

Committee(s)	Dated:
Epping Forest & Commons Committee	21 st November 2016
Subject: Epping Forest District Local Plan – public consultation under Regulation 18 SEF 52/16	Public
Report of: Superintendent of Epping Forest	For Decision
Report author: Dr Jeremy Dagley, Head of Conservation, Epping Forest	

Summary

This report notes that 6-week consultation period for the Epping Forest District Local Plan has begun and will be completed by 12th December 2016. It further notes that the housing allocation for the District is for 11,400 houses of which over 2,800 are allocated within Epping and Loughton and up to 3,900 at Harlow. As a result this report recommends that your Committee delegates its authority to the Town Clerk, in consultation with the Chairman and Deputy, to make a comprehensive response on behalf of The Conservators to seek the optimum policies and allocations for sustainable development that would best protect the environment and natural aspect of Epping Forest and its Buffer Lands.

Recommendation(s)

Members are asked to:

- delegate authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to make a response on behalf of The Conservators to the Epping Forest District Local Plan Regulation 18 Consultation.

Main Report

Background

1. Epping Forest District Council (EFDC) has now prepared its new Local Plan. The consultation period began on 31st October to run for 6 weeks until the 12th December 2016. The consultation is being conducted under Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and, so, invites a wide range of representations and may be subject to further significant amendment and change before a pre-submission Plan is then prepared for examination in public.
2. This Plan replaces the 1998 Local Plan and 2006 Alterations document and is to cover the 17-year period up to the year 2033. The Plan is required to ensure a basis for sustainable development in the District in order to conform to the UK Government's National Planning Policy Framework (NPPF 2012).

Current Position

3. EFDC has worked with three other local planning authorities (LPAs) across a large Strategic Housing Market Area (SHMA) centred around Harlow. These four SHMA LPAs have identified the need to accommodate the building of 51,100 new homes in their areas between 2011 – 2033. Of this total, 11,400 of these have been allocated to the Epping Forest District in this draft Local Plan.
4. Some of this latter allocation has been met by current permissions but over 6,100 new homes are still required by 2033 in Epping Forest District. The proposed locations for housing are given in Chapter 5 of the Plan. A key proposal is that significant residential development is located around Harlow. In this draft Plan this amounts to 3,100 new houses within EFDC's area to the south and west of the town and a further 750 to its east. In Loughton a further 1,190 houses are proposed including the development of sites on existing green space within the town. At Epping the total proposed is even higher with 1,640 houses to be added including a significant development north of Great Gregories Farm. The proposals for Waltham Abbey involve 800 new houses to the north of the town and close to Warlies Park.
5. This proposed increase in housing and development, including transport infrastructure, is a potential threat to the continuing health, biodiversity and natural aspect of Epping Forest. In particular, the EU Habitats Directive (transcribed into UK law as the Habitat Regulations 2010) requires that such developments, alone or in combination, must have no adverse impact on the integrity of Epping Forest Special Area of Conservation (SAC). The LPAs, as "competent authorities" under these Regulations, must ensure that the environmental impacts of their policies are assessed in this light.
6. The EFDC Plan states in its vision that: "*Epping Forest will be conserved and enhanced*". The Plan contains a specific Policy, DM3, for the protection of Epping Forest Special Area of Conservation and the Lee Valley Special Protection Area. This replaces a specific Policy for Epping Forest alone in the 1998 Plan.
7. The new draft Plan also states that "*The Council is committed to working with partners to address*" the poor air quality around the Forest. It is working together on this issue, and others that might have adverse impacts, through a Memorandum of Understanding (MoU) to which the Conservators and Natural England are signatories (see **Appendix 1**). This approach was approved by your Committee at its July meeting and delegated authority was given to the Town Clerk, working with the Chairman and Deputy Chairman, to negotiate the final details before signing the document.

Proposals

8. Given the concerns expressed at your Committee during discussions around the MoU it is proposed that the Town Clerk, under delegated authority and in consultation with the Chairman and Deputy Chairman, makes a comprehensive response on behalf of The Conservators to this Local Plan. This response should

reflect concerns about the increase in housing and traffic associated with it as might impact on the Forest's natural aspect. The response should cover air pollution and traffic noise, the impacts on tranquility of the Forest and the visitor experience, the impacts on biodiversity and heritage as well as the effects on the sustainability of the management of the Forest by The Conservators..

Corporate & Strategic Implications

9. Participating fully in the EFDC Local Plan consultation and providing detailed feedback to the LPA would meet the Corporate Strategic Aim of providing valued services to the nation. The response to EFDC will aim to further the Open Spaces Departmental Objective to: "Protect and conserve the ecology, biodiversity and heritage of our sites".

Conclusion

10. Epping Forest District Council's new Local Plan puts forward policies to protect the Forest whilst also seeking to accommodate 11,400 new homes in the area. There are concerns with how this might impact on the Forest and these concerns are to be expressed through a comprehensive response, the preparation of which is delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman in order to meet the 12th December deadline for comments.

Appendices

- Appendix 1 - Memorandum of Understanding on the impacts of Epping Forest

Dr Jeremy Dagley
Head of Conservation, Epping Forest
T: 020 8532 5313
E: jeremy.dagley@cityoflondon.gov.uk