

Appendix – STATEMENT OF COMMUNITY INVOLVEMENT – REPORT OF REPRESENTATIONS

Introduction

The Statement of Community Involvement sets out the Council's approach to public consultation and involvement in the preparation of the Local Plan, other development plan documents and in the determination of planning applications.

The Statement of Community Involvement went out on public consultation from the 24 February until 8 April 2016. This report sets out the representations received, officer comments and recommendations.

Consultation Responses

In total seven representations were received from the following organisations:

- Essex Region Federation of Small Businesses
- Essex Local Access Forum
- Newport Parish Council
- Takeley Parish Council
- Historic England
- Epping Forest District Council
- Uttlesford Local Group Essex Wildlife Trust

General Comments

Local Group Essex Wildlife Trust are disappointed that there is not section on linking the Local Plan with any environmental strategy and the whole approach appears to be biased towards development and against environmental protection and enhancement. They also note that there are no environmental bodies or organisation involved as Key Stakeholders.

Historic England considers the methods of communication appropriate and the document is clearly laid out.

Takeley Parish Council question why UDC has planned the public consultation over the Christmas period and are unhappy that UDC will not act on the comments at this stage as they are sent to the Inspector – how will the Statement of Compliance be fulfilled? They are unhappy that the process for determining housing sites is not needs driven rather it is developer lead, and express the need for a strategic plan and infrastructure delivery programme. They strongly believe that the new Local Plan is lacking community involvement and is flawed. They suggest that there should be meaningful consultation, appropriate resources should be engaged and the March submission deadline should be extended.

Essex Local Access Group states that they play an important role in strategic development.

Officer Comments

Uttlesford District Council consults with a number of environmental groups throughout the plan preparation including the Environment Agency, Natural England and Essex Wildlife Trust.

In order to meet government priorities for timely plan preparation and to reflect the 2012 Planning Regulations the preferred option consultation stage has been removed. In the past a Preferred Options consultation has been undertaken as was required by previous legislation. That legislation has been changed to reflect the need to develop evidence that can inform decisions. The removal of the preferred options consultation will allow the submission document to be properly informed by evidence. Equally it will allow more focused engagement on specific issues prior to the submission stage.

The government has stated that local planning authorities need to produce local plans by early 2017 or face intervention. The Council has a tight time scale in order to meet the government's timetable.

Officer Recommendation

No changes

Paragraph 3.1-3.3

Epping Forest states that despite the title these paragraphs make no mention of PPTS 2015, or its implications, especially in terms of Duty to Co-operate. They stress that this a difficult issue for them as a 92% Green Belt authority and thus likely to be seeking options for possible joint provision.

Officer Comments

Paragraph 3.1 makes specific reference to Planning Policy for Traveller Sites and the importance of early and meaningful engagement with neighbourhoods, local organisations and businesses. It is recognised that no reference is made to the duty to co-operate or engagement with neighbouring authorities.

Officer Recommendation

Amend the text in paragraph 3.1 as below:

The National Planning Policy Framework (NPPF) March 2012 and Planning Policy for Traveller Sites August 2015 replaced previous planning policy statements and guidance. It sets out the government's vision for the planning system and how policies should be applied. It stresses the importance of early and meaningful engagement with neighbourhoods, local organisations and businesses **as well as neighbouring authorities under the duty to –co-operate.**

Page 7

Takeley Parish Council fundamentally disagree that there is an opportunity for meaningful consultation on the new local plan.

Officer Comment

In order to meet government priorities for timely plan preparation and to reflect the 2012 Planning Regulations the preferred option consultation stage has been removed. In the past a Preferred Options consultation has been undertaken as was required by previous legislation. That legislation has been changed to reflect the need to develop evidence that can inform decisions. The removal of the preferred options consultation will allow the submission document to be properly informed by evidence. Equally it will allow more focused engagement on specific issues prior to the submission stage.

Officer Recommendation

No change

Section 4

Epping Forest notes that there is no mention of infrastructure development plan.

Officer Comments

Epping Forest's point is noted.

Officer Recommendation

Add a bullet point at the end as follows:

- **Infrastructure Delivery Plan (IDP)** – sets out the infrastructure requirement to support new development as set out in the local plan.

Section 5

Epping Forest suggests mentioning the Co-operation for Sustainable Development Officer Group and Member Board. Under the shared evidence base mention could be made of the Hardisty Jones report on employment and economic evidence.

Officer Comments

Paragraph 5.2 states that the Council takes part in regular officer groups. It is not felt necessary to mention specific officer groups as the names of those groups may change and new groups formed.

It is not considered necessary to mention specific evidence base work as there are a number of joint documents produced and updated as well as new work commissioned.

Officer Recommendation

No change

Table following paragraph 16.4

Epping Forest state that the Local Plan Regs are unhelpfully worded for this stage, comments should be limited to points about the four soundness tests and legal compliance – the way this section is worded does not make this clear and it would be quite understandable for consultees to continue to think that comments can be made on policy issues.

Officer Comments

The pre submission consultation provides an opportunity for public consultation, the focus of this engagement is indeed different to past consultation; at this stage of the process the Planning Inspector is only able by law to consider representations on matters of soundness and legal compliance.

Officer Recommendation

Amend table as suggested below:

Publications (Local Plan Pre-Submission Regulation 19)	Each document will be published for a formal consultation period. Written representations will be invited on the content matters of soundness and legal compliance of the document. At this stage the consultation document will be advertised and the document made available to all statutory consultees. The Council will prepare a summary of the representations which will be presented to the Inspector at the examination.
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Section 23 – Linking the Local Plan with Economic Development Strategy

Essex Region Federation of Small Businesses applauds the Council’s aim to support and encourage the growth and development of businesses. It questions how this will be achieved in the absence of an approved Local Plan. The strategy suggest that economic development is driving the amount of housing development needed, however this is not the premise on which the Local Plan is being developed and as a result there is a danger that business development issues will be lost in achieving housing numbers. They suggest that a balance between housing needs and local work provision is sensible; however this would require a strategy whereby housing development drives the amount of economic

development needed to facilitate local employment. They point out that small and medium businesses have difficulty in local recruitment and finding premises in the District.

Officer Comments

The Council recognise that they do not have an up-to-date local plan and are progressing in preparing a new local plan with adoption planned for 2017. As part of the evidence base an Economic Development Strategy is being produced and the Local Plan will take into consideration and allocate employment land within the District.

Officer Recommendation

No change

Section 26 – Planning Applications

Newport Parish Council is disappointed at the lack of weight and any recognition that UDC gives to the views and representation of the Parish Councils and local residents opinions when making planning decisions.

Officer Comments

Newport parish council's comments are noted. The Parish Council is consulted with on all planning applications and given the opportunity to express their views. All representations are taken into consideration.

Officer Recommendation

No change