

EPPING FOREST DISTRICT COUNCIL
EXAMINATION OF THE DISTRICT LOCAL PLAN, 2011-2033

**MATTER 2: CONTEXT, VISION & OBJECTIVES
AND SUSTAINABLE DEVELOPMENT**

**PRE-HEARING STATEMENT ON BEHALF OF
EPPING FOREST DISTRICT COUNCIL**

JANUARY 2019

INTRODUCTION

Epping Forest District Council ("the Council") submits this statement in response to the Inspector's Matters, Issues and Questions ("MIQs") (ED5). This statement addresses Matter 2: Context, Vision & Objectives and Sustainable Development and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 2 (ED5, p 5).

Where appropriate, the Council's responses in this statement refer to but do not repeat detailed responses within the hearing statements submitted by the Council concerning other Matters.

Key documents informing the preparation of this statement to which the Council may refer at the hearing sessions include:

- [EB1502 Lee Valley Regional Park Development Framework \(2011\)](#)

All documents referred to in this statement are listed in **Appendix A** of this statement together with links to the relevant document included within the Examination Library.

Examination Library document references are used throughout for consistency and convenience.

Issue 1: Are the context, vision and objectives for the Plan accurate and comprehensive?

Inspector's Question 1

1. Does Figure 1.3 on page 7 accurately reflect the content of paragraph 1.36 in terms of the most common job types in the district? Figure 1.3 indicates that public administration, education and health industries employ the second largest number of people in the District, but this is not mentioned in paragraph 1.36.

Response to Question 1

1. Figure 1.3 is accurate; paragraph 1.36 is not. The Council proposes to correct this typographical error by amending the final sentence in paragraph 1.36, to read as follows:

"The financial and business services; public administration, education and health; wholesale and retail; and construction sectors are the most common in the district, as shown in Figure 1.3."

Inspector's Question 2

2. Is Figure 1.5 on page 9 accurate in showing the period 2001 – 2013 on the x-axis rather than the period 2011 – 2033?

Response to Question 2

2. Figure 1.5 is not accurate. The wrong table infographic was included when drafting the Regulation 19 plan. Instead of a table showing 'Overall affordable housing need (in households) 2011-33' we erroneously included a graph illustrating the 'Ratio of Lower Quartile House Price to Lower Quartile Earnings 2001-2013'. Therefore, the Council is proposing a modification to replace Figure 1.5 with the table below.

Table 1.2 Affordable Housing Need in Epping Forest District

Epping Forest District Affordable Housing Need (Households)	
Unmet need for affordable housing 2011 - 2016	665
Future need for affordable housing 2016-33	2,186
Total need for affordable housing 2016-33	2,851

3. To be consistent with the replacement table, it is proposed that paragraph 1.43 of the LPSV is replaced as follows:

“There is a significant need for additional affordable housing within Epping Forest District as set out in the Strategic Housing Market Assessment (SHMA) 2015. Table 1.2 sets out unmet need for affordable housing between 2011 and 2016, and the District’s future affordable housing need for the period 2016-2033 based on the 2017 update of the SHMA.”

Inspector's Question 3

3. Do the vision and objectives adequately reflect the Plan’s aims for air quality, green and blue infrastructure, protection of the landscape and biodiversity, and healthy living? Should specific reference be made to the aim of conserving or enhancing the historic environment, including archaeology?

Response to Question 3

4. Subject to the proposed amendments outlined below, the Council considers the Vision for the District and the Local Plan Objectives to fully reflect the Plan’s aims for air quality, green and blue infrastructure, protection of the landscape and biodiversity and healthy living.
5. The Council proposes to amend the Vision and Objectives to address Regulation 20 representations, including those made by statutory consultees: Natural

England; Lee Valley Regional Park Authority; Essex County Council; and Historic England.

6. The revised Vision, as proposed, is set out below. For ease of reference, the key amendments are new sub-paragraphs addressing the historic environment (sub-paragraph (vi)) and air quality (sub-paragraph (xiii)). The Council also proposes to strengthen sub-paragraph (i) with the inclusion of reference to health; the expansion of sub-paragraph (vii) to include reference to nature conservation; and an addition to sub-paragraph (x) to specify opportunities to enhance the District's green and blue infrastructure. Other amendments proposed are the addition of "happy" in sub-paragraph (i) and "construction" in sub-paragraph (viii) as well as minor amendments to improve the syntax and grammar of the text that do not materially alter the vision.

"By 2033 Epping Forest District will be a place where:

- (i) residents continue to enjoy a **healthy, happy and good quality of life**;
- (ii) **new homes of an appropriate mix of sizes, types and tenures** to meet local needs will be provided and well integrated communities created;
- (iii) development **respects the attributes** of the different towns and villages;
- (iv) development needs will be met in the most **sustainable locations**;
- (v) **Epping Forest** will be conserved and enhanced;
- (vi) **the historic environment will be conserved or enhanced**;
- (vii) the recreational **and nature conservation** aims of **Lee Valley Regional Park** will be supported;
- (viii) a more **sustainable local economy** including tourism, aviation, research and development, **construction** and food production will be developed;
- (ix) a **distinctive and attractive network** of town and village centres will be maintained;
- (x) **the natural environment and landscape character will be protected and opportunities to enhance the District's green and blue infrastructure will have been taken**;

- (xi) ~~access to places by public transport, walking and cycling will be promoted~~ the provision of public transport and walking and cycling infrastructure will encourage **sustainable travel**; and
 - (xii) **significant residential development** will be located around Harlow to support the economic regeneration of the town; and
 - (xiii) **air quality** will be improved.
7. In relation to the final part of the Inspector's question and as outlined above, the Council proposes to make specific reference to conserving or enhancing the historic environment within the vision and this remains articulated in the objectives also. The term 'historic environment' encompasses archaeology as reflected in the Local Plan's Glossary (Appendix 1). The definition has been taken directly from the Framework (2012) and is identical to the definition in the revised Framework (2018). The Council proposes to strengthen the definition of 'heritage asset' within the Glossary with the inclusion of specific reference to archaeological remains in response to Historic England's Regulation 20 representation.

Inspector's Question 4

- 4. Should the vision support the leisure and nature conservation aims of the Lee Valley Regional Park to fully reflect its statutory purpose? Does the supporting text in paragraphs 2.18-2.24 adequately reflect the strategic aims of the Park Authority's adopted vision? (Reps LVRPA).**

Response to Question 4

8. As outlined in the response to Question 3, the Council is proposing an amendment to bullet (vii) of the Local Plan Vision to articulate more clearly both the recreational and the nature conservation aims of the Lee Valley Regional Park.

9. The Council proposes to include the Lee Valley Regional Park Authority's updated Vision and Strategic Objectives (EB 1502¹) after paragraph 2.22 of the LPSV on page 18. The proposed wording of the amendment is set out below:

"The Regional Park Authority's adopted Vision is that the Park is a 'world class leisure destination' and this is supported by a series of strategic aims:

(i) a Park that is a high quality and regionally unique visitor destination

(ii) a Park that delivers a range of high quality opportunities for sport

(iii) a Park that delivers a high quality biodiversity resource for the region

(iv) a Park that helps people improve their wellbeing

(v) a Park that embraces the physical, cultural and social heritage of the area, and

(vi) a Park that contributes to the environmental sustainability of the region."

¹ EB1502 is the wider Lee Valley Regional Park Development Framework. For ease of reference, the following link goes directly to the Vision & Strategic Objectives element of the Framework - <https://www.leevalleypark.org.uk/parkframework/archive/VisionsAimsPrinciples.pdf>

Issue 2: Is Policy SP1 concerning the presumption in favour of sustainable development necessary and consistent with national policy?

Inspector's Question 1

1. Does Policy SP1 add anything to, or seek to depart in any way, from national policy in paragraphs 11-16 of the NPPF? If not, is this policy necessary? If it is necessary, is it consistent with national policy?

Response to Question 1

10. Policy SP 1 reiterates national policy as set out in paragraphs 11 to 16 of the NPPF (2012) and is consistent with national policy. As such, it cannot affect the soundness of the Plan. The Council has included Policy SP 1 to reiterate its commitment to, and the importance of the achievement of sustainable development in the District. If the Inspector considers Policy SP 1 to be unnecessary and unhelpful, the Council would not object to its deletion from the Plan.

APPENDIX A: Examination documents referred to in this statement

Reference	Name	Author	Date
19STAT0006	Lee Valley Regional Park Regulation 20 Representation	<i>Lee Valley Regional Park Authority</i>	2018
19STAT0020	Historic England Regulation 20 Representation	<i>Historic England</i>	2018
19STAT0027	Natural England Regulation 20 Representation	<i>Natural England</i>	2018
19STAT0024	Essex County Council Regulation 20 Representation	<i>Essex County Council</i>	2018
EB1502	Lee Valley Regional Park Development Framework	<i>LVRPA</i>	2011