

**13 December 2016**

## **Planning and Licensing Committee**

### **Response to Epping Forest Draft Local Plan**

**Report of:** *Phil Drane – Planning Policy Team Leader*

**Wards Affected:** *All*

**This report is:** *Public*

#### **1. Executive Summary**

- 1.1 This report seeks Members approval on a formal response to Epping Forest District Council's Draft Local Plan consultation (October 2016). An early response was submitted to comply with the consultation deadline, subject to the approval of the Council's Planning and Licensing Committee.
- 1.2 The Council's response sets out general support for the Epping Forest Draft Local Plan's strategic objectives and vision, with some concern expressed over the longer term allocation of housing sites within the sub-regional housing market area.
- 1.3 Both Council's have a "duty to cooperate" on strategic priorities, such as planning issues that cross administrative boundaries. These priorities include housing and Gypsy, Traveller and Showpeople site allocation, conservation of the natural environment and Green infrastructure. Work is ongoing between the two Councils to continue development of their respective Local Plans.

#### **2. Recommendation**

- 2.1 To approve the response to the Epping Forest Draft Local (October 2016), as set out in Appendix A.**

#### **3. Introduction and Background**

- 3.1 Epping Forest District Council held a public consultation on a Draft Local Plan for the statutory minimum of six weeks from Monday 31 October to Monday 12 December 2016. The Local Plan is at an early stage of the

plan-making process (Regulation 18), which details strategic overview of development; site specific proposals for housing, employment and Travellers; as well as draft policies that manage development within Epping Forest District. In time this will replace combined policies of the Epping Forest District Local Plan (1998) and Alterations (2006).

- 3.2 Brentwood Borough Council is duty bound to undergo the duty to cooperate with neighbouring authorities on preparation of their Local Plans. The Council's response has been limited to comments on high level strategic issues that impact directly on Brentwood Borough.

#### **4. Issue, Options and Analysis of Options**

- 4.1 The National Planning Policy Framework (NPPF) requires each local planning authority to produce a local plan. This should set out strategic priorities for the area and plan positively for development and infrastructure needs, in line with national policy and guidance.

- 4.2 Local plans should include strategic policies to deliver:

- a) Homes and jobs needed in the area;
- b) Provision of retail, leisure, and other commercial development;
- c) Provision of infrastructure for transport, telecommunications, water supply, waste water, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- d) Provision of health, security, community and cultural infrastructure and other local facilities; and
- e) Climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape.

- 4.3 Epping Forest District Council's vision for the district's development over the plan period are:

##### **Environment and Design**

- a) To protect the Metropolitan Green Belt within its revised boundary, and to encourage the re-use of previously developed land;
- b) To protect Epping Forest and its setting, including the buffer lands;
- c) To protect, and encourage appropriate management of other designated wildlife sites in the district, including the Lee Valley Special Protection Area, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites;

- d) To protect and encourage the enhancement of heritage resources including Scheduled Monuments, statutorily and locally listed buildings, Registered Parks and Gardens, and Conservation Areas;
- e) To ensure that the design, density, layout and landscaping of new development is sensitive to the character of the surrounding area, is of a high quality and is designed so as to reduce opportunities for crime and anti-social behaviour; and
- f) To ensure new development takes full account of, and mitigates where necessary, potential problems from air pollution, land contamination and noise.

### **Housing**

- g) To make provision for objectively assessed market and affordable housing needs within the district, to the extent that this is compatible with national planning policy;
- h) To ensure that new homes provide an appropriate mix of sizes, types, forms and tenures to meet local needs and create balanced, mixed and well-integrated communities. This includes supported housing for elderly people and other groups with special needs; and
- i) To make provision for the identified needs of the Travellers and Travelling Showpeople.

### **Economic Development**

- j) To meet the objectively assessed economic and town centre needs in the district to the extent that this is compatible with national planning policy;
- k) To diversify the district's two town centres (Epping and Loughton High Road) and four district centres (Loughton Broadway, Ongar, Waltham Abbey and Buckhurst Hill) to support their future vitality and viability by encouraging other forms of town centre uses including residential, cultural, leisure, tourist and commercial activities appropriate to their roles;
- l) To encourage the growth of local businesses and start-ups, through supporting home-working, provision of a range of flexible and affordable business facilities and the provision of high-speed broadband across the district;
- m) To support the diversification of the agricultural economy, including the expansion of the glasshouse horticulture industry, subject to appropriate environmental considerations; and
- n) To support the expansion of tourism in the district through the promotion of, and improving access to, a wide range of existing attractions including Epping Forest; Lee Valley Regional Park; Royal Gunpowder Mills; historic towns; village centres; and countryside, and through the provision of new visitor accommodation.

- 4.4 The proposed approach in the Draft Local Plan also features appropriate sections for:
- a) Proposals for delivery including a Draft Infrastructure Delivery Plan (IDP) to demonstrate the infrastructure requirements necessary to support the site allocations and other proposals; and
  - b) Proposals to monitor the plan.
- 4.5 Epping Forest District shares a housing market area with three other districts (East Herts, Harlow and Uttlesford). The Draft Local Plan states that together these four districts have identified a need for 51,000 new homes. Epping Forest District Council are proposing to meet the need for 11,400 over the Plan period 2011-2033 (provision for the objectively assessed market and affordable housing need within the district), and to make provision for the identified need for sites for Gypsies, Travellers and Travelling Showpeople.
- 4.6 Epping Forest District Council has proposed that a majority of this development will take place around Harlow as urban extensions (approx 3,900 new homes within Epping Forest District), as well as infilling around the central transport corridor of the urban areas of Epping and Loughton. There are also a number of smaller extensions to villages within the district, including Chipping Ongar and High Ongar close to the northern Brentwood Borough boundary.
- 4.7 Development proposed in the eastern part of Epping Forest District in Chipping Ongar and High Ongar, is 599 new homes and 10 new homes respectively. Therefore, whilst it is acknowledged that this is a significant increased proportion of new homes proposed, it is considered that any direct impact on Brentwood Borough is likely to be minimal.
- 4.8 The plan proposes a minimum of 40% affordable homes on sites of 11 or more units. Of these, 20% are likely to be starter homes which aim to be in-line with the expected new regulations. The loss of bungalows will be resisted as they provide a supply of accessible accommodation.
- 4.9 Where there is evidence of unmet need, and where there is already appropriate infrastructure and larger scale new development, the plan requires development to incorporate specially designed/specialist accommodation for people with support needs (including older people) and for self-build/custom build schemes.

- 4.10 The Epping Forest District Gypsy and Traveller Accommodation Assessment (September 2016) considers that there is a need for an additional 18 new pitches and one new Travelling Showpeople yard over the life of the Plan (2011-2033).
- 4.11 The proposed strategic housing allocations around Harlow are considered potential locations for additional Traveller sites of up to five pitches each, to a maximum of 0.5ha to accommodate the future needs of Travellers.
- 4.12 Brentwood Borough Council note the stated identified need for 46,100 new homes to be delivered within the Strategic Housing Market Assessment (SHMA) area, updated to 54,600, and that this is in order to meet NPPF requirements over the period 2011 to 2033. Brentwood Borough Council further note that it is recognised by Epping Forest District Council that 11,400 homes will need to be provided on sites identified in the Epping Forest District Draft Local Plan, requiring a small extent of the Green Belt to be amended (reduction by 1.5%).
- 4.13 However, the SHMA area local authorities consider that with constraints, the 2016 maximum amount of growth for the plan period is “around” 51,100. Therefore, it is considered appropriate that Brentwood Borough Council expresses concern that Epping Forest District Council has not formally finalised the Memorandum of Understanding with the other partners of their housing market area for the exact allocation of the considered maximum growth of 51,100, or agreed to meet the identified objectively assessed housing need of 54,600.

## **5. Reasons for Recommendation**

- 5.1 It is not considered necessary to object to the Epping Forest District Draft Local Plan consultation on the basis of likely minimal impacts for Brentwood Borough. However, the four districts (Epping Forest, East Herts, Harlow and Uttlesford) within this housing market area have not finalised their agreement for meeting local housing need the target, with a Memorandum of Understanding still in draft form. There is a risk of a greater number of homes being required within Epping Forest District. Brentwood Borough Council should therefore take a precautionary approach under the duty to cooperate.
- 5.2 Specific mention is made to the way in which development is planned around Chipping Ongar and High Ongar, so as to minimise potential impacts on the north of Brentwood Borough and to ensure the benefits of new development are shared across the wider area and local communities.

- 5.3 It is considered appropriate that Brentwood Borough Council express general support for the way in which the Epping Forest Draft Local Plan looks to move forward with challenging development needs, and commit to continued collaboration through the duty to cooperate on strategic issues that affect our two areas.

## **6. Consultation**

- 6.1 The Epping Forest Draft Local Plan was available for public consultation between 31 October and 12 December 2016.
- 6.2 Officers have responded to the consultation in order to meet the deadline. This response was submitted subject to the approval of Members at the next available Planning & Licensing Committee.

## **7. References to Vision for Brentwood 2016-19**

- 7.1 The new Epping Forest Draft Local Plan will have a close relationship with the emerging Brentwood Local Development Plan, the production of which is a key priority in the Council's Corporate Plan.

## **8. Implications**

### **Financial Implications**

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- 8.1 None directly arising from this report.

### **Legal Implications**

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- 8.2 The Localism Act 2011 placed a legal duty on local planning authorities and other defined local bodies including highway authorities to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is not a duty to agree, but local planning authorities must make every effort to secure the necessary cooperation before they submit their Local Plan for examination. The cooperation should produce effective and deliverable policies on strategic cross boundary issues.

**9. Background Papers**

Epping District Council Draft Local Plan (October 2016)

**10. Appendices to this report**

Appendix A      Brentwood Borough Council response to the Epping  
Forest Draft Local Plan Consultation

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