (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (referred to throughout this Consultation Statement as 'the Regulations'). The Consultation Statement will assist the Inspector at the Examination to determine whether the processes that the Council followed leading to the Submission of the Local Plan comply with government guidance and requirements for public participation.
- 1.2 In detailing the requirements for the 'Submission of documents and information to the Secretary of State' are, Regulation 22 (1) part (c) directs the Council to prepare a statement which sets out:
 - i) which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;
 - ii) how those bodies were invited to make representations;
 - iii) a summary of the main issues raised in those representations;
 - iv) how those main issues have been taken into account;
 - v) if there are representations made under Regulation 20, the number made and a summary of the main issues raised in those representations; and
 - vi) if there are no representations made under Regulation 20, that no such representations were made.
- 1.3 The Local Plan has currently reached the Regulation 19 stage; therefore, this Interim Consultation Statement covers points 'i)' to 'iv)' above and the following sections detail how the Council has complied with its obligations for each criterion. It is intended that the Consultation Statement will be revised, post-Regulation 19 publication stage, to reflect any representations made under Regulation 20, thus complying with criteria 'v)' and 'vi)' detailed above.
- 1.4 In carrying out its consultation processes, it should be noted that, in addition to complying with the Regulations, the Council has also complied with the provisions of its Statement of Community Involvement (SCI) adopted in 2013. This document sets out the Council's approach to public engagement in the planning system and how it seeks to involve the local community in Epping Forest District. The SCI may be viewed on the Council's website: www.eppingforestdc.gov.uk/planningourfuture

2. Overview of Consultations prior to 2016

- 2.1 The Council has consulted extensively at each stage of the preparation of the Local Plan. To aid the consultation process the Council maintains a live consultee database which has been continuously updated at each event and as and when notified of changes by consultees. As of November 2017, contact details for 16,157 individuals have been registered in the database.
- 2.2 The Community visioning consultation in 2010/11 was a public engagement exercise undertaken by the Council to understand the public's views on the issues affecting the District as well as the priorities for the next 20 years. The outcome of visioning exercise can be found on the Council's website.¹
- 2.3 The Issues and Options (Community Choices) consultation between 30 July and 15 October 2012 sought views on a range of different options to gauge public opinion on issues such as housing targets, green infrastructure and transport. The questionnaire which accompanied the consultation document contained a range of questions. A 'Community Choices Consultation Report' (2013) summarising the response to the consultation was completed, which can also be found on the Council's website.²
- 2.4 For statutory consultees a formal letter was sent. This set out the subject of the consultation and invited comments. For the general public a series of information drop in sessions took place at various locations around the District. All documents were made available at the Council Offices, at libraries within the District and on the Council's website. The consultation was also advertised via local media, including local papers and social media forums such as Twitter. Documents could be provided in other formats where required, including large print.
- 2.5 The Council received responses from nearly 6,000 individuals and organisations. Most of these were from individuals but replies were also received from national bodies, adjoining local authorities, town and parish councils, landowners and developers. The most frequently mentioned and important issues were identified as:
 - i) Need to protect the Green Belt;
 - ii) Make use of brownfield (previously developed land) before releasing Green Belt:
 - iii) Prevent London from sprawling into the district and prevent larger urban areas from merging with nearby villages;
 - iv) Ensuring accurate forecasts for population/job growth and related housing targets and employment forecasts;

http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/109-community-visioning

² www.eppingforestdc.gov.uk/planningourfuture

- v) Ensuring that local services/infrastructure has the capacity to cope e.g. schools, GPs, public transport;
- vi) Protecting the countryside and landscape including Epping Forest; and
- vii) Protecting the heritage and character of the District's towns and villages.
- 2.6 The consultation results were reported to Cabinet on 10 June 2013³ and have been used to determine the strategic direction for the District and the specific development management policies included in the Draft Local Plan. These issues were used to inform the approach set out in the Draft Local Plan consultation in 2016, as outlined in Section 3.

³ http://rds.eppingforestdc.gov.uk/documents/s49377/C-006%20IO%20Responses%20Rpt.pdf

3. Draft Local Plan (Regulation 18) Consultation October-December 2016

- 3.1 Following the Issues and Options (Community Choices) consultation in 2013, the Council prepared its Draft Local Plan. This was published for consultation in October-December of 2016. The following section sets out the Council's approach and compliance with the Regulations. It sets out the bodies and persons invited to make representations and the mechanisms used to invite comments on the Draft Local Plan.
- 3.2 The consultation strategy for the Draft Local Plan was prepared in accordance with the Local Plan Communications Strategy and the adopted Statement of Community Involvement. A report setting out the consultation strategy was approved by Cabinet on 1 September 2016⁴. The principles of consultation for the Draft Local Plan were as follows:
 - Public involvement should be transparent and accessible and seek to reach as many residents and businesses as possible.
 - ii) Engagement with the local community should form part of a continuous programme of engagement activities, not be a one-off event.
 - iii) Consistent branding should be used across all Local Plan media e.g. the Planning Our Future logo
 - iv) Consultation and communication methods used should be appropriate to the communities concerned.
 - v) Work closely with other Directorates within the Council. There may be opportunities to link in with other consultation activities and use the feedback received.
 - vi) Information gathered through other consultations should be used wherever possible.
 - vii) The level of community involvement should be appropriate to the role of the plan or study in question.
 - viii) Accessible report summaries of planning documents should be produced where appropriate.
 - ix) Any consultation method should be designed to ensure that meaningful feedback is achievable within the Council's resources and Local Plan timescales.
 - x) All communication throughout the Local Plan consultation should be directed through generic telephone and email contacts rather than named team members.

⁴ http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?Cld=295&Mld=8648

- 3.3 In addition to specific and general consultees (as identified under Part 1 of the Regulations), all consultees on the consultee database (which includes those who have previously commented and/or expressed an interest in being notified) a total of 15,336 people were contacted on 28 October 2016 advising them of the forthcoming consultation.
- 3.4 A series of activities were completed to raise awareness of the Draft Epping Forest District Local Plan and the consultation, as shown in Figure 1.

Figure 1 Activities to raise awareness of consultation

14 September 2016 to 27 October 2016

Media briefings on the Draft Local Plan with associated briefing pack and press release



15 September 2016

Creation and launch of a dedicated website: www.eppingforestdc.gov.uk/planningourfuture and launch of a video to outline the detail around the Draft Local Plan and how to get involved



15 September to 13 December 2016

Twitter (@eppingforestdc) and Facebook posts to raise awareness of the Draft Local Plan and consultation. E-bulletins to local residents and stakeholders



30 September 2016

Draft version of the Draft Local Plan and its maps made available on the consultation website, ahead of Epping Forest District Council's Cabinet meeting to approve the Planfor consultation.

3.5 Following the Full Council⁵ meeting on 18 October 2016 where the Draft Local Plan was approved for a six-week consultation, a series of activities were completed to secure engagement in the process from the public and local stakeholders. These are shown in Figure 2.

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Epping Forest District Council

⁵ http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?Cld=296&Mld=8894

19 October 2016 onwards

Statutory consultee letter issued

22 to 26 October 2016

Approx. 57,000 addresses received a newsletter outlining details of the Draft Local Plan and consultation

20 October 2016

Councillor and community group information packs were also distributed

27 October 2016(for two weeks)

Adverts were placed in local papers and community blogs

w/c 31 October 2016

Commuter postcards were distributed at 11 tube/rail stations throughout Epping Forest

31 October - 12 December 2016

Static information points made available at 13 venues across the District.

31 October – 12 December 2016

Hardcopy and online questionnaire made available

5 November – 11 November 2016

Staffed public exhibitions took place in towns and parishes throughout the District

Figure 2 Activities to secure engagement

- 3.6 The formal six week consultation took place from 31 October 12 December 2016. In addition to the notification of all those on the database and to ensure widespread awareness of the consultation, the Council arranged for a newsletter to be delivered every household in the District (approximately 57,000 addresses) with details of the Draft Local Plan and consultation events. Where gaps were identified in delivery, these were monitored and follow up deliveries were arranged. Adverts were placed in the local newspapers and commuter postcards were distributed at peak hours at 11 tube/rail stations throughout the District. Static exhibitions with copies of questionnaires were available at 12 venues across the District and one in Harlow:
 - i) Buckhurst Hill Library
 - ii) Bumbles Green Leisure Centre, Nazeing
 - iii) Chigwell Library

- iv) Epping Civic Offices and Epping Library
- v) Latton Bush Centre, Harlow
- vi) Loughton Library
- vii) North Weald Library
- viii) Ongar Library
- ix) Roydon Village Hall
- x) Sheering Village Hall
- xi) Theydon Bois Village Hall
- xii) Waltham Abbey Library
- 3.7 A dedicated Local Plan website was created and was designed to ensure people could find and download the relevant information. A video was produced and launched with the new consultation website and shared across the Council's twitter and facebook accounts. The website address received 13,818 unique visitors between its launch in September 2016 and the end of the consultation period. Throughout the consultation period e-bulletins were issued to all email addresses on the Council's database, Council Members, Parish and Town Councils and residents associations. Statutory consultees were sent a letter on 28 October 2016 notifying them of the consultation and inviting them to a workshop which was held on 7 December 2016.
- 3.8 In addition six staffed public exhibitions were held in November 2016 to give the local community the opportunity to find out more about the Draft Local Plan and speak to the Planning Policy Team. The attendance at these is shown in the Table below.

Exhibition Venue	Attendees (approx.)	Date
North Weald Village Hall	259	5 November 2016
Lopping Hall, Loughton	207	7 November 2016
Chigwell Hall, High Road	107	8 November 2016
Budworth Hall, Ongar	258	9 November 2016

Epping Hall	277	11 November 2016
Waltham Abbey Town Hall	125	14 November 2016
Total	1,233 attendees	

3.9 Hard copies of the full suite of consultation documents were made available at the Council's offices, Town and Parish Council offices, libraries and at the static exhibition points.

Other Forms of Engagement

- 3.10 Alongside formal consultation on the Draft Local Plan under Regulation 18, the Council has engaged with a variety of stakeholders during the production of the Draft and Submission Plans to ensure that the approach taken in the Plan is robust and fully takes into account issues that have been raised. This included meetings where necessary and regular communication with statutory consultees such as Natural England and Sport England, infrastructure providers such as Thames Water and other key organisations such as the Lea Valley Growers Association. During the Regulation 18 consultation period the Council held a meeting with the Epping Forest District Youth Council giving an overview of the Local Plan and a platform for questions. Town and Parish Councils were invited to come to the Council offices for a meeting to discuss any issues or matters they were looking to raise on the Draft Local Plan.
- 3.11 The Council held a Developer briefing on 9 September 2016 and set up a Developer Forum in December 2016⁶, and from then on has held regular meetings for landowners and promoters to discuss relevant updates to the Plan and evidence base documents. The quarterly meetings have been used as a platform to seek engagement when needed on key issues, for example such as viability.
- 3.12 As part of the Duty to Co-operate, the Council is a member of the Co-operation for Sustainable Development Member Board set up in 2014. This board holds separate monthly officer and member meetings to discuss key cross-boundary strategic issues and aid joined-up working and approach between the member authorities.
- 3.13 Town and Parish Councils have been engaged through a number of events, not only with the purpose of receiving updates through Local Plan briefings on the Local Plan and workshops to explore evidence based documents such as the Open Space Strategy. Three briefings (arranged by area) were organised with Town and Parish Councillors and Council Members to feedback the main themes from the Regulation 18 Consultation in April 2017. The following workshops were held during

⁶ Terms of Reference can be found at www.eppingforestdc.gov.uk/planningourfuture

the preparation of the Draft Local Plan and the Submission Version of the Local Plan:

- i) 26 January 2013 Evidence and its implications for development of the Local Plan
- ii) 9 February 2013 The vision and objectives: local vision and priorities
- iii) 9 March 2013 Planning your places: using your vision
- iv) 5 October 2013 Population Projections and Housing Need
- v) 2 November 2015 Historic and Natural Environment
- vi) 10 November 2015 Economic Strategy
- vii) 24 November 2015 Affordable Housing, Older Persons' Housing, Specialist Housing and Custom Build
- viii) 28 January 2016 High Quality Design
- ix) 24 May 2016 Update on Local Plan timetable and Climate Change
- x) 25 February 2016 Green Belt Review Stage 2
- xi) 31 May 2016 Transport: accessibility and residential car parking considerations
- xii) 16 July 2016 Development Management Policies
- xiii) 18 May 2017 Sports Facilities and Open Space
- xiv) 8 July 2017 Infrastructure Delivery Plan

Summary of the Draft Local Plan 2016 Consultation

- 3.14 The Council received 3,387 responses from 3,082 respondents to the Draft Local Plan consultation. 7% of feedback was received through the hardcopy questionnaires; 22% by letter, 23% by email and 48% by online questionnaires. 1,233 people attended the six staffed exhibition events. Nine e-bulletins were issued with an 'open rate' of 6,327 in total, along with 3177 direct engagements on Twitter and 1,211 engagements on Facebook.
- 3.15 An initial analysis of the results of the public consultation was reported to Cabinet on 9 March 2017.⁷ A more detailed analysis of the comments was undertaken and reported to Cabinet on 11 July 2017⁸, with a table of key issues included as an appendix to the Cabinet Report please refer to this for full details and analysis of the Regulation 18 responses. The full Consultation Report and an Executive Summary are available on www.eppingforestdc.gov.uk/planningourfuture.

⁷ http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?Cld=295&Mld=8653

⁸ http://rds.eppingforestdc.gov.uk/ieListDocuments.aspx?Cld=295&Mld=9079

- 3.16 The ten most frequent comments received from all forms of feedback to the Draft Local Plan were that the policies and proposals would result in:
 - i) an increase in traffic congestion on local roads;
 - ii) a negative impact on local schools;
 - iii) increased pressure on the local healthcare provision;
 - iv) a loss of car parking spaces, and increased car parking pressure;
 - v) negative impact on the character of the settlement;
 - vi) an overall opposition to principle of development in the Green Belt;
 - vii) increased overcrowding on the Central Line;
 - viii) a loss of open space in the urban areas of the District;
 - ix) development on sites set out in Draft Policy P 2 Loughton/Loughton Broadway to which there was disagreement;
 - x) development in the Green Belt to which many respondents were opposed; and
 - xi) insufficient information about the infrastructure requirements of Epping Forest District.
- 3.17 Details of those people and organisations who responded to the Draft Local Plan are available on the Council's website.⁹
- 3.18 All comments that were received from the range of stakeholders were taken into account in the preparation of the Submission Plan. The Council has considered the comments from consultees when preparing the policies and allocations for the Submission Plan, for example when looking at settlement specific policies and visions and selecting sites. The creation of a master database containing all of the comments received during the consultation period, which could be sorted by policy number or by theme, allowed the Council to efficiently and comprehensively consider the consultation feedback at every decision-making stage.

⁹ http://www.eppingforestdc.gov.uk/index.php?option=com_content&view=article&id=1377

4. Local Plan Submission Version (Regulation 19) Publication December 2017- January 2018

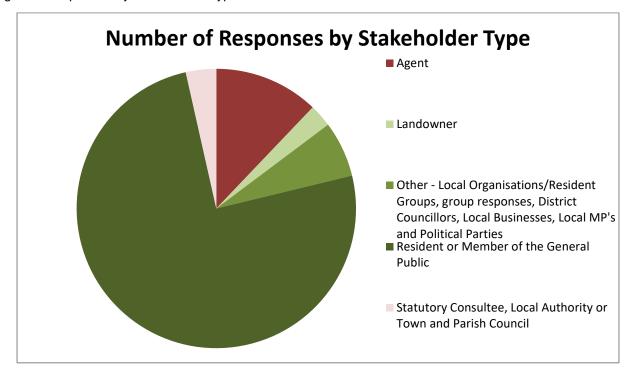
- 4.1 The following section sets out the Council's approach and compliance with the Regulations for publication of the Plan. It sets out the bodies and persons invited to make representations and the mechanisms used for the publication of the Local Plan Submission Version 2017.
- 4.2 The Regulation 19 Publication was carried out over a 6 week period from 18 December 2017 to the 29 January 2018. All those on the Council's database (i.e those interested parties who had previously commented on the previous consultations and/or expressed an interest in being notified), statutory consultees, town and parish councils and other interested parties were contacted by means of email or letter. Hard copies were made available at the Council's Offices, Leisure Centres and Libraries throughout the publication period. All published documents were on the Council's website.
- 4.3 Press releases were issued to local media, town and parish councils and other subscribers to the Council's Mailchimp distribution list. Public Notices were published in the local newspaper. Social media notifications linked to news items on the Council's website were issued primarily through Twitter and Facebook. The Regulation 19 Publication period was advertised on the Epping Forest District Local Plan website and Epping Forest District Council main website. The special meeting of Full Council was advertised in advance with further guidance/advice on how to view the webcast of the meeting online. Council publicity was also available to independent local online community forums. Briefings were offered to and accepted by some members of the local media.
- 4.4 The Council produced a representation form in both online and paper for use by those wishing to make representations on the 'soundness' and 'legal compliance' of the Plan. In their representations, respondents were asked to comment on whether the Plan had been prepared in compliance with the relevant legal requirements and whether or not the Plan is sound. The online form system allowed for multiple 'representations' to be made, where the respondent was able to specify what tests of legal compliance or soundness the representation was related to. 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.
- 4.5 A Regulation 19 Publication Representations Spreadsheet has been developed to allow representations to be reviewed by respondent or by policy. The format of the spreadsheet is set out in the Instruction Note (EB121B) available on the Council's website.

Summary of Responses Received

4.6 A total of 1,024 individual submissions from 992 respondents were received to the Local Plan Submission Version during the publication period. Approximately 28%

- (284) of responses were made using the online form, 50% (513) made through hard copy submissions and 22% (227) made via email.
- 4.7 As shown in Figure 3, 75% (770) of respondents were residents, 4% (38) were 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, group resident responses and local businesses.

Figure 3 Responses by Stakeholder Type



Stakeholder Category	Number of Responses
Resident or Member of the General Public	770
Statutory Consultee, Local Authority or Town and Parish Council	38
Landowner	26
Agent	125
Other (residents associations, group responses and local businesses)	65

- 4.8 51% (501) of respondents stated that the Plan has failed one or more of the tests of soundness, 15% (150) of respondents state that the Plan has not met the legal requirements and 13% (128) of respondents state that the Plan has failed the Duty to Cooperate.
- 4.9 Appendix One contains a list of the policies in the Local Plan Submission Version and the number of respondents from every stakeholder group that commented on each policy.

Residents

- 4.10 The Council received 770 responses from residents. The key issues raised were:
 - i) Comments relating to individual settlements, the issues of which are included in Appendix I to the 14 May 2018 Report to Local Plans Cabinet Committee¹⁰;
 - That the Regulation 19 Publication was being conducted unfairly and the Local Plan Submission Version failed to take account of residents' comments to the previous consultations;
 - iii) The amount and nature of Green Belt release;
 - iv) Infrastructure concerns relating to the lack of clarity around where and when infrastructure will be funded;
 - v) Objection to sites that are included in the Local Plan Submission Version but were not included in the Draft Local Plan;
 - vi) Concern over negative implications of allocating sites in each settlement such as traffic congestion or strain on infrastructure;
 - vii) For a small number of development sites, a notable number of responses were received, or there were recurring issues raised:
 - SR-0179 North Weald Bassett Golf Course A total of 379 responses were received from members of the public, all similar in wording and generally in support of proposed development of the site (which was not selected for allocation in the Local Plan Submission Version. Of these responses, 155 were sent with addresses which are outside of the District. Almost all of the responses were in hard copy format.
 - LOU.R5 Land at Jessel Green A number of respondents objected to the allocation of this site for housing, citing the impact on open space provision in the settlement. A petition was received objecting to the allocation of this site.
 - EPP.R5 Epping Sports Centre A number of respondents objected to the allocation of this site for housing, citing the loss of sports facilities.

¹⁰ This document can be found on our website: http://www.efdclocalplan.org/local-plan/evidence-base/

- STAP.R1 Land at Oakfield Road This site allocation was frequently commented on in relation to its inclusion in the Local Plan Submission Version but not in the previous Draft Local Plan.
- Objections to the proposed allocation of London Underground Car Park sites for residential development, in relation to potential loss of car parking.

Landowners and Agents

- 4.11 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

- 4.12 The Council received 38 responses from statutory consultees, a list of respondents can be found in Appendix Two to this report. Of these, the following responses in particular raised issues in relation to legal compliance and soundness:
- 4.13 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. Further engagement with Harlow has resulted in the withdrawal of their objections to the Local Plan Submission Version in a letter to the Council on 15 June 2018. In their letter Harlow Council noted the on-going collaborative work being undertaken through the Harlow and Gilston Garden Town and the resultant significant progress in addressing their original concerns. In response to these:
 - i) Sport England: Sport England stated that the Local Plan to be unsound due to not being able to confirm that the Built Facilities Strategy and Playing Pitch Strategy constituted a robust evidence base. Since the Regulation 19 Publication period ended, Sport England have signed off the evidence base documents and indicated that this representation no longer stands.

- ii) **Essex County Council:** The County Council submitted detailed comments on the Local Plan Submission Version policies related to making modifications to the Plan to make it 'sound'.
- iii) **Natural England:** Natural England raised concerns over the delay in preparing a mitigation strategy for Epping Forest SAC as required by the Memorandum of Understanding. Work is ongoing with Natural England and the Conservators of Epping Forest to develop a mitigation strategy.
- iv) **Environment Agency:** The EA expressed support for the strengthening of policies following their comments to 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.
- 4.14 A total of 13 Town and Parish Councils submitted representations to the Regulation 19 Publication period.
- 4.15 A detailed overview of the responses from statutory consultees can be found in Appendix I to the 14 may 2018 Report to Local Plans Cabinet Committee.

Other Respondents

- 4.16 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 the Epping Sports Club site that was included in the Draft Local Plan.

- 4.17 There were also 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.
- 4.18 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.
- 4.19 A detailed overview of the responses from 'other' respondents can be found in Appendix I to the 14 may 2018 Report to Local Plans Cabinet Committee.

Late Responses

4.20 19 responses were received after the 5pm deadline on the 29 January 2018. These responses were assigned a Stakeholder ID but have not been reviewed in detail as they were not submitted within the deadline given.

Supplementary Representations

4.21 As a result of the challenge by way of judicial review taken against the Council in March 2018, the Council gave the opportunity for some respondents to comment on the site selection appendices that were published on Wednesday 14 March 2018. A letter was sent out to respondents who had commented on the lack of the appendices during the Regulation 19 publication period. The Council invited a total of 71 respondents to submit supplementary representations. A total of 43 responded. There were also 14 respondents that submitted supplementary representations who did not receive the letter.

5. Conclusion

In carrying out its consultation processes, the Council considers that it has complied with both the Regulations and with the provisions of its Statement of Community Involvement. An overview of how the Council has complied with the Statement of Community Involvement can be found in the table below.

Approach set out in Statement of Community Involvement (up to Submission Plan publication, stage six)	Compliance with approach
Contacting/Engagement of statutory consultees such as the Environment Agency and Thames Water.	All statutory consultees were contacted for comment on the Draft Local Plan as part of the Regulation 18 Consultation, with those who submitted representations listed on the Council's 11 website. If there was need for further engagement on key issues, further meetings and written contact were employed. Letters were sent to all statutory consultees in advance of the publication of the plan to advise them of the timescale and again when the plan was published.
Contacting/Engagement with general consultees such as community and amenity groups, resident associations, business sector, developers, landowners and other agencies.	All general consultees were contacted for comment on the Draft Local Plan as part of the Regulation 18 Consultation, with those who submitted representations listed on the Council's 12 website. If there was need for further engagement on key issues, further meetings and written contact were employed. The developer forum was also a useful platform for engagement. Throughout the plan making process town and parish council representatives were involved in briefings and workshops. All consultees were advised by letter or email of the publication of the Local Plan Submission Version.
Local Plan and supporting information to be displayed on the Council's website and in print copy at the Council offices.	The Draft Local Plan, Local Plan Submission Version and supporting technical evidence were and are still available on the Council's website. Printed copies of the Plan documents and policies map were available at the Council's offices, Town and Parish Council offices, libraries and at the static exhibition points for the Draft Local Plan. For the Local Plan Submission Version copies were available at the Leisure Centres in the District. Copies of the Draft Local

¹¹ http://www.eppingforestdc.gov.uk/index.php?option=com_content&view=article&id=1377

¹² ibid

	Plan and Local Plan Submission Version were also available to purchase.
Stakeholder briefings/workshops with a variety of stakeholders as part of evidence base gathering and workshops.	Engagement with relevant stakeholders was sought during the production of evidence base documents where necessary, with several workshops held at the Council offices.
Letter/emails to existing consultees to notify of the Draft Local Plan consultation and Local Plan Submission Version publication.	All contacts listed in the consultee database were contacted to notify them that the consultation/representation period was taking place and to inform them of how to make a representation.
Comments made on the Draft Local Plan to be able to be viewed via the Council's website.	All representations to the Regulation 18 Consultation and Regulation 19 publication are on the Council website. ¹³
Duty to assist the development of Neighbourhood Development Plans.	The Council held several meetings with Town and Parish Council's on the status and intention of their Neighbourhood Plans, providing guidance and informing Councils of the requirements in relation to the Local Plan. The Council has a Service Level Agreement with the Rural Community Council of Essex to provide dedicated support to Town and Parish Council's preparing Neighbourhood Plans

¹³ ibid

Appendix One: 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 Abbotts	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

Appendix Two: List of Statutory Consultees' who responded to the Local Plan Submission Version publication

The following statutory consultees submitted a response to the Epping Forest District Local Plan Submission Version 2017:

Local Authorities Brentwood Borough Council Chelmsford City Council East Hertfordshire District Council Essex County Council Greater London Authority Hardrow District Council Hertfordshire County 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 Moreton, Bobbingworth and the Lavers Parish Council Moreton, Bobbingworth and the Lavers Parish Council Nazeing Parish Council Roydon Parish Council Roydon Parish Council Roydon Parish Council Stanford Rivers Parish Council Theydon Bois Parish Council Theydon Bois Parish Council Waltham Abbey Town Council Stapleford Abbotts Parish Council Waltham Abbey Town Council Statury 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 Theatres Trust Theatres Trust Theatres Trust Theatres Trust	Statutory Consultees
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 Council Buckhurst Hill Parish Council Chigwell Parish Council Epping Town Council Moreton, Bobbingworth and the Lavers Parish Council North Weald Bassett Parish Council Roydon Parish Council Stanford Rivers Parish Council Roydon Parish Council Stanford Rivers Parish Council Roydon Parish Council Stanford Rivers Parish Council Stanford Rivers Parish Council Waltham Abbey Town Council Waltham Abbey Town Council Waltham Abbey Town Council Without Stanford Rivers Parish Council Waltham Abbey Town Council Waltham Abbey Town Council Stautory 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 Natural England Sport England Thames Water	
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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 North Weald Bassett Parish Council Staping Parish Council Stapford Rivers 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 Natural England Sport England Thames Water	East Hertfordshire District Council
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 Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts Parish Council Wattham Abbey Town Council Wattham Abbey Town Council Statutory Bodies Affinity Water Anglian Water Services Canal and Rivers Prist Council Environment Agency Highways England Historic England Lea Valley Growers Association Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Essex County 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 Stanford Rivers Parish Council Stapleford Abbotts Parish Council Waltham Abbey Town Council Waltham Abbey Town Council Waltham Abbey Town Council Statutory Bodies Affinity Water 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	Greater London Authority
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 Stapleford Abbotts Parish Council Stapleford Abbotts Parish Council Waltham Abbey Town Council Waltham Abbey Town Council Waltham Abbey Town Council Statutory Bodies Affinity Water 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	Harlow District Council
London Borough of Newham Uttlesford District Council Town and Parish Councils Buckhurst Hill Parish Council Epping Town Council Loughton Town Council Moreton, Bobbingworth and the Lavers Parish Council Nazeing Parish Council North Weald Bassett Parish Council Roydon Parish Council Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts Parish Council Theydon Bois Parish Council Statutory Bodies Affinity Water Anglian Water Services Canal and Rivers Trust Conservators of Epping Forest Environment Agency Highways England Historic England Lee Valley Growers Association Lee Valley Regional Park Authority Natural England Sport England Thames Water	Hertfordshire County Council
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 North Weald Bassett Parish Council Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts 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 Natural England Sport England Thames Water	London Borough of Havering
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 Stanford Rivers Parish Council Stapleford Abbotts Parish Council Stapleford Abbotts Parish Council Waltham Abbey Town 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 Natural England Sport England Thames Water	London Borough of Newham
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 Abbotts Parish Council Theydon Bois Parish Council Waltham Abbey Town 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 Natural England Sport England Thames Water	Uttlesford District 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 Abbotts Parish Council Stapleford Abbotts 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 Regional Park Authority Natural England Sport England Thames Water	Town and Parish Councils
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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 Abbotts Parish Council Theydon Bois Parish Council Waltham Abbey Town 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	Chigwell Parish 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 Abbotts Parish Council Theydon Bois Parish Council Waltham Abbey Town 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	Epping Town Council
Nazeing Parish Council North Weald Bassett Parish Council Ongar Town Council Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts Parish Council Theydon Bois Parish Council Waltham Abbey Town 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	Loughton Town Council
North Weald Bassett Parish Council Ongar Town Council Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts Parish Council Theydon Bois Parish Council Waltham Abbey Town Council Wattory Bodies Affinity Water Anglian Water Services Canal and Rivers Trust Conservators of Epping Forest Environment Agency Highways England Historic England Lee Valley Growers Association Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Moreton, Bobbingworth and the Lavers Parish Council
Ongar Town Council Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts 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	Nazeing Parish Council
Roydon Parish Council Stanford Rivers Parish Council Stapleford Abbotts 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	North Weald Bassett Parish Council
Stanford Rivers Parish Council Stapleford Abbotts 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	Ongar Town Council
Stapleford Abbotts 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	Roydon 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	Stanford Rivers 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	Stapleford Abbotts Parish Council
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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	Waltham Abbey Town Council
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	Statutory Bodies
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	Affinity Water
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	Anglian Water Services
Environment Agency Highways England Historic England Lea Valley Growers Association Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Canal and Rivers Trust
Highways England Historic England Lea Valley Growers Association Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Conservators of Epping Forest
Historic England Lea Valley Growers Association Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Environment Agency
Lea Valley Growers Association Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Highways England
Lee Valley Regional Park Authority National Grid Natural England Sport England Thames Water	Historic England
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Natural England Sport England Thames Water	Lee Valley Regional Park Authority
Sport England Thames Water	National Grid
Thames Water	Natural England
	Sport England
Theatres Trust	Thames Water
	Theatres Trust

Transport for London