

Committee(s):	Date(s):	Item no.
Epping Forest & Commons	5th November 2012	
<b>Subject:</b> Formal responses to two Local Plans		<b>Public</b>
<b>Report of:</b> Superintendent of Epping Forest SEF 36/12		<b>For decision</b>
<p style="text-align: center;"><b><u>Summary</u></b></p> <p>This report presents completed formal responses to London Borough of Waltham Forest's (LBWF's) Development Management Policies and a Local Plan <i>Issues and Options</i> consultation by Epping Forest District Council (EFDC), which is at an earlier stage in its forward planning process.</p> <p>Due to the timescales, the response to LBWF was completed online by officers and a covering letter sent to the Head of Planning Policy from the Superintendent. The development management policies of LBWF are considered broadly protective of the Forest and the response, which was reviewed at a Management Plan Steering Group meeting on 27<sup>th</sup> September, in general welcomes LBWF's approach (Appendix 1). It is proposed that officers undertake further engagement with LBWF in its final formulation and implementation of the Development Management Policies.</p> <p>The consultation on housing and economic growth policies by EFDC, entitled <i>Community Choices: Issues &amp; Options</i>, puts forward proposals to develop significant areas of currently protected Green Belt immediately around the Forest. As such it is of considerable concern. The robust and critical response to the EFDC consultation followed considerations made at the Committee's Management Plan Steering Group. Due to the restrictive timescales, approval of the final response was sought under urgency procedures and the Chairman responded on behalf of the Conservators to EFDC's Director of Planning and Economic Development (Appendix 2).</p> <p><b>Recommendations</b></p> <p>It is recommended that:</p> <ul style="list-style-type: none"> <li>• you approve both responses sent to the two local authorities;</li> <li>• you approve further engagement by officers with both local authorities on the basis of these responses so that the Local Plan policies can be modified and developed;</li> <li>• I report back to you on any changes to Local Plan policies as a result of the discussions with the two authorities.</li> </ul>		

## **Main Report**

### **Background**

1. This report presents two formal responses to two separate Local Plan consultations carried out by the London Borough of Waltham Forest (LBWF) and Epping Forest District Council (EFDC).
2. The aim of the report is to provide an opportunity for the detailed responses to be considered further to guide follow-up discussions with the two local authorities.

### **Current Position**

3. The two councils are at very different stages of their Local Plan cycles. LBWF adopted its Core Strategy document in March 2012 following the finding by a planning inspector that it was 'sound' and so could be formally adopted. The document had incorporated the majority of the comments made by Epping Forest officers in a response compiled online in February 2011.
4. In contrast EFDC is only at an early consultation stage examining issues and options for their Plan following months of data collection. Despite this difference the timescale has been fore-shortened for EFDC by the Government's decision that existing Local Plans will cease to have effect from April 2013. EFDC's response now is to produce a draft Plan by May 2013 for examination in public and adoption a year later in 2014.
5. The EFDC Plan, therefore, is at a critical stage and if a Plan is not adopted it will leave the District, and the Forest, exposed to development proposals without the framework of Local Plan policies to inform decisions by councillors or planning inspectors.

### **Proposals**

6. The response to LBWF has been completed online to a tight deadline and is present here in Appendix 1 as a covering letter and detailed response document. The response has been completed and sent to LBWF and the consultation period is closed. However, it is likely that there will be further discussions on detail. Therefore, this report seeks approval on the response to allow a framework for further engagement with LBWF to ensure implementation of the proposed additions and amendments.
7. The LBWF Development Management Policies (DMPs) are looking to translate the strategic policies of the adopted LBWF Core Strategy into more detailed policies and actions, which will now inform planning decisions and allocations of development across the Borough.

8. Broadly the Core Strategy objectives are protective of Epping Forest and the DMPs in general strengthen these commitments. The comments that have been made in our response seek to ensure that there is clarity in the translation of Core Strategy into the more detailed DMPs and that the overarching duties of the local authority towards Epping Forest are fully incorporated into the policies.
9. The LBWF policies are welcomed as being strongly supportive of the Forest and its SAC status. They set out a pro-active stance by the Council towards protecting the Forest from air pollution and development whilst seeking to provide a multifunctional green infrastructure to link other green –spaces to the Forest with corridors for access and wildlife. This is broadly very positive and the Council in its Core Strategy seems to have accepted most of our comments, which provides room for optimism about its likely response to this latest consultation exercise.
10. The EFDC’s consultation document is largely centred on how to accommodate development in the Green Belt. Having successfully protected most of the Green Belt in Epping Forest District for the last 20 years this consultation represents a significant departure from the Council’s previous approach and seems, at this stage, to represent a considerable threat to the Forest.
11. The document only pays cursory attention to environmental issues and provides only 3 or 4 limited references to the Forest. It does not give the legislative context for the Forest’s status and protection or the Council’s role as a Competent Authority.
12. Furthermore, there is great emphasis on development and options for growth with few counterbalancing options or proposed policy. There are considerable and worrying gaps in this document and it presents some stark choices. The analysis of the housing requirements seems to be inadequate for the proposals put forward. As a result the response made by the Chairman on behalf of the Conservators under urgency procedures is detailed and critical. It attempts to fill the considerable gaps and to tackle head on some of the challenges to the protection of the Forest, the Buffer Lands and the surrounding landscape.

## **Strategic Implications**

### ***City Together***

13. The responses made to both local authority documents are made in the context of the *City Together* vision of a *World Class City* and, specifically “A World Class City which protects, promotes and enhances our environment”.

### ***Open Spaces Department Business Plan***

14. The content of the responses to the two documents (see Appendices 1 and 2) follow directly from the Open Spaces Department’s Strategic Aim of: “providing high quality accessible Open Spaces and services in accordance with nationally recognised standards for the benefit of London and the Nation”.

### ***Epping Forest Management Plan***

15. Responding to the Local Plan documents and seeking to influence the forward development plans of the two authorities is critical to the Epping Forest Management Plan Vision for the 21<sup>st</sup> Century, in particular:

- “Epping Forest’s position as a unique and ancient landscape for people and wildlife will be strengthened;
- “The Forest will retain its natural aspect with the diversity of wildlife habitats enhanced and the features of international importance, including its veteran pollards, protected;
- “Epping Forest will be highly valued as part of a larger and fully accessible protected landscape area”.

## **Conclusions**

16. The response to the EFDC consultation needed to be robust and critical as the housing estimates were of considerable concern and the proposed developments in the protected Green Belt, which were based on these estimates, would affect significant areas of land immediately adjacent to the Forest and its Buffer Lands. Approval is sought by this report to maintain the robust response to the EFDC Local Plan and to seek changes in the proposals to benefit the Forest and reduce adverse impacts where possible. The LBWF Development Management Policies (DMPs), on the other hand, were considered broadly protective of the Forest and the response made to the consultation was aimed at strengthening the links between Core Strategy and the greater detail of the DMPs for the benefit of the Forest. The proposed adoption of a specific policy to protect Epping Forest (DM42) has been welcomed in the response letter.

**Background Papers:**

*The Epping Forest Management Plan 2004 – 2010*

*London Borough of Waltham Forest Core Strategy March 2012*

*London Borough of Waltham Forest Development Management Policies Consultation August 2012*

*Epping Forest District Council - Planning Our Future: Community Choices – Issues and Options for the Local Plan Consultation Document July 2012.*

**Appendices**

*Appendix 1: Completed covering letter and detailed response to London Borough of Waltham Forest*

*Appendix 2: Completed covering letter from the Chairman and detailed response to Epping Forest District Council*

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